



Planning and Compulsory Purchase Act 2004 (as amended)

**The Town and Country Planning (Local Planning) (England) Regulations 2012
(as amended)**

**Regulation 19 Consultation
Draft Site Allocations Development Plan Document (DPD)**

- **Issues and Matters Topic Paper: Summary of Key Issues Submitted with Officers' Response; and**
- **Summary of Individual Representations Received with Officers' Response and Recommendations**

June 2019



The Regulation 19 Consultation was undertaken between 5 November and 17 December 2018. 2,797 individuals and organisations made representations. Analysis of the responses together with the Council's recommendations are set out in the following two documents:

- **Section 1: Issues and Matters Topic Paper:** a summary of the main issues arising from the Regulation 19 consultation, with comprehensive response by the Council;
- **Section 2: Regulation 19 Consultation Representations:** a summary of individual representations with the Council's response and recommendations.

The Issues and Matters Topic Paper has been used to inform responses to the individual representations.

Section 1: Issues and Matters Topic Paper

Introduction

Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended) (Act) requires the Council to prepare a Local Development Scheme (LDS) which must specify amongst other things the development plan documents it wishes to prepare and the timetable for preparing the documents. The Council has an approved LDS (October 2018). The LDS commits the Council to prepare a Site Allocations Development Plan Document (DPD) to identify and allocate sites for development, including housing, employment and infrastructure to cover the period to 2027, in accordance with the requirements, vision and spatial strategy set out in the Core Strategy. It also requires the Site Allocations DPD to safeguard land to meet future development needs between 2027 and 2040. It expects the Site Allocations DPD to be submitted to the Secretary of State for Examination in June/July 2019. A copy of the LDS can be accessed by this link: <http://www.woking2027.info/lDs>. Section 19 of the Act expects the Site Allocations DPD to be prepared in accordance with the LDS. The requirement to prepare a Site Allocations DPD to enable the delivery of the Core strategy is reiterated in the Core strategy (Policies CS1, CS6 and CS10). There is therefore a legitimate purpose that is supported by both national and local planning policy for preparing the Site Allocations DPD.

The National Planning Policy Framework (NPPF) requires the Council to prepare a development plan with strategic policies that sets out the overall strategy for the pattern, scale and quality of development. The strategic policies should make provision for housing, employment, retail, infrastructure and community facilities and policies to protect the natural and historic environment. Non-strategic policies should be used to set out more detailed policies such as the allocation of sites. The development plan for the area comprises the combination of the strategic and non-strategic policies. The importance of preparing the Site Allocations DPD to enable the delivery of the Core Strategy again cannot be emphasised enough.

The Council has an up to date Core Strategy that was adopted in October 2012 and reviewed in accordance with paragraph 33 of the NPPF in October 2018. The Core Strategy makes provision for the delivery of the following scale of uses between 2010 and 2027:

- 4,964 net additional dwellings;
- 28,000 sq.m of additional office floorspace and 20,000 sq.m of warehouse floorspace;
- 93,900 sq.m of additional retail floorspace.

To date (by 2017/18) 2,134 dwellings have been delivered leaving a residual of about 2,830 dwellings that land has to be identified to deliver. The Council has also identified a need for 22 pitches to meet the accommodation needs of Travellers by 2027. The Council is committed to the comprehensive delivery of the above requirements, and the Site Allocations DPD has a clear purpose to allocate land to enable that to be delivered.

The Site Allocations DPD has evolved through various stages. Each stage had been used to inform and improve the subsequent version. A draft DPD was published for Regulation 18 consultation between 18 June and 31 July 2015. About 1,692 individuals and organisations submitted comments comprising 32,712 separate representations. The Council also consulted on the possibility of substituting the sites safeguarded in the draft Site Allocations DPD to meet

future development needs between 2027 and 2040 with land to the east of Martyrs Lane. 3,018 individuals and organisations submitted comments comprising 32,164 separate representations. The representations received during these two separate consultations have informed the Publication Version of the DPD that was published for Regulation 19 consultation between 5 November and 17 December 2018.

2,797 individuals and organisations responded to the Regulation 19 consultation. The representations covered a wide range of issues. The key issues raised are identified and responded to as follows:

- 1 There is no justification for the release of Green Belt land to meet future development requirements in the Borough;
- 2 There is no justification for safeguarding Green Belt land to meet future development needs;
- 3 There is no need to release Green Belt land to meet the accommodation needs of Travellers and/or the Council has failed to consider alternative sites to meet the identified need instead of the proposed allocations in accordance with the sequential approach emphasised in the Core Strategy and other evidence base;
- 4 The proposed allocations will significantly reduce or remove Green Belt land to the detriment of the general wellbeing and amenity of residents;
- 5 The proposals in the DPD will remove a significant proportion of Green Belt land in West Byfleet and Byfleet for development, which is disproportionate and without justification;
- 6 There is no proper assessment of the infrastructure needed to support the Site Allocations DPD and/or no plans have been made to enable adequate infrastructure to be provided to enable the sustainable delivery of the Site Allocations DPD;
- 7 There is no proper assessment of the flood risk implications of the Site Allocations DPD, in particular, regarding the sites in Byfleet and West Byfleet;
- 8 Inadequate consideration has been given to the air quality and noise pollution implications of the Site Allocations DPD;
- 9 The Regulation 19 consultation of the Site Allocations DPD was inadequate;
- 10 There is inadequate evidence base to support the Site Allocations DPD;
- 11 There is a lack of assessment of alternative sites to enable decisions about the preferred sites;
- 12 Criticism about how the Green Belt Boundary Review assessed just parcels (not sites);
- 13 Development will lead to significant levels of congestion and there has not been a thorough assessment of impacts of proposed development on road infrastructure;
- 14 The DPD should allocate more land to meet housing need rather than the Core Strategy requirement. Some specific sites are being promoted.

The list is by no means exhaustive. It is acknowledged that many of the representations also raise site or locally specific concerns. The common issues raised have been identified and responded to in Sections 15 to 24 in this paper. Any remaining site or locally specific issues have been addressed as part of the schedule comprising a summary of the representations received and Officer's analysis with recommendations.

1.0 There is no justification for releasing Green Belt land for development to meet future development requirements of the Core Strategy

1.1 The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing to meet the development requirements of the Core Strategy between 2022 and 2027 and to safeguard land to ensure the enduring permanence of the Green Belt boundary well beyond this Core Strategy period. The overall principle for releasing Green Belt land to meet housing need between 2022 and 2027 is already established by the Core Strategy and supported by the Secretary of State. The Core Strategy was adopted in October 2012. The Inspector who conducted the Core Strategy Examination had the following to say about the use of Green Belt land for housing ‘the proximity of Green Belt land to Woking creates an inevitability that land within the Green Belt will be required to meet the housing aspirations of the plan and, as discussed above, its designation as a broad location for future growth is consequently reasonable. The Core Strategy will be more precise and effective on the basis that the Green Belt boundary review is undertaken at an early date enabling suitable site identification and phasing, subject to need, for the end of the plan period. Given the availability of fresh data which will indicate the accuracy or otherwise of the anticipated housing trajectory and the need to ensure the permanence of Green Belt boundaries beyond the plan period, the Council may consider it prudent to undertake its Green Belt review in a manner that identifies sites capable of delivering more than the identified minimum requirement of new dwellings’. Policies CS1 (A spatial strategy for Woking Borough), CS6 (Green Belt) and CS10 (Housing provision and distribution) of the Core Strategy provides the overall justification for releasing Green Belt land for development, the requirement for the Council to carry out a Green Belt boundary review to ensure that the land that is released does not undermine the overall purpose of the Green Belt and the overall number of dwellings (550 dwellings) that have to be accommodated in the Green Belt between 2022 and 2027. In accordance with paragraph 33 of the NPPF, the Core Strategy was reviewed in October 2018 and is therefore considered up to date to provide the strategic policy context for preparing the Site Allocations DPD. The review was also undertaken in the context of up to date evidence such as the SHLAA, five year housing land supply position statement and the Green Belt boundary review report and was also demonstrated to be in general conformity with the NPPF. Section 19 of the Planning and Compulsory Purchase Act (2004) and Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) expects the Site Allocations DPD to take into account the requirements of the Core Strategy.

1.2 The NPPF expects local planning authorities to have a clear understanding of housing needs in their area using the standard method in national planning guidance. They should also prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The Council has undertaken these exercises and have met the requirements. The SHLAA can be accessed by this link: <http://www.woking2027.info/ldfresearch/shlaa>. Using the standard method based on the 2014 and 2016 household projections, the estimates for the housing need for Woking are 409 and 264 dwellings per year respectively.

1.3 The Core strategy makes provision for the delivery of:

- 4,964 net additional dwellings, with an affordable housing provision target of 35%;

- 28,000 sq.m of additional office floorspace;
- 20,000 sq.m of warehouse floorspace; and
- 93,900 sq.m of additional retail floorspace.

1.4 Taking into account housing completions since the adoption of the Core Strategy, land has to be identified to enable the delivery of about 2,830 new homes by 2027 and 22 pitches to meet the accommodation needs of Travellers. 1,134 dwellings have been delivered to date (2017/18). The Council is expected and committed to the comprehensive delivery of the requirements of the Core Strategy by allocating specific sites to bring forward their delivery. This is necessary to avoid speculative development in unsustainable locations including in the Green Belt and to meet national planning policy requirements. The Site Allocations should be judged on whether it has identified a sufficient deliverable range of sites in sustainable locations in the context of the spatial strategy of the Core Strategy to meet the development needs of the borough.

1.5 The SHMA (2009) that informed the Core Strategy identified an objectively assessed housing need of 594 dwellings per annum. Taking into account the available evidence including an assessment of various options of housing provision and the requirements of the NPPF as whole the Inspector agreed that the Core Strategy should make provision for an annual average housing requirement of *at least* 292 dwellings. Over the plan period between 2010 and 2027 this equates to 4,964 dwellings. The SHMA was reviewed in 2015. The objectively assessed need had reduced to 517 dwellings per year. The Council is now required to use the Government's standard method to calculate its housing need. By using this method, the need comes down to 409 dwellings per year. In all the revised figures, the housing need is higher than the Core Strategy housing requirement (except the one based on 2016 projections that the Government has advised should not be used), leaving an unmet need arising from Woking Borough which the Council has to work with the other authorities in the Housing Market Area to address. Under the Duty to Cooperate the Waverley Borough Local Plan Part 1 has committed to meet 50% of Woking's unmet housing need. The Examination of the Guildford Local Plan has been completed and the Inspector's Report has been published. Whilst the Inspector accepts that Guildford Borough Council has to contribute towards meeting Woking's unmet need, he did not set a specific target for the Guildford Local Plan. He concluded that the unmet need could be met from their supply of housing land. Against this backdrop it will be indefensible if the Council failed to demonstrate that it has identified sufficient land in the Site Allocations DPD to enable the delivery of its housing requirement of at least 292 per year over the plan period. Housing delivery will closely be monitored to ensure the requirement is met.

1.6 The Core Strategy directs most new development to previously developed land in the Town, District and Local Centres, which offers the best access to a range of services and facilities. For the avoidance of doubt, the NPPF defines previously developed land as *'land which is or was occupied by permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where*

the remains of the permanent structure or fixed surface structure have blended into the landscape'. The capacity of the urban area to accommodate further growth has been assessed through the SHLAA. The evidence continue to justify the principle established in the Core Strategy that land will be required to be released from the Green Belt to meet housing delivery between 2022 and 2027, and in particular, the need for family homes that could not be met by high density flatted units at the Town Centre. There is not sufficient deliverable brownfield land to enable a continuous supply of at least 292 dwellings per year throughout the whole of the plan period and to be safeguarded to ensure the enduring permanence of the Green Belt boundary.

1.7 Some representations had claimed that the Site Allocations DPD already allocates sufficient land within the urban area to meet development needs over the plan period and in this regard, there is no need to release Green Belt land for development. The NPPF requires the Council to identify a supply of deliverable and developable sites to meet development needs over the plan period, in this case from now until 2027. In particular, specific deliverable sites should be identified for the first five years of the plan period. Given that the plan period is 2027, there are only eight years to reach its end date and, and seven years if the time that it will take to adopt is considered. It is therefore important that sufficient deliverable and developable sites that have the realistic prospect of coming forward to deliver the homes that are required are identified. Given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

1.8 Apart from the number of dwellings that the Council is expected to identify land to deliver, the proposed housing development in the Green Belt will also help to provide the nature and type of family homes that the community also needs. Most of the housing that will be delivered in the urban area is likely to be high density flatted accommodation. The SHMA demonstrates a clear need for family homes, which the proposed Green Belt sites will help to meet.

1.9 The Council acknowledges that exceptional circumstances case ought to be made to release Green Belt land for housing. The exceptional circumstances case to identify the Green Belt as the future direction of growth to release land for housing development between 2022 and 2027 has been established through the in-principle policies in the Core Strategy (see Policies CS6: Green Belt and CS10: Housing provision and distribution). It was agreed by the Secretary of State that the significant unmet need for housing and the necessity to meet the housing requirement over the plan period provides sufficient justification. Recent reviews of the SHLAA (2014 and 2017) and the assessment of housing need does not provide any significant new evidence that would lead the Council to change this policy approach. In this regard, it will be very difficult for the Council to have a sound Site Allocations DPD without the release of Green Belt land to meet housing land supply over the entire plan period. Without the Site Allocations DPD, there is also the likelihood of uncontrolled speculative development in the Green Belt. The Council can best protect the Green Belt if it can demonstrate that it has identified sufficient land to deliver its development requirements.

1.10 The Council has also undertaken a Green Belt boundary review and other evidence base studies such as the Sustainability Appraisal to demonstrate that special circumstances justification also exist to allocate and/safeguard each of the sites in the DPD. The Core Strategy Examination Inspector provided guidance on how Green Belt sites should be identified for development. He recommended that *'A review of the Green Belt boundary will be carried out to inform the Site Allocations DPD and in any event before 2016/17, to evaluate where it is appropriate to release land in the Green Belt for housing purposes and the size and scale of the release'*. Taken as a whole, not only did the Inspector recommend the release of Green Belt land for housing development, he was also prescriptive about the process and its timing. The preparation of the Site Allocations DPD follows this advice.

1.11 Section 13 of the NPPF deals with the protection of Green Belt land. It accepts that Green Belt boundaries could be altered, only in exceptional circumstances and through the preparation or review of the local plan. Guidance is provided in paragraph 139 on the factors to consider when defining Green Belt boundaries. In particular, it emphasises that when defining boundaries 'Local Planning Authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development, and where necessary, identify in their plans areas of safeguarded land between the urban area and the Green Belt in order to meet longer-term development needs stretching well beyond the plan period.' Again, the Council has followed the advice in preparing the Site Allocations DPD. The DPD will not meet the requirements of both Section 5 and paragraph 139 of the NPPF if land is not allocated in the Green Belt to meet development needs over the entire plan period and beyond. Without the allocation of the Green Belt sites to enable the delivery of the Core Strategy, it is unlikely that the Site Allocations DPD would be found sound.

1.12 Based on the above, and in the opinion of the Council, the case for releasing Green Belt land, including safeguarding land to meet future development needs has already been (or can be) established and is consistent with national policy. The Council believes that the sites that are allocated and/or safeguarded are the most sustainable when compared against other reasonable alternatives.

1.13 The Site Allocations DPD is informed by robust evidence, including, the Green Belt boundary review, a Sustainability Appraisal Report, Habitats Regulations Assessment, Transport Assessment and other evidence base listed in Appendix 1 of the DPD. In accordance with the Duty to Cooperate, comments provided by key stakeholders such as the County Council, Natural England, and the Environment Agency have been taken into account before the DPD was published and the Council will continue to involve them at all the key stages of the process. As the DPD evolved, the views of the general public have also been considered and taken into account. Alternative sites have been rigorously appraised in a consistent and transparent manner using a consistent Sustainability Appraisal Framework. Based on the outcome of this exercise and the other supporting evidence, the Council is satisfied that the proposals in the DPD can withstand scrutiny at an examination.

1.14 All the proposed sites will make a significant and a meaningful contribution towards meeting the housing requirement. Not allocating any or all of the sites (or not having new sites to replace any site that is rejected) could undermine the overall delivery of the Core Strategy. The key requirements set out as part of the proposed allocations will further make sure that any adverse impacts on the purpose and integrity of the Green Belt and the general environment of the area is minimised.

1.15 Concern has been expressed about the scale of Green Belt land being proposed to be released for development and in particular, the amount of Green Belt being taken out for development in Byfleet and West Byfleet. These are addressed separately in Sections 4 and 5 below.

2.0 Land should not be safeguarded to meet future development needs beyond 2027

2.1 The enduring permanence of Green Belt boundaries is one of its essential characteristics. The proposed safeguarded sites in the Site Allocations DPD will help achieve this essential aim. The National Planning Policy Framework (NPPF) provides useful policy and guidance about what to do when altering Green Belt boundaries. It emphasises that Green Belt boundaries should only be altered in exceptional circumstances through the preparation of the local plan. At the time, local authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Where necessary, local authorities should identify in their plans areas of '*safeguarded land*' between the urban area and the Green Belt, in order to meet longer-term development needs *stretching well beyond the plan period. It should also make it clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposed the development. They should satisfy themselves that the Green Belt boundaries will not need to be altered at the end of the development plan period*'.

2.2 There is no doubt that there is a great degree of expectation by the NPPF that in altering the Green Belt boundary, sites should also be safeguarded to ensure its enduring permanence well beyond the plan period. In this particular case it will be necessary to safeguard sites GB4 (south of Parvis Road), GB5 (land to the south of Rectory Lane), GB8 (Woking Garden Centre) and GB9 (Land adjacent to Hook Hill Lane) in the Site Allocations DPD to avoid altering the Green Belt boundary again after this plan period. The only situations where safeguarding might not be necessary will be if the Council can demonstrate that it has sufficient sites in the urban area to meet future development needs throughout the next plan period or because of existing constraints no suitable sites can be identified in the Green Belt to meet future development needs beyond this Core Strategy period. Safeguarded sites are also expected to be situated between the urban area and the Green Belt. In this regard, there is clear guidance on where safeguarded land should be identified. The Council cannot ignore this national policy and guidance without substantive reasons to justify doing so if it wishes to have a sound Site Allocations DPD. Based on the available evidence (SHLAA, Green Belt boundary review and significant need for housing) it will be difficult to find any reasons why the sites should not be safeguarded when there is evidence to demonstrate that their release from the Green Belt can be justified by very special circumstances. The Council has rightly made a decision to look beyond the plan period and safeguard land to meet development needs beyond the plan period. Without the safeguarded land, there is the likelihood that the Council will have to carry out another Green Belt boundary review to alter the Green Belt boundary to be able to meet development requirements beyond the present Core Strategy period. Practically, the review will have to be programmed to start a couple of years prior to 2027 when the Core Strategy expires because of the lead time needed to get an adopted plan in place. This will clearly be at odds with national policy for ensure the enduring permanence of the Green Belt boundary. In particular, when it is very unlikely that another Green Belt boundary review will produce a different outcome to the Peter Brett Green Belt boundary review used to inform the Site Allocations DPD.

2.3 Site GB4 (land south of Parvis Road and High Road, Byfleet), GB5 (land to the south of Rectory Lane, Byfleet) and GB8 (Woking Garden Centre, Mayford) have been proposed to be safeguarded in the DPD to help meet development needs of the next plan period. The scale

of the safeguarded land is reasonable, modest against the projected need and is underpinned by careful assumptions to ensure the protection of the Green Belt. It is important to highlight that the Town Centre will continue to be the main focus for future direction of growth through the efficient use of land and the provision of the necessary infrastructure to support the development.

2.4 Overall, the general principle of safeguarding land and the specific sites that are proposed to be safeguarded is defensible, justified by national policy and is also good planning practice.

2.5 The Council has acknowledged the comments made against the merits of safeguarding sites. Whilst the Council is open-minded to carefully consider any alternative proposal such as development at land east of Martyrs Lane to replace the proposed safeguarded sites, no alternative evidence has been provided to demonstrate that the alternative sites can be more sustainably developed than the proposed allocation(s) and/or there would be sufficient land to deliver the quantity and nature of housing that could be needed over the next plan period. The Council accepts that it would be difficult to define precisely what the objectively assessed housing need would be beyond 2027. Nevertheless, given the Government's long term goal to boost significantly the supply of housing, the household projections for the area combined with the high affordability ratio within the borough would suggest that there will continue to be a significant need for housing during the next plan period.

2.6 Others have made the case that the safeguarded sites should be brought forward to increase the housing requirement of the Core Strategy without the need to look far into the future beyond the plan period up to 2027. The NPPF emphasises that safeguarded sites are not allocated for development at the present time. They can only be released for development by the review of the plan. There is a significant degree of national policy protection for safeguarded sites against development. Evidence in the Green Belt boundary review report demonstrates clearly that beyond the sites being allocated and safeguarded in the DPD no other sites can be identified in the Green Belt for development purposes without significant damage to its purpose and integrity. Given that sufficient land has been identified to meet the development requirements of the Core Strategy, and no further land could be identified in the Green Belt without undermining its purposes, bringing the safeguarded sites forward for development before 2027 to increase the housing requirement will mean far more significant unmet need beyond 2027.

2.7 Based on the above, the principle of safeguarding sites is defensible and justified by both local and national planning policy.

3.0 Should Green Belt land be released to meet the accommodation needs of Travellers? The proposed sites for Travellers accommodation are all in Byfleet and West Byfleet.

3.1 The Council has a responsibility to meet the accommodation needs of all sections of the community including Travellers. The Government's policy on Travellers is set out in *Planning policy for Traveller sites* (August 2015). The overall aim of the Government is to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community. To achieve this aim the Government requires local planning authorities amongst other things to:

- Make their own assessment of need for the purposes of planning;
- Work collaboratively to develop fair and effective strategies to meet need through the identification of land for sites;
- To plan over a reasonable timescale;
- Make sure that plan-making and decision-taking protects Green Belt from inappropriate development; and
- Make sure that plan-making and decision-taking aim to reduce the number of unauthorised developments and encampments and make enforcement effective.

The Planning policy for Traveller sites should be read in conjunction with the NPPF.

3.2 Policy CS14: *Gypsies, Travellers and Travelling Showpeople* of the Core Strategy commit the Council through the Site Allocations DPD process to identify sufficient sites to meet identified need over the plan period. A sequential approach should be taken to identifying sites for allocation, with sites in the urban area considered first before sites in the Green Belt. However, the Core Strategy is also clear to emphasise that a demonstrated lack of any deliverable sites in the urban area would provide very special circumstances necessary to allocate sites in the Green Belt. If sites are to be released from the Green Belt, they should be informed by a Green Belt boundary review. Any site that is identified to meet the need should not have an adverse impact on environmentally sensitive sites that cannot be adequately mitigated. The process for identifying sites and the special circumstances justification for sites to be identified in the Green Belt if supported by a sequential test has already been established and supported by the Secretary of State at the Core Strategy Examination. The Council also believes that special circumstances justification exists for the identification of each of the sites allocated in the DPD.

3.3 Section 13 of the NPPF deals with the protection of Green Belt land. Paragraph 83 states that once established, Green Belt should only be altered in exceptional circumstances, through the preparation or review of the local plan. The use of the Site Allocations process to identify sites to meet the needs of Travellers is therefore in accordance with the requirements of the NPPF and the Core Strategy. It is the Council's view that the development of sites allocated through the plan-led process in a local plan where the principle had been established will not constitute inappropriate development in the Green Belt if care had been taken to minimise any adverse impacts of the development and it had been demonstrated that no urban sites could be identified to meet the need.

3.4 The Council has carried out a Travellers Accommodation Assessment (TAA) to determine the scale of need in the area. The TAA is on the Council's website

(www.woking.gov.uk). A need for 19 pitches to be delivered between 2016 and 2027 has been identified. With the loss of Ten Acre Farm, the need is now 22 pitches. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet the identified need. In doing so, the Council has to make sure that sufficient sites have also been identified to ensure the enduring permanence of the Green Belt boundary.

3.5 In accordance with the sequential approach to site selection, the Council has carried out a Strategic Housing Land Availability Assessment (SHLAA) to assess the capacity of the urban area to accommodate projected housing growth at different timeframes. In compiling the sites, some of them were rejected if they were covered by absolute constraints such as European designated sites. The sites were also sustainability appraised against a set of sustainability objectives. The outcome of the exercise is a list of sites that the Council believes their development will help achieve sustainable development of the area with minimum adverse impacts on the sustainability objectives when tested against all other reasonable alternatives. It is from this list of urban sites that the Council has considered the prospect of finding suitable sites for Traveller pitches. The Sustainability Appraisal (SA) Report is on the Council's website.

3.6 To allocate land for development the Council has to be sure that it has a realistic prospect of coming forward for development at the time that it is needed and that the development will be viable. None of the land owners/developers who have submitted sites for consideration in the SHLAA have promoted any of the sites for Travellers accommodation. Desktop search also did not lead to any credible sites that could be viably developed in the urban area. Repeated calls for sites to be submitted for consideration have been unsuccessful. Because of land values, site contexts and constraints none of the urban sites considered are envisaged to achieve positive viability if developed for Traveller pitches. The Council is satisfied that there is a demonstrated lack of deliverable sites in the urban area to meet the identified need to provide a robust case on special circumstances grounds to justify the use of Green Belt land to deliver Traveller pitches.

3.7 Policy CS6: *Green Belt* of the Core Strategy identifies the Green Belt as potential future direction of growth to meet housing need. The next area of search is therefore land in the Green Belt. The Council has carried out an SA of reasonable alternative sites in the Green Belt, and has made a decision that in following the sequential approach to site selection, it will first consider whether legally established sites in the Green Belt have capacity to expand without significant adverse impacts on the environment before new sites in the Green Belt are considered. This approach is in line with the sustainability objectives of the SA Report, the requirements of the Core Strategy, the NPPF and the advice in the Green Belt boundary review.

3.8 Land at Five Acre Farm (GB2) is an operational and an established site authorised for 13 pitches. The proposal is to intensify the use of the site by a net addition of 6 pitches. The site performs reasonably well against the sustainability objectives of the SA Report when compared against other Green Belt sites. Consequently, the Council is satisfied that it should be allocated to contribute towards meeting the identified need for Travellers. There are also existing operational sites with temporary planning permissions at land south of Murray Lane (4 pitches), Stable Year (1 pitch and land south of Gabriel Cottage (1 pitch). It is proposed that the principle for the permanent use of the sites for Travellers accommodation will be supported subject to detailed requirements being met. Land at West Hall is allocated for significant

provision for housing (net provision of 555 dwellings). It is proposed that part of the land, about 1.2 hectares be set aside to provide a net addition of 15 pitches to meet the needs of Travellers. By taking this approach, concern has been expressed that the Site Allocations DPD concentrates all the Traveller sites in Byfleet and West Byfleet, and in close proximity to each other. The Council acknowledges this concern. However, land at Murrays Lane is already a functionally established site with no significant recorded management issues. Land at West Hall is already allocated for housing and can be planned sustainably to accommodate the pitches. It is also not the case that all the Traveller pitches in the Borough would be concentrated in Byfleet and West Byfleet. Taking into account the existing sites, most of the need is being met at Five Acres and Hatchingtan with a combined total contribution of 35 pitches, not to mention Gabriel's Cottage and Stable Yard that are also in the south of the Borough. The Council will continue to work closely with the operators of the sites to make sure that they continue to be effectively managed. The Council is also of the view that the overall environmental benefits for expanding capacity at the existing sites will far outweigh any benefits for spreading the development at new locations in the Green Belt.

3.9 The Council has also carried out a Habitats Regulations Assessment Screening to assess the impacts of the allocation of land at Five Acres and West Hall on European designated sites. The HRA has been prepared with the input of Natural England. The sites have been screened out as having no likelihood of leading to significant adverse effects on European designated sites. Subject to identifying sufficient land to provide Suitable Alternative Natural Greenspace (SANG) to mitigate any adverse impacts on the Special Protection Areas, the Council is satisfied that the sites can sustainably be developed for Traveller pitches. The Council has identified sufficient SANG capacity to support housing provision than is needed in the plan period. Proposals coming forward for permanent use of temporary sites will also be subject to Appropriate Assessment at the Development Management stage to ensure any adverse impacts on European designated sites are avoided.

3.10 The proposed allocations include a list of key requirements to be met to make the development of the site acceptable. This includes making sure that site specific matters such as contamination, flood risk and biodiversity are fully assessed and where necessary mitigation measures identified to address adverse impacts. The requirements will also ensure that the siting, layout and design of the site minimises any adverse impacts on the amenity of nearby residents and the landscape setting of the area. It is also important to emphasise that the sites have been assessed in the context of an up-to-date Strategic Flood Risk Assessment. The siting of the pitches will be in areas with low probability of flooding. The Council is satisfied that the combined effects of these requirements will make sure that the development of the site are sustainable. Measures will also be taken through the development management process to make sure that the temporary pitches satisfies required standards before they are granted permanent approval.

3.11 The Council has considered the merits of the alternative site(s) such as the land east of Martyrs Lane being proposed to replace the proposed allocations. None of the sites are part of established Traveller sites and or in sustainable locations. Evidence in the SA Report and or the Green Belt boundary review does not provide any justifiable case why these alternative sites should be allocated instead of the proposed allocation. There is no alternative evidence submitted to the Council other than the Council's own evidence to demonstrate why these sites can deliver the Council's objectives in a more sustainable manner. Based on the above analysis the proposed allocations should be submitted to the Secretary of State for

Examination. Specific representations have been made generally regarding the allocation and safeguarding of Green Belt land for development and in relation to Travellers accommodation in particular that the Council has failed to provide adequate reasons for not releasing the land east of Martyrs Lane from the Green Belt for development. The Council carefully considered the suitability of safeguarding the land east of Martyrs Lane for future development at its meeting on 18 October 2018 and rejected this proposition for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: *Open space, green infrastructure, sport and recreation* of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

It is therefore incorrect to suggest that the Council had failed to provide adequate reasons for not allocating this site for development.

3.12 There are detailed matters such as inability to provide safe access and parking. In any case, they are already specified as key requirements for making any development that comes forward acceptable. The Council is confident that these matters can successfully be address as part of the development management process.

3.13 Beyond the allocation of sites, the Council recognises the work that needs to be done to improve relations between Travellers and the settled community, and will continue to engage in this work.

3.14 There have been calls for the Council to review its TAA to take into account the revised definition of Travellers. This matter has been carefully considered and it is envisaged that the outcome of such a study would not change the overall quantum of the need for Travellers accommodation.

4.0 The proposed allocations will significantly reduce or take away Green Belt land to the detriment of the general wellbeing and amenity of residents.

4.1 The Council accepts that any land taken out of the Green Belt will lead to a reduction of the total amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. Taking into account the constraints of the Borough and the available evidence, the proposed allocations are the most sustainable to deliver the objectives of the Core Strategy when compared against other reasonable alternatives. The Sustainability Appraisal Report and the Green Belt Boundary Review provides the evidence to support this view. Whilst not underplaying the significance of the benefits of Green Belt land to individual local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet development needs up to 2040 is about **1.93%** of the total area of the Green Belt. Presently, the Green Belt is about 63.27% of the total area of the Borough. When all the allocated sites have been developed the Green Belt will be about **61.34%** of the total area of the Borough. The amount of land being proposed to be released is therefore relatively modest.

4.2. While there is a loss of open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents, as set out in Core Strategy Policy CS17: Open Space, green infrastructure, sport and recreation. This is reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. These policies, together with key requirements in the Site Allocations DPD, set out how this will be achieved. Sites such as West Hall (Policy GB10) outline that approximately 4.7ha of public open space and green infrastructure should be integrated at the site, and that large areas of woodland and parkland setting should be retained. Further detail can be found in paragraph 6.8 of this paper.

5.0 West Byfleet and Byfleet is losing most of its Green Belt for development

5.1 The Council has decided through the Core Strategy that the significant unmet need for housing justifies the in principle need to release Green Belt land for housing development. In doing so it has ensured that first and foremost development is directed to the most sustainable locations of the Borough in accordance with the spatial strategy of the Core Strategy. The Council accepts that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.

5.2 The Site Allocations DPD proposes to remove 43.5% of the existing Green Belt in the ward of West Byfleet (based on the previous Ward boundaries). Excluding site GB18 which will not be developed and will continue to provide open space and sports provision for the Junior and Infant schools, the total amount of Green Belt lost for development in West Byfleet is 37.8% (45ha). Whilst the Council sympathises with the concerns of local residents over the loss of this amount of Green Belt land, it has ensured through a number of studies that the land that is released from the Green Belt will not undermine its overall purpose and integrity.

5.3 In Byfleet, the Site Allocations DPD proposes to remove 18.3% of the existing Green Belt in the ward of Byfleet (based on the previous Ward boundaries). Excluding site GB12 which will not be developed and is proposed to be used as publically accessible natural greenspace (SANG), the total amount of Green Belt to be lost to development in Byfleet is 7.3% (10.26ha).

6.0 There is lack of adequate infrastructure provision to support the Site Allocations DPD

6.1 Paragraph 20 of the NPPF requires strategic policies to make provision for infrastructure and community facilities to support development. This requirement is consistent with paragraph 162 of the previous NPPF that informed the preparation of the Core Strategy. The Council has followed this requirement and has worked with infrastructure providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand arising from the delivery of the Core Strategy and/or the Site Allocations DPD. Policy CS16 (infrastructure delivery) and Section 6 (Implementation and monitoring) of the Core Strategy provides the assurance that the Council will work with infrastructure service providers and developers to ensure that the infrastructure needed to support development is provided in a timely manner. The Council also recognises that the delivery of the Core Strategy or the Site Allocations DPD will involve multiple delivery agencies, and in this regard, will take a proactive role in coordinating them to ensure this objective is achieved.

6.2 The Council has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD. The definition of infrastructure covered in the IDP and by Policy CS16: *Infrastructure delivery* of the Core Strategy is wide ranging and it includes education, transport, green infrastructure, sewerage and utilities. The IDP is on the Council's website (<http://www.woking2027.info/ldfresearch/infrastructure>). The IDP was reviewed in November 2018 to bring it up to date and therefore provides a robust basis for supporting the delivery of the Site Allocations DPD. The IDP sets out:

- The capacity of existing infrastructure and the impact of future development on that infrastructure;
- The mechanisms in place to ensure that the additional infrastructure necessary to support new development is provided over the Plan period. This includes the scale of the new infrastructure to be provided, by whom, how, at what cost and to what timescales.

The IDP is a live document to be monitored and updated to ensure that it is as robust and up to date as possible, taking into account changes in need, capacity and the availability of funding sources in order that the Council and its partners can respond to any changes to priorities in a timely and co-ordinated manner. The IDP has been revised for this purpose, taking into account new information submitted by infrastructure providers and changes in national planning policy

6.3 The IDP is informed by a number of studies such as a Green Belt boundary review sensitivity teas - addendum report to Strategy Transport Assessment (2016), Surrey rail Strategy Position Statement, Woking Town Centre Modelling Assessment (2016), Network Rail Route Strategic Plan – Wessex Route (2018, A320 Corridor Study, A245 Potential Mitigation Study, Transport Assessment (2010), an Open Space audit (and Social and Community Facilities Audit (2011), Surrey Infrastructure Capacity Study and relevant information from key providers. The Council accepts that the IDP will continue to evolve with new information. Nevertheless, overall, the IDP provides adequate information on

infrastructure provision to support the delivery of the Core Strategy and the Site Allocations DPD.

6.4 The Council has worked with its partners to publish specific strategies and programmes to provide further details on how some of the infrastructure will be delivered. This includes:

- A Regulation 123 List with an indication of the priority infrastructure that the Council wishes to spend Community Infrastructure Levy contributions. The Regulation 123 list includes the list of schemes to be delivered, by whom, when, how, at what cost and how it will be funded. It is estimated that approximately £14M could be secured from CIL contributions over 10 years up to 2025 towards infrastructure provision;
- Woking Transport Strategy and Programme published by Surrey County Council, which sets out transport schemes that the County Council have identified to address the infrastructure requirements of the Core Strategy. The document takes a balanced approach with an appropriate range of schemes that includes pedestrian, cycling, road network and rail to deal with the transport implications of proposed development;
- Thames Basin Heaths Special Protection Areas (SPA) Avoidance Strategy published by Woking Borough Council to set out how Suitable Alternative Natural Greenspace will be provided to mitigate against development impacts on the SPA. The Council has identified sufficient Suitable Alternative Natural Greenspace (SANG) capacity to cover the entire plan period. The Avoidance Strategy is being reviewed;
- County Council's Education Programme on education provision across the Borough.
- The Council is working with Network Rail to delivery significant improvements to the rail network and other transport improvements in the vicinity of the Station. This includes the replacement of the Victoria Arch Bridge, the introduction of two-way carriageway under the Victoria Arch Bridge, the removal of the one-way gyratory and improvements to pedestrian and cycle connectivity between the north and south of the Station.

6.5 Whilst the above is non-exhaustive, they provide adequate information to demonstrate how key infrastructure will be secured to enable the sustainable delivery of the Core Strategy and/or the Site Allocations in a timely manner.

6.6 The Council has used the Site Allocations DPD process to review a number of the evidence to assess the development impacts of the proposed allocations and to address any further infrastructure that will be needed to mitigate potential adverse impacts.

6.7 The Council has carried out a revised Green Belt Boundary Review Sensitivity Test – Strategic Transport Assessment (TA) (2015) to assess the transport implications of the proposed allocated and safeguarded sites. The TA acknowledges that there will be a net but marginal increase in traffic over and above the existing situation, which could be mitigated to enable the delivery of the proposed allocated sites. The mitigation measures will comprise both strategic schemes to be funded by developer contributions and other sources of funding and by site specific measures to be determined as part of detailed Transport Assessments to support planning applications. Specific requirements have been incorporated in the relevant proposed allocations to make sure that development impacts are fully assessed and appropriate site specific measures are identified to address any adverse impacts. The County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by

the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.

6.8 Policy CS17: *Open space, green infrastructure, sport and recreation* of the Core Strategy provides a robust policy framework for securing and protecting open space provision in the Borough. The Regulation 123 List quantifies what is needed and how that will be funded. The Council has also identified sufficient Suitable Alternative Natural Greenspace (SANG) capacity for recreation and to mitigate development impacts on the Thames Basin Heaths Special Protection Areas.

6.9 Surrey County Council is the main provider of Education in the area. It provided detailed assessment of education needs to support the Core Strategy. It is satisfied that the combination of expanding capacity at existing schools and the allocation of the nursery land adjacent to Egley Road (site GB7) for a secondary school in the DPD will meet the education needs of the area for the plan period.

6.10 Affinity Water (Veolia Water) had confirmed that based on the projected growth in the Core Strategy there is no risk to the supply of water over the plan period.

6.11 The Thames Water AMP5 (2010 – 15) had informed the Core Strategy. At the time, it showed that there were no capacity issues. Thames Water has also provided input to the preparation of the Site Allocations DPD in its response to the Regulation 18 consultation. They have provided a robust wording for the Council to incorporate in the DPD to make sure that the wastewater and sewerage infrastructure needs of development are fully assessed and where necessary mitigation provided as part of the planning application process. They have also responded to the Regulation 19 consultation, and their representations will be taken into account. Together with the introduction of SuDS, which Thames Water support, the Council is satisfied that wastewater and sewerage issues will be addressed at the planning application stage.

6.12 The IDP notes that at present, GP provision varies across the Borough. It is accepted that there are locally specific pressures of over-subscription that need to be addressed. Whilst traditionally health provision reacts to meet projected demand, the Council is working with the North West Surrey Clinical Commissioning Group (CCG) to see how provision could be aligned to proposed development and avoid unacceptable standards of provision in the area. The CCG is aware of the total quantum of development that the Core Strategy seeks to deliver, and the likely spatial distribution of cumulative development as proposed in the Site Allocations DPD. As set out in Section 6 of the Core Strategy, the Council will also require developers to contribute towards the provision of facilities, services and infrastructure to make a scheme acceptable in planning terms before planning approval is granted. Infrastructure contributions will be sought via Community Infrastructure Levy, and on the back of Section 106 agreements for site specific infrastructure requirements. The 'key requirements' within the policies of the Site Allocations DPD describe how any site specific requirements will be determined on a case by case basis depending on the nature of the scheme that comes forward.

6.13 The Council is by no means suggesting that the approach it has taken to mitigate development impacts of the Site Allocations DPD will be a panacea to address deficiencies in existing infrastructure provision. Nevertheless, it will ensure that the existing situation is not exacerbated and the negative impacts of any future development are minimised. In summing

up for his consideration of infrastructure matters at the Core Strategy Examination, the Inspector concluded that the Core Strategy addresses adequately the provision of infrastructure to support the delivery of the strategic objectives of the Core Strategy.

7.0 There is no proper assessment of the flood risk implications of the Site Allocations DPD, in particular, regarding the sites in Byfleet and West Byfleet

7.1 The NPPF requires development to be diverted away from area at highest risk of flooding. Where development is necessary at high risk areas, they should be made safe for its lifetime without increasing flood risk elsewhere. Strategic policies are expected to be informed by a strategic flood risk assessment. All plans are required to apply a sequential, risk based approach to the location of development, taking into account the current and future impacts of climate change, so as to avoid, where possible, flood risk to people and property.

7.2 The Council attaches significant importance to flood risk because of its potential threat to the livelihood of residents and local businesses. In this regard, the advice in the NPPF has been carefully followed, and the Site Allocations DPD directs development to areas with the lowest probability of flooding from all sources.

7.3 The Site Allocations DPD is informed by an up-to-date Strategic Flood Risk Assessment (2015). A Sequential Test has been applied to determine the suitability of sites according to their susceptibility to flood risk. The Environment Agency had been consulted on the Sequential Test. The Sequential Test demonstrates that the Exception Test will not be required for any of the proposed sites in the DPD where development is proposed.

7.4 The functional floodplain had been considered an absolute constraint and sites within it had been ruled out for consideration as reasonable alternatives for the purposes of the DPD. The defined areas of the allocated sites where development will be required to be sited are all in Flood Zone 1 where development is encouraged. Full consideration has also been given to the assessment of alternative sites through the Sustainability Appraisal (SA) process where flood risk is one of the key objectives against which all alternative sites were appraised.

7.5 Where relevant, the key requirements of the proposed allocated sites sets out conditions for the need for detailed flood risk assessment. This will ensure that the development of the site addresses any site specific issues relating to flood risk, including making sure that the development of the site do not exacerbate flood risk elsewhere. The Site Allocations DPD has evolved and it incorporated comments received from the Environment Agency to help make sure that the requirements of national policy are met. Based on advice provided by the Environment Agency during the Regulation 19 consultation, it is being proposed to include a further key requirement requesting for a sequential test to be undertaken at the development management stage.

7.6 Sustainable Urban Drainage system (SuDs) is required for major development and encouraged for all other development where feasible. This will help minimise the risk of flooding, in particular, flooding due to surface water run-off. Policy CS9: *Flooding and water management* of the Core Strategy sets out robust policy requirements for managing the impacts of development on flood risk. This will apply when determining any application that will come forward on any of the allocated sites.

7.7 Based on the above, Officers are satisfied that flood risk has been sufficiently, adequately and appropriately considered in the preparation of the DPD and the development of the allocated sites will not lead to or be exposed to unacceptable level of flood risk. The Council has acknowledge concerns of local residents regarding flooding in particular in Byfleet and West Byfleet. The DPD takes due care to make sure that the risk of flooding is minimised.

8 Inadequate consideration has been given to the air quality and noise pollution implications of the Site Allocations DPD

8.1 Careful consideration has been given to the air quality implications of the Site Allocations DPD. The assessments include both the impacts on habitats and the wellbeing of residents.

8.2 In terms of implications on habitats, air quality impacts of the Site Allocations DPD have been appropriately assessed as part of the Habitats Regulations Assessment, available to read at the following link: <http://www.woking2027.info/ldfresearch/hra/sadpdhra>. Modelling of transport movements and associated air quality undertaken in support of Woking Core Strategy, subsequently updated to support the Site Allocations DPD, concluded that no significant adverse effects would occur on European protected sites as a result of development proposed in the Borough. The assessment also took into account 'in combination' effects with growth in surrounding authorities. The Council will continue to work proactively with other Surrey local authorities and Natural England to strategically monitor and mitigate any adverse impacts on the SPA, as recommended in the HRA report.

8.3 In terms of implications for health and wellbeing of residents, air quality impacts of each site have been assessed through the Sustainability Appraisal. Air quality in the Borough is generally good – nitrogen dioxide diffusion tubes are located throughout the borough which are changed on a monthly basis. Only two areas of the Borough have in the past not met the government's standards, and have been declared Air Quality Management Areas (AQMA): the junction at the top of Anchor Hill, and a section of Guildford Road. Steps are being taken to improve air quality at these locations. None of the sites proposed in the Site Allocations DPD are situated within an AQMA; are expected to adversely impact an AQMA; or to lead to designation of an AQMA.

8.4 It is acknowledged that there are potential implications for air quality arising from increased traffic associated with development. The Site Allocations DPD aims to concentrate most development in the main centres where key facilities and services are available, which reduces the need to travel. In addition, policies in both the Core Strategy (such as CS18: Transport) and Development Management Policies DPD (such as policies DM5: Environmental Pollution and DM6: Air and Water Quality) seek appropriate schemes of mitigation to minimise any adverse impacts on the environment from individual and cumulative development. Policy DM6 requires an Air Quality Assessment to be submitted for schemes in excess of 10 dwellings or 1,000sqm of 'other' floorspace within or adjacent to AQMAs; and for all schemes in excess of 100 dwellings or 10,000sqm of 'other' floorspace anywhere in the Borough. If a change in air quality is identified, a suitable scheme of mitigation should be put forward. These mitigation measures are reinforced by the 'key requirements' of each site allocation.

8.5 The combined effect is that air quality will not be affected to the extent that there will be a significant impact on the health and wellbeing of residents.

8.6 Noise issues were considered as a factor to assess site suitability in the Green Belt Boundary Review, and assessed to be a constraint on the parcel which included sites GB4 and GB5, although the review stated that this issue could be satisfactorily mitigated. It was also identified as a landscape issue affecting the parcel that includes sites GB10 and GB11.

8.7 The Sustainability Appraisal considered noise pollution and identified it as an issue affecting sites including GB1, GB4, GB5, GB7, GB10 and GB11. It recommended various mitigation measures, including requirements for Noise Impact Assessments, and these have been incorporated as key requirements for the policies for GB1, GB7, GB10 and GB11. Key requirements for the development of sites GB4 and GB5 will be defined as part of the review of the Core Strategy or Site Allocations DPD. This will be informed by the up to date evidence and policies at the time.

8.8 With regard to the current noise buffering role played by vegetation on sites GB10 and GB11, the allocation policies for these sites include significant measures by way of key requirements for the retention and expansion/strengthening of green infrastructure features, including woodland, tree belts, protected trees, landscape edges, wildlife corridors and off-site Green Infrastructure acting as a buffer to the Wey Navigation.

8.9 The addition of vehicles to the local road network as a result of proposed development has also been raised by consultees as a potential cause of noise pollution. Noise Impact Assessments, as required for sites GB1, GB7, GB10 and GB11, would identify, and specify mitigations for, any such impacts. More generally, the Strategic Transport Assessment, A320 Corridor Study, A245 Mitigation Study and Town Centre Modelling Assessment have assessed the impact of the proposed developments on traffic and proposed various mitigation measures to keep the impacts on traffic to an acceptable level.

8.10 Any scheme that comes forward through the development management process will also be required to take account of Policy DM7 (Noise and Light Pollution) of the Development Management Policies DPD and Policy CS21 (Design) of the Core Strategy.

9.0 Was the regulation 19 consultation of the Site Allocations DPD adequate?

9.1 The minimum level of public consultation required for a Regulation 19 consultation on a draft Development Plan Document such as the Site Allocation Development Plan Document (DPD) is prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council has also published a Statement of Community Involvement setting out how the community will be involved in the preparation of key planning policy documents. The Council published the DPD for a six weeks Regulation 19 consultation period between 5 November 2018 and 17 December 2018, and have carried out the following events, which it considered were successful:

- Sending direct mails to about 6,000 individuals or organisations on the consultation database;
- Depositing copies of the Site Allocations and its accompanying supporting documents at the main libraries across the Borough for public inspection;
- Doing presentations to local community groups, Resident Associations, Neighbourhood Forums, Agents Forum and the Chamber of commerce;
- Depositing information at places such as Shopping Centres, rail stations, community noticeboards
- Putting the Site Allocations DPD on the Council's website;
- Publishing press notices and the Statement of Representation Procedure in the local newspapers;

9.2 Under the Duty to Cooperate, the Council has also engaged with relevant neighbouring authorities, statutory consultees and key stakeholders before and during the consultation period. A Duty to Cooperate statement and a Consultation Statement will be published in due course as part of the submission documents to the Secretary of State to demonstrate in detail how the Council has engaged with local residents and key stakeholders in the preparation of the DPD.

9.3 The Council is satisfied that it has done what it can within the available resources but has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. It has done so in accordance with the Statement of Community Involvement and all other statutory and policy requirements. The Council is also satisfied that sufficient time had been allowed for the consultation and the consultation events were spread across the borough and amongst various groups to give everyone the opportunity to participate.

9.4 In accordance with the Local Development Scheme the Council plans to submit the DPD to the Secretary of State for Examination in June / July 2019. Everyone will have the opportunity to be heard at the examination if they felt that their concerns have not been satisfactorily addressed by the Council at the Regulations 18 and 19 consultation stages. The examination process is a further opportunity for the public to be involved in the DPD preparation process.

10.0 The evidence base used to support the Site Allocations DPD is inadequate and not robust

10.1 Paragraph 31 of the NPPF requires the preparation of local plans to be underpinned by relevant and up to date evidence. The evidence should be adequate and proportionate, focused tightly on supporting and justifying the plan.

10.2 The Council is satisfied that the depth and breadth of evidence used to support the preparation of the Site Allocations DPD was sufficiently comprehensive, robust and will be able to withstand scrutiny at the Site Allocations DPD Examination. The list of evidence base studies used to justify the DPD is at Appendix 1 of the Site Allocations DPD.

- Strategic Housing Land Availability Assessment (SHLAA) (2017);
- Strategic Housing Market Assessment (SHMA) (2015);
- Green Belt boundary review (2014);
- Landscape Assessment (2014);
- Strategic Transport Assessment (2015);
- Travellers Accommodation Assessment (2013);
- Sustainability Appraisal Report (2018);
- Habitats Regulations Assessment (2018);
- Employment Topic Paper (2018);
- Standard method for calculating housing need;
- A320 Corridor Study;
- A245 Mitigation Study;
- Infrastructure Delivery Plan (2018);
- Surrey Infrastructure Study
- Woking Transport Strategy and Programme;
- Strategic Flood Risk Assessment (2015) and Sequential Testing of Sites in the Site Allocations DPD (2018); and
- Technical information captured from statutory consultees, neighbouring authorities and other key stakeholders during Duty to Cooperate exercises.

10.3 The evidence gathered is sufficiently comprehensive, adequate, proportionate and robust enough to inform planning judgments about the preferred sites in the DPD. They have all been prepared to high quality standards to meet all necessary requirements. It is an extensive list of studies and covers evidence base studies required or suggested by national guidance such as SHLAA and SHMA. The breadth and depth of the evidence base studies reflect the nature and issues that are pertinent to the preparation of the DPD. The evidence base required by the SEA Directive has also been covered as part of the Sustainability Appraisal Report and the Habitats Regulations Assessment. Information gathered from the responses to the Regulations 18 and 19 consultations have also been useful source of evidence to inform the DPD process. Overall, Officers are satisfied that the DPD is adequately and appropriately informed by robust and up-to-date evidence base.

10.4 A number of the representations has expressed concern that no traffic modelling has been undertaken to assess the traffic impacts of the development proposals. The Council disagrees. There has been extensive traffic modelling works undertaken to inform the DPD. This includes:

- Green Belt boundary review Sensitivity Test – Strategic Transport Assessment;
- County Highway Authority Green Belt boundary review Sensitivity Test – Addendum Report to Strategic Transport Assessment;
- Woking Town Centre Modelling Assessment;
- Strategic Transport Assessment – cumulative assessment of future development impacts on the highway network;
- Transport Assessment;
- Potential Mitigation – Transport Infrastructure Mitigation Measures for A245;
- A 320 Corridor Study.

Full details of the evidence base can be accessed by this link:
<http://www.woking2027.info/ldfresearch>.

11.0 There has not been a thorough assessment of reasonable alternative sites to inform the selection of preferred sites

11.1 The SHLAA, Employment Land Review, Green Belt boundary review report and the Sustainability Appraisal Report provides evidence of work undertaken to assess the capacity of both the urban area and the Green Belt to accommodate the projected growth set out by the Core Strategy. The spatial strategy of the Core Strategy seeks to concentrate most new development on previously developed land in the town, district and local centres which offers the best access to a range of services and facilities. However, it recognises that land in the Green Belt will have to be released to meet housing need between 2022 and 2027. This overall spatial framework has informed the appraisal of options regarding the prioritisation to focus development up to 2022 within the urban area.

11.2 The Sustainability Appraisal (SA) process has been used to appraise reasonable alternative sites to inform the Site Allocations DPD. The SA Framework used for the appraisal of the alternative options is objective-led and has provided a consistent basis for describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations DPD. The SA Report is on the Council's website. It includes all the reasonable alternative sites that were appraised and why sites have either been selected or rejected.

11.3 The Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review (ELR) has provided the basis of the reasonable alternative sites appraised. The SHLAA adopts a comprehensive methodology to assessing sites, including density and potential housing yield. It represents an adequate, proportionate and robust source of evidence to inform the Site Allocations DPD process. The methodology used for the SHLAA has been commended by the Inspector who conducted the Core Strategy. In this regard, the Council is satisfied that the SHLAA does not need an independent verification of either its process or its outcomes. The ELR is also a consultant's report prepared to high quality standards.

11.4 To make the Site Allocations DPD and appraisal process manageable, only reasonable alternative sites that will yield 10 dwellings or more or 500sq.m or more of employment floorspace were appraised. Sites in both the urban area and within the Green Belt were appraised. Every site with a realistic prospect of coming forward during the plan period that the Council is aware has been appraised before preferred sites were selected for the DPD. It is important to acknowledge that whilst the focus has been on sites for residential development, the Council also has a responsibility to identify sufficient land to meet the economic, social and environmental requirements of the Core Strategy.

11.5 The Green Belt boundary review assessed various parcels of land against various sets of criteria to make sure that any land that is released from the Green Belt will not undermine its purposes and integrity.

11.6 Overall, the Council is satisfied that there has been a thorough assessment of alternative sites to inform the preferred sites that are allocated and safeguarded in the Site Allocations DPD. Whilst most development will be focused on previously developed land in the urban area, the need for land to be released from the Green Belt continues to be justified.

11.7 Some representations had claimed that the Council should have engaged independent consultants to undertake a 'proper' SHLAA to assess the scope for brownfield land to accommodate the future development needs. The Council has published an up to date SHLAA to identify deliverable and developable sites to meet future development needs. The SHLAA was undertaken in-house and is considered robust and adequate to inform the DPD. It is based on a tried and tested methodology that has been commended by the Secretary of State. The Inspector has this to say about the methodology used for the SHLAA: 'it adopts a comprehensive methodology to assessing potential housing sites within the Borough. There is no substantive evidence to indicate that its density and housing yield assumptions, with due regard to exemplar schemes and the housing mix requirements proposed by the Core Strategy is flawed. With regard to the NPPF, it represents an adequate, proportionate and robust evidence source'. The Council has the expertise and resources to carry out the SHLAA. It would be a waste of public money in these circumstances to engage consultants to do the study.

12.0 Does the Green Belt boundary review adopt the right approach for assessing sites?

12.1 The Green Belt boundary review is a key policy requirement of the Core Strategy. Policies CS1 (A spatial strategy for Woking Borough) and CS6 (Green Belt) expects the Council to carry out a Green Belt boundary review before 2016 to ensure that the release of Green Belt for development does not undermine its purposes and integrity. The requirement was a key recommendation of the Inspector who conducted the Core Strategy Examination.

12.2 Peter Brett Associates were commissioned to carry out the Green Belt boundary review. The consultants' brief was approved by the Local Development Framework Working Group. The Working Group considered the consultants' report and was satisfied that it had been prepared in accordance with the brief, and that the report provides a useful evidence base to inform the Site Allocations DPD. It is important to emphasise that Officers reviewed a number of examples of Green Belt boundary reviews before finalising the brief for the consultants. The Council believes that the Green Belt boundary review report is robust to inform the DPD and to make sure that any land that is released from the Green Belt does not undermine its purposes.

12.3 There is no prescribed methodology for carrying out a Green Belt boundary review. The Council had been concerned to ensure that the review is founded on a robust and credible methodology. In this regard, the consultants published the methodology for carrying out the Green Belt boundary review for stakeholder consultation to make sure that all technical aspects of how to carry out a Green Belt boundary review would be covered. Comments received were taken into account before the review was undertaken. The Council is satisfied that the methodology for the review is robust, logical, coherent, and comprehensive to form the basis of the review. The appraisal of individual parcels of land that were carried out and the conclusions and recommendations of the report follow the methodology in a logical and coherent manner. Contrary to concerns expressed by some of the representations that the Green Belt boundary review only considered large land parcels against the purposes of the Green Belt, it indeed also considered specific sites within land parcels where relevant. The methodology for carrying out the Green Belt boundary review makes this point very clear. The Methodology can be accessed by this link: <http://www.woking2027.info/ldfresearch/gbmethod>.

12.4 The review was borough-wide in coverage to ensure that all reasonable alternative sites across the borough are assessed. This was necessary to ensure that a defensible boundary that is able to endure beyond the period of the Core Strategy can be drawn. Various relevant assessments were undertaken as part of the review, including:

- An assessment of how various parcels of land in the Green Belt contribute to its purpose;
- An assessment of the landscape character and sensitivity to change of developing the parcels of land assessed;
- An assessment of the sustainability of sites with respect to their proximity to key services and facilities and how accessible they are by various modes of travel; and
- The availability, viability and deliverability of the sites were also considered.

12.5 The combined information from these assessments provide sufficient basis to make informed judgments about the proposed site allocations in the DPD. It is emphasised that the

Green Belt boundary review report is only one of a number of evidence base studies used to inform the Site Allocations DPD. A detailed list of the evidence base studies is at Appendix 1 of the draft Site Allocations DPD.

12.6 There have been a number of representations objecting to the failure of the Green Belt boundary review to properly consider the historic status of some of the town and villages in the Borough. The Council appreciates and accepts that each of the distinct areas of the Borough have their respective rich histories dating back many years. However, the reference to historic towns amongst the purposes of the Green Belt refers to specifically designated historic towns. In this regard, the approach and context adopted by the Green Belt boundary review is correct.

13.0 Development will lead to significant levels of congestion – there has been no proper assessment of the impacts of the proposed development on roads.

13.1 The Council accepts that the proposed development will generate additional traffic. This has been quantified and can be mitigated. This matter has been comprehensively addressed in Section 9 above. The Council has undertaken a series of transport assessments to inform both the Core Strategy and the Site Allocations DPD. The Core Strategy was informed by a Transport Assessment and a Transport and Accessibility Topic Paper. The Inspector who conducted the Core Strategy examination had this to say on the approach to transport matters adopted by the Council 'overall, the advocated approach to sustainable transport is the most appropriate strategy within the context of the Borough. The policy provides an adequate strategic framework to be further developed with stakeholders and partners to ensure that the Borough is served by an effective sustainable transport system. There is no substantive evidence to indicate the policy is not robust or capable of effective implementation.

13.2 Since the adoption of the Core Strategy, further studies have been carried to inform the Site Allocations DPD. The Council has carried out a revised Green Belt Boundary Review Sensitivity Test – Strategic Transport Assessment (TA) (2015) to assess the transport implications of the allocated sites. The TA acknowledges that there will be a net but marginal increase in traffic over and above the existing situation, which could be mitigated to enable the delivery of the proposed allocated sites. The mitigation measures will comprise both strategic schemes to be funded by developer contributions and other sources of funding and by site specific measures to be determined as part of detailed Transport Assessments to support planning applications. Specific key requirements have been incorporated in the relevant proposed allocations to make sure that development impacts are fully assessed and appropriate site specific measures are identified to address any adverse impacts.

13.3 The Council has also worked with Surrey County Council to carry out the A320 Corridor Study and the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the networks. A Town centre Modelling Assessment has been undertaken to allow a better understanding of potential traffic impacts in the vicinity of the Town Centre. With appropriate mitigation, the transport impacts of development can be addressed.

13.4 The Council has published a Regulation 123 list of transport schemes that CIL contributions would benefit. It also continues to bid for public sector funding to deliver transport improvements, and an example is £25M investment in transport improvements in the vicinity of the Railway Station which is currently being implemented.

13.5 The Council has worked with the County Council to review its Infrastructure Delivery Plan (2018). It includes up to date information on transport infrastructure and how that will be funded. The County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.

14.0 The DPD should allocate more land to meet housing need rather than the Core Strategy requirement. Some specific sites are being promoted.

14.1 The Council has an up to date Core Strategy to set the strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. In accordance with Section 6 of the Core Strategy, the Council is committed to the comprehensive delivery of the requirements of the Core Strategy and the preparation of the Site Allocations DPD is a key means to achieving this objective.

14.2 The Site Allocations DPD has a clear purpose set out in the Core Strategy to identify specific sites to enable the delivery of the Core Strategy. Policies CS1 (A spatial strategy for Woking Borough), CS2 (Woking Town Centre), Policy CS6 (Green Belt), Policy CS10 (Housing provision and distribution) and Section 6 (Monitoring and implementation) of the Core Strategy all highlights the role of the Site Allocations DPD to identify sites to enable the delivery of the Core Strategy. Previous Local Development Schemes also highlights the distinct purpose of the Site Allocations DPD. The Site Allocations DPD has been prepared to meet this objective by identifying sufficient land to enable the delivery of the Core Strategy. In accordance with paragraph 139 of the NPPF, the DPD goes further and safeguards land to meet future development needs beyond this plan period to ensure the enduring permanence of the Green Belt boundary.

14.3 The Core Strategy sets out the spatial strategy for the borough, including the broad spatial distribution of development and the timing for the release of Green Belt land. Policy CS1 directs most new development to previously developed land in the town, district and local centres which offers the best access to a range of services and facilities. Land in the Green Belt will only be released to enable housing provision between 2022 and 2027. Policy CS10 specifies the overall quantum of housing units to be accommodated in the Green Belt during the plan period. This is specified as 550 dwellings. The brownfield first approach adopted by the Core Strategy is necessary to ensure sustainable development across the Borough. The Inspector who conducted the Core Strategy Examination had this to say about the spatial strategy of the Core Strategy: 'with due regard to its means of production, the Core Strategy provides the most appropriate spatial strategy for sustainable development within the context of the Borough with clear objectives for the plan period in accord with the aims of national planning policy'. The Core Strategy recognises that Green Belt land will be needed to meet development needs between 2022 and 2027. The Green Belt and the Town Centre are therefore identified as future direction of growth.

14.4 Policies CS1 and CS6 prescribes the means for selecting Green Belt land for future development. These policies require the Council to carry out a Green Belt boundary review to ensure that the land that is released from the Green Belt will not undermine its purposes and integrity. Against this backdrop, any land that is being promoted that is not supported by evidence in the Green Belt boundary review will be resisted. Very special circumstances justification would not exist to allocate or safeguard such land.

14.5 Section 19 of the Planning and Compulsory Purchase Act (2004) and Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) expects the Site Allocations DPD to take into account the requirements of the Core Strategy.

It is critical that the Site Allocations DPD is prepared in the context of the above requirements. The preparation of the Site Allocations DPD is informed by a number of evidence based studies such as the Green Belt boundary review, which is prescribed by policy and the Strategic Land Availability Study which is prescribed by national policy. All the sites that are either allocated or safeguarded are justified by the available evidence. The Council has also carried out a Sustainability Appraisal of reasonable alternative sites urban and Green Belt sites to demonstrate that the allocated and safeguarded sites are the most sustainable when judged against all the other alternatives.

14.6 Regarding the Green Belt sites, there has been an additional material consideration to be taken into account. As required by paragraph 136 of the NPPF, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. It is therefore important that very special circumstance justification exists for the sites that are allocated or safeguarded in the DPD. The Council is confident that the sites that are allocated or safeguarded meets this particular test. The same cannot be said for the alternative sites that are being promoted. For any other site to be accepted, a case has to be made to demonstrate that the site being promoted is the most sustainable when compared against the sites that are allocated and safeguarded in the DPD. No credible evidence has been provided so far to convince the Council that the alternatives sites being promoted are better alternatives.

14.7 It would be simplistic and bad planning for the Site Allocations DPD to allocate further land for development to meet Woking's objectively assessed housing need up to 2027. It is highlighted that it is not the purpose of the Site Allocations DPD to determine the housing requirement for the Borough. That is the distinct purpose of the Core Strategy. Paragraph 20 of the NPPF clarifies the role of strategic policies. Strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement of the natural, built and historic environment. It would be wrong to expect non-strategic policies in the Site Allocations DPD to be performing the role of the Core Strategy by planning for a higher housing requirement.

14.8 The development requirements of the Core Strategy, including the housing requirement have been identified in an integrated manner and justified by a significant body of evidence base studies. These include an Infrastructure Delivery Plan, Employment Land Review and an Employment Topic Paper. The studies have informed the necessary scale and type of infrastructure and economic growth necessary to support and align with the expected quantum of housing growth. To allocate land to meet the objectively assessed need up to 2027 without due regard and a corresponding review of office floorspace, warehouse floorspace, retail floorspace and the necessary infrastructure to align with the revised housing requirement would at best be irresponsible, overly simplistic and ill conceived. It would undermine the overall purpose of the plan-led system to plan in a holistic manner and would also undermine the sustainable development of the Borough, which is the overall aim of national policy.

14.9 The Council's Green Belt boundary review report provides evidence to demonstrate that there is no further scope to release any Green Belt land other than those recommended in the report for strategic development without damaging the overall purpose and integrity of the Green Belt. This point is highlighted in paragraph 3.5.22 of the Green Belt boundary review

report. It states 'we do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development'. Any additional sites being promoted in the Green Belt submitted during consultation have not been identified by the Green Belt boundary review report. Their allocation or safeguarding will be damaging to the purposes of the Green Belt. Very special circumstances justification would therefore not exist to allocate these sites.

14.10 There are some representations seeking to remove the time restrictions for releasing Green Belt land for development. To do so will be at odds with the spatial strategy for the Core Strategy. The timing for the release of Green Belt land is prescribed by Policies CS1 and CS6 of the Core Strategy. They require land to be released from the Green Belt to meet housing need between 2022 and 2027. This is necessary to ensure that most new development is focused on previously development land in the urban area which offers the best access to a range of services and facilities, in line with the objective of sustainable development. Policy SA1 of the Site Allocations DPD is drafted to be in general conformity with this objective. The Site Allocations DPD clearly demonstrates that sufficient land has been identified on previously developed land in the urban area to meet development needs up to 2022. The request to remove the time restrictions on the release of Green Belt land is therefore not justified and unacceptable.

14.11 It is acknowledged that the Green Belt boundary review report has recommended that the following sites as were identified in the Regulation version of the DPD could be released from the Green Belt to meet future development needs of the Borough:

- Land to the north east of Saunders Lane, Mayford (GB10);
- Land to the north west of Saunders Lane, Mayford (GB11);
- Land rear of 79 – 95 Lovelace Drive, Teggs Lane, Pyrford (GB12); and
- Land east of Upshot Land and south of Aviary Road, Pyrford (GB13).

14.12 The sites were identified in the draft Site Allocations DPD to be safeguarded to meet future development needs beyond the plan period between 2027 and 2040. This was published for Regulation 18 consultation between June and July 2015. The Council has considered the representations received during this consultation and has also reviewed all the available evidence and the policy context for safeguarding the sites, and has come to the conclusion that very special circumstances justification does not exist to safeguard the sites for the following reasons:

- All the sites would give rise to a certain level of harm to the sustainability objectives of the Sustainability Framework used for the Sustainability appraisal. In particular, it is noted that GB9, 10 and GB13 are all within the designated "Escarpment of Rising Ground of Landscape Importance" which policy CS24 Core Strategy specifically identifies as a "key landscape" to be "conserved" and where possible "enhanced". Furthermore, whilst GB12 is not within the Escarpment designation, it is adjacent to the Escarpment and forms part of an important rural landscape setting to the southerly boundary with the urban area of Woking it is consider to also be protected by policy CS24. Moreover, GB12 together with GB13 form part of the setting of the Registered Park and Garden at Pyrford Court and the Aviary Road Conservation Area (both designated heritage assets). In their present open and rural form these sites make an important contribution towards the respective heritage significance of those designated

heritage assets. Paragraph 193 NPPF requires “great weight” to be attached to the conservation of designated heritage assets. The Council is therefore of the view that exceptional circumstances do not exist so as to justify the release of proposal sites GB 10, 11 and 12 from the Green Belt because the use of those sites for residential development would: (i) conflict with policy CS24 Core Strategy and thus not be in accordance with the development plan’s strategy for sustainable development contrary paragraph 139(a) of the NPPF, (ii) fail to protect or enhance a valued landscape in accordance with paragraph 170(a) of the NPPF, (iii) in the case of GB12 GB13, fail to conserve designated heritage assets and (iii), result in the permanent loss of Green Belt land assessed within the Green Belt Review as performing variously a “critical” and “major” role to check urban sprawl and a “critical” and “major” role towards safeguarding the countryside from encroachment Moreover, contrary to Policy CS6 of the Core Strategy, it is considered that the development of GB10, 11 and 12 and GB13 would individually and certainly collectively, critically undermine the overall purpose and integrity of the Woking Green Belt.

14.13 The decision to determine whether very special circumstances justification exist to safeguard the sites is a matter of planning judgment. It is clear from the above reasons that the decision of the Council is well informed by the careful consideration of all the available evidence and defensible.

Other representations

The following issues attracted a significant number of representations, many of which are site or locally related, but may not necessarily be of a strategic nature.

15.0 Part of safeguarded site GB5 (Land to the south of Rectory Lane, Byfleet) is owned by the Church, and is consecrated as future burial land.

15.1 The Council has not sought to prepare key requirements for safeguarded sites as it has with allocated sites. These will be prepared and agreed as part of the review of the Core Strategy and/or the Site Allocations DPD, and will be informed by up to date evidence and policies at the time. The Council is aware of the matters raised by the representations and will be taking them into account when it defines the key requirements for the site. The anticipated capacity of the site as set out in Appendix 4 of the Site Allocations DPD takes account of the ownership issues raised by the representations. At this stage it is not envisaged that the ownership issues would preclude the entire site coming forward to meet future development needs.

16.0 The DPD – specifically the allocation of West Hall (site allocation reference GB10) and, to a lesser extent, West Byfleet Junior and Infant School Playing Fields (GB18) – conflicts with the objectives and policies of the West Byfleet Neighbourhood Plan.

16.1 The Core Strategy clearly specifies that Green Belt will need to be released to deliver the development aspirations and requirements of the Council. West Hall has been identified in the context of this broad strategic framework, taking account of a breadth of evidence that is robust and comprehensive. This evidence justifies the allocation of this site, and others put forward in the DPD. As stated in the NPPF, Neighbourhood Plans should support and be in conformity with the delivery of strategic policies contained in local plans or other spatial development strategies.

17.0 The allocation of West Hall (GB10) does not take account of and/or is in conflict with the safeguarding of the site by Surrey County Council's Minerals Plan.

17.1 The designation of mineral safeguarded areas is not an absolute constraint to development. Surrey County Council, the Minerals Planning Authority, have been consulted in the plan preparation process and have not raised an objection to the site's allocation on the grounds of the minerals allocation.

18.0 The density of development on allocated sites in urban areas should be maximised in order to reduce the need to release Green Belt land.

18.1 The Council takes the view that the proposed anticipated densities are reasonable and are broadly in line with the Core Strategy. It is always emphasised that the proposed densities are indicative, based on ranges provided in policy CS10 of the Core Strategy (which are in turn based on the character of the area and on exemplar sites) and actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. Densities could go up or down depending on the nature of the scheme, and this will be managed at pre-application / planning application stage. Paragraph 1.7 above reiterates the need to allocate a range of sites to meet the variety of housing need across the

Borough. Green Belt sites will contribute towards the provision of family homes that could not be met by high density flatted development.

19.0 Development will have a detrimental impact on local habitats, including fields and woodland, and their wildlife.

19.1 During the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological and/or tree survey as a key requirement to assess any site specific ecological issues. The surveys will make sure that trees and other features of environmental, ecological and amenity significance are fully assessed and protected from development, where necessary. Furthermore, development will have to comply with the requirements of policy CS7 and CS8 of the Core Strategy. These policies seek to protect and enhance the biodiversity assets of the Borough.

19.2 The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: *Biodiversity and nature conservation*, and reinforced by Development Management Policies DPD Policy DM1: *Green infrastructure*. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

19.3 If at planning application stage any trees/woodland of value are identified and should be retained, then policies in the Development Plan will ensure any development proposal takes this into account. Examples of such policies include policy CS7 of the Core Strategy mentioned above, and also Development Management Policies DPD Policy DM2: *Trees and landscaping*, as well as the Key Requirements of the site allocation policy.

20.0 Green Belt land in Mayford is fundamental to the physical separation of Woking, Mayford and Guildford; and preserves the strong historical character of Mayford. This should be recognised.

20.1 The Green Belt boundary review assessed parcels of land against the purposes of the Green Belt, one of which is preventing neighbouring towns from merging into one another. Sites GB7, GB8 and GB9 are all in parcel 20 of the Green Belt boundary review. The review concluded that development in this parcel would not reduce the gap between the town and the northern edge of Guildford. Furthermore, the northern part of site allocation GB7 (Nursery Land adjacent to Egley Road) has been designated as an area of local separation to provide a visual gap between Mayford and the rest of the urban area, in order to strengthen the visual separation between Mayford and the rest of Woking.

20.2 The specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the Green Belt boundary review because by definition Woking and its villages are not classified as historic towns. It is acknowledged that Woking has a variety of heritage assets and a rich history dating back many years, and there are sufficient and robust policies to preserve and/or enhance these assets. It is not envisaged that the integrity of any of these assets will be compromised by the proposed allocations.

20.3 It is acknowledged that residents of Mayford wish to preserve the identity and character of the village. The special character of Mayford is recognised by the Council and Core Strategy Policy CS6: *Green Belt* specifically highlights that development will not be allowed if it is considered to have an unacceptable effect on the primarily residential character of the village and Green Belt.

21.0 Development of Green Belt land will lead to urban sprawl.

21.1 The Green Belt boundary review assessed the parcels of Green Belt land against the purposes of the Green Belt, one of which is to check the unrestricted sprawl of large built up areas. None of the proposed allocations will lead to unacceptable urban sprawl.

22.0 The Council should use empty offices / commercial buildings in industrial estates for development instead of using Green Belt land.

22.1 The Council has assessed brownfield sites including empty offices that can be developed for housing and/or alternative uses. However, the amount of land identified from this source is insufficient to meet development requirements over the entire plan period. Green Belt land will be needed in accordance with the Core Strategy and as demonstrated by evidence to meet future development needs. It is important to acknowledge that whilst the focus has been on residential development the Council also has a responsibility to identify sufficient land to meet its economic, social and environmental requirements. Evidence of previously developed land assessed is contained the Strategic Housing Land Availability Assessment, Employment Land Review, Employment Topic Paper and the SA Report for the Site Allocations DPD.

23.0 The proposals in the DPD will have adverse impacts on the heritage assets of the area.

23.1 It is not envisaged that the DPD will have significant adverse impacts on the heritage assets of the area. This is confirmed by the evidence in the SA Report. The Core Strategy (Policy SC20) and the Development Management Policies DPD (Policy DM20) has robust policies to conserve the heritage assets of the area as a result of development impacts. Historic England has also confirmed that they are satisfied that the relationship of the Site Allocations DPD to the policies of the Woking Core Strategy will ensure that development takes place in a sustainable form that reflects the requirements of the NPPF, and by definition, this includes the objective to conserve heritage assets in a manner appropriate to their significance.

24.0 The make-up of the LDF Working Group is unrepresentative. The Councillors are biased towards certain areas. There was also a lack of due process prior to and during the Council meeting in October 2018.

24.1 The Council has a laid down procedure for selecting Members to serve on Working Groups. This has been followed in selecting the cross-party Membership of the Local Development Framework Working Group to scrutinise the plan-making process and make recommendations to the Executive / Council. As an advisory Group, the Working Group appropriately carried out its duties by making recommendations to Council for the October 2018 meeting. The Group gave clear and specific reasons for its recommendations. The Council took them into account before coming to its decision to proceed to Regulation 19 consultation. The correct process has been followed at every stage of the Site Allocations DPD process.

24.1 The Council also has an Overview and Scrutiny Committee, which can recall matters for further scrutiny if deemed necessary. At full Council, all Members are involved in the discussions, making sure that the wider interests of all Councillors representing a range of community interests are taken into account.

24.2 Where necessary, in between these meetings there have been private Members briefings to ensure Members are clear on the reports, and decisions that they will be asked to make. In this regard, all aspects of the political workings of the Council have been engaged in preparing the DPD.

Section 2: Summary of Representations with Officers Responses and Recommendations

Introduction

All of the 'duly made' representations received during the Regulation 19 consultation period have been summarised by Officers, analysed and responded to. The comments received have been arranged into alphabetical order based on the surname or organisation name of the representor. The Council's comments refer to the 'Issues and Matters Topic Paper', which is in Section 1 of this document. A number of other documents referred to, including the Duty to Cooperate Statement, Consultation Statement, Sustainability Appraisal and Habitat Regulations Assessment can be found online at www.woking2027.info/allocations. Other evidence base documents can be found at www.woking2027.info/ldfresearch.

The original representations can also be found on the Woking2027 website. All personal and sensitive information such as email and home addresses have been removed. A list of representations received by organisation and their representatives – including statutory consultees – is also included, to assist in identifying particular representations by surname online. Paper copies of the representations can be inspected at the Council offices by arrangement with the Planning Policy Team. The team can be contacted by email at planning.policy@woking.gov.uk, or by telephone on 01483 743871.

Agent / Group / Organisation Name	Name as it appears in Contents Table below	Representor ID	Representor Name	Page Number in this document
Bell Cornwell LLP on behalf of Octagon Developments Ltd	Octagon Developments Ltd	06586/1	Brake, C	564
Bell Cornwell LLP on behalf of SJR KMN Woking LLP	SJR KMN Woking LLP	06898/1	Alexander, L	659
Bell Cornwell LLP on behalf of Woodham Court landowners	Landowners of Woodham Court	06630/1	Lawrence Bright, T	421
Byfleet Residents Neighbourhood Forum		06903/1	Chapples, G	114
Byfleet Residents Petition	Byfleet Residents	06911/1	Syrett, F	113
Byfleet, West Byfleet and Pyrford Residents Association	Pyrford Residents	06374/1	Grimshaw, A	117
Camphill Club		06619/1	De Netto, M	128
Carter Jonas for Burhill Developments Ltd	Burhill Developments Ltd	06545/1	Gregson, K	101

Carter Jonas on behalf of Burhill Developments Ltd and Randall's Field Ltd	Burhill Developments Ltd and Randall's Field Ltd	06402/1	Wilkinson, R	102
Carter Jonas on behalf of Burhill Developments Ltd	Carter Jonas	06545/3	Wilkinson, R	139
Carter Jonas on behalf of EcoWorld	Eco World	06618/1	Taylor, N	225
Carter Jonas on behalf of Royal Mail	Royal Mail Group Ltd	04942/1	Wilkinson, R	625
Chartplan (2004) Ltd on behalf of Webb South East and Surrey County Council	Webb South East PUT and Surrey County Council	06517/1	Kitcherside, B	771
Childs and Co on behalf of Woodsted Properties Ltd	Woodsted Properties Ltd	06848/1	Childs, P	806
Congregation of St Mary's Church, Byfleet		06927/1	McCabe, J	158
Elmbridge Borough Council		06915/1	Elmbridge Borough Council	234
Environment Agency		06667/1	Green, S	237
Erimax on behalf of Hook Heath Residents' Association	Hook Heath Residents Association	02141/2	Dare, J	366
Firstplan Ltd on behalf of Day Group Ltd	Day Group Ltd	06626/1	Walsh, V	200
FORM Architecture Planning representing landowners	FORM Architecture and Planning	05945/1	Uttley, P	251
Gillings Planning on behalf of Churchgate Services	Churchgate Services	06762/1	Gillings, A	148
Gladman Developments Ltd	Gladman Developments	06683/1	Agnew, R	272
Grant Consulting on behalf of Rutland Ltd	Rutland Ltd	06719/1	Grant, A	630
Guildford Borough Council		06700/1	Stonham, G	302

Haskins Garden Centres Ltd		06576/1	Davidson, M	332
Heathlands Ward	Ashall, S	06629/1	Ashall, S	10
Highways England		06712/1	Beata, G	354
Historic England		06006/1	Byrne, A	358
Hoe Valley Residents Forum		06931/1	Shatwell, R	359
Horsell Common Preservation Society		06909/1	Hoyle, R	373
Indigo Planning Ltd on behalf of McKay Securities Plc	McKay Securities Plc	06538/1	Sharland, K	520
Leigh Place Properties Ltd		06447/1	Bocking, P	449
Mayford Village Society		04811/1	Evans, E	509
Natural England		06392/2	James, J	551
Network Rail		06598/1	Stamp, E	553
Pegasus Group on behalf of Anchor Hanover Group	Anchor Hanover Group	06772/1	Rainey, J	7
Peter Brett Associates on behalf of West Estates Ltd	West Estates Ltd	06412/1	Greep, B	780
Phoenix Cultural Centre	McGinty, E	06362/1	McGinty, E	518
Pyrford Green Belt Action Group		02455/2	Carolin, J	600
Pyrford Neighbourhood Forum		03021/2	Geaves, G	603
Rapleys on behalf of Axis Land Partnership	Axis Land Partnership	06688/1	Asson, H	16
Runnymede Borough Council		06751/1	Pacey, G	627
Savills on behalf of GolDev Woking Ltd	GolDev Woking Ltd	04913/1	Collins, C	472
Savills on behalf of Martin Grant Homes	Martin Grant Homes	06543/2	Mountford, J	496
SGN (gas network operator)	SGN	06741/2	McClafferty, I	641
South Ridge Development LLP		06823/1	Stephen, B	679
Sport England		02605/2	Owen, N	681

Strutt and Parker on behalf of West Hall Ltd	West Hall Ltd	06560/1	Vashi, B	782
Surrey County Council		04960/1	Harrison, K	690
Surrey Nature Partnership	Surrey Wildlife Trust and Surrey Nature Partnership	02277/2	Waite, M	695
Surrey Wildlife Trust	Surrey Wildlife Trust and Surrey Nature Partnership	02277/2	Waite, M	695
Terence O'Rourke Ltd on behalf of McLaren Technology Group Ltd	McLaren Technologies Group Ltd	03027/2	Southgate, T	527
Thakeham Homes Ltd	Thakeham Homes	06315/1	Onuh, J	725
Thames Water Utilities Ltd	Thames Water	02721/2	Hurley, T	726
Thameswey Group		04962/2	Owen, S	729
Turley on behalf of Cala Homes	CALA Homes	06748/2	Palmer, D	123
Turley on behalf of CEPF II (Woking) Ltd	CEPF II (Woking) Limited	06917/1	McFarland, M	141
Turley on behalf of Taylor Wimpey UK Ltd	Taylor Wimpey UK Ltd	06580/1	Home, P	713
		06580/2		717
		06580/3		718
		06580/4		719
Turley on behalf of The Harrison Family	The Harrison Family	06585/1	McFarland, M	323
Union 4 Planning on behalf of Coplan Estates	Coplan Estates	06587/1	Fidgett, S	163
Waverley Borough Council		02415/2	Parrott, G	765
West Byfleet Infant School		06650/1	Woods, A	772
West Byfleet Neighbourhood Forum		05004/1	Pollard, W	774
Westfield Common Residents Association		06358/1	Corney, B	786
Woking Chamber of Commerce		06821/1	Stevens, M	797

Wokingham Borough Council		06800/1	McCabe, J	797
Wood Plc on behalf of National Grid	National Grid	06893/1	Bevins, H	550

Contents

Name: Mrs Kees Van Den Aarssen	1
Name: Ms Susan Adams	1
Name: Mr Anne Adams	2
Name: Mrs Clare Adamson.....	4
Name: Mrs Sally Ahmed	5
Name: Ms And Mr Dee And Bob Allen	5
Name: Mr Simon Amer	6
Name: Anchor Hanover Group	7
Name: Mr Ian Anderson.....	9
Name: Ms Liz Arnott	10
Name: Councillor Simon Ashall	10
Name: Mr Bryan Ashfield.....	11
Name: Ms Robyn Ashfield	12
Name: Mr W G Ashpitel.....	14
Name: Mr David Askew	14
Name: Neil And Pat Atkins	15
Name: Mr Richard Aubry	16
Name: Axis Land Partnership	16
Name: Mr Simon Baker	20
Name: Ms Marisa Baker	21
Name: Mr Mark Baker.....	22
Name: Mr Zac Baker.....	23
Name: Mr G Balchin	24
Name: Ms Vicki Baldwin	25
Name: Mr N Baldwin.....	26
Name: Ms Caroline Balharrie.....	28
Name: Mr Nicholas Bareham.....	29
Name: Mr Steven Barker	30
Name: Mr Lionel Barnes	31
Name: Mr Andrew Barrow	32
Name: Mrs Amanda Barrow.....	32
Name: Mr Edward Bawtree.....	33
Name: Ms Elspeth Bawtree	34
Name: Mr M Beazleigh	36

Name: Mr Henry Beck	36
Name: Mr Michael Beck.....	38
Name: Ms Ann Belcher.....	40
Name: Ms Natalie Berthiaud	41
Name: Mr And Mrs Martin And Pamela Bett	42
Name: Pamela Bett	47
Name: Mr Steven Bews	52
Name: Mrs Tamsin Birch	53
Name: Mr A. M. Bird	54
Name: Mr Gordon Bishop	55
Name: Mr Daniel Black	59
Name: Mr Daniel Black	60
Name: Ms Carolyn Black	62
Name: Mr And Mrs Blake.....	63
Name: Ms Jane Bond	64
Name: Cllr John Bond.....	66
Name: Miss Alison Bond.....	68
Name: Councillor Amanda Boote.....	69
Name: Mrs Cecilia Botha	74
Name: Mrs Cecilia Botha	74
Name: Sandra Boutell.....	75
Name: Ms Andrea Boutell	75
Name: Mr Bruce Bovill	76
Name: Mr Jonathan Bowden	78
Name: Ms And Mr Barbara And Ron Boyse.....	79
Name: Mrs Diana Bradford	79
Name: Mr Nick Bradshaw	80
Name: Mrs Rebecca Bradshaw	80
Name: Mr Stuart Bradshaw.....	82
Name: Alexis Brandon	83
Name: Ms Liz Brann	84
Name: Mrs Carla Brannan	85
Name: Mr Paul Brannan	86
Name: Mr Anthony Brewer	88
Name: Mrs Rachel Brewer.....	90
Name: Maureen And Michael Brewer	90

Name: Ms Sydra Brewitt.....	91
Name: Mr Cobus Breytenbach.....	92
Name: J Briggs.....	93
Name: Mrs Demi Brooks.....	93
Name: Ms Clare Brown.....	94
Name: Mr Charlie Brown	94
Name: Ms Catherine Buchanan.....	95
Name: Sheila Buckley.....	97
Name: Mr Mrs S LJ Bujdoso	98
Name: Mr And Mrs Teresa Bullen.....	99
Name: Burhill Developments Ltd	101
Name: Burhill Developments Ltd and Randall's Field Ltd.....	102
Name: Ms Margaret Burnett.....	105
Name: Mr Graham Burnett.....	106
Name: Mr And Mrs LJ And CE Burnham	106
Name: Louise Burr.....	107
Name: Ms Cara Burton	108
Name: Ms Joanna Butler	108
Name: Mr Christopher Butler	110
Name: Mrs Christine Bye.....	112
Name: Byfleet Residents	113
Name: Byfleet Residents Neighbourhood Forum	114
Name: Byfleet, West Byfleet and Pyrford Residents Association	117
Name: CALA Homes	123
Name: Mrs Claire Calder	125
Name: Jeanne Campbell	128
Name: Camphill Club.....	128
Name: Mr Thomas Canedi.....	129
Name: Mr Bob Carey.....	133
Name: Ms Sheila Carroll.....	133
Name: Mrs Jean-Marie Carroll.....	137
Name: Caroline & Graeme Carter.....	138
Name: Carter Jonas on behalf of Burhill Developments Ltd.....	139
Name: Ms Joy Cassidy	140
Name: CEPF II (Woking) Limited.....	141
Name: Ms Pauline A. Chapples	146

Name: Mr Godfrey H. Chapples.....	147
Name: Churchgate Services	148
Name: Mr Robin Churchill.....	150
Name: Mr John Clark.....	151
Name: Mr Roger Clark.....	151
Name: Mr And Mrs Terry And Adele Clarke.....	152
Name: Mr And Mrs John And Celia Clarke	154
Name: Mr James Clegg.....	154
Name: Mr Michael Collisson	155
Name: Mr Ronald Colvin.....	156
Name: David Colwell	156
Name: Mr And Mrs Colwell	157
Name: Congregation Of St Mary's Chruch Byfleet	158
Name: Mrs Charlotte Cook	159
Name: Mr Michael Cooke	159
Name: Mr Richard Cooke	161
Name: Ms Caroline Coomber	162
Name: Ms Mandy Cooper.....	162
Name: Coplan Estates.....	163
Name: Mr Andy Cornwell.....	167
Name: Ms C Cornwell.....	168
Name: Mr Aidan Corrigan	169
Name: Mr Peter Coulter.....	170
Name: Sally Coulter.....	170
Name: Miss J S Cowan	171
Name: Ms Lynn Cozens	172
Name: Miss Holly Cozens.....	178
Name: Mr P Cozens	178
Name: Ms Kate Craddock.....	181
Name: Mrs Patricia Creedan.....	182
Name: Mr Keith Creswell	183
Name: Ms Fiona Creswick.....	184
Name: Ms Libby Crew	185
Name: Ms Charlote Cripps.....	185
Name: Mr Richard Crockett	186
Name: Mr Matthew Cromey.....	186

Name: Miss Alison Crosby.....	187
Name: C J And A Crouch	188
Name: Mrs Julia Cryer	188
Name: Mr And Mrs Simon And Jackie Curry.....	189
Name: Mr And Ms Adam And Miriam Dalton	191
Name: Ms Isabelle David.....	193
Name: Ms Katrina Davies	194
Name: Ms Lynette Davies.....	195
Name: Ms Fiona Davies	197
Name: Mrs Carole Davis.....	198
Name: Ms Emma Davis	198
Name: Ms Kirstin Dawe	199
Name: Day Group Ltd.....	200
Name: Mr G.R. Deadman	203
Name: Mr Jason Denman.....	204
Name: Mr And Mrs J Dernbach	205
Name: Mr John Dewar.....	205
Name: Ms Sushmita Dharmarajasingham.....	206
Name: Mr Stewart Dick.....	210
Name: Aileen Dick.....	213
Name: Mr And Mrs Brian And Susan Dossett	215
Name: Mrs Christine Dougherty.....	216
Name: Mr Gordon Dow.....	216
Name: Mr Martin Doyle.....	217
Name: John Draper	218
Name: Mr And Mrs David And Jill Drinkwater	220
Name: Ms Lindsay Druckman.....	220
Name: Mr Chris Dunstan	221
Name: Ms Fiona Dunstan	222
Name: Mrs Kelly Dyer.....	222
Name: Ms Charlotte Earl	223
Name: Miss Natalie Ebeling.....	224
Name: Eco World	225
Name: Mrs Chrissie Ecob	227
Name: Mr Paul Egginton.....	229
Name: Mr And Ms Paul And Susan Egginton	231

Name: Mr Alexia Egginton	231
Name: Alexia Egginton	233
Name: Elmbridge Borough Council.....	234
Name: Ms Caroline Emmet.....	234
Name: Mrs Lynden England	236
Name: Mrs Lynden England	237
Name: Environment Agency	237
Name: Mrs Annette Van Essen.....	242
Name: Mr Leslie Evans.....	242
Name: Ms Natalie Evans	244
Name: Ms Melanie Evans	244
Name: Mr Tony Fearon.....	245
Name: Ms Claire Ferguson.....	246
Name: Nigel Field	246
Name: Mr Paul Flaherty.....	247
Name: N W Fletcher	247
Name: Mr Nick Forde.....	248
Name: Mr Stephen Foreman	248
Name: Ms Nina Foreman.....	249
Name: FORM Architecture and Planning	251
Name: Mr John Foster	253
Name: Mr Roger Gahagan.....	254
Name: Ms Carole Gale	256
Name: Mr Ivan Gale.....	257
Name: Mr David Gardiner	257
Name: Miss Hellen Gardner.....	258
Name: Mrs Elizabeth Gathercole	260
Name: Mrs Elizabeth Gathercole	260
Name: Ms Yvonne Geaves	261
Name: Mr Geoff Geaves.....	262
Name: Mr Alan George.....	263
Name: Mrs C M George.....	264
Name: Mrs Teddy Gerretsen	265
Name: Dr Konstantinos Giannoutakis	267
Name: Dr Konstantinos Giannoutakis	268
Name: Dr Konstantinos Giannoutakis	268

Name: Mr Chris Gibbins	269
Name: Julie, John And Martin Gilbert	271
Name: Gladman Developments.....	272
Name: Olwen Glynn-Owen	274
Name: Mr Anthony Goddard	277
Name: Mr Trevor Golding	277
Name: Mrs Helen Golding	278
Name: Mrs Théo Goldsmith.....	278
Name: Mrs Nora Goodman.....	279
Name: Mr Ross Goodman	283
Name: Ms Alice Goring.....	283
Name: Mrs Lisa Graae.....	285
Name: Mr Stephen Grady	286
Name: Ms Eleanor Grady	290
Name: Ms Kathryn Grant.....	293
Name: Mr Peter Graves.....	294
Name: Mr Peter Graves.....	294
Name: Mr And Mrs Thomas And Christine Gray.....	294
Name: Mr Alastair Gray	295
Name: Mr And Mrs Nikola Grenander-Cobb	296
Name: Mr Gerald Griffiths	296
Name: Mr Andrew Grimshaw.....	297
Name: Ms Lucy Grivvell.....	300
Name: Mr Simon Grout.....	300
Name: Ms Ann-Marie Grout.....	301
Name: Ms Jane Groves	302
Name: Guildford Borough Council	302
Name: Miss Lisa Von H	306
Name: Mr Ralph Hales	306
Name: Mr Mike Hales	307
Name: Rita Hales	308
Name: Mrs Linda Hall	308
Name: Mr And Mrs Alan And Catherine Hall.....	309
Name: Mr Peter Hammond	310
Name: Ms Alison Hammond	310
Name: Mr Tobias Hampshire.....	313

Name: Ms Lucy Hampshire.....	315
Name: Ms Susan Hanrahan.....	317
Name: Glenyss Hansell	317
Name: Mrs S Hardesty	318
Name: Mr Tim Hardyman	319
Name: Mrs Alina Hargrave.....	319
Name: Mr Grant Harrison	320
Name: The Harrison Family.....	323
Name: Tim Harrold	328
Name: Mr Matt Hart.....	330
Name: Ms Jane Harvey	331
Name: Ms Carly Harwood.....	331
Name: Haskins Garden Centres Ltd	332
Name: Mr David Hastie.....	334
Name: Ms Mary Hastie	334
Name: Mr A Hastie	334
Name: Barry And Maureen And Joanne Hatcher	335
Name: Mr David And Monica Haward.....	336
Name: Mrs Camilla Hawkins.....	337
Name: Ms Yvonne Heard	337
Name: Mr Andrew Heaton	338
Name: Lynn Heaton.....	338
Name: Mr Harry Heaton.....	339
Name: Mr Liam Hebb.....	340
Name: Ms Lucy Hebb	342
Name: Ms Rosie Hebb.....	344
Name: Mr Ian Hebb	346
Name: Mr Neil Henderson	347
Name: Ms Amanda Hensby.....	348
Name: Mr Clive Hensby.....	349
Name: Mr Steve Henshall.....	350
Name: Ms Samantha Herbert	350
Name: Mr Stephen Hickford.....	353
Name: Highways England	354
Name: Mrs Jillian Hills	355
Name: Mr Keith Hills	355

Name: Mr Michael Hipkins	356
Name: Ms Lynda Hirst	357
Name: Historic England	358
Name: Hoe Valley Residents Forum	359
Name: Jill And Kevin Holland.....	361
Name: Mrs Julie Holloway	362
Name: Ms Louise Holman	362
Name: Mr Denis Holmes.....	363
Name: Hook Heath Residents Association	366
Name: Mr Michael Hopgood	370
Name: James Hopkins.....	371
Name: Lesley Hopkins.....	372
Name: Horsell Common Preservation Society	373
Name: Mr Peter Hoskyn	374
Name: Mrs Penelope A Hoskyn.....	378
Name: Dr David Howbrook	379
Name: Ms Dawn Howells.....	380
Name: Mr Martin Howells	381
Name: Councillor Deborah Hughes	382
Name: Greta Hughson.....	384
Name: Derya Ibrahim.....	385
Name: Mr And Mrs Leo And Monica Iles.....	386
Name: Mr David James	386
Name: Mr Stuart James.....	387
Name: Mr Keiron James	387
Name: Stephanie James	388
Name: Mr N.R. Jarman.....	390
Name: Mr Graham Jarvis.....	392
Name: Ms Louise Jelly.....	392
Name: Ms Andrea Jenner.....	393
Name: Mr A Jennings	394
Name: Mr Erik Jespersen	396
Name: Mr Tom Jestico.....	397
Name: Mr Tom Jestico.....	398
Name: Jean Jobson.....	398
Name: Ms Christine Johnson.....	399

Name: Mr Gary Johnson.....	400
Name: Mr Peter Jones.....	401
Name: Helena Jones	405
Name: Mr Barry Jones.....	405
Name: Mr Stephen Joseph	406
Name: Ms Sushmita Kakati.....	406
Name: Peter Kane	407
Name: Helen Kelly.....	408
Name: Phil And Julia Kenworthy.....	409
Name: Mrs Margaret Keys.....	411
Name: Mr Martin Keys.....	412
Name: Ms Angela King.....	412
Name: Mr Jonathan King.....	413
Name: Mr And Mrs Brian John And Rosemary Kirby	415
Name: Ms Jean Knott.....	416
Name: Ms Jean Knott.....	417
Name: Mr Tony Kremer	418
Name: Ms Lisa Land.....	420
Name: Mr David Lander.....	420
Name: Landowners of Woodham Court.....	421
Name: Mr Simon Lane.....	423
Name: Mr Guy Langston.....	424
Name: Mrs Sarah Lardner	428
Name: Dr Benjamin Larwood.....	429
Name: Mrs And Mr Katherine And David Mark Laver.....	431
Name: Ms Katherine Laver	431
Name: Mr Richard S Lawrence.....	432
Name: Heather Lawrence OBE	432
Name: Ms Charlotte Lawrie	433
Name: Mr And Ms John And Lindsay Lay.....	435
Name: Mr Tom Leader.....	436
Name: Mr Mike LeBez	436
Name: Ms Carol Le'Bez.....	441
Name: Ms Claire Lee.....	442
Name: Mr Andrew Lee.....	444
Name: Ms Elizabeth Leese.....	445

Name: Mr Mike Legg	447
Name: Leigh Place Properties Ltd	449
Name: Ms Rosanna Leney	451
Name: Mr Robert Leney	452
Name: Lisa Leonard	453
Name: Mr Andrew Leong-Son	454
Name: Mrs Julie Lewis.....	457
Name: Mr Richard Ley.....	459
Name: Mr Christopher Light.....	459
Name: Mr James Linehan.....	459
Name: Ms Lucy Lines	460
Name: Taranjeet De Lisio	461
Name: Arnaldo De Lisio.....	462
Name: Mr And Mrs Roy And Pam Lomax	464
Name: Miss Claire Lonsdale	464
Name: The Rt Hon Jonathan Lord	465
Name: Ms Suzanne Lovell.....	470
Name: Mr Richard Lovell	471
Name: GolDev Woking Ltd	472
Name: Mr Stephen Lutley	477
Name: Mr And Mrs William And Beryl MacConnol	479
Name: Mr Paul Mace	480
Name: Mr Neil Maclennan	481
Name: Dr Rudo N Madada-Nyakauru	482
Name: Mr Andrew Malcher	483
Name: Mr Andrew Malcher	483
Name: Mrs Marion Malcher.....	484
Name: Mrs Marion Malcher.....	485
Name: Mrs Marion Malcher.....	487
Name: Mrs Marion Malcher.....	488
Name: Mrs Marion Malcher.....	489
Name: Mrs Marion Malcher.....	489
Name: Mrs Marion Malcher.....	490
Name: Mrs Daniela Marev	491
Name: Ms Annabel Marks	493
Name: Mr Chris Martin.....	495

Name: Martin Grant Homes	496
Name: Ms Jessica Masey	502
Name: Thomas Masey.....	502
Name: Mrs Louise Mason	503
Name: Dr Ian Mason.....	504
Name: Mr Hugo Mason.....	505
Name: Ms Mary Mauvis	506
Name: Mr Jean-Francois Mauvis	506
Name: Ms Judith Mawhood	506
Name: Mr Roger Mawhood.....	508
Name: Mayford Village Society.....	509
Name: Mr Ian McAtamney	512
Name: Rev Dr John McCabe	514
Name: B McConville	514
Name: Ms Jan McDermott	515
Name: Ms Elaine McGinty	518
Name: Dr M A McHarg-Parry.....	519
Name: Dr M A McHarg-Parry.....	520
Name: McKay Securities PLC.....	520
Name: Mr Jonathan McKenna	524
Name: Mr And Mrs Walter McLaren.....	525
Name: Mr Bruce McLaren.....	525
Name: McLaren Technologies Group LTD.....	527
Name: Mr David McQueen	533
Name: Ms Julie McQueen	534
Name: Fay Meadows.....	535
Name: Ms Marianne Meinke	535
Name: Mr William Menzel.....	538
Name: Ms Florence Mills	539
Name: Mr Ian Mills.....	539
Name: Mr Colin Mitchell.....	540
Name: Mr Jonathan Mole	540
Name: Aine Montague	541
Name: Miss Hollie Moore.....	541
Name: Councillor Louise Morales	542
Name: Ana Moreira	544

Name: Mr Derek Morton	544
Name: Ms Lucia Mosko	545
Name: Mr David Moxey	546
Name: Mr Andrew Murphy	546
Name: Ms Lucy Murphy	547
Name: Miss Daphne Murray	550
Name: National Grid	550
Name: Natural England	551
Name: Ms Patricia Van Nederveen	552
Name: Network Rail	553
Name: Mr Roland Nevett	554
Name: Ms Fran Nevett	555
Name: Mr Matt Newman	556
Name: Ms Debbie Nicholson	557
Name: Mr Ian Nicholson	558
Name: Mr Simon Nicholson	559
Name: Mr James Nicholson	560
Name: Mr And Ms Roger And Maureen Nuttall	561
Name: Mr Adrian O'Callaghan	564
Name: Octagon Developments Ltd	564
Name: Mr And Mrs Gerry And Barbara O'Malley	566
Name: Mr David Orledge	567
Name: Mrs Sharon Osborn	568
Name: Mr Cary Osborn	569
Name: Mr Mrs S Owen	571
Name: Ms Lynda Parry	573
Name: Mr Paul Parsons	574
Name: Ms Lorraine Parsons	574
Name: Mr Kenneth Pearce	574
Name: Mr Steve Peckham	575
Name: Mr Steve Peckham	578
Name: Ms Charmaine Peckham	578
Name: Mr Christopher Penabad	582
Name: Karen Penry	583
Name: Jane And Mark Perry	584
Name: Mr Richard Phillips	586

Name: Ms Linda Pitchford-Jones	587
Name: Ms Sue Platt.....	588
Name: Ms Judith Pollard.....	588
Name: Mr David Pope	589
Name: Mr Hugh Pope	590
Name: Ms Shailie Post	590
Name: Mr James Post	591
Name: Mrs Thelma Powell.....	592
Name: Ms Nicola Powell.....	592
Name: Mr P C Preston.....	593
Name: Mr James Pretty.....	594
Name: Mr Andrew Price.....	595
Name: Mr And Mrs J Pridden.....	597
Name: Mr Bill Pugh.....	598
Name: Ms Libby Punter	598
Name: Mr And Ms Andy And Liz Puttock	599
Name: Pyrford Green Belt Action Group.....	600
Name: Pyrford Neighbourhood Forum	603
Name: Mrs Nicola Quibell	605
Name: Ms Wendy Quintal.....	605
Name: Mr Justin Quintal	606
Name: Mr Peter Quinton.....	607
Name: Ms Susan Randall	608
Name: Mr Malcolm Rapps	609
Name: Mr Frank Ray	609
Name: Mrs E Redknap	610
Name: Ms Joanne Reed	610
Name: Ms Kathryn Reeves.....	611
Name: Mr Michael Reilly.....	612
Name: Mr Mark Rennie.....	612
Name: Mr Paul Reynoldson.....	613
Name: Anthony Rich.....	614
Name: Mr David Robbins.....	615
Name: Mr John Roberts.....	617
Name: Mr Matthew Roberts.....	618
Name: Mr Justin Robinson.....	619

Name: Mrs Adeline Roche	619
Name: Mrs C Rocke	621
Name: Winn Rose	621
Name: Mr David Rousham.....	622
Name: Mr David Routley.....	622
Name: Liesel Roux	623
Name: Mr Glyn Rowlands.....	625
Name: Royal Mail Group Ltd.....	626
Name: Runnymede Borough Council.....	627
Name: Mr Simon Ruston	629
Name: Rutland Ltd.....	630
Name: Mrs Rachel Rutter	632
Name: Mr Iain Rutter	632
Name: Mr And Mrs Ryan	633
Name: Mrs Jennifer Ryan	634
Name: Mr Akeel Sachak	634
Name: Katie Saker	635
Name: Mr Christian Schramm.....	635
Name: Mr Peter Thomas Ashton Scott	636
Name: Mr And Mrs David And Johanna Seear	637
Name: Ms Jane Sevenoaks	638
Name: Mrs Victoria Seymour	640
Name: SGN	641
Name: Mr Robert Shatwell.....	642
Name: Mr Robert Shatwell.....	643
Name: Mr Antony Shepheard	645
Name: Mrs Margaret Mary Shepheard.....	645
Name: Mrs Sandra Simkin.....	646
Name: Mr Andrew Simon.....	648
Name: Mrs Nina Simon.....	651
Name: Ms Joanne Simpson MBE	653
Name: Mr Dharma Sivarajasingham	654
Name: SJR KMN Woking LLP	659
Name: Ms Ellie Slade	661
Name: Mr Mark Slater.....	663
Name: Ms Shellie Slater	665

Name: Ms Emma Slaymaker	666
Name: Mr Jeff Smeeton	668
Name: Ms Shareen Smeeton	669
Name: Mr Philip Smith	670
Name: Mr Alan Smith	672
Name: Mr Mat Smith	673
Name: Mr And Mrs Smith	673
Name: Mrs Christina Smith	674
Name: Mr Bruce Smith	675
Name: Mr Richard Snape	676
Name: Mrs Lotte Snowden	676
Name: Mr John Snowden	678
Name: South Ridge Development LLP	679
Name: Mr Michael Spears	680
Name: Sport England	681
Name: Mr Peter Spreckley	682
Name: Ms And Mr Alison And Raymond Adams And Standage	683
Name: Mr Vaughan Starkey	684
Name: Mrs Susan Stedman	684
Name: Mr Rod Steel	685
Name: Mr Mark Stevens	687
Name: Mr And Mrs Robert And June Stonard	687
Name: Mr Richard Stringfellow	688
Name: Mr Richard Stringfellow	690
Name: Surrey County Council	690
Name: Surrey Wildlife Trust and Surrey Nature Partnership	695
Name: Ms Fleur Syrett	699
Name: Mr Paul Syrett	702
Name: Mr Geoff Syrett	705
Name: Mr Fiona Syrett	708
Name: Mr Mark Takla	710
Name: Mr Matt Tarrant	711
Name: Mr Matt Tarrant	711
Name: Mr John Taylor	712
Name: Taylor Wimpey UK Ltd	713
Name: Taylor Wimpey UK Ltd	717

Name: Taylor Wimpey UK Ltd	718
Name: Taylor Wimpey UK Ltd	719
Name: Mr Julian Temple.....	724
Name: Thakeham Homes	725
Name: Thames Water.....	726
Name: Thameswey Group.....	729
Name: Mr Richard Thomas.....	731
Name: Mr David Thompson.....	732
Name: Ms Genevieve Thompson.....	733
Name: Mrs Roberta Tilley	734
Name: Mr Robert Tilley.....	734
Name: Miss Beverley Tourle.....	735
Name: Mr And Mrs Towner.....	738
Name: Mr Tu Tran	741
Name: Mrs Glenis Trangmar.....	743
Name: Mr Tony Trangmar	743
Name: Ms Yvette-Louise Tree	745
Name: Mrs Barbara Tucker.....	746
Name: Mr Andrew Turner	746
Name: Mr Stephen Twilley.....	747
Name: Ms Joan Vacha	751
Name: Mr Pietro Valentino.....	751
Name: Mr Michael Valter	753
Name: Mrs Janet Berry, Mr Andrew Berry And Mr Edwin Wakefield	754
Name: Mrs Suzanne Wakeley	754
Name: Mr Julian Wakeley.....	755
Name: Mr Julian Wakeley.....	756
Name: Mr Julian Wakeley.....	756
Name: Mr Bob Waldie.....	757
Name: MRS J S Walker.....	758
Name: Mr And Mrs N Walter.....	759
Name: Mr Josh Warby	760
Name: Mrs Sally Ward.....	760
Name: Mrs Barbara J Warren	762
Name: Mrs Penelope Watson	763
Name: Ms Marjorie Watson	764

Name: Waverley Borough Council	765
Name: Mr Peter Webb	768
Name: Webb South East PUT and Surrey County Council	771
Name: Ms Penny Weiss	772
Name: West Byfleet Infant School	772
Name: West Byfleet Neighbourhood Forum.....	774
Name: West Estates Ltd	780
Name: West Hall Ltd.....	782
Name: Westfield Common Residents Association	786
Name: Ms Tessa Westlake	788
Name: Mr Ian A White	789
Name: Mr Daniel White.....	790
Name: Mr Huw Wigley	790
Name: Mr Simon Wilby	792
Name: Mrs Elizabeth Wild	793
Name: Neil Willetts	794
Name: Mr Anthony Williams.....	795
Name: Ms Frances Willis	795
Name: Mrs J Wilman	796
Name: Woking Chamber of Commerce	797
Name: Wokingham Borough Council	797
Name: Ms Rachel Rebecca Woods	799
Name: Angela Woods.....	801
Name: Mr Mike Woods	803
Name: Mr James Woods	805
Name: Woodsted Properties Ltd	806
Name: Woodsted Properties Ltd	808
Name: Mr Norman Woolley.....	809
Name: Mrs Debbie Wordingham.....	810
Name: Mr A J Wyatt.....	810
Name: Ms Angela Wyatt.....	811
Name: Mrs Kathryn Young.....	811
Name: Mr David Young	813
Name: Mrs Kay Young.....	813

Representations

Contributor Reference: 05857/1
Name: Mrs Kees Van Den Aarssen
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Concerned about building on the Green Belt around West Byfleet. Infrastructure cannot cope - roads, healthcare services nor schools will be able to cope with increased numbers. Concerned about air pollution given proximity to M25, A3 and in between major airports. This busy part of Surrey cannot accommodate so many houses.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council responds to concerns about infrastructure capacity in full in its Regulation 19 Issues and Matters Topic Paper, including concerns about schools, healthcare facilities and roads. Concerns regarding air pollution are addressed in Section 8 of the Topic Paper.
Response Reference: U0001542
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05106/1
Name: Ms Susan Adams
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA15
Summary of Comment: Considers that the DPD does not comply with the Duty to Cooperate. The DPD does not show that the Phoenix Culture Centre is currently located in the Quake premises, or present plans to move this project into a new space. Considers that the Site Allocations DPD, the Core Strategy DPD, and the IDP all support the need for community, culture, higher education and leisure. Woking is in need of a music venue combined with a community-led culture centre. The Phoenix Culture Centre fulfils needs, offering community space, higher education through apprenticeships, adult education through workshops, music and leisure. It is inclusive and supports all age groups. The DPD stipulates that UA15 should make improvements to the public realm. The Phoenix Culture Centre and Fiery Bird strongly supports the quality of the public realm. UA2, UA3, UA15, UA25, GB7, GB17 all include allocations for leisure facilities, which provides opportunity for the relocation of the Phoenix Culture Centre. Relocating the Phoenix Culture Centre fulfils the below objectives: 1. Core Strategy objectives 1,5, 9, 12 and 13. 2. The Core Strategy's Spatial Vision (in particular the need for culture and community) 3. IDP points 9.0, 10.0, and 11.0 regarding education, positive programs for mental health and isolated individuals, shared spaces, cultural connections, preserving and showcasing Woking's music. The Core Strategy's SWOT analysis identifies an increasing size of elderly and dependent population and pockets of deprivation. The Phoenix Culture Centre can help to address these.

<p>The Phoenix Culture Centre addresses Core Strategy Policies CS13 and CS19. The IDP projects that population growth over the Core Strategy period, in particular amongst youth or older age groups, could lead to a requirement to provide additional services or facilities. Although the Borough appears relatively well-served by a range of community facilities, the 2011 Study identifies various facilities which could benefit from redevelopment/refurbishment, and identified opportunities for new facilities and/or co-location of services within community hubs.</p> <p>Does not wish to participate at the public examination.</p> <p>Wishes to be informed when the DPD progresses to the next stages.</p>
<p>Contributor Proposed Modification: Working needs a space for the Phoenix Culture Centre.</p>
<p>Modification Reference: U0000351</p>
<p>Officer Response: It is noted that the Site Allocations does not deal with individual operations, but focuses mainly on types of use. It is noted that UA15 is allocated for a mixed use scheme to comprise community, leisure, offices, retail and residential including Affordable Housing. Given that the allocation includes Community uses, it is noted that the respondent may wish to negotiate with the developer should they wish to remain at this location.</p> <p>More generally, it is noted that Core Strategy Policy CS19 sets out that the Council will work with its partners to provide accessible and sustainable community infrastructure to support growth in the Borough. It will do so by promoting the use of social and community infrastructure for a range of uses.</p>
<p>Response Reference: U0001337</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06788/1</p>
<p>Name: Mr Anne Adams</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB12, GB18</p>
<p>Summary of Comment: Objects to the DPD with regard to the proposed 1000 new dwellings and 21 traveller pitches which are to be located on Green Belt land in Byfleet and West Byfleet, due to:</p> <ul style="list-style-type: none"> - Flooding: land considered in West Byfleet and particularly Byfleet (mapped as floodplain) gets saturated annually with rainwater, which cannot drain away (as M25 was built on drainage ditches). - People will be exposed to pollution from traffic on M25 (junction 10-11 is in constant gridlock) and from the constantly busy A245. - Inadequate infrastructure: roads cannot take further traffic, schools are at bursting point, no GP surgeries available (none in Byfleet - everyone goes to West Byfleet). Thousands more cars on the road would lead to overcrowding and dangerous conditions. Byfleet and West Byfleet would suffer overdevelopment. Only Emerald House in Byfleet should be developed for social housing. - The wildlife of our little remaining Greenbelt should be protected. Sloe worms, bats, stag beetles, badgers, buzzards and other wildlife lives here. - Disproportionate amount of development in this area, which is limited by boundaries of M25, canal, river and railway.
<p>Contributor Proposed Modification: Emerald House in Byfleet should be allocated for social housing.</p>
<p>Modification Reference: U0000228</p>

Officer Response: The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Council's Regulation 19 Issues and Matters Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The comments regarding pollution are addressed in Section 8 of the Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. Details of any access arrangements will be determined as part of the development management process at planning application stage, once the detailed layout and configuration of the sites are better known. The Council is confident that safe and suitable access arrangements are achievable on all allocated sites.

Section 5 of the Topic Paper addresses concerns regarding the disproportionate allocation for development in Byfleet and West Byfleet. Given that most of the housing need is generated from within the Borough, the Council is confident that the Borough can accommodate the proposed housing and the population associated with it, and it will not amount to overcrowding. Emerald House in Byfleet is currently in employment use, and the redevelopment of the site would therefore be encouraged for continued employment use to provide further employment opportunities in the area. The Core Strategy policy CS15 would only support the redevelopment of these sites for alternative uses - such as social housing - where the existing use of the site causes harm to amenity and/or it can be demonstrated that the location is unsuitable for the needs of modern business. Should a planning application come forward for the site as a windfall development it would be assessed against existing planning policies, including on retention of viable employment sites. Section 11 of the Topic Paper describes in detail how the assessment of alternative brownfield sites was conducted.

Section 19 of the Topic Paper responds to concerns about the impact of releasing Green Belt land on wildlife and habitats. Section 4 responds to concerns about the impact on the wellbeing and amenity of residents.

Section 12 describes the Green Belt Boundary Review methodology in more detail.

Response Reference: U0001513

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):
Contributor Reference: 06808/1
Name: Mrs Clare Adamson
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: The DPD is not legally compliant: the proposals would not provide suitable living accommodation for future residents. The infrastructure is inadequate - congested roads; lack of GP surgery or dentist in Byfleet; primary school at capacity; no secondary school provision. Greenbelt land in Byfleet should not be released, particularly near St Mary's Church. It should in fact be protected from flooding and overdevelopment. The DPD has not been positively prepared, is not justified, nor is it consistent with national policy. It is unsound.
Contributor Proposed Modification: At a minimum, a doctors surgery and NHS dentist must be provided in Byfleet village.
Modification Reference: U0000252
Officer Response: The Council's Regulation 19 Issues and Matters Topic Paper provides a detailed response. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. The concern about land in ownership of St Mary's Church has been addressed in Section 15 of the Topic Paper. The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward. The representation regarding overdevelopment and lack of need for Green Belt land is addressed in Section 1 of the Topic Paper. Section 2 sets out in detail why sites GB4 and GB5 need to be safeguarded for development beyond 2027. Sites GB4 and GB5 have not yet been allocated for development, only safeguarded, in recognition of the fact that needs, and the planning policies reflecting them, may change beyond 2027.

Response Reference: U0001524
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06496/1
Name: Mrs Sally Ahmed
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Plans are aggressive, do not properly consider existing homeowners in West Byfleet. Wish to participate in examination in public, due to serious safety concerns for my family.
Contributor Proposed Modification: Suggest to significantly reduce number of purposed new homes in West Byfleet area and remove the travelers pitch as this will have significant impact on current residents in area
Modification Reference: U0000114
Officer Response: The impact of the proposals on the amenity of existing residents is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4.
Response Reference: U0001574
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06628/1
Name: Ms And Mr Dee And Bob Allen
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Strongly opposed to proposals for site GB7. This proposal would be the nail in the coffin for Mayford's character and for the Green Belt, after continuing desecration. The green lung between Mayford and Woking would be lost, creating one big metropolitan area or 'concrete corridor' and destroying Mayford's village status, against the wishes of many villagers. Concerned about the loss of many trees and therefore wildlife. Concerned about far more congested roads in an area that has already suffered a massive increase in traffic, precipitating gridlock and more accidents, as well as noise and pollution. Concerned about even more pressure on local services.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on the gap between Mayford and Woking is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 20. The impact of the proposals on wildlife and trees in general is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. However, the importance of the woodland within Site GB7 does merit further recognition and additional text will be inserted into the policy to ensure its protection. The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.

The impact of the proposals on infrastructure and services is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.
Response Reference: U0001013
Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site". Amend third paragraph of reasoned justification to read 118 dwellings.
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06887/1
Name: Mr Simon Amer
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB09
Summary of Comment: No comment on legal compliance Proposing a modification regarding GB9 and the green belt land to the north. This land is identified on the main plan as Escarpment and Rising Ground of Landscape Importance. Woking Council should take all possible steps to protect this area and not release it from green belt status unless there are exceptional circumstances. Understands that the rationale of removing the greenbelt status is to create a clear defensible boundary, however the current boundary appears relatively clear and defensible. If the safeguarded use of GB9 as green infrastructure can be achieved within the greenbelt then this would be preferable. Similarly the land to the north of GB9 is proposed to become part of the urban infrastructure. Understands from discussions with planning officers that the DPD will be amended to make it clear that this area is not for development, and this is most welcome, however again it would be preferable if this area could remain as green belt. No comment on has the DPD been positively prepared, justified, its effective, its soundness and its consistency with national policy. Does not wish to participate in the examination in public and wishes to be informed of the next stages.
Contributor Proposed Modification: GB9 should remain in the Green Belt.
Modification Reference: U0000403
Officer Response: The council is aware of the importance of the Escarpment and Rising Ground of Landscape Importance. The Development Plan has several planning policies that aim to protect and enhance this important landscape asset, particularly policy CS24 Woking's landscape and townscape. The representation is correct, the removal of this site from the Green Belt will ensure a strong defensible boundary and the Council is proposing a modification to provide further protection from development to Parcel 20g within the plan period. This modification will extend the site northwards to include this parcel, to make it part of the safeguarded land. This means that while it will be released from the Green Belt upon adoption of the plan, it will not be released for development until 2027, through a review of the Core Strategy and/or Site Allocations DPD. This parcel includes residential properties and for this reason a distinction will be made, using a hatched area on the site plan, to show that this area is not intended for Green Infrastructure. Until 2027, development at any part of the site will have to comply with the Green Belt policies in the development plan. A specific policy and key requirements to guide development at the site, noting the distinction in the amended proposed hatched area (parcel 20g) will be developed and determined as part of the review of the Core Strategy and/or the Site Allocations DPD.
Response Reference: U0001110

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06772/1
Name: Anchor Hanover Group
Number of Signatories: 1
Comment Type: COMM
Site Reference: GB10
<p>Summary of Comment: Considers that the DPD is legally compliant, sound and complies with the Duty to Cooperate.</p> <p>Wishes to participate at the public examination; wishes to be informed when the DPD progresses to the next stages.</p> <p>Anchor Hanover Group (AHG) owns West Hall Care Home which specialises in dementia care. AHG considers it imperative that any further development within the vicinity of West Hall does not impinge on its successful operation or its residents, especially those who require specialised care.</p> <p>It is recognised that at the time of adoption of the Core Strategy the Council had a demonstrable supply of 3,966 homes against a policy requirement of 4,964 through to 2027. It is further recognised that additional sites would be required toward the end of the plan period, and that this would likely necessitate Green Belt release. GB10 is one site contributing to this requirement.</p> <p>West Surrey Strategic Housing Market Assessment (September 2015) does not appear to have been appropriately reflected in the DPD. The SHMA notes that in West Surrey HMA, the 65+ demographic is forecast to increase by over 48% by 2033. The situation is not simply about the population getting older, but also the associated implications including related health issues and increased demands on NHS services and social services. The SHMA identifies the additional need for 1,031 care home bed spaces by 2033, which is in addition to the identified need for extra care. The Council must give careful consideration to a spatial solution which at present appears to be lacking within the DPD, despite the evidence available.</p> <p>The Traveller Accommodation Assessment identifies the need for an additional 19 pitches between 2012-2027 and a further 11 pitches between 2027-2040. It is noted that the DPD takes a sequential approach to meeting this need. It is noted that the text within the DPD refers incorrectly to a SANG proposal, Policy GB13.</p> <p>Supports the conclusion in the Green Belt Boundary Review that "Parcel 4 is particularly sensitive in landscape terms but this has been weighed against its very high potential to deliver sustainable development. However, any development delivered here will need to be sensitively designed to create a strong landscape edge to the settlement." Argues that, further to this, the Council should consider a comprehensive master plan in the location, taking account of West Hall Care Home's very special requirements, including appropriate buffers if necessary.</p> <p>Agrees that GB10 is suitable for residential-related uses, but questions why the Council has not considered the contribution it could make to delivering accommodation for older people or specialist care, given the wealth of evidence suggesting significant need. This is particularly important given the site's adjacency to a care facility. It is noted that AHG is in discussion with the land owner regarding an element of specialist housing being delivered on site should the allocation come forward.</p> <p>Argues that it is unclear why the Council is seeking to provide Gypsy and Traveller pitches at GB10. It appears that such a use has not been promoted by the landowners based on the SHLAA submission. Indeed the Green Belt Boundary Review found that parcels 6 and 20 were also suitable for accommodation of up to 15 traveller pitches. It is also considered</p>

that insufficient consideration has been given to the location of traveller pitches within GB10.
Recognises that there are presently traffic congestion issues, and hopes that through the masterplanning process adequate consideration is given to traffic impacts and mitigation. Access to the West Hall site must be possible at all times, especially for emergency services.
Considers that the proximity of GB10 to West Hall Care Home also requires careful consideration to be given to the location of the traveller pitches, particularly where residents are likely to be more susceptible to changes to the present amenity of the site. This is considered an important factor which must be considered as part of the masterplanning process.

Contributor Proposed Modification: Would welcome the policy being amended to allow accommodation for older people or specialist care to come forward.
Recommends that the policy be amended to require a masterplanning process, actively involving all landowners within the immediate vicinity, prior to the release of land.
Wishes to work with the council and the major landowner to explore the opportunities of additional extra care facilities within the area to supplement West Hall Care Home

Modification Reference: U0000194

Officer Response: The Council considers that it has taken a credible and robust approach to making provision for C2 accommodation. It must first be noted that Policy CS13 of the Core Strategy provides in principle support for the development of specialist accommodation for older people in suitable locations. Policy CS13 also specifies that the Council will allocate specific sites through the Site Allocations DPD to assist in bringing suitable sites forward to meet need. A suitable site, GB11, has indeed been identified to contribute to meeting this need, and the site has extant permission for 155 C2 bedrooms. Furthermore, the provision in CS13 clarifies that the Site Allocations DPD is not intending to allocate a quantum of sites to meet need for C2 units in full, but rather to contribute to this objective. The Site Allocations DPD and the SHLAA identify a range of sites that are deliverable or developable for residential development. The development of these sites could come forward to include elderly people's accommodation if there is market demand for it. The Council considers that such an approach is sound, given the current development pipeline. It is recognised that over the past five years, completions have been relatively modest; twenty dwellings/bed spaces have been delivered between 2013/14 and 2017/18. However, a significant number of units have been permitted more recently. 231 dwellings/bed spaces have been permitted between 2015/16 and 2017/18. This equates to an average of 77 permitted units per annum.
The West Surrey Housing Market Area Assessment specifies a projected need of 918 units between 2013-2033. Taking into account historic undersupply of 209.5 units over the past five years, this creates an extant annual need of 75.2 units per year over the next fifteen years to 2033. While it is acknowledged that not all permissions will be implemented, the number of permissions that have been issued in the past three years provides assurance that market values are sufficient to ensure that schemes for older people's accommodation continue to come forwards. Indeed the aforementioned permission for 155 C2 bedrooms at Broadoaks in February 2019 lends further weight to this argument.
The finding of the Green Belt Boundary Review that "Parcel 4 is particularly sensitive in landscape terms" has been accounted for in proposed Policy GB10. As stated in the Regulation 19 Issues and Matters Topic Paper, the West Hall allocation and reasoned justification outlines that approximately 4.7ha of public open space and green infrastructure should be integrated at the site, and that large areas of woodland and parkland setting should be retained.
As outlined above, it is also noted that the site's allocation for residential development would allow scope for older persons' accommodation.

<p>Section 3 of the Draft Site Allocations DPD Regulation 19 Issues and Matters Topic Paper sets out clearly the credible sequential approach which the Council has taken to allocating sites for Traveller Pitches. More specifically, Paragraph 3.10 sets out that the proposed allocations include a list of key requirements to be met to make sure that the development of the site is acceptable, including that the siting, layout and design of the site minimises any adverse impact on the amenity of nearby residents and the landscape setting of the area. Indeed the Council is satisfied that the combined effects of the key requirements will ensure that the development of the site is sustainable.</p> <p>Section 13 of the Draft Site Allocations DPD Regulation 19 Issues and Matters Topic Paper addresses the issue of congestion comprehensively, and Paragraph 13.3 confirms that the Council has worked with Surrey County Council to identify the potential mitigation measures that might be necessary to address development impacts on the network. In addition, Paragraph 13.2 provides that specific key requirements have been incorporated in the relevant proposed allocations to make sure that the development impacts are fully assessed and appropriate site specific measures are identified to address any adverse impacts. This includes Site GB10 which has a key requirement for a Transport Assessment.</p> <p>In this regard, the key requirements of the Policy are considered to obviate any need for a formal masterplanning process.</p>
<p>Response Reference: U0001251</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick): T</p>
<p>Contributor Reference: 06742/1</p>
<p>Name: Mr Ian Anderson</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: SUPP</p>
<p>Site Reference: UA15</p>
<p>Summary of Comment: Supports the provision of a permanent space for Fiery Bird/Phoenix Cultural Centre CIC to provide live music, cultural and community activities in the town centre. This facility has resulted in a positive social, community and educational impact on the borough. It improves the identity of the town and supports grassroots emerging music. From personal experience, is beneficial for a diverse range of people, including those with e.g. dementia. Improves self-confidence. The facility is currently within site allocation UA15, proposed for leisure and community use. A permanent, alternative space (as accepted by the Council in 2014) should be identified to reduce uncertainty.</p>
<p>Contributor Proposed Modification: Identify a permanent location for the re-provision of the Fiery Bird / Phoenix Cultural Centre CIC to end uncertainty around this valuable facility.</p>
<p>Modification Reference: U0000305</p>
<p>Officer Response: The Council recognises the contribution that the organisation makes to the local community, and that it is a valued venue. However, the Site Allocation DPD does not deal with individual companies but focusses mainly on uses. The Big Apple site allocation UA15 is allocated for mixed uses, including community uses. If existing users would like to initiate discussion with prospective developers and/or the owner of the land to occupy the premises in the future, there is scope for that to occur. Otherwise, as mentioned in the representation, the organisation is welcome to continue separate discussions with the Council (a separate team to that in the Local Planning Authority who are preparing the DPD) to help identify alternative site availability.</p>
<p>Response Reference: U0001409</p>

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06595/1
Name: Ms Liz Arnott
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA19
Summary of Comment: Objects to any sites which will be developed for high rise buildings. UA19 should be kept low rise to remain in keeping with Horsell Village, rather than form as an extension to the Town Centre on the other side of Lockfield Drive and the canal. There should be a way to comment on planning applications so that full names and addresses are not published online, privacy is important, so people may be deterred from commenting.
Contributor Proposed Modification: UA19 should be kept low rise to remain in keeping with Horsell Village, rather than form as an extension to the Town Centre on the other side of Lockfield Drive and the canal.
Modification Reference: U0000369
Officer Response: Within the UA19 policy there is a Key Requirement for development to consider the local context in terms of building heights. Should a development come forward for the site, this Key Requirement would facilitate a scheme which is appropriate for the area in terms of height. This will be determined at the development management stage where the application will be fully assessed in greater detail. The issue regarding commenting on planning applications is beyond the remit of the Site Allocations DPD.
Response Reference: U0001601
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06629/1
Name: Councillor Simon Ashall
Number of Signatories: 3
Comment Type: OBJ
Site Reference: GB07, GB09
Summary of Comment: GB9 - the proposal is unsound. It fails to have regard for NPPF s136 which states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and where strategic policies determine. The purpose of the proposal is to safeguard for Green Infrastructure to support nearby development and to ensure a strong Green Belt boundary. Land north of Saunders Lane have been removed from the DPD due to their landscape importance and protection under Policy CS24 Escarpments of Rising Land. Having removed these sites, the argument to retain GB9 in the DPD and remove it from Green Belt falls away and becomes unnecessary. Parcel 20g is noted in the GBR as having great landscape sensitivity, no evidence has been put forward to overcome this view and support it becoming part of the urban area. The site and 20g should be retained in the Green Belt, which is consistent with the NPPF, creates a better green belt boundary and makes the site consistent with the sound decision to retain the land north of Saunders Lane in the Green Belt. Does not wish to participate in oral examination regarding this site.

GB7 - supports the retention of the northern part of GB7 as an area of green separation between the urban area of Woking and Mayford, which is sound as it preserves a historically significant boundary and accords with the GBR (para 4.3.14 and 7.2.3). It is also supported by local residents.
 Wishes to participate in oral examination regarding this site, to address any opposition to the proposal.
 Wishes to be kept informed as the DPD progresses.

Contributor Proposed Modification: GB9 and Parcel 20g should be retained in the Green Belt, which is consistent with the NPPF.

Modification Reference: U0000356

Officer Response: GB9 - The site is excluded from the Green Belt to ensure a strong, defensible Green Belt boundary in the future, that endures beyond the plan period. This approach is consistent with national policy. It is acknowledged that Green Infrastructure is a use compatible with the Green Belt, and the Policy for the site makes clear that it is situated at a high point of the Escarpment or rising ground of landscape importance, and is unsuitable for built development. Trees are safeguarded by a Tree Preservation Order. This is considered to provide sufficiently strong protection for the site to remain green while meeting long term Green Infrastructure needs. Further justification for safeguarding can be found in section 2 of the Council's Regulation 19 Issues and Matters Topic Paper. It is not intended that the proposed modification put forward in the representation is taken forward. However, Officers are proposing a modification to provide further protection from development to Parcel 20g within the plan period. This modification will extend the site northwards to include this parcel, to make it part of the safeguarded land. This means that while it will be released from the Green Belt upon adoption of the plan, it will not be released for development until 2027, through a review of the Core Strategy and/or Site Allocations DPD. This parcel includes residential properties and for this reason a distinction will be made, using a hatched area on the site plan, to show that this area is not intended for Green Infrastructure. Until 2027, development at any part of the site will have to comply with the Green Belt policies in the development plan. A specific policy and key requirements to guide development at the site, noting the distinction in the amended proposed hatched area (parcel 20g) will be developed and determined as part of the review of the Core Strategy and/or the Site Allocations DPD.
 GB7 - support for the green separation at the northern part of the site is welcomed.

Response Reference: U0001723

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06531/1

Name: Mr Bryan Ashfield

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11, GB18

Summary of Comment: Concerns regarding inadequate infrastructure (roads, schools etc.) in place to support schemes on Parvis Road.
 Objects to building on the Green Belt.

Can the council justify such a proposal before all brownfield sites have been exhausted?

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses concerns about the adequacy of infrastructure. Section 13 specifically

addresses road infrastructure. As stated in paragraph 13.3, the Council has also worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. The issue regarding the release of Green Belt for development has been addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. The matter regarding the development of brownfield sites before Green Belt sites is addressed in paragraphs 1.6 and 1.7.
Response Reference: U0000943
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): F

Contributor Reference: 06563/1
Name: Ms Robyn Ashfield
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Objects to GB10. Considers that the DPD does not pass the test of soundness. In particular it is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy. Reasons for this are detailed as below:</p> <ol style="list-style-type: none"> 1. Traffic issues. Parvis Road is already congested and unable to cope at peak times. When there are accidents on the A3 and M25, this leads to severe congestion on Parvis Road, with West Byfleet becoming gridlocked and the surrounding villages impacted. 2. Increased pollution. Parvis Road exceeds the government's recommended pollution levels and increased weight of traffic, including standing traffic, will increase pollution. The road is close to local schools and runs alongside a children's play park and playing fields. These sites and the local residents that use these facilities should not be subject to the current levels of pollution, let alone an increase. 3. Safety. The footpath along Parvis Road is unsafe due to the weight and speed of traffic and associated pollution. Increasing the issues will decrease the functionality of the footpath, leading to heavier reliance on the car. 4. The site is located over 1km from the station which will increase reliance on cars, and all the associated problems listed above. 5. The location of the site is incompatible with national policy which prevents new developments from contributing to, or being exposed to, air and noise pollution as per the above points and in conjunction with the M25. 6. Access to healthcare provision. The current doctors' surgeries are full. The redevelopment of West Byfleet Centre means that there will only be one small chemist serving local needs. Add additional 570 residential units will add untenable pressure to services. 7. Access to school places. The infant and junior schools have recently expanded to increase capacity by one third. The schools are full and have waiting lists. The outside spaces have significantly decreased with the developments. Consideration to the provision of school places has not been appropriate. Families living locally but needing to travel to schools elsewhere will compound traffic issues. 8. Parts of West Byfleet and Byfleet are subject to repeated severe flooding. The areas under consideration for building and development fall into these areas, and the increased hard landscaping and reduction in soft landscaping will push the risks outwards to more homes. 9. The potential release of school playing fields from the Green Belt is unthinkable. Schools already have less outdoor space, and studies demonstrate its importance to the

successful development of children. To surround their school with development would be detrimental.

Contributor Proposed Modification: Consider community feedback and reconsider the proposals, taking account of the need to address many issues including infrastructure before progressing any plans.

Modification Reference: U0000237

Officer Response: Many of the issues raised by this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper.

Paragraph 6.7 of the Regulation 19 Issues and Matters Topic Paper confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 of the Regulation 19 Issues and Matters Topic Paper addresses transport and congestion issues in greater detail, and Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

Air quality is addressed by Paragraphs 8.1 to 8.5 of the Regulation 19 Issues and Matters Topic Paper.

Regarding road safety it is noted that Policy CS18 of the Core Strategy seeks to ensure that "development proposals provide appropriate infrastructure measures to mitigate the adverse effects of development traffic and other environmental and safety impacts (direct or cumulative)."

The Sustainability Appraisal found GB10 to have moderate accessibility to services and facilities. Among the optimising/mitigating measures was "improve access to key services and facilities by improving sustainable transport infrastructure." This measure is reflected in the key requirements for GB10 which include inter alia that "the developer will contribute to the provision of essential transport infrastructure related to the mitigation of the impacts of the development of this site. The exact nature of these site specific requirements will be identified through the development management process and informed by a Transport Assessment. Potential issues to be addressed include:

- Significant infrastructure required to provide access to A245
- Lack of pedestrian and cycle infrastructure (including crossing) that would link to the surrounding strategic pedestrian and cycle network,
- Appropriate and adequate provision of car and cycle parking in accordance with the adopted car and cycle parking standards but that takes into account the site's sustainable location and will not compromise on highway safety;
- Bus stop provision and direct access to this."

Section 8 of the Regulation 19 Issues and Matters Topic Paper addresses the due consideration which has been given to air and noise pollution.

Access to GP provision is addressed in Paragraph 6.12 of the Regulation 19 Issues and Matters Topic Paper.

Access to education provision is addressed in Paragraph 6.9 of the Regulation 19 Issues and Matters Topic Paper.

Section 7 of the Regulation 19 Issues and Matters Topic Paper confirms that due consideration has been given to the flood risk implications of the Site Allocations DPD. In particular, Paragraph 7.7 confirms that the DPD takes due care to make sure that the risk of flooding is minimised.

As outlined in Paragraph 5.1 of the Regulation 19 Issues and Matters Topic Paper, GB18 will not be developed and will continue to provide open space and sports provision for the Junior and Infant school. As set out in the reasoned justification for GB18, "Taking into account other changes to the Green Belt boundary set out in the Site Allocations DPD, this site would result in the formation of a Green Belt 'island', which would not be logical. Its exclusion from the Green Belt is therefore sought."

The Council will consider all representations received during the Regulation 19 consultation, and outline any proposed modifications.
Response Reference: U0001326
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05839/1
Name: Mr W G Ashpitel
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports removal of Regulation 18 sites GB12 and GB13 in Pyrford Green Belt from the DPD. Concerned they may be re-instated, and reiterates objections from Regulation 18 consultation: <ul style="list-style-type: none"> - If site GB13 were developed, Sandy Lane would create an ineffective Green Belt boundary. There were inconsistencies in the proposals. - The sites are in close proximity to conservation areas and heritage assets which are core to the character of Pyrford. Development would be contrary to Core Strategy policy which seeks to conserve heritage assets and their settings. Development would have an adverse impact on these assets, and create a marked and inappropriate intrusion into Green Belt land. - Indicative density of GB13 at 30dph would be significantly higher than surrounding density of around 10dph. This would change the setting of Pyrford. - Over 400 dwellings would significantly increase traffic, taking local roads beyond their capacity. Access roads already hold significant traffic - difficult to mitigate impacts. Increased school journeys would cause further congestion on local roads. Some of these routes flood in heavy rain. Contrary to the proposals, regular shopping at West Byfleet, Brooklands or supermarkets towards Woking will also increase traffic (the local shopping parade does not serve full needs). - Increasing 'cycle access' from Pyrford to Wisley and Ripley is not deliverable - they are significant distances away from the sites.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted. The reasons for excluding the Regulation 18 sites referenced GB12 and GB13 are set out in detail in paragraph 14.12 of the Council's Regulation 19 Issues and Matters Topic Paper.
Response Reference: U0001361
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06761/1
Name: Mr David Askew
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Objects to the removal of the Green Belt status of the site. It is vital to retain the gap between Woking's urban area and Mayford village.
Contributor Proposed Modification:

Modification Reference:
Officer Response: This representation has been comprehensively addressed in Council's Regulation 19 Issues and Matters Topic Paper, section 20.
Response Reference: U0001284
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06865/1
Name: Neil And Pat Atkins
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
<p>Summary of Comment: Traffic</p> <p>Why are GB4 and GB5 proposed for development in 2027-2040, when there are no traffic projections beyond 2026?</p> <p>The traffic worse case scenario used for assessment is for the morning easterly flow along the A245. There are similar situations in the evening rush hour that also need to be considered.</p> <p>In addition to the A245 junctions with Seven Hills Road, Brooklands Road and Camphill Road, all other critical traffic conditions and locations need to be studied e.g. the morning northbound congestion along Shearwater Road past West Byfleet Golf Club.</p> <p>Are the projected traffic conditions for the planned upgrade of the A3/M25 junction consistent with the 2026 projections used for the A245 assessment? It seems like Highways England is not interested in A245 congestion, only the A3.</p> <p>The proposed A245 mitigation measures appear to be very 'light'; why have they not been implemented already? Particularly hatching at Brooklands Road junction.</p> <p>The proposed 'no right turn' from the Seven Hills junction will surely force westbound A245 traffic either up to the A3 roundabout and back, or along Queens Road and Brooklands Road. Neither would solve the westbound A245 traffic beyond Brooklands Road.</p> <p>How will the proposed mitigation measures affect road conditions other than the critical morning easterly flow condition?</p> <p>There appears to be no consideration or discussion related to local traffic and parking issues in Byfleet village. There currently is minimal parking available and regular parking on pavements, double yellow lines, etc have become the norm.</p> <p>What are the provisions for the extreme traffic conditions, sometimes gridlock, that occur in Byfleet around 10 times a year when the M25 is jammed or busy around J10 and J11?</p> <p>Flooding</p> <p>Flooding issues on GB4 and GB5 and in Byfleet more generally are known. However I believe no new capital spend or significant maintenance effort has been undertaken recently. There should be no significant developments here until flooding is properly addressed.</p> <p>Are the flood projections used for the potential development areas realistic and based on the very latest forecasts? Note the existence of new EA flood maps being used by insurance companies, including in Woking, reported 16/12/2018.</p> <p>Little reference to any extensions to local infrastructure particularly schools and health facilities. Both of these are stretched at the moment, in particular our health facilities (doctors and hospitals) are running at full capacity. No developments should be approved until realistic plans for these services are agreed.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS

<p>Officer Response: The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13. The issue of flood risk in relation to the proposals is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 7. The impact of the proposals on community infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6.</p>
<p>Response Reference: U0001722</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 03730/1</p>
<p>Name: Mr Richard Aubry</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: COMM</p>
<p>Site Reference: UA25</p>
<p>Summary of Comment: Representor's property sits just outside the border of UA25. Proposes modifications to widen a footpath that their house is situated on, to allow residents to drive up to and park in their front gardens, and requests an electric car charging point to be installed as part of the site allocation. Identifies several benefits that this proposal would have on the residents of the Green.</p>
<p>Contributor Proposed Modification: Representor's property sits just outside the border of UA25. Proposes modifications to widen a footpath that their house is situated on, and an electric car charging point to be installed as part of the site allocation.</p>
<p>Modification Reference: U0000410</p>
<p>Officer Response: The proposed widening of the footpath is outside the scope of the Site Allocations DPD, as the area of concern sits outside the boundary of UA25. This is a matter which could be addressed at the development management stage upon submission of a planning application. Furthermore, the widening of a footpath for car access would need to be raised with Surrey County Council who are responsible for road, cycle and footpath networks.</p>
<p>Response Reference: U0001261</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06688/1</p>
<p>Name: Axis Land Partnership</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference:</p>
<p>Summary of Comment: A detailed critique has been submitted to demonstrate that the DPD is not robust, or supported by adequate evidence, and puts forward a strategy that is not sound.</p> <p>- The growth strategy put forward by the Core Strategy is no longer justifiable. There has been a material change in circumstances since its adoption. A critique is provided showing a persistent increase in the median affordability ratio in Woking - pressure on the housing market has increased substantially and the benefits of delivering a greater housing requirement than 292 per annum now arguably outweigh other considerations (such as damage to environment, which was given much weight at the Core Strategy</p>

Examination and which caused the housing requirement to be reduced). In any case, any potential harm is now less, as the Standard Methodology gives a figure of 431, not 594. The Sustainability Appraisal of the Core Strategy is out of date (and did not appraise a figure of 431), and the reasoning presented to the Inspector is no longer relevant. The review of the Core Strategy was conducted without consultation (and thus doesn't meet the Duty to Cooperate); and was based on 2016-based projections which does not comply with Government guidance. The review is unjustified. A detailed explanation is given in sections 3, 4 and 5 of the document. Section 3 gives background to the preparation of the Site Allocations DPD and emphasises that NPPF 2018 should be used to assess Woking's development framework; section 4 provides extracts of relevant NPPF 2018 sections which set the context for the review of the Core Strategy and Site Allocations DPD preparation; and section 5 assesses the soundness of the claim by the Council that the Core Strategy does not need to be modified (in particular the housing requirement). In any case, the 292 figure was to be considered a minimum figure as a condition of the Core Strategy's soundness. The rate of housing delivery does not reflect this condition - questions the Core Strategy's continued soundness.

- The available evidence suggests that a different level of growth is required than that stated in the Core Strategy. The 2014-based projections should be used to better reflect evidence of need. The Standard Methodology requirement of 431 (as a minimum) should be used and the Core Strategy amended accordingly, during a review. This is explained in detail in sections 6, 7 and 8 of the document.

- The evidence base does not represent an appropriate starting point for the DPD - the Green Belt Boundary Review fails to provide clear guidance for the level of growth required in the Borough. Assessment of housing need and supply is inaccurate and needs to be updated. The Housing Delivery Test results fail to meet the Core Strategy target in 2017; and is less than 85% of the standard methodology target in 2018. This is explained in detail in sections 6, 7 and 8 of the document. Seeks clarification of the housing land supply evidence base (stated figures are inaccurate). In light of the HDT results (with the full effect of the Standard Methodology applied) it is clear that a 20% buffer should be employed. The results would show that the local authority is unable to demonstrate a 5 year supply of housing. Within the context of the borough's need for housing, the GBBR fails to provide clear strategic advice for the release of land to accommodate future growth.

- The adoption of the Site Allocations DPD to cover the final third of the (out-of-date) Core Strategy could not possibly be intended. The DPD is unlikely to achieve its own strategic goals - there are significant concerns about the delivery of major sites that are allocated for a substantial quantity of the borough's housing supply. These sites include UA14 Poole Road Industrial Estate and GB11 Broadoaks (based on recent planning applications these sites are clearly sensitive in the eyes of the Council and local support for the allocation of the sites is questionable); GB10 West Hall (questions the site's sustainability and viability); UA44 Woking Football Club (lack clarity about scale and capacity of the site, and fails to meet requirements of paras 16 of the NPPF). The failure of these sites to come forward as envisaged will result in the failure of the DPD to achieve its goals. It cannot be considered sound in this context. Details are provided in sections 11 and 12 of the document.

- The DPD will not meet Woking's growth requirements as it is significantly higher than that quoted in the Core Strategy. Additional land should therefore be identified for allocation to meet the realistic housing requirement, and Land at Chobham Road should be included with this process. This is set out in detail in section 13 of the document. This details a number of sustainable benefits that the site offers (without undermining the Green Belt and wider countryside setting); and supporting documentation demonstrates that there are no significant constraints to the site's development (including a Transport Note, Landscape and Ecology Note, Flooding and Drainage Note. An indicative development framework for the site has been provided. The SHLAA confirms that the site can be sustainably developed for housing subject to its release from the Green Belt. It

has the potential to deliver 90-124 dwellings (21-30dph) within five years. The site is a logical extension to the urban area, which can be delivered sensitively without undermining the openness and purposes of the Green Belt by creating a defensive boundary.

Contributor Proposed Modification: A full and thorough review of the Core Strategy should be carried out in order to accurately assess the level of growth for which the borough should plan. This should use appropriate evidence, such as an appropriate housing requirement (based on the Standard Methodology) and buffer to determine a 5 Year Housing Land Supply (as set out in the Housing Delivery Test). Woking need to allocate additional land to ensure they are able to meet their growth requirement to the end of the Plan period and beyond. Axis Land Partnerships are promoting Land at Chobham Road for residential development. The site is suitable, deliverable, and developable. It should be allocated for housing land, and included within Woking's strategy for growth.

Modification Reference: U0000365

Officer Response: In accordance with paragraph 33 of the NPPF, the Core Strategy was subject to a thorough review in October 2018 and is therefore considered up to date to provide the strategic policy context for preparing the Site Allocations DPD. This is set out in detail in Section 1 of the Council's Regulation 19 Issues and Matters Topic Paper. At the time of the review, Officers sought clarification from the Ministry of Housing, Communities and Local Government (MHCLG) who confirmed that there was a clear distinction between 'review' and 'modification' and what the amended Town and Country (Local Planning) (England) Regulations 2012 required first and foremost was a review of the Local Plan to determine whether a modification might be necessary. As no modifications were found to be necessary, there was no requirement for formal consultation with Duty to Cooperate bodies (their representations were, nevertheless, taken into account by the Council).

Several options were assessed against the identified housing land supply to determine whether the Council should continue to enable the delivery of an annual average of 292 dwellings, including using the Government's standard methodology for calculating objectively assessed housing need. In all the revised figures, the housing need is higher than the Core Strategy housing requirement (except the one based on the 2016 projections that the Government has advised should not be used), leaving an unmet need arising from Woking Borough which the Council has to work with the other authorities in the Housing Market Area to address. It should be noted that the unmet need arising from Woking is being met within the Housing Market Area by the Waverley and Guildford Borough Councils' Local Plans. The Council believes the 292 requirement strikes a good and delicate balance between the need to boost housing growth whilst at the same time protecting the environment from significant damage. Average housing completions since 2012 when the Core Strategy was adopted is about 302 dwellings per year, which is above the 292 requirement. It is reasonable to assume that at least the 292 average housing requirement will continue to be delivered during the plan period. As set out in the conclusions of the Review, the constraints of the Borough have not changed since the adoption of the Core Strategy and would not justify a higher future housing requirement over and above the current 292 annual requirement. It was concluded that no purpose would be served by undertaking immediate modification of the Core Strategy with the hope that the Council would be able to meet its objectively assessed housing need and/or set a higher housing target. The Council does not agree with the point made in the representation that the benefits of providing additional residential development in response to growing pressure on the housing market clearly outweigh harm to the environment. The policies of the Core Strategy continue to help address the key issues and challenges facing the area and the Council's key priorities. Consequently, there is no immediate need to modify any of the policies of the Core Strategy, and in particular, the

housing requirement. The Council is therefore now focusing on the comprehensive delivery of the Core Strategy through the preparation of a Site Allocations DPD. The Council is confident that the Site Allocations DPD rests upon up-to-date, robust and well evidenced foundations.

Section 14 of the Council's Regulation 19 Issues and Matters Topic Paper sets out in detail why the Council is committed to the comprehensive delivery of the requirements of the recently reviewed Core Strategy, and how the preparation of the Site Allocations DPD is a key means to achieving this objective. Paragraph 14.5 emphasises the legislative context within which the Site Allocations DPD is prepared, and how its preparation has been informed by a number of evidence based studies. All the sites that are either allocated or safeguarded are justified by the available evidence, and if in the Green Belt, meet the exceptional circumstances test.

Undertaking the Green Belt Boundary Review (GBBR) is a key policy requirement of the Core Strategy to inform the release of Green Belt land. The Council is satisfied that this requirement remains up to date, and reflects the required housing targets of the borough, having recently reviewed the Core Strategy. As explained in Section 10 of the Topic Paper, the Council is satisfied that the depth and breadth of evidence used to support the preparation of the Site Allocations DPD was sufficiently comprehensive, robust and will be able to withstand scrutiny at the Examination. Section 12 sets out how the Council believes the GBBR adopted the right approach for assessing sites.

The Site Allocations DPD already allocates land to deliver more homes than the housing requirement. This is considered sufficient to ensure that at least the housing requirement is delivered and to also cater for any non-implementation. Section 14 provides more detail about why the Council does not intend to allocate more land to meet housing need rather than the Core Strategy requirement. Land at Chobham Road, Knaphill, should not be included as it is not supported by evidence in the GBBR. Very special circumstances justification does not exist to allocate or safeguard such land.

The Land at the Mount, Chobham Road falls within Parcel 24 of the GBBR. The land is considered to have very low suitability for removal from the Green Belt. It is of critical importance to three Green Belt purposes - contributing to the containment of the well-defined urban area; contribution to the separation between neighbouring urban areas (i.e. Knaphill and Bisley); and assisting in safeguarding the attractive rural countryside from encroachment beyond the well-defined existing urban edge. The land was found to have little/no capacity for change due to its strong, largely unspoilt and intact character, which reinforces the sense of separation between two built-up areas. The area makes a significant contribution to the attractive setting of the edge of Knaphill and Bisley and is particularly sensitive to change. Following the Green Belt and Sustainability Assessments, the area was not selected as a preferred parcel for further investigation as it was identified as having lower potential to deliver sustainable development relative to others mainly due to lack of strategic accessibility. The Strategic Housing Land Availability Assessment (SHLAA, Ref: SHLAAKNA010) concluded that the site was not deliverable or developable, and referred to the GBBR as not identifying this site as having any potential to be removed from the Green Belt for residential development. The Sustainability Appraisal also appraised the site but recommended its rejection as the landscape is largely unspoilt; and due to the contribution that the site makes towards reinforcing the sense of visual separation between the north western edge of the town and Bisley. The Council does not consider the evidence submitted with the representation is sufficient to demonstrate that the site being promoted is a better alternative than those already allocated and safeguarded in the DPD. The land at Chobham Road is not identified by the GBBR report; its allocation or safeguarding will be damaging to the purposes of the Green Belt. Very special circumstances justification would therefore not exist to allocate the site.

The issues surrounding the Housing Delivery Test are noted, but since Woking has a recently reviewed Core Strategy, the requirement is taken as the annualised Core Strategy housing deliver figure of 292 dwellings per annum. Table 3 of the Annual

Monitoring Report demonstrates a total of 1104 standard housing units completed from 2015/16 to 2017/18, and a total housing delivery of 1117, resulting in a surplus of 876. Delivery as a percentage of requirement is therefore 128%. Based on these figures, it is concluded that Woking Borough Council amply meets the Housing Delivery Test on the basis of completions over the past three years. The Government has published the Housing Delivery Test figures for each authority and Woking has passed with no action to take. The AMR also demonstrates that Woking Borough has a total housing land supply at 1 April 2017 to enable the delivery of 2,909 net additional dwellings between 2017/18 and 2021/22. After taking into account previous undersupply, this represents a surplus of 1,298 net additional dwellings against the requirement and an overall supply of 9.2 years. The Council therefore disputes the findings in section 9 of the representation put forward in the housing summary.

With regards to site allocation-specific comments:

UA14 - this site has been approved for inclusion in the DPD for Regulation 19 consultation by the Council. Despite the outcome of recent planning history quoted in the representation, the Council is confident that there is scope for a different scheme to come forward on the site which better complies with design and parking planning policies.

GB11 - in February 2019 a planning application for the redevelopment of the Broadoaks site was approved. The Council is confident that development will come forward. The progress with redevelopment at site GB11 counters concerns about potentially frustrating the delivery of site GB10.

GB10 - the Council recognises the potential contamination, biodiversity, designated landscape and flooding constraints but is confident that these can be addressed through a sensitive design approach and suitable contamination remediation, as expressed in the key requirements of the policy. The Council is confident that a suitable Green Belt boundary can be established to the east of the site, which will serve to avoid perception of development narrowing the Green Belt separation between Byfleet and West Byfleet.

UA44 - the stadium is the key driver for the allocation and will determine the scale and level of residential development. The quantity of dwellings can only be determined when a specific proposal is prepared, and once a planning application is submitted (or at pre-application stage) the local community will be consulted on the proposals. This site was identified as a potential site allocation after the Regulation 18 consultation stage. By including the site at Regulation 19 consultation stage, the Council is satisfied that sufficient time and opportunity has been provided for the local community to participate and comment on the policy.

Response Reference: U0001682

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 00132/2

Name: Mr Simon Baker

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: The DPD is unsound (as per NPPF para 35), not an appropriate strategy or based on proportionate evidence, nor consistent with national policy. Reasons as follows:

Green Belt issues: Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the protection of the special character of W Byfleet and the importance of protecting green spaces. The proposal would be contrary to this.

Traffic issues: Question the ability of the heavily congested Parvis Road to cope with additional traffic. Parvis Road will require significant upgrading work and crossing facilities. This will change the green, country qualities that they moved to the area for.

Infrastructure: concerned about provision of healthcare and education for the increased population. There is inadequate existing infrastructure.

Noise and air pollution: Close to the A245 and M25, concerned about increase in air and noise pollution.

Traveller's Pitches: Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.

Other: The Broadoaks and Sheer House developments will exacerbate a number of these issues, particularly the inadequate infrastructure. The development is unnecessary, and will lead to overdevelopment and overcrowding.

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The representation is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1-3, 6, 8, 10-11, 13 and 16. Overdevelopment will be addressed on a site by site basis, in accordance with the Council's adopted Development Plan policies. Culmulative impact from the overall quantum of development proposed and already in the pipeline, in terms of service provision and transport, have been incorporated into the assessment of infrastructure, as outlined in section 6 of the Regulation 19 Issues and Matters Topic Paper. The Core Strategy clearly specifies that Green Belt will need to be released. West Hall has been identified in the context of this broad strategic framework, taking account of a breadth of evidence that is robust and comprehensive. This evidence justifies the allocation of this site, and others put forward in the DPD. As stated in the NPPF, Neighbourhood Plans should support and be in conformity with the delivery of strategic policies contained in local plans or other spatial development strategies.
Response Reference: U0001158
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00218/3
Name: Ms Marisa Baker
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is unsound (as per NPPF para 35), not an appropriate strategy or based on proportionate evidence, nor consistent with national policy. Reasons as follows: Green Belt issues: Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the protection of the special character of W Byfleet and the importance of protecting green spaces. The proposal would be contrary to this. Traffic issues: Question the ability of the heavily congested Parvis Road to cope with additional traffic. Parvis Road will require significant upgrading work and crossing facilities. This will change the green, country qualities that they moved to the area for.

Infrastructure: concerned about provision of healthcare and education for the increased population. There is inadequate existing infrastructure.

Noise and air pollution: Close to the A245 and M25, concerned about increase in air and noise pollution.

Traveller's Pitches: Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.

Other: The Broadoaks and Sheer House developments will exacerbate a number of these issues, particularly the inadequate infrastructure. The development is unnecessary, and will lead to overdevelopment and overcrowding.

Contributor Proposed Modification:
Modification Reference:
Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, in particular in sections 1, 3, 6, 8, 10 and 16. It should be noted that various background assessments, including the Transport Assessment and Infrastructure Development Plan, account for the total development requirements and spatial distribution in the Borough set out in the Core Strategy and Site Allocations DPD. This includes Broadoaks and Sheer House, which are both allocations (or fall within an allocation in the case of Sheer House) with planning permission. Therefore the cumulative impacts have been assessed, and the Council is confident that adequate mitigation and local infrastructure can be delivered to ensure that any existing issues are not exacerbated and negative impacts from development in Wesy Byfleet, and across the Borough, are minimised. The Core Strategy clearly specifies that Green Belt will need to be released. West Hall has been identified in the context of this broad strategic framework, taking account of a breadth of evidence that is robust and comprehensive. This evidence justifies the allocation of this site, and others put forward in the DPD. As stated in the NPPF, Neighbourhood Plans should support and be in conformity with the delivery of strategic policies contained in local plans or other spatial development strategies.
Response Reference: U0001285
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05212/1
Name: Mr Mark Baker
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07, GB08, GB09
Summary of Comment: Objects to release of nursery land adjacent to Egley Road from the Greenbelt. The lovely village area needs to be kept green, especially given the impacts of climate change and to retain air quality. This area should be used to plant more trees and transformed into a natural wooded space, thus contributing to people's wellbeing and mental health. Further development in Mayford would severely impact facilities and services in the area, and place a further strain on roads, which are at capacity, including the main Egley Road with queues at peak times. The two bridges around Mayford Green are choke points for rush hour traffic. Roads are narrow and used as rat-runs. Lack of pavements mean

residents risk walking on even busier roads or use their cars, adding to traffic. Cyclists are also at risk due to narrow roads. Respect the village's footprint.
Contributor Proposed Modification: Consider using the site to plant more trees and turn it into a natural wooded space.
Modification Reference: U0000227
Officer Response: The multiple benefits of the Green Belt are recognised by the Council - as described in its Green Infrastructure Strategy 'Natural Woking' - but the Council believes that very special circumstances exist that justify the release of a very small portion of Green Belt land to meet future development needs. This is explained in detail in Sections 1 and 2 of the Council's Regulation 19 Issues and Matters Topic Paper. It is acknowledged that residents of Mayford wish to preserve the identity, character and green feel of the village. Section 20 of the Topic Paper, in particular paragraph 20.3, responds to these concerns. Section 4 responds to concerns about the impacts on the general wellbeing and amenity of residents; and Section 6 outlines how the Council is confident that infrastructure, including road infrastructure, can be improved to support future growth. Section 13 goes into detail about how additional traffic impacts will be mitigated, and assessed in more detail at development management stage. Section 8 responds to concerns about air and noise pollution. Whilst the allocation of site GB7 provides an opportunity to deliver new homes, the value of local woodland has been recognised by the Council. The policy will be amended to conserve the woodland known locally as 'Hook Hill Woods'. Several key requirements in the Green Belt release policies also seek enhanced Green Infrastructure provision, including the retention of valuable trees and planting of new ones.
Response Reference: U0001511
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06475/1
Name: Mr Zac Baker
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: DPD inconsistent with national policy due to GB4 and GB5 not meeting the social objectives of the NPPF, having a negative impact on the community: -The type of dwellings required to meet need has not been considered for these sites. -The impact of this development on community facilities has not been considered. -The loss of accessible open space will affect residents' cultural wellbeing. -High voltage power lines might reduce the quality of the homes to be built on the sites, and risk public health. DPD inconsistent with national policy due to GB4 and GB5 not meeting the environmental objectives of the NPPF: -Harming the natural environment by removing the green gap (which also serves as an acoustic barrier to the M25) between Byfleet and its neighbouring conurbations. -The increase in traffic on Parvis and Redhill Road (already congested at rush hour) will harm air quality.
Contributor Proposed Modification: I urge Woking Borough Council to review the draft allocation in respect of sites GB4 GB5 GB15 and reconsider their suitability for development against the stated objectives in the National Planning Framework.
Modification Reference: U0000147

<p>Officer Response: No requirements have yet been set for the type of dwellings to be built on sites GB4 and GB5. This is because the sites are not proposed for allocation until 2027, from when the dwelling need profile is likely to have changed from the present day, and new Local Plan policies will be written taking into account the situation at that time. If and when the site is allocated for development, the writing of that allocation policy and any key requirements will have regard to the latest evidence at that time.</p> <p>The impact of the SADPD proposals on community facilities is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of Green Belt loss on residents' wellbeing is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. If and when the site is allocated, the writing of that allocation policy will have regard to the latest evidence at that time, including on the importance of current uses of the site.</p> <p>No building of dwellings can occur within an easement along high voltage power lines. Beyond this easement, the potential for health issues associated with the power lines is identified in the Sustainability Appraisal. If and when the site is allocated, the writing of that allocation policy will have regard to the latest evidence at that time, including on any health issues. The quality of homes built will be subject to any design policies extant at the time the policy is allocated.</p> <p>The impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19.</p> <p>The impact of the proposals on noise and air pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p>
<p>Response Reference: U0001643</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 03833/1</p>
<p>Name: Mr G Balchin</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11</p>
<p>Summary of Comment: Feels that the green space between Byfleet and West Byfleet should be preserved. In the event that this is overruled, there are flaws in the Site Allocation Development Plan Document and the following should be taken into consideration: Flood alleviation - upgrading the foul water drainage system including the sewage outfall works. Congestion would be exacerbated to the A245 and all tributary roads, resulting in greatly increased pollution. Additional educational facilities should be provided for all age groups and additional medical facilities would be required.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team,</p>

<p>and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. The waste water provision has been considered in the IDP, see Section 12 of the IDP for more information. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development along the corridor.</p> <p>The concern regarding vulnerability of the sites to flooding is addressed in section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.</p>
<p>Response Reference: U0001191</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 05733/1</p>
<p>Name: Ms Vicki Baldwin</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11</p>
<p>Summary of Comment: Lived in Byfleet over 40 years. Strongly objects due to:</p> <ul style="list-style-type: none"> - Green Belt, with its wildlife, should be retained as green space to soak up water, for trees and plants; - Land is vulnerable to flooding - food risk will increase with hard standing; - The village can become gridlocked with traffic, especially at rush hour - this will be exacerbated with new development; - Healthcare facilities are at capacity and deal with over the national average number of patients, and schools are at capacity and oversubscribed; - Disproportionate allocations in the Byfleets - why was Pyrford Green Belt removed from the DPD? - A245 suffers high pollution already - pollution will rise with increase in cars; - Three acre field should be retained for use as burial land as it is owned by the Church. These plans will destroy the Byfleets and its surroundings.
<p>Contributor Proposed Modification: Green Belt in the Byfleets should be retained. Three Acre Farm should be retained for burial use.</p>
<p>Modification Reference: U0000310</p>
<p>Officer Response: The issues raised in the representation have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper. Sections 1 and 2 of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. Section 19 explains how the Council is committed to conserving and protecting wildlife. The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2. Key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. This will be determined as part of the review of the Core Strategy and/or the Site Allocations DPD. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built</p>

development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. It is not intended that the new Hoe Valley School serves the education needs of a growing population in the east of the Borough; the County Council have confirmed that there will not be a need for a new secondary school in the east of the Borough as existing schools in the area can absorb growth. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper.

The Council sympathises with concerns regarding the expansion of the village. Section 4 responds to concerns about the loss of green spaces and the impact on wellbeing of residents. Section 11 sets out how the Council conducted a thorough assessment of alternative, previously developed sites before assessing Green Belt land.

Response Reference: U0001400

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06736/1

Name: Mr N Baldwin

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11

Summary of Comment: Lived in Byfleet over 16 years. Strongly objects due to:

- Green Belt, with its wildlife, should be retained as green space to soak up water, for trees and plants;
- Land is vulnerable to flooding - food risk will increase with hard standing;
- The village can become gridlocked with traffic, especially at rush hour - this will be exacerbated with new development;
- Healthcare facilities are at capacity and deal with over the national average number of patients, and schools are at capacity and oversubscribed;

- Disproportionate allocations in the Byfleets - why was Pyrford Green Belt removed from the DPD?
- A245 suffers high pollution already - pollution will rise with increase in cars;
- Three acre field should be retained for use as burial land as it is owned by the Church. These plans will destroy the Byfleets and its surroundings.

Contributor Proposed Modification: Allocated land should be retained as Green Belt. Three Acre Field should be retained as burial land.

Modification Reference: U0000309

Officer Response: The issues raised in the representation have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper. Sections 1 and 2 of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. Section 19 explains how the Council is committed to conserving and protecting wildlife. The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. It is not intended that the new Hoe Valley School serves the education needs of a growing population in the east of the Borough; the County Council have confirmed that there will not be a need for a new secondary school in the east of the Borough as existing schools in the area can absorb growth. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper.

The Council sympathises with concerns regarding the expansion of the village. Section 4 responds to concerns about the loss of green spaces and the impact on wellbeing of

residents. Section 11 sets out how the Council conducted a thorough assessment of alternative, previously developed sites before assessing Green Belt land.
Response Reference: U0001403
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06463/1
Name: Ms Caroline Balharrie
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Why target building on Byfleet's small area of Green Belt, rather than sharing around other parts of the Borough with more Green Belt? Infrastructure in Byfleet/West Byfleet cannot support the proposed development: Doctors' surgeries covering the area are oversubscribed with three weeks' wait for appointments. The proposals could make this worse, with potentially fatal consequences. There are no NHS dentists in Byfleet. Parvis Road and Oyster Lane are the only ways out of Byfleet, traffic on them is always heavy and almost always gridlocked at rush hour. Additional vehicle movements from the proposed development would increase noise, pollution and traffic. The nearest railway station has nowhere to park; commuters from the proposed developments would lead to additional on street parking or drop off trips, worsening traffic problems either way. On street parking makes it hard to navigate Rectory Road at present; this situation would be worsened by traffic from additional dwellings. Byfleet is on a flood plain, building there should be avoided. Brewery Lane has surface water flooding every time it rains. All schools in the area are oversubscribed. Where will the children in the new dwellings be educated? WBC should look at developing Sheer House and vacant areas in Sheerwater instead. WBC appears to have no respect for its current residents and impacts on them
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The concentration of Green Belt loss on Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 5. The impact of the proposals on infrastructure, including doctors, dentists and schools, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on traffic congestion and highway capacity is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7. Sheer House and the Sheerwater redevelopment area are also allocated for development in the SADPD.
Response Reference: U0001701
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06539/3

Name: Mr Nicholas Bareham
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Makes no comment on legal compliance or the Duty to Cooperate.</p> <p>Considers that the DPD is not positively prepared, not justified, not effective, not consistent with national policy and unsound.</p> <p>Does not consider that the DPD passes the required test of soundness. In particular the DPD is not considered an appropriate or justifiable strategy, taking into consideration the reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy. Reasons for this assertion are detailed below:</p> <p>Firstly the selection of land is entirely Green Belt. No brownfield sites are put forward for alternative, prioritised, proposals. This contradicts the NPPF recommendation.</p> <p>GB10 fulfils several of the recognised purposes of Green Belt, including the prevention of urban sprawl, and as such is not suitable for reclassification.</p> <p>GB10 is subject to regular flooding, and no suitable assessment of the risks has been included as part of the DPD.</p> <p>The site's proximity to the A245 and M25 means there is an extremely high risk of noise and air pollution for any future residents of the proposed developments.</p> <p>No suitable and justifiable reason has been given for the reclassification of GB18. Given its proximity to West Byfleet Infant & Junior Schools, the protection of the site, in the absence of any other adjacent Green Belt sites, is essential for the future safeguarding of school children.</p> <p>Both sites covered in the DPD are ill-equipped to deal with a projected increase in 50 dwellings (all of which will be more than 1km from the train station and surrounding amenities), especially in consideration of the approved Sheerwater development. Parvis Road is currently unsustainably busy at school pick-up/drop-off times. Along with a lack of car parking, the infrastructure cannot cope.</p> <p>As confirmed by the head teachers of the two local primary schools and the one secondary school, there is no adequate space for an influx of new students. The local doctors' surgeries do not have the capacity for the requisite new places.</p> <p>In summary, the DPD is ill-assessed, unsustainable and undeliverable given the constraints.</p> <p>Wishes to participate in the public examination due to being a local resident dependent on local infrastructure for family's wellbeing.</p> <p>Wishes to be informed when the DPD progresses to the next stages.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Many of the issues raised in this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>As per paragraph 1.6, the Core Strategy directs most new development to previously developed land in the Town, District and Local Centres, which offers the best access to a range of services and facilities. The Site Allocations has been prepared in accordance with this strategic context. Section 11 sets out that the Council has undertaken a thorough assessment of reasonable alternatives to inform the selection of preferred sites.</p> <p>Paragraph 11.6 concludes that whilst most development will be focused on previously developed land in the urban area, the need for land to be released from the Green Belt continues to be justified.</p> <p>Regarding the release of GB10 from the Green Belt, it is noted that in accordance with Paragraph 4.1 the Council has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. In particular, as outlined in Paragraph 21.1, the Green Belt Boundary Review assessed the</p>

parcels of Green Belt land against the purposes of the Green Belt, one of which is to check the unrestricted sprawl of large built up areas. None of the proposed allocations will lead to unacceptable urban sprawl.

Section 7 confirms that there has been proper assessment of the flood risk implications of the Site Allocations DPD. It is also noted that the key requirements for GB10 include inter alia that "the site is within Flood Zone 1 but features a number of existing drainage channels meaning there is a risk of flooding. The site is also adjacent to Flood Zones 2 and 3 whilst a principle aquifer is located within the site. Consideration of sustainable drainage and flood attenuation within the landscape are potential options. Early engagement with the Environment Agency is required. Flood Risk from onsite and adjacent ordinary watercourses will need to be assessed and details submitted as part of a Flood Risk Assessment with any planning application."

Section 8 addresses air and noise pollution.

The reasoned justification for GB18 provides that "the Green Belt boundary Review (GBBR) recommends exclusion of this land from the Green Belt paragraph 7.3.3 advises that it is 'an area of public open space, a school and associated playing fields which are essentially part of the urban area of West Byfleet being contained by urban development on three sides and the Major developed site in the Green Belt at 'Broadoaks'. It makes no contribution to Green Belt purposes'.

Taking into account other changes to the Green Belt boundary set out in the Site Allocations DPD, this site would result in the formation of a Green Belt 'island', which would not be logical. Its exclusion from the Green Belt is therefore sought to ensure a defensible Green Belt boundary.

As per Paragraph 5.2 of the Regulation 19 Issues and Matters Topic Paper, GB18 will not be developed and will continue to provide open space and sports provision for the Junior and Infant schools.

Section 6 addresses infrastructure. In particular, Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 addresses transport and congestion considerations in greater detail, and Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

Paragraph 6.9 addresses education provision and Paragraph 6.12 addresses GP provision.

Response Reference: U0001315

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06437/1

Name: Mr Steven Barker

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11

Summary of Comment: Objects to building on Green Belt land. Distribution of housing is unjustified, Pyrford, St John's and Knaphill do not have any allocations for additional dwellings. Developments would destroy the character of both the villages of Byfleet and West Byfleet

Concerns regarding the following:

- Flooding;

<ul style="list-style-type: none"> - Increased traffic causing congestion, pollution and noise, as well as increasing response times for emergency services (particularly on Parvis Road); - Inadequate health and educational infrastructure; - Loss of open natural countryside and the impacts this will have on wildlife.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding development of Green Belt land, section 4 covers the loss of open space and the detriment to the amenity of residents, section 5 specifically covers the loss of Green Belt land in Byfleet and West Byfleet.</p> <p>Section 6 addresses the issue regarding adequacy of infrastructure.</p> <p>Section 8 addresses the issue regarding air and noise pollution.</p> <p>Section 13 specifically covers road infrastructure. As stated in paragraph 13.3, the Council has also worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Transport Assessments acknowledge there will be a marginal increase in traffic over and above the existing situation, which can be mitigated satisfactorily to enable the delivery of the proposed allocation sites. Thus response times for emergency services - including on Parvis Road - will not be adversely affected. Key requirements included in the site allocation policies also require detailed transport assessments to be submitted with planning applications. Any impacts identified, including any impacts on emergency services response times, will need to be mitigated for the development to be considered acceptable.</p> <p>Section 19 addresses the issue regarding detriment to wildlife.</p> <p>Should a proposal come forward to develop a site, the design, including impact on character, will be assessed at the development management stage. It will be assessed against design policies set out in the Core Strategy to ensure that it is sympathetic and contributes positively to the surrounding area.</p>
Response Reference: U0001239
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02450/3
Name: Mr Lionel Barnes
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
<p>Summary of Comment: Supports the removal of Regulation 18 sites GB12 and GB13 from the DPD. Argues that these sites would have resulted in traffic problems and additional burden on health and education services which are already stretched. Also argues that urban sprawl resulting from the development would harm the environment around Pyrford, and raises a concern that the current approach to Woking from Ripley is an attractive area of mostly unbroken countryside which should be preserved for future generations.</p>
Contributor Proposed Modification: None stated
Modification Reference: U0000138
Officer Response: Support for the removal of Regulation 18 sites GB12 and GB13 is noted.
Response Reference: U0000955
Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06472/1

Name: Mr Andrew Barrow

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10, GB11

Summary of Comment: The planned dwelling numbers have not been adjusted since 2012 to reflect approved or currently pending development, or the fact that the forecast demand has reduced.

The proposals will have a massive impact on local infrastructure (utilities, transport infrastructure, health and education facilities).

Parvis Road is overloaded with current traffic, slow at rush hour.

There are currently major issues with surface water from Dartnell Park that flows in to GB10. GB10 is also part of the flood plain for the Wey Navigation. Building homes on this land will have major impacts on the water table.

Contributor Proposed Modification: From the meeting on the 3rd Dec, it seems that the council has not adjusted the number of new homes that need to be built or considered using infill and Brown Field sites.

The obvious location that would minimize the impact to the whole area is Horsell Common, we would told that is protected by the EU, so has not been considered. As we are coming out of the EU, why has this site not been considered?

Modification Reference: U0000141

Officer Response: The reasons for the total dwelling capacity of the proposed allocations are addressed in the Regulation 19 Issues and Matters Topic Paper, Section 1. In particular, the issue of changing household projections and their impact on calculations of need is addressed in Paragraph 1.5.

The impact of the proposals on local infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6.

The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13.

Issues of flood risk in relation to the proposals are addressed in the Regulation 19 Issues and Matters Topic Paper, Section 7.

The consideration of alternative brownfield sites is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 11.

The Horsell Common SPA will continue to be protected by British law after the UK's departure from the EU. It is not a suitable location for housing development due to the international importance of most of it for wildlife; various other designations on the other parts of the common and also its status as common land.

Response Reference: U0001657

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06504/1

Name: Mrs Amanda Barrow

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10, GB11, GB18

<p>Summary of Comment: Concerns regarding the development of affordable housing and traveller pitches on Parvis Road sites.</p> <p>Concerns regarding;</p> <ul style="list-style-type: none"> -Increased traffic congestion on Parvis Road -Lack of educational or health infrastructure, how will capacity be increased? -Building on flood plain, how is this justified? <p>Concerns over pub in the park next to West Byfleet Junior School, introducing more traffic and potentially disorderly conduct.</p> <p>Greater detail is required to address traffic and infrastructure issues.</p> <p>Needs reassurance of the affect of developing affordable housing in areas vulnerable to flooding.</p>
<p>Contributor Proposed Modification: Greater detail is required to address traffic and infrastructure issues.</p> <p>Needs reassurance of the affect of developing affordable housing in areas vulnerable to flooding.</p>
<p>Modification Reference: U0000409</p>
<p>Officer Response: Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 13 specifically covers road infrastructure in greater detail.</p> <p>Section 3 addresses the issue regarding the allocation of traveller pitches.</p> <p>Section 7 addresses the issue regarding flooding in Byfleet and West Byfleet, paragraph 7.4 addresses the specific issue relating to the floodplain.</p> <p>The development of the pub in the park is beyond the remit of the Site Allocations DPD.</p> <p>The Council has published a new release that Marstons will no longer be pursuing a proposal for a pub at this location.</p>
<p>Response Reference: U0001306</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06611/1</p>
<p>Name: Mr Edward Bawtree</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference:</p>
<p>Summary of Comment: DPD does not pass the test of soundness in accordance with paragraph 35 of the National Planning Policy Framework 2018.</p> <p>DPD is not an appropriate strategy and is not consistent with national policy.</p> <p>Objects to developing Green Belt land.</p> <p>The West Byfleet Neighbourhood Plan emphasises the protection of existing Green Belt.</p> <p>The proposed development is unlikely to be compliant with planning law, as it is contrary to these protection policies.</p> <p>Concerns regarding the following;</p> <ul style="list-style-type: none"> - Inadequate road infrastructure. Parvis Road is already heavily congested, particularly during rush hour; - Inadequate health and educational infrastructure; - Noise and air pollution arising from increased traffic; - Traveller pitches. Proposed 15 pitches undermine WBC's policy on Gypsies, Travellers and Showpeople. Sites should be identified in the urban area before Green Belt areas.

<p>Traveller site criteria has not been met in proposals (access and turning space; room for business activities and access to schools and health care);</p> <p>- Flooding.</p> <p>The proposal constitutes overdevelopment in the area.</p> <p>West Byfleet will lose approximately 50% of its Greenbelt land.</p> <p>Consideration should be give to smaller developments spread more equally through the borough, using brownfield sites where possible.</p>
<p>Contributor Proposed Modification: Consideration should be give to smaller developments spread more equally through the borough, using brownfield sites where possible.</p>
<p>Modification Reference: U0000366</p>
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 5 specifically addresses the loss of Green Belt in Byfleet and West Byfleet. Section 16 addresses the associated issue regarding the West Byfleet Neighbourhood plan. Section 3 addresses the issue regarding traveller pitches. Section 6 addresses the issue regarding the adequacy of infrastructure. Section 13 specifically covers road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 7 addresses the issue regarding flooding. Section 8 addresses the issue regarding pollution. With regard to the comment about overdevelopment, the Core Strategy has already set the number of dwellings to be provided in the Borough. The overall quantum of development and its associated impacts have been assessed, and with the appropriate measures of mitigation, the proposed allocated sites can be developed sustainably.</p>
<p>Response Reference: U0001676</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06877/1</p>
<p>Name: Ms Elspeth Bawtree</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. My reasons for this assertion are detailed below: Greenbelt land - the site is currently designated as greenbelt and forms part of the Greenbelt of West Byfleet Neighbourhood Development Plan (NDP2017) which emphasises the protection of existing Greenbelt land. The proposed development clearly fails to honour this and seems contrary to the NDP2017 and so likely not to be compliant with Planning Law. Infrastructure - Roads - Parvis Road is already heavily congested, particularly at the start and end of the working and school days. It is unlikely to be able to cope with the additional traffic from the proposed 550 homes and 15 traveller pitches. Schools - the local schools are heavily over-subscribed and will not be able to accommodate additional children from the proposed development.</p>

<p>Health centre - the local GP practices do not have the capacity to provide services to the additional population of the proposed development.</p> <p>Noise & air pollution - the increased traffic will have an impact on levels of noise and air pollution.</p> <p>Traveller pitches - the proposed 15 pitches appear not to conform to Woking Borough Council's own policy on Gypsies, Travellers and Travelling Showpeople which requires that suitable sites should be identified in the urban area before considering siting them in the Greenbelt. The proposed development also appears to have failed to take into consideration on a number of criteria such as access and turning space; room for business activities and access to schools and health care.</p> <p>Flooding - the area floods regularly.</p> <p>Overall, if the proposal is allowed to proceed, it will have a significantly deleterious effect on the West Byfleet area and constitutes overdevelopment of the area. West Byfleet will lose approximately 50% of its Greenbelt land while the rest of Woking Borough is largely unaffected, which is unacceptable. If additional dwellings are required to meet Government objectives, then consideration should be give to smaller developments spread more equally through the borough, using brownfield sites where possible.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: In regards to the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.</p> <p>The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.</p> <p>Section 5 of the Topic Paper responds to concerns about the proportion of development identified in the Byfleets area; and the amount of Green Belt land proposed for release in the Byfleets area.</p> <p>The Council did consider brownfield sites and this has been addressed in Section 11 of the Topic Paper.</p>
<p>Response Reference: U0001341</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 04935/1</p>

Name: Mr M Beazleigh
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB18
Summary of Comment: Objects to the plan to develop Green Belt land in Byfleet and between Byfleet and West Byfleet. Considers that this is a disproportionate amount of development, when other areas of the Borough, for instance Pyrford, are having no development at all. Feels that this is unfair and unjust.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Paragraph 5.1 of the Regulation 19 Issues and Matters Topic Paper recognises that the allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development. Paragraphs 14.11 to 14.13 of the Regulation 19 Issues and Matters Topic Paper outline the reasons for the removal of Regulation 18 sites GB12 and GB13 from the Site Allocations DPD. This decision is well informed by careful consideration of all available evidence and is defensible.
Response Reference: U0001323
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06460/1
Name: Mr Henry Beck
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
Summary of Comment: The DPD is not legally compliant because it has not followed the SCI, e.g. site UA44 has been included without having been in any previous consultations, and without any engagement with the community to highlight this addition. Concerned that residents who have read previous drafts of the DPD may not read this draft since they may not be expecting such a large new site. Also, the DPD is not positively prepared because the appropriate process of consultation has not been followed for certain sites. The site is not 'sound' in respect of sustainability. The Sustainability Appraisal is wrong to state that the site could sustain 992 additional dwellings. That number would require huge tower blocks- not in keeping with the surrounding area and with an enormous light and sound pollution impact, including in the operational phase. The DPD is not positively prepared since elements of it do not currently achieve sustainable development. The DPD is not consistent with national policy since parts of it (e.g. the football club site) do not enable the delivery of sustainable development. The DPD has not met the Duty to Cooperate since multiple neighbouring councils have stated that they have not been consulted on key parts of it. The DPD is not positively prepared since it is not based on a strategy informed by agreements with other authorities.

The DPD is not effective since cross boundary strategic matters have not been dealt with and neighbouring councils have told WBC that they will be contacting WBC to discuss the matter once they have time to review the documentation.
The DPD is not justified since it does not provide evidence that some sites (e.g. UA44) are the most appropriate approach (e.g. the football club could relocate elsewhere).

Contributor Proposed Modification:

Are you proposing a modification(s) to make the DPD legally compliant and/or to strengthen its compliance?: Yes

You will need to say why this modification(s) will make the DPD legally compliant / strengthen its legal compliance. Please set out your suggested modification(s) in the text box below. It will be helpful if you are able to put forward your suggested revised wording for any policy or text, and include all information and evidence necessary to support / justify your suggested change. Please be as precise as possible. Please be aware that after closure of this consultation, further submissions for modifications will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination. Leave this section blank if you have no modifications to make regarding legal compliance (please note: there is a separate question on compliance with the Duty to Cooperate). : 1. The correct and legally necessary level of full consultation required on site UA44 needs to be conducted OR the site needs to be removed from the DPD document entirely.

...

Are you proposing modification(s) to make the DPD sound, or to strengthen its soundness?: Yes

You will need to say why this modification(s) will make the DPD sound/strengthen its soundness. Please set out your suggested modification(s) in the text box below. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and include all information and evidence necessary to support / justify your suggested change. Please be aware that after closure of this consultation, further submissions relating to soundness will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.: The appropriate process of consultation for certain "late addition" sites contained within the DPD needs to be followed - eg UA44

Modification Reference: U0000127

Officer Response: There is no requirement, either in the SCI or in law or national policy, for every individual allocated site to undergo two rounds of public consultation. If there were it would cause great expense for Local Planning Authorities to introduce sites after Regulation 18 stage, for example in response to comments received during the Regulation 18 consultation. Site UA44 has undergone full and adequate public consultation at Regulation 19 stage, as set out in the Regulation 19 Issues and Matters Topic Paper, Section 9.

Although site UA44 was proposed to be allocated for 992 dwellings, the Council voted that this be removed prior to publication for Regulation 19 consultation. The policy for site UA44 gives no indicative dwelling number, but states 'Density of development should maximise the efficient use of the site without compromising the general character of the area', 'the development would need to consider the impacts on noise and light pollution and ensure mitigation measures are implemented to protect residential amenity', alongside many other requirements. The compliance with the SADPD of any proposed dwelling number on this site would be dependent on meeting these key requirements. Therefore the SADPD will deliver sustainable development.

All neighbouring councils, and others in the West Surrey Housing Market Area, have been consulted on the SADPD. The question of duty to cooperate with neighbouring authorities, and the addressing of cross boundary strategic matters with neighbouring authorities, is addressed by the Regulation 19 Neighbouring Authorities Topic Paper, Section 9.

Site UA44 has been considered through the SHLAA process against many alternative sites, including the consideration of sites' suitability for mixed use development. The policy does not require any increased capacity within the stadium, but only its retention and enhancement (alongside residential and commercial development.) Therefore it is not considered necessary to assess alternative sites specifically for a football stadium.
Response Reference: U0001707
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06817/1
Name: Mr Michael Beck
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA32, UA44
<p>Summary of Comment: The DPD has been prepared without proper consultation with residents and without suitable evidence underpinning it. Shows no consideration about which options have been considered - WBC are only promoting their own agenda which is anti-democratic and covert (similar to poor management of the Sheerwater redevelopment).</p> <p>Concerned about classification of sites outside the Town Centre for potential development using high-rise residential blocks e.g. site UA44, which was not part of previous rounds of consultation (as required by the Statement of Community Involvement). WBC have signed a development contract with GolDev despite a lack of any approved land-use designation that would permit it; or consultation with affected residents. The re-siting and major expansion of a football club (with a stadium serving 8 times the current attendance), the relocation of a major sports facility, the development of 992 housing units, 10,000 square foot of commercial retail space and 671 parking space - resulting in a high-rise development and involving Compulsory Purchase Orders - is not justified, needed or supported through consultation. Another example is the proposed development of a high rise block at Oriental Road Car Park (UA32). Illogically, if the car park is removed, accessibility to the railway will be diminished - a facility that the DPD recognises as unique and special in its contribution to the history and development of Woking. Overspill of high-rise development beyond the boundary of the railway line and the town centre into surrounding villages is unwelcome - if this were promoted previously residents may have been inclined to be less protective of the Green Belt.</p> <p>The DPD has not been properly prepared as UA44 was not publicly consulted on as per the SCI. There is no sustainability appraisal for the site. No evidence has been provided about how the site will achieve key requirements e.g. appropriate and adequate provision of car, coach and cycle parking which will not compromise on highway safety; nor to support statements made in the DPD e.g. there is 'excellent accessibility'. The site currently could only support a few extra vehicles and hence only a few extra dwellings. This is supported by evidence in the SHLAA, which states the site is suitable for only 40 additional dwellings. The adjoining Loop Road recreation site should also be designated as Urban Open Space.</p>
Contributor Proposed Modification: Remove those proposals (such as UA44 Westfield and Oriental Road Car Park) which have not been properly (or at all) consulted upon as required by WBC's own regulations.
Modification Reference: U0000265
Officer Response: The main aim of preparing the Site Allocations DPD is to identify land and allocate specific sites to enable the delivery of the Core Strategy, and to meet future

development needs beyond the Core Strategy period. The vision of the Core Strategy includes providing well-designed homes to meet the needs of all sections of the existing and future community; the creation of jobs for a sustainable economy; and the provision of shops and facilities to meet the day-to-day needs of the community. The Council recognises the outcomes of plan-making may not satisfy everyone, but that a good balance is struck between all the conflicting needs and aspirations for the Borough. The Site Allocations DPD provides a framework for clear and consistent decision making, giving greater certainty to both the local community and developers. During the preparation of the Site Allocations DPD, the Council has sought to involve the public at each stage and consider the variety of views submitted. The consultation process for plan-making - led by the planning authority - is a different process to that of consulting on development proposals and projects at the planning application stage (such as Sheerwater), which are managed by different teams within the Council. In plan-making, the Council must follow certain criteria in national town and country planning regulations, and Officers are satisfied that they have done what they can within the available resources, but gone beyond statutory requirements to engage the community during each phase of consultation. This is set out in detail in Section 9 of the Regulation 19 Issues and Matters Topic Paper.

In parallel to the Site Allocations DPD preparation process, planning applications can be submitted at any time for consideration through the development management process, and often considered by the Planning Committee. Land does not have to be allocated for certain uses in order to be subject to a speculative planning application. Any development organisation, including those working with Woking Borough Council and those established by the Council, can submit a planning application to be determined on its own merits outside of the DPD preparation process. The full Council considered the plans for Woking Football Stadium at a meeting in July 2018, and all documentation is in the public domain on the Council's website, under 'Council Meetings'. The reports include all aims and objectives of the redevelopment, and reasons behind the proposals. GolDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this year. There will be extensive public consultation as part of the planning application process. The planning merits of the scheme will be determined by the Council's Planning Committee in accordance with the Development Plan, which (if not adopted yet) will take into account the draft Site Allocations DPD. Any planning proposal that comes forward will need to take into account the draft (or possibly adopted) key requirements of policy UA44, including the provision of suitable parking infrastructure. The football stadium site, UA44, was not included in the first draft of the DPD as it was only identified by the evidence base later in the preparation process. It was then appraised accordingly for sustainability, and included in the latest draft DPD for Regulation 19 public consultation. The sustainability appraisal matrix for the site is included in Appendix 11 of the Sustainability Appraisal report. The site was also assessed as part of the updated (2017) Strategic Housing Land Availability Assessment (SHLAA), available on the Research and Evidence Base section of the Woking2027 website. The SHLAA identifies deliverable and developable sites to help inform the preparation of the Site Allocations DPD. The yields in the Site Allocations DPD are indicative - actual yields delivered may go up or down. Indicative yields are based on the ranges provided in policy CS10 of the Core Strategy, which are in turn based on the character of the area and on exemplar sites. Should a planning proposal come forward for a site with an increased yield, this will be considered on a case by case basis depending on the merits and impacts of the proposal at the planning application stage. The community will also be consulted on the planning proposals, whose responses would be considered in making a decision to approve or reject the scheme.

A key requirement of policy UA32 for development schemes to achieve planning approval includes the provision of alternative car parking to serve the railway station. There should be no overall loss of parking serving the station. The site falls within the designated Woking Town Centre boundary. Land to the south of the railway line falls within the

boundary, and as such will help support the development of the town centre as the primary centre for economic and high density residential development. Any development proposals will be expected to comply with Core Strategy policy CS2 in the Core Strategy, and deliver high quality, well designed public spaces and buildings which make efficient use of land, contribute to the functionality of the centre and add to its attractiveness and competitiveness. Sites such as UA32 make the best use of urban land in the most sustainable locations, and help reduce the use of private cars. Upon adoption of the Core Strategy, the boundary of the town centre was actually revised inwards so that development and investment is focused in the heart of the town, maintaining its compact nature and making the best use of land closest to the station. Any proposals for tall buildings south of the railway line will, however, continue to be carefully managed by the development management process to ensure they respect and make a positive contribution to the street scene and the character of the area in which they are situated, as per Core Strategy design policy.

The accessibility of the site was assessed as part of both the SHLAA and the Sustainability Appraisal. Walking and cycling distances to key services and facilities were measured using the Council's Geographical Information System software. The site is considered to be in reasonable walking distance to key services and facilities and there is scope to reduce the need to travel by car. It is considered to have excellent accessibility to schools and GP facilities. Reasonable walking distances are defined as within 800m walking distance, or a 600m straight-line distance, or within a 10minutes' walking distance. Reasonable cycling distance is considered to be up to 3km (guidance by Sport England). If commercial and/or retail uses are delivered as part of any scheme coming forward, accessibility by occupiers and the local community to facilities will be further enhanced. It is acknowledged the proposals map does not show the Loop Road recreation ground as 'Urban Open Space'. However, this area is still protected by Core Strategy policy CS17. The Urban Open Space designations on the proposals map were informed by an audit conducted in 2008. The Site Allocations DPD does not seek to allocate recreation grounds for urban open space, but there may be an opportunity to do this via an emerging Neighbourhood Plan for the area.

Response Reference: U0001419

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 05588/1

Name: Ms Ann Belcher

Number of Signatories: 1

Comment Type: OBJ

Site Reference:

Summary of Comment: The A245 was assessed as at maximum capacity by the Highways Authority several years ago; frequently gridlocked and a lot of cars use the road through the village itself rather than the A245, blocking access from the back of the village.

A lot of the proposed development land is flooded frequently

A lot of the proposed development land is near the M25, should consider noise and fuel pollution.

Schools are at full capacity and any new classrooms would have to be built on playgrounds and sports fields, risking childrens' health.

Doctors are at full capacity with 3 weeks' wait to see a named doctor.

Brownfield sites in other areas of Woking should be considered. The high rise buildings in central Woking should provide enough housing to meet the Government conditions. Byfleet is at the edge of the borough with few amenities, but our council charges are the same as in central Woking with many amenities.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The road traffic implications of the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7. The issue of noise and air pollution in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The impact of the proposals on local infrastructure, including schools and healthcare facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The consideration of alternative sites, and the potential to meet the identified need on brownfield sites, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 11. Levels of council tax are not within the remit of planning policy. The Infrastructure Delivery Plan identifies several projects in Byfleet for new infrastructure including re-provision of the Centre for the Community and the library, reinforcement to the electricity grid, a flood alleviation scheme and a SANG.
Response Reference: U0001593
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06621/1
Name: Ms Natalie Berthiaud
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Object to proposed site allocations: Byfleet and West Byfleet is already lacking green space. The traffic along Parvis Road is already a nightmare. Both these issues will be exacerbated by the Sheer House and Broadoaks developments.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on the amount of open space in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 4 and 5. The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. The Sheer House and Broadoaks developments were included in the traffic mitigation evidence base, and were also provided to inform the planning of infrastructure providers.
Response Reference: U0001034
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05039/1

Name: Mr And Mrs Martin And Pamela Bett
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Wishes to be informed when the SADPD progresses to the next stages.</p> <p>Objection to the proposal to remove site GB10 (land surrounding West Hall) from the Greenbelt. Does not believe that the Draft Site Allocations DPD passes the test of soundness required by paragraph 35 of the National Planning Policy Framework (NPPF) 2018. In particular, does not think GB10 in the Proposals Map should be taken out of Greenbelt as, in my opinion, this is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence. Furthermore, the Draft Site Allocations DPD concerning GB10 is not it consistent with national policy. Therefore propose that the Draft Site Allocations DPD should be changed to keep site GB10 in the Greenbelt and that the proposed allocation of this site for the development of 555 dwellings and 15 traveller pitches should not be permitted.</p> <p>This Site is currently allocated as Greenbelt land. Inaccurate Statements regarding the Greenbelt function of the Site are provided.</p> <p>The Site does in fact perform the Greenbelt function of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment.</p> <p>This Site falls within the boundary of the West Byfleet Neighbourhood Development Plan (NDP2017) and forms part of their Greenbelt designation. One of the objectives of the NDP2017 is to maintain, enhance and protect the distinctive and special character of West Byfleet. Any future application for Planning Permission on the Site would be contrary to the NDP2017 and therefore not compliant with Planning Law as defined in the NPPF paragraph 47. The plan emphasises the protection and enhancement of all existing green spaces which would be significantly undermined if the GB10 Site was released from the Greenbelt for housing.</p> <p>Within the West Byfleet Neighbourhood Area, 85 ha or (28.9%) is officially designated as Greenbelt. Some of the land (Broadoaks and school land) can no longer be looked upon as open space, so the open space provided by Greenbelt reduces from 85 ha to 68 ha. Should the land designated as GB10 be taken out of the Greenbelt and allocated for development under the Draft Site Allocations DPD, the area of open space provided by the Greenbelt will reduce to 13%. This compares very unfavourably with the 63% of Woking Borough currently designated as Greenbelt. It is therefore extremely unlikely that an alternative and more appropriate Greenbelt site is not available elsewhere within the borough.</p> <p>The loss of Greenbelt (GB10) within West Byfleet, which has been untouched for many years, will inevitably cause a net loss of bio-diversity within West Byfleet which would be contrary to the National Planning Policy Framework guidelines for sustainable development.</p> <p>The Site is also covered by a minerals allocation which will still exist if the Site is released from the Greenbelt - the minerals plan runs from 2011 to 2026 and the site allocations DPD to 2027. As a result of the timings running in parallel the minerals allocation hanging over the Site would not make this site an attractive prospect for residential development and therefore the deliverability of the allocation is questionable.</p> <p>Parvis Road is congested already. There is currently approval or outline planning approval for an additional 507 dwellings in West Byfleet, 252 of which will only be accessible by Parvis Road (A245), and the ability of the A245 to cope with an additional increase in vehicular movements to serve 555 private dwellings and 15 traveller pitches in addition to the 252 from the Broadoaks development is questioned.</p>

Effective mitigations for the additional traffic are not proposed in any appropriate detail and are likely to be complex, represent a significant cost and take time to implement. Without effective mitigations for the increased levels of traffic, the proposal for GB10 to be taken out of the Greenbelt does not pass the guidelines laid down in the National Planning Policy Framework for sustainable development.

The NPPF (paragraph 170(e)) states that planning policies and decisions should contribute to and enhance the local environment by preventing new development from contributing to or being put at unacceptable risk by unacceptable high levels of soil, air, water or noise pollution. Given the site's proximity to the M25 and the A245, any future residential development is considered to be at risk from both noise and air pollution which would be very difficult to mitigate against resulting in an allocation which is not consistent with National Policy.

The Sustainability Assessment Objective 11 is to minimise the adverse impacts of emissions from transport, yet no baseline data on air quality exists across the Borough (Appendix 2 section 7). The existing Greenbelt provides a noise and pollution buffer between much of West Byfleet and the M25. Its proposed removal from the Greenbelt will increase both noise and pollution for schools, residents and businesses within West Byfleet.

The proposed removal of GB10 from the Greenbelt and development of 555 dwellings along with the already approved, but not yet delivered, developments of 507 dwellings in West Byfleet (total 1,062) will place a significant strain on the local infrastructure: roads, parking, education healthcare, utilities, etc..

This is a 46% increase in the number of dwellings in West Byfleet where the roads are already congested throughout much of the day, schools and GP surgeries are operating above their capacity, on street-parking is already a problem for local residents and the water supply is designated as stressed. The Infrastructure Report completely fails to address how and where adequate healthcare could be provided for an increased population.

These mitigations are likely to be complex, represent a significant cost and take time to implement. Most importantly, they have not been identified and so the removal of GB10 from the Greenbelt for development is not consistent with the principles of sustainable development as per the National Planning Policy Framework lays guidelines.

WBC's policy on Gypsies, Travellers and Travelling Showpeople states that sites in the urban area will be considered before those in the Greenbelt. It has not been demonstrated that there is a lack of deliverable sites in the urban area. Only then, and in very special circumstances, can Greenbelt sites be considered. The proposed development of 15 travellers' pitches falls short on a number of criteria, the site should have safe access from the highway and adequate parking provision and turning areas - access would only be by Parvis Road (A245) which is already congested and does not provide safe or easy access from roads already giving onto Parvis Road; the site should have adequate amenity for its intended occupiers including space for related business activities; the site should not have unacceptable impact on the visual amenity and character of the area; the site should have adequate infrastructure and on-site utilities to service the number of pitches proposed; and the site should have a safe and reasonable access to schools and other local facilities.

The National Planning Policy Framework lays down guidelines for sustainable development. Paragraph 9 states that: Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including making it easier for jobs to be created in cities, towns and villages, moving from a net loss of bio-diversity to achieving net gains for nature, replacing poor design with better design, improving the conditions in which people live, work, travel and take leisure, widening the choice of high-quality homes.

The Sustainability Appraisal has not been carried out with due regard to these objectives. Moving from a net loss of bio-diversity to achieving net gains for nature: Within the West Byfleet Neighbourhood Plan is the following analysis of Greenbelt: The West Byfleet Neighbourhood Area covers approximately 294 ha, of which 85 ha - or 28.9% - is officially

designated as Greenbelt. Within this, the land area on which the schools physically stand and Broadoaks can no longer be looked upon as open space, so the open space provided by Greenbelt reduces from 85 ha to 68 ha, or 23% of The Area. Should the land designated as GB10 be taken out of the Greenbelt and allocated for development under the Site Allocations DPD, the area of open space provided by the Greenbelt will further reduce to 13%. This compares very unfavourably with the 63% of Woking Borough currently designated as Greenbelt and will inevitably cause a net loss of bio-diversity within West Byfleet.

The proposed removal of GB10 from the Greenbelt and development of 555 dwellings along with the already approved but not yet delivered developments of 507 dwellings in West Byfleet (total 1,062) will place a significant strain on the local infrastructure: roads, parking, education healthcare, utilities, etc..

This is a 46% increase in the number of dwellings in West Byfleet where the roads are already congested throughout much of the day, schools and GP surgeries are operating above their capacity, on street-parking is already a problem for local residents and the water supply is designated as stressed. These issues will require significant mitigation if the proposed development of site GB10. These mitigations are likely to be complex, come at a significant cost and take time to implement. The removal of GB10 from the Greenbelt for development is not consistent with the principles of sustainable development.

Access to the Site is over 1km from the railway station and Parvis Road would require significant upgrading works and crossing facilities to be provided and, even then, would not be a sustainable location as the use of private vehicles would be heavily relied upon. Table 1 of the Sustainability Appraisal lists GB 13 as having "relatively high potential for sustainability" yet does not remotely pass the guidelines laid down in the National Planning Policy Framework for sustainable development. Nor does it propose any mitigation measures.

The Site is an area subject to frequent and severe flooding. Adequate assessments regarding flooding from both river and surface water have not been carried out.

Inadequate reasons have been provided for excluding Martyrs Lane Greenbelt from the draft Site Allocations DPD.

WBC has not focused on previously developed land in sustainable locations, which it is required to do. Inadequate consideration has been given to alternative sites. For example, Appendix 7 of the Sustainability Appraisal lists sites which have not been included in the Draft Site Allocation DPD because each individual site is too small. However, collectively they could contribute 273 dwellings during the plan period and no account of this or other windfall sites has been made in determining the number of dwellings required in the Site Allocation DPD.

This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment. The outline planning permission granted to Shere House and the development at Broadoaks will contribute an additional 507 dwellings to West Byfleet, (on a current total of approximately 2,320 households). The increase in households in West Byfleet of 46% within the plan period will only exacerbate a number of the issues raised above, in particular the inadequacy of appropriate and detailed plans for improvements to infrastructure, including health, schools, water, sewage and roads.

Contributor Proposed Modification: The DPD should be changed so that site GB10 is retained in the Greenbelt and the proposed allocation of this site for the development of 550 dwellings and 15 traveller pitches should not be permitted.

Modification Reference: U0000200

Officer Response: The Council acknowledges that Parcel 4, which contains site GB10, was assessed by the Green Belt Boundary Review to be sensitive in Green Belt terms, but this was weighed against its very high potential to deliver sustainable development. Any development at GB10 would therefore need to be sensitively designed to create a strong landscape edge to development. Section 1 of the Council's Regulation 19 Issues and Matters Topic Paper sets out in detail the Council's views on why exceptional

circumstances exist for the site's release from the Green Belt. Sections 4 and 5 set out how the Council is confident that the overall purpose and integrity of the Green Belt will not be undermined by releasing and safeguarding Green Belt land in Byfleet and West Byfleet. Section 5 also addresses concerns about the proportion of Green Belt being released in West Byfleet.

Section 16 responds to the issue regarding designation in the West Byfleet Neighbourhood Development Plan. Section 17 addresses concerns about the allocation of the site in Surrey's Minerals Plan.

Section 19 responds to the concern regarding loss of biodiversity. Section 13 sets out the Council's response regarding congestion and traffic issues. The County Council as Highways Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD.

Section 8 of the Topic Paper provides the Council's response regarding noise and air pollution. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD.

Section 3 of the Topic Paper sets out the Council's response regarding Traveller pitches, including how a sequential approach has been taken to identify sites.

Regarding the Sustainability Appraisal, the Sustainability Appraisal Framework includes the objective to conserve and enhance biodiversity. When appraising sites, several issues regarding biodiversity were taken into consideration (refer to Table 5 in the Sustainability Appraisal for details). Many of the effects on biodiversity are either uncertain or depend upon implementation, individual site design and exploring opportunities for biodiversity gain. Where any sites scored negatively against biodiversity objectives, optimising and/or mitigation measures were put forward to ensure any impacts are avoided and/or mitigated accordingly. Key requirements within site allocations include conducting extra assessments to determine levels of biodiversity on and adjacent to the site, and the need to identify how these would be best preserved and enhanced. Sections 5 and 19 of the Topic Paper set out the Council's full response to concerns about loss of Green Belt and biodiversity.

In terms of improving the conditions in which people live, work, travel and take leisure, the Sustainability Appraisal Framework includes many objectives which contribute towards this national aim, including SA Objectives 2, 4, 5, 15, 16 and 17. The Sustainability Appraisal has identified several optimising and/or mitigation measures to maximise positive outcomes and minimise negative outcomes that development of proposal sites would create against these objectives. For example, where the need to travel has been appraised as being potentially high due to lack of accessibility to local services and railway stations, key requirements have been introduced to site allocations, including GB10, to conduct transport assessments and contribute financially towards sustainable modes of transport and infrastructure. The exact nature of these site specific requirements will be identified through the development management process, and be informed by the detailed transport assessment.

The Council updated the links to documents contained in Appendix 1 in the Summer of 2018. It is appreciated that websites continue to change and evolve with new publications, and the Council will endeavour to continue to update the links as the DPD process progresses.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. Section 11 of the Topic Paper describes how the Council is satisfied that it has carried out an extensive assessment of alternative sites.

With regards to windfall sites: the Core Strategy Inspector stated that small sites and windfalls should be seen as supplementing the Council's housing provision rather than necessarily replacing particular identified sites, and that the leeway that such small sites provide would appear capable of compensating for any delay in the housing which is anticipated to be delivered from, for example, identified sites. Windfall sites are therefore considered to be a buffer to cater for non-implementation of or delay to the delivery of development. The representation regarding unnecessary, excessive and overdevelopment is addressed in paragraphs 1.7 and 1.8 of the Topic Paper.

The impacts of cumulative development in the area have been considered. The evidence base looks at the overall quantum of development. For example, the transport assessment analysed worst case scenarios at peak travel times, and looked at development in a cumulative manner. Surrey County Council is confident that whilst cumulative development will have some adverse impact on the road network, the impacts

can be satisfactorily mitigated. The Council has, and continues to, share with infrastructure providers its development proposals. Infrastructure providers are aware of the cumulative nature of development in various parts of the Borough and are factoring this into their future development plans for health facilities, school places, and utilities.
Response Reference: U0001126
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06904/1
Name: Pamela Bett
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Wishes to be informed when the SADPD progresses to the next stages.</p> <p>Objection to the proposal to remove site GB10 (land surrounding West Hall) from the Greenbelt. Does not believe that the Draft Site Allocations DPD passes the test of soundness required by paragraph 35 of the National Planning Policy Framework (NPPF) 2018. In particular, does not think GB10 in the Proposals Map should be taken out of Greenbelt as, in my opinion, this is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence. Furthermore, the Draft Site Allocations DPD concerning GB10 is not it consistent with national policy. Therefore propose that the Draft Site Allocations DPD should be changed to keep site GB10 in the Greenbelt and that the proposed allocation of this site for the development of 555 dwellings and 15 traveller pitches should not be permitted.</p> <p>This Site is currently allocated as Greenbelt land. Inaccurate Statements regarding the Greenbelt function of the Site are provided.</p> <p>The Site does in fact perform the Greenbelt function of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment.</p> <p>This Site falls within the boundary of the West Byfleet Neighbourhood Development Plan (NDP2017) and forms part of their Greenbelt designation. One of the objectives of the NDP2017 is to maintain, enhance and protect the distinctive and special character of West Byfleet. Any future application for Planning Permission on the Site would be contrary to the NDP2017 and therefore not compliant with Planning Law as defined in the NPPF paragraph 47. The plan emphasises the protection and enhancement of all existing green spaces which would be significantly undermined if the GB10 Site was released from the Greenbelt for housing.</p> <p>Within the West Byfleet Neighbourhood Area, 85 ha or (28.9%) is officially designated as Greenbelt. Some of the land (Broadoaks and school land) can no longer be looked upon as open space, so the open space provided by Greenbelt reduces from 85 ha to 68 ha. Should the land designated as GB10 be taken out of the Greenbelt and allocated for development under the Draft Site Allocations DPD, the area of open space provided by the Greenbelt will reduce to 13%. This compares very unfavourably with the 63% of Woking Borough currently designated as Greenbelt. It is therefore extremely unlikely that an alternative and more appropriate Greenbelt site is not available elsewhere within the borough.</p> <p>The loss of Greenbelt (GB10) within West Byfleet, which has been untouched for many years, will inevitably cause a net loss of bio-diversity within West Byfleet which would be</p>

contrary to the National Planning Policy Framework guidelines for sustainable development.

The Site is also covered by a minerals allocation which will still exist if the Site is released from the Greenbelt - the minerals plan runs from 2011 to 2026 and the site allocations DPD to 2027. As a result of the timings running in parallel the minerals allocation hanging over the Site would not make this site an attractive prospect for residential development and therefore the deliverability of the allocation is questionable.

Parvis Road is congested already. There is currently approval or outline planning approval for an additional 507 dwellings in West Byfleet, 252 of which will only be accessible by Parvis Road (A245), and the ability of the A245 to cope with an additional increase in vehicular movements to serve 555 private dwellings and 15 traveller pitches in addition to the 252 from the Broadoaks development is questioned.

Effective mitigations for the additional traffic are not proposed in any appropriate detail and are likely to be complex, represent a significant cost and take time to implement. Without effective mitigations for the increased levels of traffic, the proposal for GB10 to be taken out of the Greenbelt does not pass the guidelines laid down in the National Planning Policy Framework for sustainable development.

The NPPF (paragraph 170(e)) states that planning policies and decisions should contribute to and enhance the local environment by preventing new development from contributing to or being put at unacceptable risk by unacceptable high levels of soil, air, water or noise pollution. Given the site's proximity to the M25 and the A245, any future residential development is considered to be at risk from both noise and air pollution which would be very difficult to mitigate against resulting in an allocation which is not consistent with National Policy.

The Sustainability Assessment Objective 11 is to minimise the adverse impacts of emissions from transport, yet no baseline data on air quality exists across the Borough (Appendix 2 section 7). The existing Greenbelt provides a noise and pollution buffer between much of West Byfleet and the M25. Its proposed removal from the Greenbelt will increase both noise and pollution for schools, residents and businesses within West Byfleet.

The proposed removal of GB10 from the Greenbelt and development of 555 dwellings along with the already approved, but not yet delivered, developments of 507 dwellings in West Byfleet (total 1,062) will place a significant strain on the local infrastructure: roads, parking, education healthcare, utilities, etc..

This is a 46% increase in the number of dwellings in West Byfleet where the roads are already congested throughout much of the day, schools and GP surgeries are operating above their capacity, on street-parking is already a problem for local residents and the water supply is designated as stressed. The Infrastructure Report completely fails to address how and where adequate healthcare could be provided for an increased population.

These mitigations are likely to be complex, represent a significant cost and take time to implement. Most importantly, they have not been identified and so the removal of GB10 from the Greenbelt for development is not consistent with the principles of sustainable development as per the National Planning Policy Framework lays guidelines.

WBC's policy on Gypsies, Travellers and Travelling Showpeople states that sites in the urban area will be considered before those in the Greenbelt. It has not been demonstrated that there is a lack of deliverable sites in the urban area. Only then, and in very special circumstances, can Greenbelt sites be considered. The proposed development of 15 travellers' pitches falls short on a number of criteria, the site should have safe access from the highway and adequate parking provision and turning areas - access would only be by Parvis Road (A245) which is already congested and does not provide safe or easy access from roads already giving onto Parvis Road; the site should have adequate amenity for its intended occupiers including space for related business activities; the site should not have unacceptable impact on the visual amenity and character of the area; the site should have

adequate infrastructure and on-site utilities to service the number of pitches proposed; and the site should have a safe and reasonable access to schools and other local facilities.

The National Planning Policy Framework lays down guidelines for sustainable development. Paragraph 9 states that: Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including making it easier for jobs to be created in cities, towns and villages, moving from a net loss of bio-diversity to achieving net gains for nature, replacing poor design with better design, improving the conditions in which people live, work, travel and take leisure, widening the choice of high-quality homes.

The Sustainability Appraisal has not been carried out with due regard to these objectives. Moving from a net loss of bio-diversity to achieving net gains for nature: Within the West Byfleet Neighbourhood Plan is the following analysis of Greenbelt: The West Byfleet Neighbourhood Area covers approximately 294 ha, of which 85 ha - or 28.9% - is officially designated as Greenbelt. Within this, the land area on which the schools physically stand and Broadoaks can no longer be looked upon as open space, so the open space provided by Greenbelt reduces from 85 ha to 68 ha, or 23% of The Area. Should the land designated as GB10 be taken out of the Greenbelt and allocated for development under the Site Allocations DPD, the area of open space provided by the Greenbelt will further reduce to 13%. This compares very unfavourably with the 63% of Woking Borough currently designated as Greenbelt and will inevitably cause a net loss of bio-diversity within West Byfleet.

The proposed removal of GB10 from the Greenbelt and development of 555 dwellings along with the already approved but not yet delivered developments of 507 dwellings in West Byfleet (total 1,062) will place a significant strain on the local infrastructure: roads, parking, education healthcare, utilities, etc..

This is a 46% increase in the number of dwellings in West Byfleet where the roads are already congested throughout much of the day, schools and GP surgeries are operating above their capacity, on street-parking is already a problem for local residents and the water supply is designated as stressed. These issues will require significant mitigation if the proposed development of site GB10. These mitigations are likely to be complex, come at a significant cost and take time to implement. The removal of GB10 from the Greenbelt for development is not consistent with the principles of sustainable development.

Access to the Site is over 1km from the railway station and Parvis Road would require significant upgrading works and crossing facilities to be provided and, even then, would not be a sustainable location as the use of private vehicles would be heavily relied upon. Table 1 of the Sustainability Appraisal lists GB 13 as having "relatively high potential for sustainability" yet does not remotely pass the guidelines laid down in the National Planning Policy Framework for sustainable development. Nor does it propose any mitigation measures.

The Site is an area subject to frequent and severe flooding. Adequate assessments regarding flooding from both river and surface water have not been carried out. Inadequate reasons have been provided for excluding Martyrs Lane Greenbelt from the draft Site Allocations DPD.

WBC has not focused on previously developed land in sustainable locations, which it is required to do. Inadequate consideration has been given to alternative sites. For example, Appendix 7 of the Sustainability Appraisal lists sites which have not been included in the Draft Site Allocation DPD because each individual site is too small. However, collectively they could contribute 273 dwellings during the plan period and no account of this or other windfall sites has been made in determining the number of dwellings required in the Site Allocation DPD.

This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment. The outline planning permission granted to Shere House and the development at Broadoaks will contribute an additional 507 dwellings to West Byfleet, (on a current total of approximately 2,320 households). The increase in households in West Byfleet of 46% within the plan period will only exacerbate a number of the issues raised above, in

particular the inadequacy of appropriate and detailed plans for improvements to infrastructure, including health, schools, water, sewage and roads.

Contributor Proposed Modification: The Draft Site Allocations DPD should be changed to keep site GB10 in the Greenbelt and the proposed allocation of this site for the development of 555 dwellings and 15 traveller pitches should not be permitted.

Modification Reference: U0000462

Officer Response: The Council acknowledges that Parcel 4, which contains site GB10, was assessed by the Green Belt Boundary Review to be sensitive in Green Belt terms, but this was weighed against its very high potential to deliver sustainable development. Any development at GB10 would therefore need to be sensitively designed to create a strong landscape edge to development. Section 1 of the Council's Regulation 19 Issues and Matters Topic Paper sets out in detail the Council's views on why exceptional circumstances exist for the site's release from the Green Belt. Sections 4 and 5 set out how the Council is confident that the overall purpose and integrity of the Green Belt will not be undermined by releasing and safeguarding Green Belt land in Byfleet and West Byfleet. Section 5 also addresses concerns about the proportion of Green Belt being released in West Byfleet.

Section 16 responds to the issue regarding designation in the West Byfleet Neighbourhood Development Plan. Section 17 addresses concerns about the allocation of the site in Surrey's Minerals Plan.

Section 19 responds to the concern regarding loss of biodiversity. Section 13 sets out the Council's response regarding congestion and traffic issues. The County Council as Highways Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD.

Section 8 of the Topic Paper provides the Council's response regarding noise and air pollution. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD.

Section 3 of the Topic Paper sets out the Council's response regarding Traveller pitches, including how a sequential approach has been taken.

Regarding the Sustainability Appraisal, the Sustainability Appraisal Framework includes the objective to conserve and enhance biodiversity. When appraising sites, several issues regarding biodiversity were taken into consideration (refer to Table 5 in the Sustainability Appraisal for details). Many of the effects on biodiversity are either uncertain or depend upon implementation, individual site design and exploring opportunities for biodiversity gain. Where any sites scored negatively against biodiversity objectives, optimising and/or mitigation measures were put forward to ensure any impacts are avoided and/or mitigated accordingly. Key requirements within site allocations include conducting extra assessments to determine levels of biodiversity on and adjacent to the site, and the need to identify how these would be best preserved and enhanced. Sections 5 and 19 of the Topic Paper set out the Council's full response to concerns about loss of Green Belt and biodiversity.

In terms of improving the conditions in which people live, work, travel and take leisure, the Sustainability Appraisal Framework includes many objectives which contribute towards this national aim, including SA Objectives 2, 4, 5, 15, 16 and 17. The Sustainability Appraisal has identified several optimising and/or mitigation measures to maximise positive outcomes and minimise negative outcomes that development of proposal sites

would create against these objectives. For example, where the need to travel has been appraised as being potentially high due to lack of accessibility to local services and railway stations, key requirements have been introduced to site allocations, including GB10, to conduct transport assessments and contribute financially towards sustainable modes of transport and infrastructure. The exact nature of these site specific requirements will be identified through the development management process, and be informed by the detailed transport assessment.

The Council updated the links to documents contained in Appendix 1 in the Summer of 2018. It is appreciated that websites continue to change and evolve with new publications, and the Council will endeavour to continue to update the links as the DPD process progresses.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. Section 11 of the Topic Paper describes how the Council is satisfied that it has carried out an extensive assessment of alternative sites.

<p>With regards to windfall sites: the Core Strategy Inspector stated that small sites and windfalls should be seen as supplementing the Council's housing provision rather than necessarily replacing particular identified sites, and that the leeway that such small sites provide would appear capable of compensating for any delay in the housing which is anticipated to be delivered from, for example, identified sites. Windfall sites are therefore considered to be a buffer to cater for non-implementation of or delay to the delivery of development. The representation regarding unnecessary, excessive and overdevelopment is addressed in paragraphs 1.7 and 1.8 of the Topic Paper. The impacts of cumulative development in the area have been considered. The evidence base looks at the overall quantum of development. For example, the transport assessment analysed worst case scenarios at peak travel times, and looked at development in a cumulative manner. Surrey County Council is confident that whilst cumulative development will have some adverse impact on the road network, the impacts can be satisfactorily mitigated. The Council has, and continues to, share with infrastructure providers its development proposals. Infrastructure providers are aware of the cumulative nature of development in various parts of the Borough and are factoring this into their future development plans for health facilities, school places, and utilities.</p>
<p>Response Reference: U0001133</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06731/1</p>
<p>Name: Mr Steven Bews</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10</p>
<p>Summary of Comment: The respondent is opposing the planned review of the Green Belt Status of GB4, GB5 and GB10. The designated Green Belt that exists between Byfleet and West Byfleet successfully checks unrestricted urban sprawl, prevents neighbouring towns merging together, assists in safeguarding the countryside from encroachment and preserves the setting and special character of historic towns. Both villages have their own identity; Byfleet is an historic village named in the Domesday Book and is home of the former royal palace Byfleet Manor. The Green Belt areas provide a 'green corridor' essential for numerous wildlife species. The mature trees and fields at GB5 provide an aesthetically pleasing backdrop to the local park. The field is also used for recreation, including sports events, dogwalking and space for older children to play. The space and scenery are essential to the physical and mental wellbeing of the villagers. The mature treeline of GB5 separates the residential areas of Byfleet from the M25; alteration to the landscape would result in atmospheric and noise pollution detrimental to the health of residents. The proposed development of more than 800 houses seems excessive and is unsupported by current infrastructure. Medical services are already overstretched, with a shortage in recruitment. There are no plans to extend health provisions, and the decision regarding the previous Weybridge walk in centre is yet to be made. Additionally Byfleet and the surrounding areas are heavily congested; the A245 is the only route out of the village and during rush hour becomes heavily congested. Further housing development would compound this issue. In addition, given pressures on education and policing, inadequate consideration has been given to infrastructure required to support the growth of the village.</p>

Inadequate research has been undertaken regarding land ownership of GB5; the boundary outlines incur onto Church Cottage, Sanway Road, and 1/3 of the site has been bequeathed to St Mary's Church, and is registered as burial land.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper. Regarding Green Belt, Paragraph 12.2 provides that the Green Belt Boundary review is sufficiently robust to inform the DPD and to make sure that any land that is released from the Green Belt does not undermine its purposes. As regards particular Green Belt purposes, Section 21 provides further confirmation that none of the proposed allocations will lead to unacceptable urban sprawl. Paragraph 12.6 addresses the question of historic settlements. Section 4 addresses the impact of Green Belt release on wellbeing and amenity of residents. In particular Paragraph 4.2 provides that while there is a loss of open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents. Further detail can be found in Paragraph 6.8. Air and noise pollution are comprehensively addressed in Section 8. The Council does not consider development to be excessive. As recognised in Paragraph 1.7, the Council has identified a quantum of land capable of delivering in excess of the overall housing requirement. However, the Council considers that this approach is sensible as it caters for non-implementation. Infrastructure is comprehensively addressed by Section 6; paragraph 6.12 addresses GP provision specifically and Paragraph 6.9 addresses education provision. Consideration has been given to policing requirements in Paragraphs 12.80 to 12.89 of the Draft Infrastructure Delivery Plan. Section 13 addresses congestion and Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the networks. Section 15 addresses the section of GB5 which is consecrated as a future burial ground.
Response Reference: U0001014
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05534/1
Name: Mrs Tamsin Birch
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
Summary of Comment: No comment on legal compliance. No modifications proposed. No comment on duty to cooperate. The DPD has not been positively prepared, is not justified, not effective. The DPD is unsound because sites GB4, GB5 and GB10 are subject to flooding. Inadequate studies have been completed for these sites and the flood risk. The DPD does not take into account the likely amendments to housing policy following the changes to the housing market following Brexit. Does not wish to participate at examination. Wishes to be informed of DPD progression.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Regulation 19 Issues and Matters Topic Paper, which also

<p>points to the assessments undertaken regarding flooding. GB4 is in Flood Zone 1 and only a very small percentage of site GB5 falls within Flood Zone 2: should the sites be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure detailed flood risk assessments are undertaken as part of any scheme coming forward.</p> <p>Sections 1 and 2 of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. At this point in time, the Government has not provided guidance to the Local Planning Authority in regards to the impact of Brexit on local plan making. However, GB4 and GB5 are safeguarded sites and their key requirements for development will be set out as part of the review of the Core Strategy and or the Site Allocations DPD to be informed by up to date evidence at the time.</p>
Response Reference: U0001156
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06919/2
Name: Mr A. M. Bird
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11, UA40, UA41, UA42, UA43
<p>Summary of Comment: Considers the proposals in West Byfleet to be unrealistic. Considers that new houses are required, especially affordable homes to help young people to get onto the housing ladder. If the development was of a modest nature and not on Green Belt, it would have the respondent's full support. However 750 dwellings are considered unmanageable as the infrastructure would not cope.</p> <p>Parvis Road and Old Woking Road are heavily congested during the morning and evening rush hours. The potential addition of 900 cars would be untenable. The new traffic light system and the prohibition of a right turn at Seven Hills Road may make a slight impact on westerly-flowing traffic but the overall impact will probably be minimal.</p> <p>The existing health centre is at full capacity, and would not be able to support 1500 new residents.</p> <p>Concerns are raised about the capacity of the recreation ground to accommodate the activities resulting from 750 new dwellings. This is considered in the context of the possible sale of some of this amenity space.</p>
Contributor Proposed Modification: Requests that WBC abandons the current plans, and supports any modest development that could be readily incorporated into West Byfleet village.
Modification Reference: U0000346
<p>Officer Response: This representation has been addressed in the Council's Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 6 addresses infrastructure. In particular, Paragraph 6.7 addresses the impact of development on transport infrastructure; Paragraph 6.12 addresses healthcare provision; and Paragraphs 6.8 and 4.2 address recreation and open space provision.</p>

Section 13 addresses transport infrastructure and congestion. In particular Paragraph 13.3 confirms that that Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify potential mitigation measures that might be necessary to address development impacts on the network.
Response Reference: U0000944
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04970/1
Name: Mr Gordon Bishop
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: The DPD is not Leagally compliant and unsound. No comment on Duty to cooperate.</p> <p>In producing the SADPD the Council has decided not to consider for allocation any sites that will yield less than 10 dwellings. Since the Council has stated in its SHLAA that a site in the Green Belt cannot be considered to be in a suitable location for residential development unless it is removed from the Green Belt and allocated through the SADPD, it follows that no Green Belt site that will yield less than 10 dwellings will ever be considered for development. The Council's decision is contrary to its duties as a planning authority and so unreasonable and/or irrational that no reasoanable authority could reasonably have come to that decision.</p> <p>Contrary to its obligation to deliver a wide choice of high quality homes the Council has failed to allocate any sites for the building of sizeable homes with sizeable gardens. Contrary to its obligation to provide suitable sites for self-build the Council has failed to allocate any.</p> <p>The automatic rejection of sites that will not yield at least 10 dwellings</p> <p>The approach that has been adopted by the Council means that, whilst sites yielding less than 10 dwellings which are not in the Green Belt could come forward in the form of windfall development, any such sites in the Green Belt cannot come forward in such a way. If they are not allocated in the SADPD they will remain in the Green Belt, however appropriate it might be that they should be removed from it. Since they are automatically rejected by the SADPD their suitability for removal from the Green Belt will never be considered.</p> <p>Blackhorse Road and Heath House Road SHLAABR030, the site on the corner of Heath House Road and Rough Road (SHLAABRO34) and the site to the southwest of Blackhorse Road/Heath House Road have been rejected. The site is in the Green Belt, and so cannot be considered to be in a suitable location for residential development unless it is removed from the Green Belt and allocated for this use in the plan period through the Site Allocations development plan document.</p> <p>The failure or refusal by the Council to consider for allocation sites in the Green Belt yielding less than 10 dwellings prevents a number of suitable sites being available for low density housing. By failing to consider such sites the Council has robbed itself of the opportunity of complying with its obligations under the NPPF and the Core Strategy to provide sites on which sizeable houses can built, as set out in paragraph 3 below. Further it is grossly unjust and unfair to those who have put forward such sites for consideration for development. It necessarily follows that the SADPD is in that respect fundamentally flawed, not legally compliant and unsound.</p> <p>The failure to allocate any sites for the building of sizeable houses with sizeable gardens</p>

Despite the Council's obligation to provide sites for the building of sizeable homes and the need for them the SADPD fails to allocate any such sites. The SADPD is fundamentally flawed in that respect and therefore not legally compliant and unsound.

In the last paragraph on page vi of their Executive Summary of their Green Belt Review dated January 2014, Peter Brett Associates (PBA) state that it is quite possible that individual sites might be sustainable and appropriate for removal from the Green Belt, despite the wider parcel within which they were being assessed, being considered inappropriate and at page 54 of the Review itself they say that, although in their view Parcel 19 as a whole is not suitable for removal from the Green Belt, some development could be integrated along Heath House Road without wider visual harm as the parcel is "generally very well contained visually from surroundings due to the high level of mature vegetation.

PBA's description of the residential development along Heath House Road as being "scattered" suggests that there is a relatively small, randomly distributed number of houses; that is incorrect. In fact on the north side of the road there is a continuous line of houses, mostly on sites in excess of 1 acre; only the last plot on the corner of Blackhorse Road (SHLAABR030) has not been built on. On the south side of the road, excluding the plots at each end of the road, there is a line of houses, with only 2 gaps, those being the plots on which houses were intended to be built at the beginning of the 20th century, but in fact were not; one is the land on the corner of Heath House Road and Rough Road (SHLAABR034). The suggestion in the 2014 SHLAA that the existing houses along Heath House Road constitute ribbon development is also incorrect. They were not "built along a road radiating from a settlement" but around a golf course with the intention, at least in the case of Worplesdon Golf Course.

PBA do add that allowing such development might result in adverse effects on landscape features and its existing character, but they do not identify what those adverse effects might be and in any event any risk of adverse effects could easily be overcome by imposing suitable conditions on any permission to develop that is given.

Any houses built will not adversely affect the "openness" of the area because they would be on large sites and, as PBA say, they would be very well contained visually from surroundings due to the "high level of mature vegetation". The public have no access to such sites and can only see them from the road. If mature vegetation is retained and where necessary new trees planted, those views would not be adversely affected.

Consequently it is not necessary to keep them "permanently open" and they should not be included in the Green Belt (see para 85 of the NPPF). They could and should be allocated in the SADPD and thereby removed as individual sites from the Green Belt as suggested by PBA (see para 2.7 above). They would then be washed over by the Green Belt. Alternatively the relevant area could be inset within the Green Belt.

Allocating the relevant sites and thereby removing them from the Green Belt will provide sites on which sizeable homes can be built, including self-build homes, and thus fulfill the Council's obligations under the NPPF and the Core Strategy.

To make the SADPD legally compliant and sound the following sites which have been proposed for allocation need to be allocated for residential housing during the plan period:

Land on the corner of Heath House Road and Rough Road, GU22 0RB - SHLAABR034 in the 2014 SHLAA Appendices.

Land on the corner of Blackhorse Road and Heath House Road, GU22 0QT - SHLAABR030 in the 2014 SHLAA Appendices.

Land to the southwest of Blackhorse Road/Heath House Road, GU22 0QU - SHLAAHEA033 in the 2018 SHLAA Appendix 5.

The sites are ones in Worplesdon Hill which are suitable for the construction of sizeable houses with sizeable gardens and are also suitable for self-build. They have been put forward by the owners for allocation but have not been considered because they will yield less than 10 dwellings. If the SADPD is modified to allocate them the grounds for rejecting it set out in paragraph 5 above would no longer apply.

Wishes to participate at the oral examination.

Wishes to explain in more detail the grounds set out in paragraph 5 above and the modifications suggested in paragraph 6 above. To respond to any arguments the Council may put forward as to why the SADPD is legally compliant and sound despite the flaws set out above. I made similar representations under the Regulation 18 consultation but the Council failed to provide any valid response to them.
Has the right to appear and be heard by virtue of section 20(6) of the Planning and Compulsory Purchase Act 2004.
Wishes to be informed when the Site Allocations DPD progresses to the next stages.

Contributor Proposed Modification: Land on the corner of Heath House Road and Rough Road, GU22 0RB - SHLAABR034 in the 2014 SHLAA Appendices.
Land on the corner of Blackhorse Road and Heath House Road, GU22 0QT - SHLAABR030 in the 2014 SHLAA Appendices.
Land to the southwest of Blackhorse Road/Heath House Road, GU22 0QU - SHLAAHEA033 in the 2018 SHLAA Appendix 5.
The sites are ones in Worplesdon Hill which are suitable for the construction of sizeable houses with sizeable gardens and are also suitable for self-build. They have been put forward by the owners for allocation but have not been considered because they will yield less than 10 dwellings. If the SADPD is modified to allocate them the grounds for rejecting it would no longer apply.

Modification Reference: U0000426

Officer Response: The representation regarding the Green Belt Boundary Review and the SHLAA, and also the decision not to allocate small sites have been addressed in Section 11 and 12 of the Regulation 19 Issues and Matters Topic Paper. Policy CS6 of the Core Strategy requires the release of Green Belt land to be informed by a Green Belt Boundary review to ensure that any land that is released does not undermine the purpose and integrity of the Green Belt. The sites being promoted are not recommended by the GBBR.

The Core Strategy has Policy CS11 Housing Mix, paragraph 1.7 in the Topic Paper reiterates the need to allocate a range of sites to meet the variety of housing need across the Borough. The DPD achieves this objective.

The NPPF specifies that "under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permission to meet the identified demand." While the Council maintains a self build housing register, it has not identified any serviced plots. However, the Council has published a SHLAA which provides a comprehensive evaluation of all sites in the Borough that are considered deliverable or developable and are in sustainable locations. This provides sufficient information for those wishing to carry out a self-build or custom housebuilding project. Indeed, through the CIL monitoring process, it is clear that a significant number of self-build schemes continue to come forwards in the Borough. Furthermore Policy DM12 of the Development Management Policies DPD provides in principle support for "the development of self and custom-build homes and custom-build projects in suitable locations, where they support the delivery of the Core Strategy and meet all other requirements of the Development Plan for the area." In this regard, the Council is not acting contrary to its obligations as it is addressing self-build and custom house building through a variety of means. If market signals allow, any of the housing sites in the DPD can make a contribution towards self-build houses.

The Council has an up to date Core Strategy to set the strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. In accordance with Section 6 of the Core Strategy, the Council is committed to the comprehensive delivery of

the requirements of the Core Strategy and the preparation of the Site Allocations DPD is a key means to achieving this objective.

The Site Allocations DPD has a clear purpose set out in the Core Strategy to identify specific sites to enable the delivery of the Core Strategy. Policies CS1 (A spatial strategy for Woking Borough), CS2 (Woking Town Centre), Policy CS6 (Green Belt), Policy CS10 (Housing provision and distribution) and Section 6 (Monitoring and implementation) of the Core Strategy all highlights the role of the Site Allocations DPD to identify sites to enable the delivery of the Core Strategy. Previous Local Development Schemes also highlights the distinct purpose of the Site Allocations DPD. The Site Allocations DPD has been prepared to meet this objective by identifying sufficient land to enable the delivery of the Core Strategy. In accordance with paragraph 139 of the NPPF, the DPD goes further and safeguards land to meet future development needs beyond this plan period to ensure the enduring permanence of the Green Belt boundary.

The Core Strategy sets out the spatial strategy for the borough, including the broad spatial distribution of development and the timing for the release of Green Belt land. Policy CS1 directs most new development to previously developed land in the town, district and local centres which offers the best access to a range of services and facilities. Land in the Green Belt will only be released to enable housing provision between 2022 and 2027. Policy CS10 specifies the overall quantum of housing units to be accommodated in the Green Belt during the plan period. This is specified as 550 dwellings. The brownfield first approach adopted by the Core Strategy is necessary to ensure sustainable development across the Borough. The Inspector who conducted the Core Strategy Examination had this to say about the spatial strategy of the Core Strategy: 'with due regard to its means of production, the Core Strategy provides the most appropriate spatial strategy for sustainable development within the context of the Borough with clear objectives for the plan period in accord with the aims of national planning policy'. The Core Strategy recognises that Green Belt land will be needed to meet development needs between 2022 and 2027. The Green Belt and the Town Centre are therefore identified as future direction of growth.

Policies CS1 and CS6 prescribes the means for selecting Green Belt land for future development. These policies require the Council to carry out a Green Belt boundary review to ensure that the land that is released from the Green Belt will not undermine its purposes and integrity. Against this backdrop, any land that is being promoted that is not supported by evidence in the Green Belt boundary review will be resisted. Very special circumstances justification would not exist to allocate or safeguard such land. The sites SHLAABR034, SHLAABR030 and SHLAAHEA033 fall within parcel 19. The merits of the sites has been assessed as part of the parcel and the evidence has concluded that these sites should not be removed from the Green Belt.

Section 19 of the Planning and Compulsory Purchase Act (2004) and Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) expects the Site Allocations DPD to take into account the requirements of the Core Strategy. It is critical that the Site Allocations DPD is prepared in the context of the above requirements. The preparation of the Site Allocations DPD is informed by a number of evidence based studies such as the Green Belt boundary review, which is prescribed by policy and the Strategic Land Availability Study which is prescribed by national policy. All the sites that are either allocated or safeguarded are justified by the available evidence. The Council has also carried out a Sustainability Appraisal of reasonable alternative sites urban and Green Belt sites to demonstrate that the allocated and safeguarded sites are the most sustainable when judged against all the other alternatives. Based on the evidence, the Council does not think that these sites SHLAABR034, SHLAABR030 and SHLAAHEA033 should be allocated for development.

Regarding the Green Belt sites, there has been an additional material consideration to be taken into account. As required by paragraph 136 of the NPPF, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. It is therefore

important that very special circumstance justification exists for the sites that are allocated or safeguarded in the DPD. The Council is confident that the sites that are allocated or safeguarded meets this particular test. The same cannot be said for the alternative sites that are being promoted. For any other site to be accepted, a case has to be made to demonstrate that the site being promoted is the most sustainable when compared against the sites that are allocated and safeguarded in the DPD. No credible evidence has been provided so far to demonstrate to the Council that the alternatives sites being promoted are better alternatives.

The development requirements of the Core Strategy, including the housing requirement have been identified in an integrated manner and justified by a significant body of evidence base studies. These include an Infrastructure Delivery Plan, Employment Land Review and an Employment Topic Paper. The studies have informed the necessary scale and type of infrastructure and economic growth necessary to support and align with the expected quantum of housing growth. To allocate land to meet the objectively assessed need up to 2027 without due regard and a corresponding review of office floorspace, warehouse floorspace, retail floorspace and the necessary infrastructure to align with the revised housing requirement would at best be irresponsible, overly simplistic and ill conceived. It would undermine the overall purpose of the plan-led system to plan in a holistic manner and would also undermine the sustainable development of the Borough, which is the overall aim of national policy.

The Council's Green Belt boundary review report provides evidence to demonstrate that there is no further scope to release any Green Belt land other than those recommended in the report for strategic development without damaging the overall purpose and integrity of the Green Belt. This point is highlighted in paragraph 3.5.22 of the Green Belt boundary review report. It states 'we do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development'.

Response Reference: U0001428

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06641/1

Name: Mr Daniel Black

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11

Summary of Comment: Object to releasing green belt land in Byfleet/ West Byfleet for housing developments and traveller pitches.

Why are Byfleet and West Byfleet, where the infrastructure is under such pressure, being targetted for so much development? I am sure other areas could be looked at.

Disgusted that WBC are trying to take away more of our green spaces. The field opposite St Mary's Church and the playground there are popular with families after school.

Removing this would take away more freedom for our children, who need to be able to run around and play safely, and adults need local parks in the rush of everyday life; we don't always have time to travel to Byfleet Rec.

Baffled to see how local infrastructure would cope:

Local schools are already stretched, including with children coming from Woking because they can't get a more local school. How would the additional children be accommodated?

The A245 is currently slow- how will our roads cope with the extra vehicles? There are already hundreds of potholes in the area, and rush hour is stressful for parents trying to pick up children on time on pain of a fine. Making this worse will put a massive strain on families. Preventing right turns out of Seven Hills Road will only achieve a bottleneck in other areas, not help traffic flow.

<p>Most Byfleet residents use West Byfleet Health Centre, which is already over-stretched (sometimes not offering a same day emergency appointment), requires 20-30 minutes travel due to traffic and the difficulty of parking. With more patients and more traffic, appointment times will become even harder to make- deeply depressing with young children.</p> <p>Not enough consideration has been given to how flooding will affect any homes built, and the flood risk impact on existing properties.</p> <p>We are already exposed to a lot of pollution due to proximity to the M25, the proposals will increase this.</p> <p>Need to consider climate change.</p> <p>Concerned over releasing green spaces for Travellers; they should not be treated differently.</p>
<p>Contributor Proposed Modification: Please keep our green belt safe</p>
<p>Modification Reference: U0000296</p>
<p>Officer Response: The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p> <p>The impact of Green Belt loss on the wellbeing and amenity of local people is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. At this stage, site GB5 will only be safeguarded to meet future development needs, and so no key requirements (for example about layout, on-site green infrastructure provision, etc) can be set for the site's development. The contents of any allocation policy would be informed by the policy and evidence at the time, including about the importance of the site's current uses.</p> <p>The impact of the proposals on infrastructure, including schools and health facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The issue of flood risk in relation to the development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>Climate change has been considered throughout the DPD production process, notably through the Sustainability Appraisal, the incorporation of sustainable transport considerations into the Green Belt Boundary Review, the Strategic Flood Risk Assessment process, and the incorporation of site specific key requirements into the allocation policies on issues such as green infrastructure, sustainable transport accessibility, biodiversity, flood risk and sustainable drainage. Policies and guidance within the Council's other planning documents, when applied during the design and planning application process, will also help to minimise the impact of the proposed development on climate change. Policy CS22 is an example.</p> <p>The way the needs of Travellers are provided for through the planning process is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p>
<p>Response Reference: U0001491</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06641/2</p>
<p>Name: Mr Daniel Black</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11</p>

<p>Summary of Comment: Object to proposed development in Byfleet and West Byfleet, particularly Green Belt sites next to M25.</p> <p>The area is already overcrowded, polluted and congested. The Parvis Road is blocked at peak times. The trains between London and West Byfleet are overcrowded with people standing. Doctors' surgeries and schools are full and cannot accommodate any more. The loss of this Green Belt land is an environmental disaster, it can never be replaced. New residents would have a poor quality of life:</p> <p>The sites are prone to flooding.</p> <p>Very noisy (due to concrete surface on M25).</p> <p>Motorway traffic pollutes Byfleet and West Byfleet. The sites are distant from services (without walking along the busy Parvis Road) so will require cars, adding to the congestion. Pollution will cause health problems for the new residents. Removal of trees on these sites will increase the pollution.</p> <p>Building these homes will prevent the widening of the M25 and future passage of a high speed railway.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The effect of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see section 13.</p> <p>The effect of the proposals on infrastructure, including doctors' surgeries and schools is addressed by the Regulation 19 Issues and Matters Topic Paper, see section 6.</p> <p>WBC's Infrastructure Development Plan describes Network Rail's proposals for improvements to Woking station, and how the Council intends to support these, including through the safeguarding of required land as site UA7 in the Site Allocations DPD. These improvements which would increase capacity on the line, allowing for less overcrowding on trains from West Byfleet.</p> <p>The effect of the proposals on pollution (including air and noise pollution) is addressed by the Regulation 19 Issues and Matters Topic Paper, see section 8.</p> <p>The impact of the proposals on the environment is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 4, 7, 8, 13, 19 and 23.</p> <p>The issue of flood risk in relation to the proposals is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>It is true that only part of the site is within standard walking distance of West Byfleet District Centre and the station. However this level of proximity to services is still better than that for most other sites considered through the Green Belt Boundary Review. In addition, only slightly over half the total area of the site will be developed, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is likely to limit development on the areas of the site furthest from the District Centre. The key requirements in policy GB10 include to 'improve sustainable transport infrastructure including pedestrian and cycle links and bus services to West Byfleet District Centre'. It is therefore not considered that the residents would be entirely car reliant.</p> <p>The Council is aware of the HS4Air high speed railway proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.</p> <p>The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network.</p>

Response Reference: U0001551
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06662/1
Name: Ms Carolyn Black
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
<p>Summary of Comment: Object to releasing green belt land in Byfleet/ West Byfleet for housing developments and traveller pitches.</p> <p>Why are Byfleet and West Byfleet, where the infrastructure is under such pressure, being targetted for so much development? I am sure other areas could be looked at.</p> <p>The field opposite St Mary's Church and the playground there are popular with families after school. Removing this would take away more freedom for our children, who need to be able to run around and play safely; and adults need local parks in the rush of everyday life</p> <p>Local schools are already stretched, including with children coming from Woking because they can't get a more local school. How would the additional children be accommodated.</p> <p>The A245 is currently slow- how will our roads cope with the extra vehicles. There are already hundreds of potholes in the area, and rush hour is stressful for parents trying to pick up children on time on pain of a fine. Making this worse will put a massive strain on families. Preventing right turns out of Seven Hills Road will only achieve a bottleneck in other areas, not help traffic flow.</p> <p>Most Byfleet residents use West Byfleet Health Centre, which is already over-stretched, requires 20-30 minutes travel due to traffic and the difficulty of parking. With more patients and more traffic, appointment times will become even harder.</p> <p>Not enough consideration has been given to how flooding will affect any homes built, and the flood risk impact on existing properties.</p> <p>Already exposed to a lot of pollution due to proximity to the M25, the proposals will increase this.</p> <p>Need to consider climate change.</p> <p>Concerned over releasing green spaces for Travellers.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Objection noted.</p> <p>In regards to the developments being mainly in Byfleet and West Byfleet see Section 5 and in regards to the loss of Green Belt land for wellbeing and amenity for residents see Section 4 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p>

<p>On the matters of Flooding and climate change see Section 7 and in regards to air pollution see Section 8 of the Regulation 19 Issues and Matters Topic Paper. With regards to concerns about Gypsy and Travellers, the Council recognises the work that needs to be done to improve relations between Travellers and the settled community, and will continue to engage in this work. The release of Green Belt land to meet the accommodations needs of Gypsy and Travellers has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.</p>
<p>Response Reference: U0001056</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 01724/2</p>
<p>Name: Mr And Mrs Blake</p>
<p>Number of Signatories: 2</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10</p>
<p>Summary of Comment: Object to the DPD. The Broadoaks site is already being developed for over 200 homes. Infrastructure such as roads, which are already heavily congested, will be subject to over 400 more cars (every household now owns 2 cars). Allocated sites GB4, GB5 and GB10 will produce a staggering 930 dwellings, resulting in 1,860 cars on the roads in these small villages. Inadequate assessment of noise pollution from M25 which will affect dwellings at GB4 and GB5. Exhaust fumes are a significant public health concern. Air quality by the motorway bridge on Parvis Road has been monitored as higher than recommended levels. No consideration given to National Transport Infrastructure project HS4 Air which includes land at sites GB4, GB5 and Byfleet SANG area. Inadequate research into land ownership - a third of site GB5 is owned by St Mary's Church and is registered as burial land. Safe access to the remainder of the site would lead to a forced acquisition of this bequeathed land, which would be entirely inappropriate. Inadequate assessments of flooding from both river and surface water. Reasons for excluding Pyrford Greenbelt sites are inadequate and could equally be applied to GB4, GB5 and GB10. There are 5000 houses planned over the next 10 years - a surplus of 2000 even before a likely reduction in housing need is announced. The housing quantity is unnecessary, excessive and is overdevelopment. If housing need is already met or in fact exceeded, there is no justifiable reason or exceptional circumstance to release any Greenbelt for development. The IDP fails to address how and where adequate healthcare and education could be provided for an increased population. The areas of Greenbelt are successfully performing prevention of urban sprawl - keep Byfleet as a village.</p>
<p>Contributor Proposed Modification: Green Belt land should not be released for development.</p>
<p>Modification Reference: U0000459</p>
<p>Officer Response: A comprehensive response to the issues raised is provided in the Council's Regulation 19 Issues and Matters Topic Paper. Section 13 describes how the impacts on road infrastructure have been thoroughly assessed, and potential mitigation measures identified. Transport assessments looked at the cumulative quantum of development during both morning and afternoon peak times to enable worst case scenarios to be identified. Each of the main allocations also include a requirement for site specific transport assessments to identify any further mitigation measures to address</p>

scheme specific traffic impacts. The Council and Surrey County Council are confident that whilst cumulative development in Byfleet and West Byfleet will have some adverse impacts on the road network, they can be satisfactorily mitigated by both these strategic and site specific measures.

The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network. The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper. The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion.

The representation regarding unnecessary, excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper. Section 2 sets out in detail why sites GB4 and GB5 need to be safeguarded for development beyond 2027.

It is argued that the Green Belt sites perform several Green Belt functions. It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Paragraph 20.2 describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 addresses concerns about urban sprawl.

Response Reference: U0001122

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 02301/2

Name: Ms Jane Bond

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: This Regulation 19 Consultation does not give enough consideration to the amount of traffic that these developments will generate. It would add to the already polluted areas adjacent to these proposed sites, due to the very heavy traffic on the A245 Parvis Road.

Pollution monitors have already shown high readings on this road and the amount of proposed housing will mean many more vehicles converging onto this narrow stretch of main artery road between the A3 and Woking centre.

SCC Transport Study 'Potential Mitigation' on the A245 - These proposals to mitigate traffic flow in the area seem inadequate and therefore liable to cause a build-up in adjacent areas as a result.

Has the current development at Broadoaks in West Byfleet which neighbours the GB10 site - been taken into account? This development and employees will generate more traffic. This development and its impact on any future development in the immediate area needs to be taken into consideration.

Also to be taken into consideration is the proposed development at the Sheer House site in West Byfleet. Although it has been suggested that occupants will travel by train, it is inevitable that most households will have one or more cars.

In addition, these Green Belt sites are positioned between the two urban areas of Byfleet and West Byfleet. It should be vital that these green wooded areas continue to provide a necessary open space and be preserved for the health and wellbeing of generations to come. the essential characteristics of Green Belts are their openness and their permanence (NPPF Para 79)

Noise impact from M25 and A245 - (Proposal reference: GB10 - point 3) - page 281:
Due to the proximity to significant traffic on the M25, the development would need to consider the impacts on noise and ensure mitigation measures are implemented to protect residential amenity. A Noise Impact Assessment would be required, to also include impacts from Parvis Road.

Surely this Assessment should already have been undertaken as part of this Study and before Green Belt land is permanently removed.

NOTE - Inaccurate information in the Consultation: (Proposal reference: GB10) - page 280:

Location of primary access - new access from Parvis Road, via a new roundabout at junction of Parvis Road with Blackwood Copse- should this read Blackwood Close

If this is an error, it would suggest that insufficient care has been taken in the preparation of this Consultation and therefore reduces the credibility of the remainder of the Document and its associated Studies.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The issue of traffic congestion has been addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. The Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development along the corridor. Section 8 of the Topic Paper addresses's concerns with noise and air pollution.

<p>The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery. In regards to wellbeing and the Green Belt see Section 4 of the Topic Paper. The representation is correct there is an error in the text, it should read Blackwood Close. The DPD will be amended to reflect this.</p>
<p>Response Reference: U0001094</p>
<p>Officer Proposed Modification: Delete Blackwood Copse in fifth to last bullet point on p280 and replace with "Blackwood Close".</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 05466/1</p>
<p>Name: Cllr John Bond</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference:</p>
<p>Summary of Comment: This consultation document would lead to the elimination of vital Green Belt land in Woking, but it does so without sufficient justification or defensible evidence.</p> <p>The sole basis for needing to build on Green Belt sites was a questionable long term forecast made seven years ago which has now been thoroughly refuted. In addition this consultation document has a number of questionable aspects and has not even been updated to fully reflect the current and the proposed housing situation in Woking. This consultation document fails to adequately demonstrate a real housing need and does not provide any exceptional circumstances. There are also serious flaws in the evidence base and in the way the evidence base is used.</p> <p>The current document is unsound as it is substantially different from that presented to Woking Borough Council for approval: full list provided of differences. In addition the main evidence base (SHLAA) was not finalised or made available before that approval. The DPD contains no explanation of why three sites in Pyrford have been removed, which were in the version presented to Council in October.</p> <p>WBC has never had a public consultation on whether any Green Belt land should be lost; only on which area of Green Belt land is most suitable, causing a massive rejection by affected residents each time.</p> <p>I wish to attend the Examination and may wish to speak at that time.</p> <p>The points below make this consultation unsound and negate the conclusion that Green Belt land must be removed to satisfy housing needs:</p> <p>The proven uncertainty in the long term forecasts. The SHLAA 2009 estimated that 1,728 units would be available in years 11-15; the SHLAA 2010 estimated 840 units in years 11-15; the SHLAA 2018 estimates 1,558 units in the same time period (starting 2022/23). The argument for a need to use Green Belt was based on the estimate of 840 units, now shown to be wholly incorrect by the revised figure. This is a very inadequate justification for releasing Green Belt. The enormous variation in figures shows the impossibility of forecasting accurately this far ahead.</p> <p>The failure to include the latest information on developments in Woking. The SHLAA 2017 shows a deficit of 362 dwellings, mainly due to a lack in years 11-15. This figure is nebulous and cannot justify the loss of Green Belt for over 900 dwellings. Many things have changed in the 18 months since it was prepared, e.g. the council now expects many more dwellings to be built in the town centre. It also excludes many anticipated developments, e.g. Victoria Square, the expanded plans for Sheerwater and Broadoaks, development in the Sheer House area for over 50 dwellings, and the plans for Woking Football Club (the latter four also excluded from the SHLAA 2018).</p>

The lack of an independent professional study of urban sites. WBC has never commissioned such a study into possible urban/brownfield sites, to match the Green Belt Boundary Review. There has been no rigorous attempt to ensure the forecasting figures are as accurate and complete as possible. This undermines the robustness of the evidence base and cannot be acceptable.

The known reduction in the UK housing growth forecasts. The revised ONS household growth forecasts (September 2018) would mean the SHLAA does not show a deficit against housing need, so there is no need to consider Green Belt sites. The same is true of Guildford and Waverley boroughs, but there is a greater need to protect Woking's Green Belt because of the densely populated nature of the Borough and its shortage of green spaces.

The failure to include a realistic number of windfall sites. The DPD states that 'windfall sites are assumed to deliver an average of 42 dwellings each year during the current plan period' (630 over 15 years), but the SHLAA 2018 only allows for 200 in years 11-15. The difference between these figures is greater than the deficit of 362, which would remove the need for Green Belt loss. Guildford and Waverley both included higher windfall allowances in their plans.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The necessity of Green Belt loss is addressed by the Regulation 19 Issues and Matters Topic Paper, see in particular Sections 1, 2 and 3.

The evidence underlying the Core Strategy has not been successfully refuted. It withstood scrutiny at the Core Strategy examination. Several updates have been made to the evidence base since the Core Strategy has been adopted to bring it up to date (although these do not undermine the validity of the original evidence as it was presented at that time) and the SADPD reflects these updates.

The existence of exceptional circumstances required for removing Green Belt land is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.

The report to Council, on 18 October 2018, clearly stated that the draft Site Allocations DPD would be amended to reflect changes recommended by the Local Development Framework Working Group (on 5 September 2018) and changes agreed by Council. In addition, Council resolved (amongst other things) that: "(iii) authority be delegated to the Deputy Chief Executive in consultation with the Portfolio Holder for Planning to approve any minor changes to the DPD ..., including the presentation of the documents and any updates on the status of the proposed sites before they are published for Regulation 19 consultation;"

The changes made to the Site Allocations DPD published for Regulation 19 consultation, following the Council meeting on 18 October 2018, related solely to substantive changes agreed by Council and minor presentational changes resulting from the changes agreed by Council. These changes were approved in accordance with the delegated authority granted by Council to the Deputy Chief Executive in consultation with the Portfolio Holder. Although the final SHLAA 2017 document had not been produced at that stage, the base data and a draft SHLAA document did exist when the Site Allocations DPD was considered by Council on 18 October 2018 (and by the LDF Working Group on 5 September 2018). The draft Site Allocations DPD was informed by the base data contained in the SHLAA 2017. The SHLAA 2017 was listed in the draft DPD considered by Council as one of the evidence base documents that informed the DPD.

Reference to Pyrford- this may refer to the one site in Pyrford and two in Mayford which were removed from the DPD after the October Council meeting. Alongside the draft DPD, that Council meeting was presented with a proposed amendment to remove those sites, which was debated and then carried at a vote, after which it formed part of the substantive recommendations which were themselves then carried. Since the DPD is intended to

guide decision making up to 2027, it does not need to contain explanations of why certain sites were rejected; this information is available in the evidence base documents supporting the DPD. The reasons for removing these sites are addressed by the Regulation 19 Issues and Matters Topic Paper, paragraphs 14.11-14.13.

The requirement to release land for 550 dwellings from the Green Belt was established by the Core Strategy, the production of which involved three rounds of public consultation in 2009, 2010 and 2011.

The justification for removing land from the Green Belt for housing allocation is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.

While various sites will be removed from the Green Belt and allocated for housing, their release for housing development (other than Broadoaks, which already has planning permission) will only take place if there is evidence of significant under-provision against the housing requirement and there is no indication that the shortfall could be met by development on previously developed land within the urban area. In any case this will be between 2022-2027 or 2027-2040 regarding the safeguarded sites. Policy SA1 of the SADPD contains more detail on this. The SHLAA 2017 included Victoria Square as providing 390 dwellings in 0-5 years; Broadoaks with 155 dwellings in 0-5 years; and the Sheer House area (called 'Land at Station Approach') with 91 dwellings in 6-10 years. The revised plans for Broadoaks (which did not have planning permission when the Reg 19 SADPD was published) include 179 dwellings, an increase of only 24 dwellings on the previous scheme. The revised Sheerwater regeneration scheme, approved on 18 April 2019, represents an increase of 158 dwellings compared to the previous scheme; this is significant, but much less than the increase implied by the respondent. The plans for Woking Football Club have not even been submitted as a planning application and there is no figure specified for this site in the SADPD. The feasibility of denser town centre/PDL schemes meeting the Borough's whole development requirement is addressed by the Regulation 19 Issues and Matters Topic Paper, see paragraph 1.7 and Section 18.

The merits of commissioning an independent assessment of brownfield sites are addressed by the Regulation 19 Issues and Matters Topic Paper, Paragraph 11.7.

The implications of changing household projections for Woking's housing need are addressed by the Regulation 19 Issues and Matters Topic Paper, Paragraph 1.5. It is important to highlight that using the Government's recommended household projections, housing need for the area is estimated to be about 409 per year at least. This is over and above the 292 dwellings per year requirement in the Core Strategy.

With regard to windfall sites, these are not counted as part of the allocations supply, as they help to deal with non-implementation. A windfall allowance is made for the period over ten years in the future, allowing it to become clear whether or not recent trends for windfall sites to contribute to supply will in fact continue. It is emphasised that when windfall sites come forward for development, they are counted as part of the overall housing completions for that period (year).

Response Reference: U0001138

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06652/1

Name: Miss Alison Bond

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11

Summary of Comment: The DPD is not sound, justified or effective. Allocations GB4, GB5, GB10 and GB11 will adversely affect the surrounding areas.

<p>GB4 and GB5 Will increase an already high population in Byfleet with not enough school places. The sites are on Green Belt land. Very close to a canal and its surrounding wildlife. Close to a busy motorway. GB10 and GB11 Parvis Road already struggles with heavy traffic and huge delays which will only increase with the proposed developments.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The impact of proposed Green Belt removal on the amenity of surrounding areas is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. The impact the proposals on infrastructure, including education provision, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The justification for the loss of Green Belt land is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. The effect of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. The relationship of the proposals with the nearby motorway, including issues of air and noise pollution, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p>
<p>Response Reference: U0001148</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06591/1</p>
<p>Name: Councillor Amanda Boote</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB18</p>
<p>Summary of Comment: The DPD is not legally compliant or sound and does not comply with the Duty to Cooperate. In particular, sites GB10, GB18, GB4 and GB5 should be removed; the DPD is not justified or consistent with national policy. An unfair and unsound process has been followed: The standard of communication is not adequate. The process is bureaucratic and uses legal and planning jargon throughout; this together with the volume of information excludes all but the most persistent individuals. The intended recipients of the information are unable to understand it and react accordingly with reasonable efforts. Residents should be supplied with legal and planning advice. Many changes were made to the document's wording between the document given to the full Council meeting and the original document given to Councillors one week prior. All the Traveller sites were put in at the 'eleventh hour' and did not go through the committee process. Many people will think that their comments from the Regulation 18 stage would be taken forward; these comments should also be considered. Some residents will be unaware of the Consultation due to its timing. Traveller pitches at West Hall were not included at Regulation 18, or at any point up to the last minute; this is unsound.</p>

The proposals ignore the letter and spirit of the West Byfleet Neighbourhood Plan, due to their size and scale materially changing the nature of the village and reducing residents' quality of life.

The DPD is unsound due to inadequate research on land ownership; 1/3 of GB5 is registered burial land owned by St Mary's Church; safe access to the rest of the site may be required across this land. GB5 is therefore not appropriate for development.

The burden placed on the Byfleets to deliver Woking's Green Belt allocations is disproportionate and unfair, and would cripple the functioning of the village- this makes the plans ineffective and not justified. Consider that this has occurred because the area has independent councillors; there are no dwellings or traveller pitches proposed in the DPD Committee Chairman's ward of Pyrford, despite it being rich in space. Why not share out the target across the borough?

Due diligence has not been given to using brownfield/windfall sites, of which there are many just in the Byfleets, e.g. the empty car dealership next to the station, or Emerald House.

Impacts on the environment and wellbeing of residents:

Impacts on wildlife have not been assessed correctly. The area is home to wildlife including herons and red kites (both nesting in West Hall woods), kingfishers, owls, larks and warblers among others. There is a large badger sett near Murray's Lane.

Development will force animals away and reduce the area's biodiversity.

Air quality: WBC studies show the A245 in Byfleet/West Byfleet is one of the worst locations for air quality. In 2016 the sensor was repositioned to a location away from the A245 which resulted in lower readings, which are misleading. The addition of 1,800 new cars and the removal of foliage filtering the air will further reduce this quality. Not convinced that the cumulative effects of all developments, or the effect of stationary traffic in particular on air quality have been considered; this is hard to do, so recommend not allocating until the already permitted schemes have been implemented. Evidence is inadequate to show that the proposals will not cause unacceptable levels of pollution, so the DPD is unsound under NPPF para 170(e), and immoral.

No proper consideration has been given to noise pollution for GB4 and GB5 which adjoin the M25, contradicting NPPF para 170(e)

The proposals reduce health and wellbeing of the community by causing distress during the planning process, and removing the small amount of green space in the area used for relaxation and exercise.

The M25 will be all that is left to prevent urban sprawl.

Local infrastructure and amenities:

Despite the large population increase proposed, the Infrastructure Report completely fails to provide firm plans to invest in local health, education or transport infrastructure. Any infrastructure plans alluded to are not tied to the development proposals. CIL will be insufficient for the scale required and is not guaranteed to be spent on the categories of most need. DPD therefore unsound, since the evidence provided does not support the proposals as being viable and deliverable.

Over 1250 additional places would be required at local schools. The head teachers of West Byfleet Junior School and The Marist have said that even with investment, they would have no room to expand. They are operating at nearly 100% capacity. They are both very concerned about traffic, also child safety (at the Marist) and parking (at West Byfleet Junior School).

There would be over 2500 new patients at the Medical Centre. All three practices there are at or over capacity, there is no clear plan for how they will expand.

There would be over 1800 additional cars on the roads. The A245 is at or over capacity.

The IDP does not provide details of measured traffic levels or of projected levels, and it does not seem to take into account the two major approved developments in West Byfleet. Major road changes would be required to avoid a catastrophic failure in infrastructure. The impact of additional traffic on air pollution, carbon emissions, congestion and parking has not been realistically or adequately taken into account.

The access to West Hall is 1km from the train station, but the further reaches of the site will be nearer 2km from the station and facilities, meaning residents would drive to those amenities.

No consideration given in sites GB4, GB5 and the Byfleet SANG proposal to possible future widening of the M25; the local stretch of which is one the busiest.

The developments at Sheer House and Broadoaks will exacerbate a number of the above issues.

Housing need evidence supporting the DPD is out of date and incorrect, so Green Belt developments cannot be justified and the DPD is unsound.

Before allocating Green Belt developments, WBC need to investigate revising housing needs in accordance with the ONS 2016-based household forecasts, as other boroughs have done.

WBC should clarify the exact number of houses required from Green Belt given the current position on redeveloping Woking Football Club, plus other recently available sites.

No other brownfield developments have been factored into the model so it seems the Green Belt allocation is no longer justified. If housing need is already met or exceeded there is no justifiable reason or exceptional circumstance to release Green Belt.

Any recommendations for provision beyond the Core Strategy period are unnecessary; predictions of need beyond ten years are too susceptible to inaccuracy. GB4 and GB5 should therefore be removed.

The DPD refers to the 2014 SHLAA, not the 2017 SHLAA (which was only given to councillors after they approved the DPD for Reg 19 consultation), so it is out of date.

Deliverability and effectiveness

The West hall proposal is not deliverable with traveller pitches, which put at risk the viability of standard housing development on this site and on Broadoaks. GB10 will therefore not be effective in delivering new housing.

Nationally large traveller pitches do not work so well as small ones occupied by a single family.

The sequential approach to identifying Gypsy and Traveller sites has not been undertaken.

These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.

Flooding

GB4 (and areas to its north and south), part of GB5 and the lower parts of West Hall are subject to flooding; the account taken of this in the DPD is inadequate and the mitigations proposed are not detailed enough; deliverability is put at risk. No flood prevention measures have been put in place since the 2014/15 flood; the land should be left as a flood plain, considering the effects of global warming; more houses will only put increased pressure on the water table, lead to additional flood issues and increased risk to neighbouring properties. Assessments of river and surface water flooding in Byfleet are inadequate.

The Byfleet SANG area is not suitable as a SANG as it suffers extensive and frequent flooding, compromising its usability for much of the year; wooden walkways are insufficient to offset this.

Consideration of alternative sites.

PDL sites should be considered before Green Belt, but WBC have not commissioned a report on brownfield or windfall sites to match the Green Belt Boundary Review, or proactively and exhaustively sought out potential alternative sites (including consultation with local residents). Allocation of GB10 is therefore not justified or sustainable, so not sound.

The justification for not selecting other sites before those in the Byfleets (eg. Martyrs Lane, parts of which are PDL), or allocating more dwellings to other sites, is woefully

inadequate- no clear and justifiable reasons. The same reasons given for the removal of Martyrs Lane and the Pyrford sites could equally be applied to GB4, GB5 and GB10. WBC's claim that the Byfleets' Green Belt does not serve Green Belt purposes is incorrect; the proposed sites in Byfleet serve all the Green Belt purposes: They are successfully preventing urban sprawl by Byfleet and West Byfleet. Their development would effectively merge the separate villages (each with their own centre) of Byfleet and West Byfleet. They are maintaining areas of countryside with an already well defined Green Belt boundary; their development would adversely affect the countryside. Byfleet is a historic village and as such should not be merged with West Byfleet; the Green Belt is required to maintain this. Object to changing the Green Belt status of GB18; why is it an issue for it to be isolated Green Belt? Should be given absolute protection for the sake of future children; we all know WBC are keen to sell off the land for a public house.

I would like speak at the Examination of the DPD.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The adequacy and timing of communication during the Regulation 19 Consultation is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 9. In particular, WBC planners talked through points within the DPD and gave advice to residents in person at multiple public meetings and drop-in sessions, and over the telephone and by email throughout the consultation period. All proposed Traveller sites went through the full committee process, including LDF Working Group and full Council. The fact that some sites were not included at Regulation 18 stage has no impact in itself on the soundness of the document. The procedure around the Council meeting in October 2018 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 24. All comments made on the Regulation 18 stage of the DPD were taken into due consideration in preparing the Regulation 19 version. The relationship of the DPD to the West Byfleet Neighbourhood Plan is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. The assessment of brownfield sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 11. It is recognised that new sites will continue to become available and these can be included in the SHLAA, and if they are within the urban area they can come forward with planning applications as windfall sites or potentially be allocated in Neighbourhood Plans. In all cases the development of such sites would be assessed against existing planning policies, including on the retention of viable employment sites. The impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. The woodland at West Hall is proposed for retention as one of the key requirements of policy GB10. Consideration of air and noise pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The implications of the minerals allocation for site GB10 are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 17. The impact of Green Belt loss on the wellbeing of local residents is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. It is not the case that the M25 will be all that is left to prevent urban sprawl. The DPD proposes the retention and improvement of the area of Green Belt between site GB10 and the M25, including the creation of a Suitable Alternative Natural Greenspace. In addition,

only a minority of the green space between Byfleet and the M25 is proposed to be safeguarded for development.

The provision of infrastructure for the new development, including healthcare and education, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. CIL would not be expected to cover all the costs of the new infrastructure required. Public sector sources of funding will continue to play a key part in infrastructure provision.

The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.

It is true that only part of the site is within standard walking distance of West Byfleet District Centre. However this level of proximity to services is still better than that for most other sites considered through the Green Belt Boundary Review. In addition, only slightly over half the total area of the site is considered to be developable, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is likely to limit development on the areas of the site furthest from the District Centre.

With regard to the potential for M25 widening: WBC are aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network.

The developments at Sheer House and Broadoaks have been factored into the evidence base for transport studies and the IDP.

The justification in terms of housing need and requirements for the principle of releasing Green Belt land for housing is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. In particular, WBC do not intend to revise housing needs on the basis of the ONS 2016-based household forecasts, given that, as anticipated, the Government has recently (20.02.19) updated Planning Practice Guidance to specify that housing need should be calculated using 2014-based projections. Using this base data, the housing need for Woking is estimated at 409 dwellings per year. Also, there is no extant planning application or draft allocation for a large number of dwellings at Woking Football Club; the delivery of a high density development on this site has not yet been demonstrated to be acceptable in planning terms. That will be assessed at the planning application stage should the currently proposed scheme come forward as an application. The need to safeguard land for years beyond the Core Strategy period is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 2.

The DPD refers to both the 2014 and 2017 SHLAA.

The justification for the allocation of Gypsy and Traveller sites, and for the details of those allocations, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.

Flood risk matters in relation to the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.

It is speculation at this stage to state that raised paths would be insufficient to offset the impacts of flooding on the functionality of the Byfleet SANG. The Council will bring forward proposals to deliver the land to a SANG standard.

The consideration of brownfield/alternative sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 11. The reasons for rejecting the Martyrs Lane site are set out the papers for the Council meeting on 18 October 2018: Item 8, Appendix 2. This is repeated in paragraph 3.11 of the Regulation 19 Issues and Matters Topic Paper. The reasons for rejecting the sites previously considered for safeguarding in Pyrford are described in the Regulation 19 Issues and Matters Topic Paper, paragraph 14.12. WBC consider these reasons to be clear and justifiable, and not to be capable of application to the sites proposed in the DPD.

The contribution of Byfleet's Green Belt to Green Belt purposes was assessed by the Green Belt Boundary Review (2015), which found that what are now sites GB4, GB5, GB10, GB11 and GB18 should be removed from the Green Belt. The methodology of the GBBR is addressed in the Regulation 19 Issues and Matters Topic Paper, section 12.
Response Reference: U0001085
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06770/1
Name: Mrs Cecilia Botha
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Considers that the DPD is not legally compliant Does not consider that the DPD passes the tests of soundness. In particular the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence. Nor is it consistent with national policy. One reason for this is that Parvis Road is heavily congested and with the addition of 550 dwellings and 15 Traveller pitches, this road will get gridlocked. Significant upgrading works would be required, leading to road works for a substantial period of time. Also the infrastructure report fails to address how adequate healthcare and school place provisions will be addressed due to increased population. No comment on whether the DPD is positively prepared, justified or effective. Does not wish to participate at the public examination; does wish to be informed when the DPD progresses to the next stages.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation has been comprehensively addressed by the Regulation 19 Issues and Matters Topic Paper. Section 6 addresses infrastructure provision. In particular 6.9 addresses education provision, and 6.12 address GP provision. Paragraph 6.7 addresses transport, as does Section 13. Paragraph 13.3 in particular confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.
Response Reference: U0001017
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06770/2
Name: Mrs Cecilia Botha
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Considers that the DPD does not pass the test of soundness. In particular, the DPD is not an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. Nor is it consistent with national policy. Reasons for this assertion are detailed below:

<p>Parvis Road is heavily congested and the addition of 550 dwellings and 15 traveller pitches will cause the road to get gridlocked. There would also be significant upgrading works required, leading to road works for a substantial amount of time. The infrastructure report fails to address how adequate healthcare and school place provisions will be addressed due to increased population. Wishes to be informed when the DPD progresses to the next stages.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: This representation is addressed by the Regulation 19 Issues and Matters Topic Paper. Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. More generally paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Paragraph 6.9 addresses education provision. Paragraph 6.12 addresses GP provision.</p>
<p>Response Reference: U0001183</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06495/1</p>
<p>Name: Sandra Boutell</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05</p>
<p>Summary of Comment: Object to green belt proposals in Byfleet due to: The sites being flood plain Existing traffic problems on Rectory Lane and Parvis Road Primary schools and doctors' surgeries are already overburdened, with new homes this would become intolerable.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 7. Neither proposal is on a flood plain. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 6. The impact of the proposals on local infrastructure, including schools and health facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 6.</p>
<p>Response Reference: U0001664</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06568/1</p>
<p>Name: Ms Andrea Boutell</p>
<p>Number of Signatories: 1</p>

Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Objects to the development of Byfleet's Green Belt. Considers that there is insufficient infrastructure to support housing, and does not wish to see the destruction of any more Green Belt land.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The issues raised in this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper. Section 6 addresses the infrastructure provision to support the Site Allocations DPD. Section 1 confirms that there is a justification for the release of Green Belt land to meet future development requirements in the Borough.
Response Reference: U0001276
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06801/1
Name: Mr Bruce Bovill
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Considers that there are flaws relating to proposals GB4 and GB5. 1. Road Infrastructure. The A245 is subject to severe congestion daily, and this is compounded when there are accidents on the A3 and A245. Access to anywhere beyond Byfleet village becomes impractical at such times. It is noted that at present there are a number of large unoccupied buildings, whose use would further compound these issues. To add a substantial number of additional houses on former Green Belt land would be foolish. The proposal to alleviate traffic issues by stopping a right hand turn at Seven Hills Road, and have that traffic navigate the roundabout from the A3 is impractical, as that road already becomes impassable at times with the volume of traffic from the A3 Cobham and Byfleet. The volume of large articulated lorries servicing the industrial areas of Byfleet and Brooklands without suitable road provision is large. This is worsened by traffic lights at the Seven Hills Road junction which cause traffic to back up. To send a further volume to the roundabout would be unlikely to improve traffic in Byfleet village. 2. Health Infrastructure: The only access to health provision for the village is in West Byfleet or hospitals outside the immediate area. Since the fire at the Weybridge drop-in clinic, the nearest such centre is in Woking, and serves an area that reaches as far as Fleet in Hampshire. The health infrastructure for the village needs improving before further development is considered. There should be provision within the village to avoid further pressure on roads and to assure timely assistance in an emergency. 3. Educational infrastructure. Both primary schools are oversubscribed, requiring some students to attend schools outside the village. All secondary education is outside the village. Schooling that takes place outside the villages requires use of the A245 at peak times. 4. Byfleet floods The areas of Green Belt are effectively soakaways when Byfleet floods. Photographic evidence is available of such flooding. To designate parts of the green Belt for building will

reduce absorption of water, and result in floods extending beyond areas they have covered before. Existing buildings, new buildings and the village will be more vulnerable.

5. Location of the proposed sites

Issues regarding GB4 and GB5 include: the impact of electricity pylons on amenity; the damp and its impact on health; the impact of air pollution from the M25 on health; and noise.

Before further development of any sort is contemplated for the village, the M25 needs to be resurfaced.

6. Incorrect assignment of land

Part of GB5 has been included in the areas of Green Belt, in apparent ignorance of the fact that is deeded to the Church in perpetuity for burial purposes.

At present, it also forms an important community green space, part of which is a children's playground. Following the loss of the playground at Byfleet Recreation Ground, to remove another would be harsh.

Contributor Proposed Modification: Before any further building can be permitted in Byfleet, the infrastructure would need to be substantially reviewed and changed. There should be healthcare provision within Byfleet village boundaries. Before any further development of any sort is considered in Byfleet, the M25 needs to be resurfaced.

Modification Reference: U0000208

Officer Response: Regarding the A245, Paragraph 13.3 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. More generally, Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.

Paragraph 6.12 of the Regulation 19 Issues and Matters Topic Paper addresses GP provision.

Paragraph 6.9 of the Regulation 19 Issues and Matters Topic Paper addresses education provision.

Section 7 of the Regulation 19 Issues and Matters Topic Paper addresses the assessment of flood risk as it relates to the Site Allocations DPD. In particular, Paragraph 7.7 confirms that the DPD takes due care to ensure that the risk of flooding is minimised in Byfleet and West Byfleet.

The reasoned justification for GB4 recognises the potential impact of pylons on amenity. It provides that "whilst significant constraints affect the western portion of the site, notably substantial electricity infrastructure (pylons) and noise from the M25, the eastern part of the site south of the existing building line is considered suitable for residential development. Use of the remaining land to the west will retain its open nature and assist in buffering Byfleet from the M25."

Air and noise pollution impacts are comprehensively addressed in Section 8 of the Regulation 19 Issues and Matters Topic Paper.

Dampness as a construction issue is addressed by Building Regulations and outside of the scope of the DPD.

The M25 is subject an ongoing South West Quadrant Study, the particular recommendations of which are not yet known. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the Site Allocations DPD, in particular their impact on the Strategic Road Network.

The section of GB5 which is consecrated as future burial land is addressed by Section 15 of the Regulation 19 Issues and Matters Topic Paper.

Regarding the community green space, including a children's playground, Paragraph 4.2 of the Regulation 19 Issues and Matters Topic Paper confirms that "the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet

<p>the open space and recreational needs of both existing and future residents, as set out in Core Strategy Policy CS17: Open space, green infrastructure, sport and recreation." Section 6 of the Regulation 19 Issues and Matters Topic Paper confirms that infrastructure needs including healthcare and transport have been sufficiently addressed to support to development proposed by the Site Allocations DPD.</p>
<p>Response Reference: U0001055</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06291/1</p>
<p>Name: Mr Jonathan Bowden</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB07</p>
<p>Summary of Comment: Objects to GB7 proposal and would request that the Egley Road site remain in the Green Belt. This will lead to loss of the greenbelt between Mayford and Woking. The blending of the Village of Mayford with built up Woking for the first time in history, the village has been separate from Woking since before the Doomsday book! Major Road pollution Air pollution Noise Pollution Danger to School Children with the volume of Traffic. 3 Schools in 1000 yards catering for several thousand children at risk 5 Gym/Leisure centres (Woking Leisure Centre, Sports Box, David Lloyd, Woking Athletics Club with Stadium and Woking Gym Club) all accessing the Mayford section of the A320 The road is the busiest in Woking being the main artery between Guildford/ A3 /M25 and supports close to 30,000 car movements per day. The Rural Character of the Area would drastically and impact on the Residents that live in the area.</p>
<p>Contributor Proposed Modification: GB7 should remain in the Green Belt</p>
<p>Modification Reference: U0000392</p>
<p>Officer Response: Objection noted. The representation regarding Mayford Green Belt, Mayford character and visual gap have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21. In regards to road infrastructure and traffic and the A320 see Section 6 and 13 in the Regulation 19 Issues and Matters Topic Paper. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures will satisfactorily address any adverse impacts from cumulative development. On the matters raised about noise and air pollution see Section 8 in the Regulation 19 Issues and Matters Topic Paper.</p>
<p>Response Reference: U0001064</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

Contributor Reference: 06599/1
Name: Ms And Mr Barbara And Ron Boyse
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Objects to the release of site GB7 from the Green Belt. The site is important in providing a buffer between the urban sprawl of Woking and the village of Mayford, protecting the village identity. Concerns regarding inadequate infrastructure, particularly the A320. Egley Road is one of the busiest roads in Woking. The increase in traffic will make the road more dangerous for children. An accident has occurred at the school crossing. Possibility of five gym/leisure centres using Egley Road for access points. Mayford's unique rural character needs to be retained.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 20 addresses the issue regarding the loss of Green Belt land and the associated issue regarding the physical separation of Woking and Mayford. Section 13 addresses the issue regarding road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A320 Corridor Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Policy CS18: Transport and accessibility of the Core Strategy ensures that development proposals provide appropriate infrastructure measures to mitigate the adverse effects of development traffic and other environmental and safety impacts. The matter regarding the relocation is a separate process to the Site Allocations DPD. If planning permission were to be granted for this facility on the site, the Site Allocation DPD will take that into account.
Response Reference: U0001656
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06841/1
Name: Mrs Diana Bradford
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Object to Green Belt release for development of housing / Traveller sites. Green belt is so important for wellbeing, and enhances the lives of all residents of Byfleet and West Byfleet.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1. The requirement to use Green Belt land to accommodate Traveller sites is addressed in Section 3. The impact of Green Belt loss on the wellbeing and amenity of local residents is addressed in Section 4.
Response Reference: U0001497

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06547/1
Name: Mr Nick Bradshaw
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Strongly objects to the plan as it takes away an unprecedented percentage of green belt land in the Byfleet / West Byfleet areas and leads to urban sprawl and the merging of two villages. It is out of proportion with other parts of the Borough. The plan fails to address adequately the infrastructure needs of the two villages - traffic flows and related air pollution, schooling, health care provisions.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council's Regulation 19 Issues and Matters Topic Paper responds to concerns raised in the representation: Section 1 sets out the justification for releasing Green Belt land to meet future development needs; section 5 responds to concerns about disproportionate release in the West Byfleet and Byfleet areas; section 6 describes how infrastructure provision has been assessed; section 8 describes how air pollution has been taken into account; and section 13 addresses concerns around traffic congestion.
Response Reference: U0001789
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05357/1
Name: Mrs Rebecca Bradshaw
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB10
Summary of Comment: The DPD is legally non-compliant: Green Belt should remain protected as it currently is by law. Green Belt provides access to green space (with its health benefits) for adults and especially for children. Green Belt provides a 'green lung' for fresh air and wildlife to thrive. With the combination of the Recreation Ground pub proposal and proposed DPD sites I feel we may completely lose green space in West Byfleet. There are other parts of the Borough with more green space available that could provide better locations, e.g. the non-SSSI parts of Horsell Common, golf courses or privately owned estates. Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP. The NDP also emphasises the importance of protecting green spaces, this would be contradicted by the proposals. The DPD is unsound: the proposal to release Green Belt sites in West Byfleet is not justified. To build 1000 homes on the small area of Green Belt in West Byfleet and Byfleet, putting strain on their infrastructure and altering the village feel, is not a balanced distribution. Other greener areas are available. It seems not all alternative options have been thought through. I wish to participate in the Examination in Public, since I spoke at the Council exec meeting on the West Byfleet playground upgrade and this project has been successful.

Contributor Proposed Modification: I feel that there are other areas in Woking borough with more green space available that could provide better locations. For example Horsell Common which is 880 acres with only 380 being SSSI. Surely some of the other 500 acres at Horsell could be used instead of removing the small remaining green 'lung' that West Byfleet has.
Perhaps approaching golf courses and privately owned estates might be an alternative to using greenbelt land.
The council to research all possible alternatives such as use of Horsell Common, Chobham Common, farmland, golf courses, private land for sale.

Modification Reference: U0000283

Officer Response: Green Belt is protected by local and national planning policy rather than directly by law (except in so far as the planning system as a whole is underpinned by laws). Nevertheless its protection is a key objective of the Council and the Core Strategy. National planning policy (NPPF paragraphs 136-140) sets out how Green Belt boundaries should be reviewed where there are exceptional circumstances to do so, including identified needs for development that cannot be met in other ways. The Core Strategy established the existence of a need in Woking for removal of land from the Green Belt for development. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1.

The impact of the proposals on access to green space for local people is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 4.

The impact of the proposals on air quality is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.

The impact of the proposals on wildlife is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 19.

The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5. The proposal for building a pub at West Byfleet Recreation Ground has never been submitted as a planning application, nor has it been proposed as an allocation, so cannot be considered in the evidence base for the Site Allocations DPD. Any planning application for such a development that came forward now would have to be assessed taking into account the draft proposals in the DPD. In any case, the Council has published a statement that the developer is no longer pursuing the proposal.

Common land has legal protection and was considered an absolute constraint on development in the Green Belt Boundary Review. In any case the non-SSSI parts of Horsell Common are all protected by other designations as well, mainly as Site of Nature Conservation Importance and/or Green Belt and partly as Urban Open Space. Part is also used as a Suitable Alternative Natural Greenspace to enable housebuilding elsewhere. Almost all golf courses are in the Green Belt and their suitability for release and development was therefore assessed through the Green Belt Boundary Review, which found them not to be suitable (the same applies to Green Belt parts of Horsell Common). The consideration of alternative sites within the urban area is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 11.

The relationship of the proposals in the DPD to the West Byfleet NDP is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 16.

The impact of the proposals on infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.

Response Reference: U0001345

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06631/1
Name: Mr Stuart Bradshaw
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: No comment is made on legal compliance, whether the DPD is positively prepared or whether it is consistent with national policy. The DPD is not justified or effective.</p> <p>The DPD is unsound as it does not meet the test of being "the most appropriate approach when considered against reasonable alternatives, and based on proportionate evidence" on the grounds that it concentrates too much change in too few areas.</p> <p>WBC is commended on the openness and transparency of this consultation.</p> <p>Woking Borough has to increase its housing by less than 10% of its current level, requiring a reclassification of less than 2% of overall total green belt space. However, West Byfleet faces an approximate 50% reduction in green belt, and a 40% uplift in total dwelling numbers (increasing by 1,000 dwellings, including West Hall, Broadoaks , Sheer House and smaller sites). It is accepted that there is a need for more housing in the Borough, and this cannot be spread 100% evenly. However this is a huge and unmanageable amount to impose on one village, in terms of impact on its infrastructure and general workings. Aside from the extra households within Woking town centre, West Byfleet is taking on almost half of the borough's remaining obligation. If instead every village a 10% uplift over years, the effect would be negligible and the infrastructure mitigation costs far lower. A concern is raised as to whether the disparity is related to previous objections to planning applications in West Byfleet.</p> <p>Accepts that there is a need for more traveller pitches and that some of these could be situated in West Byfleet. Argues that there are already many traveller sites in the south of the borough so there is a need for rebalancing. However concerns are raised that traveller pitches are not being spread evenly throughout the borough, and that 15 pitches will impact infrastructure and social cohesion. Asks whether it would be better to have 2-3 pitches in half a dozen different locations to improve travellers' choice and reduce impact on any one site. Additionally concerns are raised as to the justification for situating traveller sites away from the centre of the borough.</p> <p>A final point is raised that the DPD might fail the test of being "deliverable over the plan period;" contends that developers will not agree to build new housing next to a large traveller site.</p> <p>Wishes to be informed when the DPD progresses to the next stage.</p>
<p>Contributor Proposed Modification: 1. Reconsider the spread of new housing and reclassification of green built across the Borough; make it more even-handed, for example by limiting it to no more than 15% change in any one village/region (or alternatively find a completely empty site and make a whole new village there)</p> <p>2. Spread out new traveller pitches across half a dozen smaller sites, spread throughout the borough and not just at the extremities.</p>
Modification Reference: U0000179
<p>Officer Response: The issues raised in this representation have been comprehensively addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>Paragraph 5.1 confirms that the proposed allocation of sites is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to ensure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.</p>

<p>Moreover, as confirmed by Section 6, adequate consideration has been given to the infrastructure provision necessary to support the Site Allocations DPD.</p> <p>Paragraph 3.8 addresses the concern that has been raised that the Site Allocations DPD concentrates all the Traveller sites in Byfleet and West Byfleet, and in close proximity to each other. This paragraph highlights that taking into account the existing sites, most of the need is in fact being met at Five Acres and Hatchingtan with a combined total of 35 pitches. It is further noted that the Council will continue to work closely with the operators of the sites to make sure that they continue to be effectively managed.</p> <p>The Council considers that developers should agree to build new housing next to Traveller sites if they are well designed and well managed. For instance, there is presently an application for a housing development for the settled community adjacent to a Travellers site at Five Acres in Brookwood. Furthermore Planning Policy for Traveller Sites provides that "Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies: a) promote peaceful and integrated co-existence between the site and the local community."</p> <p>Paragraph 4.1 provides that "taking into account the constraints of the Borough and the available evidence, the proposed allocations are the most sustainable to deliver the objectives of the Core Strategy when compared against other reasonable alternatives." Therefore it is not considered appropriate to substantively modify the DPD.</p>
Response Reference: U0001267
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06680/1
Name: Alexis Brandon
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
<p>Summary of Comment: Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not, in my opinion, an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy.</p> <p>Objects to the development GB4, GB5 and GB10.</p> <p>Traffic and pollution have increased and cannot cope with the additional cars. With the M25 in such close proximity to some of the proposed sites surely both air and noise pollution are a huge cause for concern for anyone wishing to live in these proposed sites. Greenbelt- Byfleet is relatively unspoilt, believes the greenbelt serves to provide a barrier to avoid Byfleet Village and West Byfleet merging into one big urban mass. Buying it cheap to then use for housing is not acceptable. We all need green spaces, now and for generations to come. The granting of permissions on any Greenbelt sets a precedence for others to to the same until the entire country is just one concrete jungle - the green belt needs protecting!</p> <p>Part of the proposed land belongs to the Church - and should not, for any reason be forceably used for development.</p> <p>Flooding - Some of the proposed Building land lies on a flood plane even if every measure is taken to protect these homes the water will have to go somewhere, increasing the risk of flooding to pre existing houses.</p> <p>Services- There would need to be an increase to the services in the Byfleets if it is to accommodate that many more residents, schools, doctors, dentists and public transport .</p>

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Objection noted.</p> <p>Sections 1 and 2 of the Regulation 19 Issues and Matters Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough.</p> <p>The impact of the proposed development on noise and air pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development.</p> <p>In regards to the loss of Green Belt land and residents amenity see Section 4 of the Topic Paper. In terms of the church land see Section 15 of the Topic Paper.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. The IDP has considered dentist and public transport provision please see paragraph 10.43 and Section 6 of the IDP, the IDP can be found on the Council 2027 website. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.</p>
Response Reference: U0001182
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06536/1
Name: Ms Liz Brann
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
<p>Summary of Comment: Objects to building on the Green Belt and developing land with inadequate infrastructure.</p> <p>Concerns regarding increased traffic in Byfleet and associated safety issues (speed, damage to parked cars). What are the proposals for dealing with extra traffic?</p>

Concerns regarding strain on health and educational infrastructure.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses concerns regarding development of Green Belt Land. More specifically, section 5 addresses the loss of Green Belt land in West Byfleet and Byfleet. Section 6 addresses the issue regarding the adequacy of infrastructure, including education and health. More specifically, section 13 addresses impacts of proposed development on road infrastructure. Should a proposal come forward for the development of a site, the development management process will require assessment of site specific impacts and address any adverse impacts on traffic, noise, overcrowding and general impacts on amenity and safety of existing residents. Transport and parking issues would also be considered in detail. The Council sets specific requirements within its Parking Supplementary Planning Guidance and has a policy framework for car parking in Core Strategy policy CS18 on Transport. The policy aims to ensure development proposals provide appropriate infrastructure measures to mitigate any adverse effects of development traffic and other environmental and safety impacts. Transport Assessments will be required for development proposals to fully assess the impacts and identify appropriate mitigation measures.
Response Reference: U0001245
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05687/1
Name: Mrs Carla Brannan
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is unsound, not positively prepared (the allocated sites in the Byfleets are not sustainable due to inadequate infrastructure), not justified (taking into account reasonable alternatives), not effective (not clear that sufficient joint working has taken place), and not consistent with national policy. Objects to site GB10: Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces. The site performs the Green Belt functions of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment. The site is covered by a minerals allocation. This will make the site unattractive to developers, so its deliverability is questioned. The Infrastructure Report does not address provision of healthcare and or education for the increased population. Current infrastructure including health, schools, water, sewage and roads is at capacity. Even with enhanced infrastructure, which would not be physically possible to put in place, the village would be 'bursting at the seams' unnecessarily. Very close to the A245 and M25, so at risk of air and noise pollution, very difficult to mitigate against- contrary to NPPF para 170(e). The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk. Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment. Inadequate consideration of alternative sites, in particular PDL in sustainable locations.

The Byfleets would be disproportionately affected, compared with allocations elsewhere in the Borough.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The relationship of the DPD to the West Byfleet NDP is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16.</p> <p>The performance of the parcel including site GB10 against Green Belt purposes was assessed in the Green Belt Boundary Review (2015) and the site found suitable for removal from the Green Belt. The Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12.</p> <p>The issue of the minerals safeguarding area on site is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 17.</p> <p>The impact of the proposals on local infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The issue of air and noise pollution in relation to the proposals is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The issue of flood risk in relation to the proposals is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The housing quantity is not considered excessive for site GB10. The proposed indicative density of 40 dwellings per hectare (dph) is consistent with the Core Strategy, which recommends a density of 30-50 dph for 'Green Belt sites to be released after 2021/22'. This is a medium density of suburban development. The figure only relates to the developable area of the site (approximately 14.8 ha), and does not include the areas of existing woodland and new green infrastructure which are proposed to take up nearly half the site's total 29.33ha area.</p> <p>The consideration of alternative PDL sites is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 11.</p> <p>The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p>
Response Reference: U0001329
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05726/1
Name: Mr Paul Brannan
Number of Signatories: 1
Comment Type: OBJ
Site Reference: RG18GB12, RG18GB13, GB10
<p>Summary of Comment: Objects to the proposed developments, the SADPD does not pass the required test of soundness required by paragraph 35 of the National Planning Policy Framework 2018. This is because the SADPD has not been positively prepared, is not justified and is not effective. It is also that the SADPD is not consistent with national policy. My reasoning is detailed below.</p> <p>Infrastructure Report</p> <p>The current infrastructure in the Byfleets area (West Byfleet and Byfleet) is already at, if not over, capacity and the Infrastructure Report does not address the very real concerns of how our schools, medical centres, dental centres and roads would cope with a bulging population caused by the introduction of over 1000 new dwellings. Even if new infrastructure were to be put in place, fails to see how where such infrastructure would be accommodated given the current layout of the Byfleet and West Byfleet villages.</p>

Site Allocation of site GB10 (land surrounding West Hall)

There are a number of allocations which are currently applicable to GB10, namely it is allocated as Greenbelt Land, it is allocated as a concrete aggregated safeguarded site and it is covered by a minerals allocation. As a result of these allocations, does not believe that that the proposed development of GB10 is deliverable. In particular and regarding GB10's Greenbelt designation, any application for Planning Permission on GB10 would be contrary to not only the West Byfleet Neighbourhood Development Plan but also contrary to the National Planning Policy Framework 2018, which places great emphasis on the protection and enhancement of all existing green spaces unless very special circumstances exist which would justify the release of Greenbelt Land for housing development. The SADPD fails to demonstrate that such special circumstances exist. The proposal in the SADPD to allocate a large number of traveller pitches at GB10 is contrary to Woking Borough Council's policy on Gypsies, Travellers and Travelling Showpeople, which clearly states that a sequential approach should be taken when identifying suitable sites with sites in the urban area being considered before those in the Greenbelt. This has not been done.

In addition, Woking Borough Council has not focussed on previously developed land in sustainable locations, which it is required to do and inadequate consideration has been given to alternative sites.

The SADPD does not provide adequate reasons for excluding Pyrford and Martyrs Lane greenbelt from the allocation.

Pollution

No proper consideration has been given to noise and air pollution despite the fact that The National Planning Policy Framework makes it clear that planning decisions should contribute to and enhance the local environment by preventing new development from contributing to or being put at unacceptable risk by unacceptable high levels of soil, air, water or noise pollution. Considers that mitigating the risk of such pollution is not something that could be easily achieved given the proximity of the proposed new developments to the M25 and the A245.

Extent of Proposed Development

Woking Borough Council's required housing quantities has not been spread proportionately across the entire borough. As it stands, the SADPD proposal would see a housing uplift of over 40 percent in West Byfleet alone. This is unfair, unnecessary and unjustified.

Conclusion

The SADPD is not unsound because it has not been positively prepared (the allocated sites in the Byfleets' are not sustainable due to current and future inadequate infrastructure), is not justified (reasonable alternatives have not been properly taken into account) and is not effective (it is not clear that sufficient joint working has been undertaken to consider fully the proposed developments).

Wishes to be informed when the SADPD progresses to the next stage.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. The IDP contains dentist provision, this can be found on the council website. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate

<p>information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>In regards to the mineral allocation see Section 17 and for the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper. In regards to the lack of alternative sites see Section 11 of the Topic Paper.</p> <p>The reasons for not removing the Martyrs Lane site from the Green Belt are addressed in the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11. Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to site GB10.</p> <p>Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.</p> <p>In terms of the housing quantities and spread of development in the Borough see Section 5 of the Topic Paper.</p>
Response Reference: U0001211
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00169/2
Name: Mr Anthony Brewer
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Does not consider the DPD to be legally compliant because:</p> <ul style="list-style-type: none"> - Appendix 1 is not an evidence base, but rather a list of references, and the so-called evidence does not take into account rise in crime rate in relation to Travellers settling in an area (proposals to add e.g. 4 temporary pitches to the South of Murray's Lane will not make any difference); - Where are public views listed / summarised (e.g. regarding the pub on West Byfleet playground) - Cannot read Appendix 2, even when magnified, and there needs to be a reference in Appendix 2 to the existing Green Belt boundary for comparison. <p>Proposals to remove the Green Belt land in West Byfleet and Byfleet are unsound and unjustified because:</p> <ul style="list-style-type: none"> - Exceptional circumstances have not been quoted; - This Green Belt land assists in urban regeneration by forcing development away from the countryside; - The land clearly separates West Byfleet from Byfleet - proposals will extend urban sprawl - a 20% increase in these two local villages will strain the already insufficient infrastructure.
<p>Contributor Proposed Modification: Produce a complete evidence base, not a heavily biased one that struggles to meet the definition.</p> <p>Provide accurate and readable comparisons.</p> <p>Build on brownfield and windfall sites first.</p> <p>Present properly thought through Travellers proposals instead of 'playing the game'.</p>

Modification Reference: U0000174

Officer Response: Appendix 1 of the DPD makes reference to the various documents that make up the Council's evidence base. Some of these do date back to the Core Strategy period, and many have been updated specifically to inform the preparation of the Site Allocations DPD. All of the documents are available on the Research and Evidence section of the Woking2027 website, or available to inspect at the Civic Offices. Section 10 of the Council's Regulation 19 Issues and Matters Topic Paper describes how the Council believes its evidence base is thorough and robust.

The responses to previous rounds of consultation are also available on the Woking2027 website, under 'Previous Consultations' on the Site Allocations DPD tab. Alternatively, they are available to inspect at the Civic Offices in paper form. The proposals for a pub on West Byfleet Recreation Ground are not related to the preparation of the Site Allocations DPD. A formal planning application is yet to be submitted, and so public comments about the proposal are not available on the planning application database. A news release was published by the Council on 16 April 2019 stating that Marston's would no longer be pursuing proposals for a pub and new sports changing facilities in West Byfleet.

Councils are required by law to assess the accommodation needs of all people living in the area they are responsible for, and this includes Gypsies and Travellers. By allocating permanent pitches in the Site Allocations DPD, and thus better meeting the needs of the Traveller community, the number of unauthorised developments and encampments should be reduced. Section 3 of the Council's Regulation 19 Issues and Matters Topic Paper explains this in more detail, and describes how the Council has conducted a thorough and satisfactory Travellers needs assessment and site selection process.

The Council acknowledges that the map at Appendix 2 is difficult to read. The map is also available online, and there is a 'zoom in' facility which allows better analysis of the proposed new Green Belt boundary. This is available on the Site Allocations DPD section of the Woking2027 website. Hard copies of larger proposals maps are also available in the Civic Offices and in local libraries. for inspection.

The existing Green Belt boundary can be seen on the existing proposals map which accompanies the Core Strategy, also available on the Development Plan section of the Woking2027 website.

Sections 1 and 2 of the Topic Paper set out in detail why the Council believes it is justified to release and safeguard Green Belt land to meet future development needs, including which exceptional circumstances have been identified. It is argued that the Green Belt sites perform several Green Belt functions. It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Section 21 of the Topic Paper addresses concerns about urban sprawl.

Section 5 addresses concerns about disproportionate release of Green Belt land in Byfleet and West Byfleet, and how the Council has made sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity.

Section 6 sets out the Council's response regarding the capacity of infrastructure to accommodate future development.

With regard to using brownfield land and windfall sites, section 11 sets out how the Council has assessed alternative sites to enable decisions about the preferred sites in the DPD.

Response Reference: U0001210

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): F

Contributor Reference: 06639/1
Name: Mrs Rachel Brewer
Number of Signatories: 1
Comment Type: COMM
Site Reference: UA15
Summary of Comment: The DPD is legally compliant and sound on all counts. I believe that the Planets site will be crucial for keeping a balanced provision to the town centre and town as a whole. Continuing the Fiery Bird venue , including centres such as the Lighthouse and corner house and facilities for community groups to hire with ideally a nursery provision, it was a shame that Akram Yoga moved, also a concert venue , people from the whole town and those moving into the new flats will enjoy variety that is affordable and there will be a balance to match shops, cafes and restaurants...
Contributor Proposed Modification: I believe that the Planets site will be crucial for keeping a balanced provision to the town centre and town as a whole. Continuing the Fiery Bird venue , including centres such as the Lighthouse and corner house and facilities for community groups to hire with ideally a nursery provision, it was a shame that Akram Yoga moved, also a concert venue , people from the whole town and those moving into the new flats will enjoy variety that is affordable and there will be a balance to match shops,cafes and restaurants...
Modification Reference: U0000297
Officer Response: The allocation of UA15 does not deal with individual companies or operations, but focusses on uses. The allocation policy does require development to include community and leisure uses. This could include the provision for the retention of the Fiery Bird/Phoenix Centre. The operators of this venue may well engage with the potential developers of the site to secure this retention.
Response Reference: U0000979
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06822/1
Name: Maureen And Michael Brewer
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Object to further use of Green Belt land in Byfleet. There is little Green Belt land left in the village, it should remain without further encroachment. Wildlife is already living at breaking point and will have no futher places to pull back into should proposals go ahead. Until recently Murrays Lane was home to deer and one of the largest badger setts in Surrey. Since Gypsy developments on the lane, deer have left and the badgers are forced to forage further into Church Road and surrounding areas, which is dangerous for them and brings them into contact with humans. The temporary permission for Gypsy pitches on Murrays Lane has elapsed so the pitches should close. Roads are already over capacity, the proposals will bring unknown extra traffic. There is no supporting infrastructure. The existing schools and health centre are also at their limits.

Doesn't make sense to focus development on a small village like Byfleet, which is already built to capacity. Let Byfleet breathe and survive.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in by the Regulation 19 Issues and Matters Topic Paper, see Section 5. The impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. The reasoning behind the proposal to make permanent the temporary Gypsy site south of Murrays Lane is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3. The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on infrastructure, including schools and health facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.
Response Reference: U0001570
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06734/1
Name: Ms Sydra Brewitt
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: GB7 should be retained in the Green Belt. It effectively serves the five purposes of the Green Belt set out in national policy, namely: checking the unrestricted sprawl of Woking; preventing Woking and Mayford merging into one another; assisting in safeguarding Mayford Village and green space from encroachment; to preserve the setting and character of Mayford, an historic village that appeared in the Domesday book; to assist in urban regeneration by encouraging the recycling of derelict and other urban land - Woking should prioritise brownfield land. With the addition of the new secondary school, leisure centre and athletics club, the traffic and light pollution affecting the semi-rural village of Mayford has encroached residents. Adding 168 dwellings would exacerbate traffic and pollution. The village doesn't have appropriate infrastructure to support this growth. The trees and woodland (Hook Hill Woods) should be protected and perhaps enhanced for the benefit of the community. The woods have a well established ecosystem, and are teeming with wildlife. They also provide a screen for local residents from light and noise pollution from the school and sports facilities.
Contributor Proposed Modification: Retain GB7 in the Green Belt as it effectively serves the purposes of the Green Belt. Retain Hook Hill Woods and perhaps enhance them for the local community.
Modification Reference: U0000311
Officer Response: The concerns raised have been addressed in the Council's Regulation 19 Issues and Matters Topic Paper, particularly in Sections 1 and 2 justifying the release of Green Belt land; Section 6 regarding infrastructure provision; Section 8 regarding pollution; and Section 13 regarding congestion.

<p>Section 19 sets out how trees and other features of environmental, ecological and amenity significance will be fully assessed and protected from development where necessary. However, in response to concerns from the local community and based on further information from the Council's green infrastructure team, the Council supports a modification to policy GB7 to ensure that the area referred to as Hook Hill Woods are excluded from any future built development scheme.</p> <p>Sections 20 and 21 of the Topic Paper respond to the representation about land in Mayford serving the purposes of Green Belt as set out in national planning policy. Sections 11 and 22 describe how other brownfield sites have been thoroughly assessed, including empty offices and commercial buildings in industrial estates.</p>
<p>Response Reference: U0001348</p>
<p>Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site".</p> <p>Amend third paragraph of reasoned justification to read 118 dwellings.</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06799/1</p>
<p>Name: Mr Cobus Breytenbach</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: Does not consider that the DPD passes the test of soundness. In particular the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence nor is it consistent with national policy. Reasons for this assertion are detailed below:</p> <p>The objective of the West Byfleet Neighbourhood Development Plan is to maintain, enhance and protect the distinctive and special character of West Byfleet. GB10 would undermine the great emphasis placed by this plan on protection and enhancements of green spaces.</p> <p>Wishes to be informed when the DPD progresses to the next stages.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: This representation is addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>In particular the justification for West Hall, and its consistency with the West Byfleet Neighbourhood Plan, is addressed by Paragraph 16.1. Furthermore Paragraph 4.2 sets out the Council's commitment to ensuring that sufficient high quality open space and green infrastructure is available to meet the needs of both existing and future residents. Core Strategy Policy CS17 and Development Management Policies DPD DM1, together with key requirements in the Site Allocations DPD set out how this will be achieved. In particular, at West Hall, it is envisaged that 4.7ha of public open space and green infrastructure should be integrated at the site, and that large areas of woodland and parkland setting should be retained.</p>
<p>Response Reference: U0001072</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06843/1</p>

Name: J Briggs
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Object to development proposals in Byfleet. The sites are on a flood plain, there is lots of evidence of past flooding. The doctors' surgery is full and not taking any more patients, with more people this will get worse. The walk-in centre in Weybridge has not been rebuilt yet, and may not be. There are not enough school places for more children in the village. The A245 between Cobham and Byfleet is very congested every day, and Byfleet is used as a cut-through to avoid the traffic. The proposals would make these problems worse, risking the safety of children going to school, and causing pollution all around Byfleet. It is not acceptable to take away land that was given to the church for burials. The whole plan for building in Byfleet is not sustainable and brownfield sites should be used instead.
Contributor Proposed Modification: brown field sites should be used instead.
Modification Reference: U0000229
Officer Response: Flood risk issues affecting the proposals are addressed in the Regulation 19 Issues and Matters Topic Paper, Section 7. In particular, none of the proposed development sites are on a flood plain. The implications of the proposals for local infrastructure, including medical and education facilities, are addressed in the Regulation 19 Issues and Matters Topic Paper, Section 8. The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13. The impact of the proposals on air pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 8. The issue of future burial land within the boundary of site GB5 is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 15. A sustainability appraisal has been carried out on the proposed sites which found them to be sustainable. The availability of alternative brownfield development sites is addressed in the Regulation 19 Issues and Matters Topic Paper, Sections 1 and 11.
Response Reference: U0001398
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06578/1
Name: Mrs Demi Brooks
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Concerns regarding the following: - Development of Green Belt Land for housing and traveller pitches; - Effect of Green Belt loss and associated impact on health; - Increased traffic on Parvis Road and associated air pollution; - Inadequate health and educational infrastructure; - Waste water management.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 4 addresses the issue regarding the loss of Green Belt on the well-being and amenity of

residents. Section 5 specifically addresses the loss of Green Belt land in West Byfleet and Byfleet. Section 3 addresses the issue regarding travellers. Section 6 addresses the issue regarding adequacy of infrastructure. Section 13 specifically addresses road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 8 addresses the issue regarding pollution.
Response Reference: U0001565
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00455/2
Name: Ms Clare Brown
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Object to release of the majority of the remaining Green Belt in Byfleet for housing development/ Travellers site.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1. The requirement to use Green Belt land to accommodate Traveller sites is addressed in Section 3. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in Section 5.
Response Reference: U0001547
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06819/1
Name: Mr Charlie Brown
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Object to release of the majority of the remaining Green Belt in Byfleet for housing development/ Travellers site.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The reasoning behind the proposals for Green Belt removal in Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see sections 1, 2 and 3.
Response Reference: U0001472
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06670/1

Name: Ms Catherine Buchanan
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11, GB18
<p>Summary of Comment: Objects to development of land surrounding West Hall, Parvis Road, West Byfleet (GB10) and removal of this site and the school playing fields (GB18) from Green Belt.</p> <p>Does not believe that the Draft Site Allocations DPD passes the test of soundness required the National Planning Policy Framework 2018. In particular the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy.</p> <p>The importance of Green Belt</p> <p>The sites are currently designated as Green Belt and as local green space within the West Byfleet Neighbourhood Development Plan. A key function of Green Belt land is to prevent urban sprawl and preventing neighbouring towns from merging together. This land clearly forms part of the 'green' boundary between West Byfleet and Byfleet and West Byfleet and Pyrford. Although not publicly accessible, the Green Belt land is clearly important in checking the unrestricted sprawl of West Byfleet. It also assists in urban regeneration by encouraging the recycling of derelict and other urban land and safeguarding the countryside from encroachment.</p> <p>It should be noted that the proposed loss of Green Belt at West Hall (GB10) of 29.3 hectares and the School Playing Fields (GB18) of 6.8 hectares follows the loss of 14.7 hectares at Broadoaks (GB11). In total this is 60% of total Green Belt land in West Byfleet.</p> <p>The National Planning Policy Framework states at paragraph 81 that once Green Belts have been defined (as is the case with these sites) that "local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land". Woking Borough Council as local planning authority is in fact doing the opposite to this and is attempting to remove these key sites from the Green Belt to allow residential development without first having considered alternative sites within urban areas.</p> <p>Traffic and Infrastructure Issues.</p> <p>The proposal to build 555 dwellings and 15 travellers pitches at West Hall will have a significant impact on both traffic and other infrastructure. This development is in addition to the large development at Broadoaks (252 new dwellings plus an 80 bed care home) which has just begun and is immediately adjacent to site GB10 and the development at Sheer House which has outline planning consent for 255 apartments.</p> <p>If all three developments go ahead that is an additional 1,062 additional dwellings. The village currently has just under 2,400 homes so this would be an increase of 45%. This scale of development will put overwhelming pressure on local infrastructure.</p> <p>Parvis Road is the only route both into and out of Broadoaks and West Hall. Indeed this road is the main route out of West Byfleet and is already congested at peak times. It is extremely difficult to see how this road could cope with such a large increase in traffic without having a significant adverse impact on residents trying to move around / through the village.</p> <p>Another key infrastructure matter is school places for the new residents. West Byfleet Infant and Junior Schools have recently expanded to three-form entry to deal with existing pressure for school places. Both schools are oversubscribed and have insufficient space for further expansion. The nearest state secondary school is also already oversubscribed. It is also unclear how and where adequate healthcare could be provided by such an increased population.</p>

There are frequent issues with waste water in the centre of West Byfleet. Further development on this scale will only exacerbate this issue.

There has been inadequate consideration of alternative sites for development. This applies to both dwellings and travellers pitches. Indeed the Council's own policy on Gypsies, Travellers and Travelling Showpeople states that suitable sites in urban areas should be considered before those in the Green Belt. This has not been done.

The West Hall site suffers from flooding. This has not been properly considered within the draft DPD.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

Sections 1 and 2 of the Regulation 19 Issues and Matters Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough.

It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes. It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development.

The representation regarding urban sprawl has been addressed in the Council's Issues and Matters Topic Paper see Section 21.

In regards to the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.

In terms of the total loss of Green Belt land and well being see Section 4 and 5 of the Topic Paper. The council did consider alternative sites, see section 11.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. The IDP has considered waste water provision please see Paragraph 13.91, the IDP can be found on the Council 2027 website. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.

The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

Response Reference: U0001167

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06869/1
Name: Sheila Buckley
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: DPD not sound, not an appropriate strategy taking into account reasonable alternatives or based on proportionate evidence, not consistent with national policy.</p> <p>The site is allocated as Green Belt land.</p> <p>The proposals will ruin the character of West Byfleet, and encourage urban sprawl by merging West Byfleet with Byfleet.</p> <p>This housing quantity is excessive and constitutes overdevelopment, especially in addition to current developments.</p> <p>The site is over 1km from the railway station requiring the further use of cars. This will increase pollution (including noise pollution) and congestion which is already bad. I suffer from asthma and am worried by current pollution levels.</p> <p>Where will extra school places and provision for doctors be found Both of these areas are overstretched at the moment.</p> <p>Why do Travellers' sites have to be placed on green belt before urban sites have been fully explored</p>

Contributor Proposed Modification: Please think again before spoiling a really lovely part of Surrey which is struggling already with congestion and pollution.
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Modification Reference: U0000262

<p>Officer Response: The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1.</p> <p>With regard to local character, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the site will increase the population of West Byfleet. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.</p> <p>The impact of the proposals on urban sprawl are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 21. The Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that sufficient exceptional circumstances justification exists for the release of site GB10 from the Green Belt, based on its high potential to deliver sustainable development. A significant green gap will be retained between site GB10 and the motorway, with public access to this area enhanced by the creation of the Byfleet SANG and possibly off-site green infrastructure provided as part of the development of GB10, and the majority of the Green Belt on the west side of Byfleet will also be retained.</p>

<p>The proposed indicative density for site GB10 of 40 dwellings per hectare (dph) is consistent with the Core Strategy, which recommends a density of 30-50 dph for 'Green Belt sites to be released after 2021/22'. The figure only relates to the developable area of the site (approximately 14.8 ha), and does not include the areas of existing woodland and new green infrastructure which are proposed to take up nearly half the site's total 29.33ha area.</p> <p>It is true that only part of the site is within standard walking distance of West Byfleet station. However this level of proximity to services is still better than that for most other sites considered through the Green Belt Boundary Review. In addition, only slightly over half the total area of the site is considered to be developable, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is likely to limit development on the areas of the site furthest from the station. The key requirements in policy GB10 include to 'improve sustainable transport infrastructure including pedestrian and cycle links and bus services to West Byfleet District Centre'. It is therefore not considered that the residents would be car reliant.</p> <p>The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The impact of the proposals on local infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The necessity for allocating Traveller pitches in the Green Belt is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3. In particular, the ability of sites in the urban area to deliver Traveller sites has been fully explored.</p>
Response Reference: U0001487
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06850/1
Name: Mr Mrs S LJ Bujdoso
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Needs more consideration given the great short term impact. Should build some infrastructure, new roads and maybe a couple of bypasses, before proposing additional housing (not on Green Belt).
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council has worked with infrastructure providers to assess the quality and capacity of infrastructure and its capacity to meet forecast demand arising from the Local Plan, and has undertaken a number of studies to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy. This is addressed in more detail by the Regulation 19 Issues and Matters Topic Paper, see Section 6.
The need to release Green Belt land for housing development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.
Response Reference: U0001243
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05254/1

Name: Mr And Mrs Teresa Bullen
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07, GB08, GB09
<p>Summary of Comment: Objects to the proposal with particular reference to GB7, GB8 and GB9 (Mafor/ Egley Road).</p> <p>Government have repeatedly stated that Green Belt should be protected at all costs. Many other councils are heading this directive and Woking needs to take the same stance as these councils (and their planning departments) that there were no special circumstances which would outweigh the harm to the Green Belt. Woking council should look at other Councils stance on the Green Belt.</p> <p>Removal of GB7 is contrary to 2011 Core Strategy which states that Mayford Village is designated as an infill only settlement within the Green Belt. The Green Belt prevent urban sprawl. The new school and sports complex has already impacted the Green Belt. Mayford is a village and normally only infill residential development have normally been acceptable. Indeed, to quote the 2011 Core Strategy produced by WBC. new build business or industrial developments will not be allowed as they are likely to result in an unacceptable effect on the primarily residential character of the village, and Green belt. In terms of GB7, much of the development has already been started and finished before 2022 and 2027 (ie school and sports and leisure facilities). Does this mean plans are already afoot to start the housing development prior to 2022 and the consultation is a means to tick the boxes.</p> <p>Loss of green lung, impact on global warming, air, noise and light pollution and increase in traffic on A320.</p> <p>Relating to the school and sports development which compromise the general character of the area, views are not retained to the railway because the views are obscured by the buildings, fences, MUGA pitches and flood lights, not much progress on landscape frontage and tree belts. It is also very apparent that there has been considerable clearing of the site behind Wye Vale and the sensitive handling of site topography needs to be considered and the area of high archaeological potential being safeguarded .</p> <p>The flood lighting is intrusive and not 'sensitively designed to minimise impact in landscape/ townscape terms.' Driving along the A320 is now like driving through a metropolis and that will only get worse if the rest of the area is developed as proposed. It is evident that Egley Road could be in danger of unlimited development. However, the A320 and locality does not have the capacity nor infrastructure to support increased development. The road and transport organisation is overloaded with heavy traffic, and by bottlenecks such as at Victoria Arch and Slyfield. There are also a considerable number of single track roads over railway lines, at Hook Hill Lane, Mayford Green and St John's Hill Road Bridge and the single track tunnel at Blackhorse Road. This area is extremely congested, and this is unlikely to improve due to the huge costs which would ensue. The new school and sports development has exacerbated the situation. The A320 is, in effect the only North/South arterial road and currently it becomes gridlocked at Mayford. Further increased traffic would put local school children at risk.</p> <p>There could potentially be 5 gym/ leisure and sports facilities all accessing the Mayford section of the A320.</p> <p>This proposed site has a vast area of flood plain. Any further building is likely to exacerbate the problem, as roads, drains, ditches, sewers all overflow and are often not fully maintained. The report of 2015 (cited) was made before the felling of trees in Egley Road and the clearance of Smarts Heath has highlighted the problem of flooding, not only on the fields but also the roads. The water runoff from the escarpment during heavy down pour of rain is also evident along the A320 and surrounding roads.</p> <p>Disagrees that development of this site would not adversely affect the integrity of the escarpment</p>

<p>The fields prevent urban sprawl and Mayford would lose its identity, which impacts mental health, community and healthy lifestyle. In regards to GB8, why is GB8 escarpment not suitable but Egley Road Escarpment is suitable for development.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Objection noted. The release of Green Belt land for development has been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 1. The representation regarding Mayford Green Belt, urban sprawl and Mayford character have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21. In regards to the representation the development has already started and finished before 2022 and 2027. The application for the Hoe Valley school and associated sports facilities at Egley Road were considered as part of the Development Management process, with regard to the Borough's statutory development plan at the time of the application (in 2015). This part of the site has been implemented and the school opened in September 2018. On balance, the merits of the proposal and need for a school and sports facilities were among a number of considerations that demonstrated very special circumstances for development in this Green Belt location. Following approval by the Council, the application was referred to the Secretary of State for consideration, but was not called in, meaning the Secretary of State did not consider it necessary to determine the application for the Council. The Site Allocations DPD has always been clear that the school can be developed during the plan period when a need can be justified and a very special circumstances case can be established. The DPD states the residential element of the proposal will be implemented between 2027 and 2040. The Council does not intend to support housing development prior to 2022. In regards to the loss of Green Belt and residents wellbeing see section 4 and the impact of traffic congestion see Section 13 of the Regulation 19 Issues and Matters Topic Paper. The NPPF supports appropriate measures to improve the resilience of communities and infrastructure to climate change impacts. All plans are required to apply a sequential, risk based approach to the location of development, taking into account the current and future impacts of climate change, so as to avoid, where possible, flood risk to people and property. The impact of flood risk has been addressed in Section 7 of the Regulation 19 Issues and Matters Topic Paper. In terms of noise, air and light pollution, see Section 8 of the Topic Paper. The Council will make sure that the development of any land it safeguards will avoid or mitigate impacts to the landscape in accordance with the policies of the Core Strategy. The Development Plan for the area has several planning policies that aim to protect and enhance the environment of the Borough, particularly policies CS7 Biodiversity and nature conservation, CS8 Thames Basin Heaths Special Protection Areas, CS17 Open space, green infrastructure, sport and recreation and CS24 Woking's landscape and townscape. The Core Strategy and the Development Management Policies DPD includes robust policies to protect features of environmental value, within and in close proximity to any other development sites. The DPD does not state that GB8 Escarpment is not suitable for development. GB8 is a safeguarded site and its key requirements will be set out as part of a review of the Core Strategy and/or Site Allocations DPD to be informed by up to date evidence at the time. In regards to GB7 escarpment, it is considered that GB7 can be developed without significantly damaging the integrity of the escarpment. It should be highlighted that a significant part of the site has been developed for the school. This has been achieved without significant damage to the escarpment.</p>
<p>Response Reference: U0001069</p>

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06545/1

Name: Burhill Developments Ltd

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB17

Summary of Comment: Considers the DPD to be unsound, legally compliant and complies with duty to cooperate.

The land identified for the heritage parkland/country park is in private ownership and is currently in use as arable and grazing. It is private land with no public access to it. There have been no formal discussions with the owners about the delivery of a heritage parkland/country park on its land. The land was considered in the 1999 local plan but not the Core Strategy.

There is no robust and credible evidence base that justifies a heritage parkland/country park on the site.

The site has previously been safeguarded for minerals workings and discussions with aggregates companies about the extraction of minerals from the site has been held.

The land to the north of Carters Lane and some of the land to the south of Carters Lane is also defined as being 'Good to Moderate Quality' on the London and South East Region Agricultural Land Classification Maps. As such, there is no reason for this land to be included within the proposed heritage parkland/country park.

This area of land is also the closest to the existing golf course at Hoebridge, the land should be safeguarded for future operational expansion of Hoebridge Golf Course.

The Council's explanation of the role of the facility is unclear and has simply identified the land for some form of public open space use. This is emphasised in the statement that the "use of the Site as Suitable Alternative Natural Greenspace (SANG) is not proposed at this time". The Council needs to identify a demand or need for a particular type of open space use in this location, it should then quantify the area required. This should include whether the land is required to be a SANG.

If it can be demonstrated that there is a need for this facility and specifically the use for which it is required, then this should be restricted to land to the south of Carters Lane which excludes the land that might be required for the future expansion of the Hoebridge Golf Centre.

Subject to appropriate evidence, proposes that Policy GB17 should be changed to identify land to the south of Carters Lane extending to some 28.6 hectares as being suitable for SANG/ heritage parkland/country park or similar use. The extent of the revised area is shown.

Wishes to participate in the examination and to be informed of the next stages of the DPD. Given the strategic importance of the site and the number of issues to discuss, important to represent our Client's interest in person.

Contributor Proposed Modification: Subject to appropriate evidence, proposes that Policy GB17 should be changed to identify land to the south of Carters Lane extending to some 28.6 hectares as being suitable for SANG/ heritage parkland/country park or similar use.

Modification Reference: U0000389

Officer Response: Woking Palace is a Scheduled Ancient Monument which is an important Heritage Asset for Woking. The Council intends to repair, conserve and to rejuvenate Woking Palace and make it available for public recreation and education. The

<p>Council owns the ancient monument but not the land surrounding it. The Council will seek to require the land through negotiations but has Compulsory Purchase Powers, which it would be prepared to use to purchase the land as there is no alternative to this site. The representation is correct, the site is not in the Core Strategy. This is because the Core Strategy does not allocate sites, this is prepared through the Site Allocation DPD. The Country Park proposal was in the Local Plan 1999 Policy REC 17 and the Council wishes to see this proposal to fruition.</p> <p>As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. This site is not classified as high quality agricultural land by DEFRA. Nevertheless, the agricultural land within the Country Park will be retained for agricultural use as far as possible during the lifetime of the plan. The Council is satisfied that the depth and breadth of evidence used to support the preparation of the Site Allocations DPD was sufficiently comprehensive, robust and will be able to withstand scrutiny at the Site Allocations DPD Examination. The list of evidence base studies used to justify the site is within the Site Allocations DPD. The NPPF, the Core Strategy (Policy CS20) and the Development Management Policies DPD (Policy DM20) supports the conservation of heritage assets. Historic England has also confirmed that they support Policy GB17.</p> <p>The designation of mineral safeguarded areas is not an absolute constraint to the preservation of this historic asset. Surrey County Council, the Minerals Planning Authority, have been consulted in the plan preparation process and have not raised an objection to the site's allocation on the grounds of the minerals allocation.</p> <p>The current position of the Council is to use the site for a heritage/Country park and not as a SANG site.</p> <p>The representation regarding the revised site area, to move it South of Carters Lane is noted. However, the Council considers the current area is appropriate for the requirements of the site for a Country Park which will need car parking and footpaths. The site area carries forwards the same proposal in the Woking Local Plan (1999.)</p>
Response Reference: U0001749
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06402/1
Name: Burhill Developments Ltd and Randall's Field Ltd
Number of Signatories: 1
Comment Type: OBJ
Site Reference: RG18GB12, SA1, GB17
<p>Summary of Comment: SA1</p> <p>Considers the DPD unsound and not compliant with the Duty to Cooperate. The tests of soundness include whether the DPD is positively prepared, objective, and based on a robust and credible evidence base. BDL and RFL own land to the rear 79-95 Lovelace Drive, Tegg's Lane, Pyrford (former GB12, at Reg 18).</p> <p>Examines the background evidence to SA1, including the Core Strategy and NPPF guidance on designating and reviewing Green Belt and its boundaries, and the evolution of the DPD to the current (Reg19) stage. Detailed work on Heritage Impact and Landscape and Visual Impact have been carried out in response to the minutes of the LDF working group (05.09.18) and decision of Full Council on 18.08.18. These documents are attached to the representation.</p> <p>Escarpment of rising ground and Policy CS24 of the Core Strategy - Contests the extent of the escarpment of rising ground used in Parcel 9 of the GBR, which is too widely drawn and further assessed in the representor's Landscape and Visual Impact Study. The</p>

evidence for the former GB12's removal from the DPD, it terms of its conflict with CS24 is subjective, misguided (by Councillors) and not justified by proportionate evidence. The evidence supported the safeguarding of this site at the Reg18 stage of the DPD.

Housing need - the Council's analysis of housing need is fundamentally flawed and out of date, based the Core Strategy (CS) and the 2009 SHMA and the defunct SEP housing requirement. The Council decided not to review its CS and housing targets, as outlined at the Council meeting on 18.10.18. but confirmed there is 'significant unmet housing need' in the housing market area. This shows that the opportunity to plan positively and effectively was not taken. Runnymede Council are unhappy with this approach, and make a case that not including the Pyrford sites fails to meet the housing needs of families, whose needs can not be met by high density apartments being developed in the town centre. They state it is not good enough for Woking to rely on similarly constrained neighbours to meet Woking's unmet needs. The SA DPD is not promoting sustainable development as it has not taken the opportunity to meet more of its unmet need by releasing more land from the Green Belt, identified following the GBR. The land (former GB12) should be safeguarded and if it is not needed post 2027 it would not be allocated for future development.

Concerns about the large size of land parcels reviewed in the GBR, which is not robust, and urges a finer grained analysis, which would provide greater support to release the site from the Green Belt.

Draws on detail from the revised Heritage Impact Assessment which would limit impact of development of the site on heritage assets, and also re-assesses the evidence on the site's contribution to the purpose and integrity of Woking's Green Belt, concluding that the site plays a limited Green Belt function and its release would not undermine it.

To sum up, the site could be released from Green Belt without causing harm to designated heritage assets, designated landscape of the wider Green Belt.

Duty to Cooperate - while this is largely a matter for neighbouring authorities, draws attention to the failure to update housing need targets, and use of the Core Strategy's outdated housing target, meaning that the SA DPD plans for the wrong housing target.

This has significant implications for meeting the Duty to Cooperate, as set out in the Planning and Compulsory Purchase Act (2004) and NPPF paras 25, 26 and 27. Further detail on this, in relation to Runnymede's submission to the DPD, at Appendix 1 of the rep. To ensure proper planning of the Green Belt, and to ensure it permanance and ability to endure beyond the plan period, safeguarding of this site should be undertaken.

Affordable housing (AH) delivery - the Council's performance on the delivery of AH is poor, only meeting the Council's overall target of 35% in 2 of the last 13 years, leading to a year on year growing shortfall. One of the identified benefits of Green Belt release is that they could deliver 50% AH. There will be a continuing shortfall of AH without the release of such sites. Woking TC development is leading to a reduction of AH delivery because of the viability of developing complex brownfield sites, and a viability assessment of site UA44 showed only 20% of the near 1,000 units would be likely to be affordable.

SA1 suggested modification - the Council should add 'land rear of 79-95 Lovelace Drive, Teggs Lane, Pyrford' to the list of safeguarded sites to be released from the Green Belt and safeguarded to meet the long term development needs of the Borough from 2027-2040.

Wishes to participate in oral examination, and to be kept informed as the DPD progresses.

Contributor Proposed Modification: Proposed modifications to the DPD to improve soundness:

SA1

The Council should add 'land rear of 79-95 Lovelace Drive, Teggs Lane, Pyrford' to the list of safeguarded sites to be released from the Green Belt and safeguarded to meet the long term development needs of the Borough from 2027-2024.

[Officer note: the above proposed modification on SA1, if accepted, would require the re-inclusion of the former Reg 18 GB12 allocation, detailed key requirements and policy justification]

Modification Reference: U0000357

Officer Response: SA1 (and former site GB12)

The Council considers that the DPD is positively prepared, objective, and based on a robust and credible evidence base, as outlined in the Regulation 19 Issues and Matters Topic Paper.

Former site GB12 was identified in the draft Site Allocations DPD to be safeguarded to meet future development needs beyond the plan period between 2027 and 2040, and was published for Regulation 18 consultation between June and July 2015. The Council has considered the representations received during this consultation and has also reviewed all the available evidence and the policy context for safeguarding the sites, and has come to the conclusion that very special circumstances justification does not exist to safeguard the sites for the following reasons:

The site would give rise to a certain level of harm to the sustainability objectives of the Sustainability Framework used for the Sustainability appraisal. Whilst it is not within the Escarpment of Rising Ground of Landscape Importance designation, it is adjacent to the Escarpment and forms part of an important rural landscape setting to the southerly boundary with the urban area of Woking and is considered to also be protected by policy CS24. Moreover, GB12 together with GB13 form part of the setting of the Registered Park and Garden at Pyrford Court and the Aviary Road Conservation Area (both designated heritage assets). In their present open and rural form these sites make an important contribution towards the respective heritage significance of those designated heritage assets. Paragraph 193 NPPF requires "great weight" to be attached to the conservation of designated heritage assets. The Council is therefore of the view that exceptional circumstances do not exist to justify the release of proposal site GB12 from the Green Belt because the use of those sites for residential development would: (i) conflict with policy CS24 Core Strategy and thus not be in accordance with the development plan's strategy for sustainable development contrary paragraph 139(a) of the NPPF, (ii) fail to protect or enhance a valued landscape in accordance with paragraph 170(a) of the NPPF, (iii) in the case of GB12 (and GB13) fail to conserve designated heritage assets and (iii), result in the permanent loss of Green Belt land assessed within the Green Belt Review as performing variously a "critical" and "major" role to check urban sprawl and a "critical" and "major" role towards safeguarding the countryside from encroachment. Moreover, contrary to Policy CS6 of the Core Strategy, it is considered that the development of GB12 (and GB13) would individually and certainly collectively, critically undermine the overall purpose and integrity of the Woking Green Belt.

The decision to determine whether very special circumstances justification exist to safeguard the sites is a matter of planning judgment. It is clear from the above reasons that the decision of the Council is well informed by the careful consideration of all the available evidence and defensible.

The evidence submitted as part of the representation seeks to demonstrate that the site could be sustainably developed. The Council is of the view that this evidence is not significant enough to outweigh the in principle harm that the development of the site could cause to the landscape, heritage assets, and to Woking's Green Belt, as detailed above. With this in mind, a very special circumstances case to safeguard the site for future development needs can not be demonstrated, and it is therefore not proposed that the site is re-included in the DPD.

Regarding the Duty to Cooperate and meeting strategic, cross borough housing need and targets, see section 1.5 and 9.2 of the Council's Regulation 19 Issues and Matters Topic Paper. In addition, it should be noted that the Core Strategy was reviewed in accordance with the NPPF (2018) and the Council (in Oct 2018) decided that there was no immediate need to modify it, meaning that the Core Strategy remains the necessary strategic policy framework to manage development across the Borough, and is an appropriate strategic policy framework for the Site Allocations DPD, one of its delivery documents. The purpose and scope of the Core Strategy and Site Allocations DPD should not be conflated, and it is not the role of the Site Allocations DPD to set the housing requirement for the Borough.

The Council will continue to work with neighbouring Boroughs on strategic matters, as and when it begins a review of the Core Strategy, to ensure compliance with the 2018 NPPF and NPG. To the current time, the Council has worked with both Guildford and Waverley Borough Councils to ensure that housing need across the HMA is met, and has an agreed Statement of Common Ground with these two Boroughs on the issue. Waverley's Local Plan makes provision for half of Woking's unmet housing need. Guildford Local Plan provides a surplus of nearly 4,000 homes above Guildford's own housing requirement of 10,678, which ensures the Plan is robust in terms of any slippage or non-delivery. While a specific figure is not prescribed to meet Woking's remaining unmet need, it gives 'enough headroom to provide for the anticipated level of unmet need from Woking' (Inspectors Report on Guildford Local Plan, 27 Mar 2019). In this respect, the adoption of up to date Local Plans across the Housing Market Area shows there is potential, albeit with the appropriate delivery mechanisms, for Woking's unmet housing need to be met across the Housing Market Area.

In addition, the Site Allocations DPD allocates land to deliver more homes than the housing requirement (which is a minimum). This ensures that (at least) the housing requirement is delivered and caters for any non-implementation. It should also be noted that delivery in the Borough in the six years since the Core Strategy's adoption in 2012 has averaged 356 units per year, showing that housing delivery has not been constrained by the (minimum) requirement.

On the shortfall of Affordable Housing, it is acknowledged that overall affordable housing delivery has been lower (an average of 18% in the 8 years since 2010) than the Council's target, but this has been justified by exceptional circumstances on site by site basis based on viability, in line with Policy CS12. Financial payments have also been used to provide affordable housing on alternative sites. Development coming forward through the Site Allocations DPD is subject to Policy CS12, and allocation policies contain specific key requirements on affordable housing, with Green Belt sites set to provide a contribution to affordable housing in accordance with CS12, of 50% to be provided on site. Policy CS12: Affordable Housing is a robust and sound policy framework for affordable housing, which includes targets, but also provides the flexibility to demonstrate the exceptional circumstances for levels of affordable housing that do not meet the target, based on site specific viability.

The Council is aware that sites recommended for removal from the Green Belt and allocated for housing may provide a particular opportunity for development of family homes and affordable housing. The (Green Belt release) allocations put forward in the DPD are underpinned by careful consideration of all the available evidence. While it is accepted that the site (GB12) could contribute to affordable housing, the Council is of the view that this reason (alongside other reasons put forward) is not significant enough to outweigh the in principle harm that the development of the site could cause to the landscape, heritage assets, and to Woking's Green Belt. With this in mind, a very special circumstances case to safeguard the site for future development needs can not be demonstrated.

Response Reference: U0001724

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 04997/1

Name: Ms Margaret Burnett

Number of Signatories: 1

Comment Type: OBJ

Site Reference:

Summary of Comment: Concerned that development will worsen existing traffic problems. Further development in Woking is unnecessary.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 13. The need for further development in Woking is addressed by the introduction to the Site Allocations DPD, in particular pages 16-24, which set out the requirement for various categories of development already established by the Core Strategy, how much of that development has already been completed and how much is still required.
Response Reference: U0001663
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06833/1
Name: Mr Graham Burnett
Number of Signatories: 1
Comment Type: SUPP
Site Reference: UA44
Summary of Comment: The DPD is legally compliant, sound and complies with the Duty to Cooperate. Fully supports the inclusion of policy UA44 - a positive development in the urban area which relieves pressure on Green Belt land. Satisfied to see it is intended to provide a range of housing sizes. Due to difficulties in relocation elsewhere, supports the redevelopment of football stadium and provision of mixed uses for benefit of community and immediate area.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06922/1
Name: Mr And Mrs LJ And CE Burnham
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB18
Summary of Comment: Objects to allocations in West Byfleet and Byfleet. Concerns regarding increased traffic congestion. If an incident occurs on the M25, traffic is diverted through the area which exacerbates the issue. The bus service is limited, the 436 has to travel through heavily congested routes. Concerns regarding inadequate health infrastructure. Byfleet, West Byfleet, Pyrford, Woodham and parts of Sheerwater are served by one doctor's surgery. Concerns regarding inadequate educational infrastructure.

<p>Concerns regarding flooding. Allocated land is flood plain. Release of playing fields from infant and junior school would take away a place of recreation. Concerns regarding associated detriment to health and well-being. This is against government policy. Concerns regarding traveller pitches on Murray's Lane. It is Green Belt land and is also flood plain. It is not suitable for vehicles. There are an adequate number of pitches throughout Surrey, and there is land in Chobham where more could be developed.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 5 specifically addresses the loss of Green Belt in Byfleet and West Byfleet. Section 3 addresses the issue regarding traveller pitches. Section 6 addresses the issue regarding adequacy of infrastructure. Section 13 specifically addresses road infrastructure. As identified in the Draft Infrastructure Delivery Plan, Paragraph 6.68 sets out the local bus network improvement measures that Surrey County Council will seek to implement as and when funding becomes available. Section 7 addresses the issue regarding flooding. The GB18 site is allocated for open space to serve the school. As set out in Policy GB18, this land would not be developed. It is an existing open space associated with an educational use. Accordingly it is allocated for continued use as open space to serve the schools and will be protected by Policy CS17 of the Core Strategy.</p>
<p>Response Reference: U0001694</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06852/1</p>
<p>Name: Louise Burr</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10, GB18</p>
<p>Summary of Comment: Strongly object to removal of GB10 and GB18 from Green Belt. The proposals conflict with the West Byfleet Neighbourhood Plan, which included them in the Green Belt to protect them. Parvis Road is already at full capacity; the roads around GB10 cannot cope with further congestion. Infrastructure in West Byfleet is inadequate to deal with the increased population from GB10. The doctors' surgeries and schools already accomodate residents of Byfleet and New Haw, and the proposed dwellings at Sheer House are already putting too much pressure on those services. GB10 has been known to flood badly and would seem completely inappropriate for this many dwellings.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The relationship of the DPD with the West Byfleet Neighbourhood Plan is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 16. The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13.</p>

<p>The impact of the proposals on local infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6. Flood risk issues affecting the proposal sites are addressed in the Regulation 19 Issues and Matters Topic Paper, Section 7.</p>
<p>Response Reference: U0001397</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06645/1</p>
<p>Name: Ms Cara Burton</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05</p>
<p>Summary of Comment: I object to building on our green belt in Byfleet. There are not enough spaces in schools. Traffic is bad enough round here too!</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The justification in principle for the removal of Green Belt is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2. The focus of Green Belt loss on the Byfleet area is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. The impact of the proposals on infrastructure, including education facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p>
<p>Response Reference: U0001134</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06750/1</p>
<p>Name: Ms Joanna Butler</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: Would like to be kept informed of the next stages of the DPD. Objects to the removal of GB10 from the Green Belt. The proposal shows disregard for the democratic views of the vast majority of West Byfleet's citizens. The DPD is unsound, not positively prepared, justified, effective, or consistent with national policy. The proposal is inconsistent with previous decisions made by Woking BC and with planning law. Green Belt Land: The Site is current Green Belt land and a concrete aggregate safeguarded site. The proposal would lead to a devastating reduction in Green Belt in West Byfleet and development should be more equitably spread on available land within Woking. The site is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The site is covered by a minerals, in a minerals plan running to 2026. This will make the site unattractive to developers, so its deliverability is questioned.</p>

Traffic issues: Question the ability of the heavily congested Parvis Road to cope with additional traffic. There are no detailed proposals showing how this busy road could cope.

Noise and air pollution: Extremely close to the A245 and M25, the site currently provides a noise and pollution 'buffer' between W. Byfleet and the M25, so there is a risk of increased air and noise pollution, very difficult to mitigate against and contrary to NPPF para 170(e). No proper consideration of noise pollution.

Infrastructure: High level of additional dwellings approved or proposed in W Byfleet (1,062 or 46% increase) with consequent additional strain on local infrastructure incl. roads, parking, education, healthcare, utilities etc.. The proposal does not adequately address this.

Traveller Pitches: Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.

Sustainability: The Sustainability Appraisal has not been carried out in accordance with National Policy. It specifically does not deal with the requirement to positively improve conditions for people and does not deal with biodiversity issues. The proposal would create a serious and very negative effect.

Other issues: The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk.

Inadequate reasons have been given for excluding Martyrs Lane Green Belt.

Inadequate consideration of alternative sites, in particular PDL in sustainable locations. This housing quantity is unnecessary, excessive (46% increase in households in W Byfleet in the plan period) and clearly constitutes overdevelopment.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The DPD has been through the relevant procedures and consultation in accordance with legislation set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Council's own Statement of Community Involvement. The democratic process has played out through Councillors' active involvement with the DPD preparation process. The Council respects and values the views of residents in this regard. There has been significant public involvement in the process. The Council has a duty to balance the often conflicting demands of meeting the development needs of the community and local objections to development. It also has to meet its national obligations. The DPD strikes that delicate balance.

The examination by the Secretary of State, expected in late 2019 will provide a judgement on the soundness of the of the DPD, however the Council is confident that the document will be found sound because it is positively prepared, justified, effective and consistent with national policy, as set out in detail in the Council's Regulation 19 Issues and Options Topic Paper.

The other issues raised are comprehensively covered in the Council's Regulation 19 Issues and Options Topic Paper sections 3, 4, 5, 6, 7, 8, 16, 17, 19.

Regarding the point on inadequate reasons given for excluding Martyrs Lane Green Belt, The Council has thoroughly considered the possibility of including this land in the DPD, and removing it from the Green Belt. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the

Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
 - The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
 - It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
 - The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
 - There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
 - A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.
- The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

Response Reference: U0001680

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06767/1

Name: Mr Christopher Butler

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Would like to be kept informed of the next stages of the DPD. Objects to the removal of GB10 from the Green Belt. The proposal shows disregard for the democratic views of the vast majority of West Byfleet's citizens. The DPD is unsound, not positively prepared, justified, effective, or consistent with national policy. The proposal is inconsistent with previous decisions made by Woking BC and with planning law. Green Belt Land: The Site is current Green Belt land and a concrete aggregate safeguarded site. The proposal would lead to a devastating reduction in Green Belt in West Byfleet and development should be more equitably spread on available land within Woking.

The site is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47.

The site is covered by a minerals, in a minerals plan running to 2026. This will make the site unattractive to developers, so its deliverability is questioned.

Traffic issues: Question the ability of the heavily congested Parvis Road to cope with additional traffic. There are no detailed proposals showing how this busy road could cope.

Noise and air pollution: Extremely close to the A245 and M25, the site currently provides a noise and pollution 'buffer' between W. Byfleet and the M25, so there is a risk of increased air and noise pollution, very difficult to mitigate against and contrary to NPPF para 170(e). No proper consideration of noise pollution.

Infrastructure: High level of additional dwellings approved or proposed in W Byfleet (1,062 or 46% increase) with consequent additional strain on local infrastructure incl. roads, parking, education, healthcare, utilities etc.. The proposal does not adequately address this.

Traveller Pitches: Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.

Sustainability: The Sustainability Appraisal has not been carried out in accordance with National Policy. It specifically does not deal with the requirement to positively improve conditions for people and does not deal with biodiversity issues. The proposal would create a serious and very negative effect.

Other issues: The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk.

Inadequate reasons have been given for excluding Martyrs Lane Green Belt.

Inadequate consideration of alternative sites, in particular PDL in sustainable locations. This housing quantity is unnecessary, excessive (46% increase in households in W Byfleet in the plan period) and clearly constitutes overdevelopment.

Contributor Proposed Modification:

Modification Reference:

Officer Response: The DPD has been through the relevant procedures and consultation in accordance with the legislation set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Council's own Statement of Community Involvement. The democratic process has played out through Councillors' active involvement with the DPD preparation process. The Council respects and values the views of residents in this regard. There has been significant public involvement in the process. The Council has a duty to balance the often conflicting demands of meeting the development needs of the community and local objections to development. It also has to meet its national obligations. The DPD strikes that delicate balance.

The examination by the Secretary of State, expected in late 2019 will provide a judgement on the soundness of the of the DPD, however the Council is confident that the document will be found sound because it is positively prepared, justified, effective and consistent with national policy, as set out in detail in the Council's Regulation 19 Issues and Options Topic Paper.

The other issues raised are comprehensively covered in the Council's Regulation 19 Issues and Options Topic Paper sections 3, 4, 5, 6, 7, 8, 16, 17, 19.

Regarding the point on inadequate reasons given for excluding Martyrs Lane Green Belt, The Council has thoroughly considered the possibility of including this land in the DPD, and removing it from the Green Belt. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson

Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

Response Reference: U0001176

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 05887/1

Name: Mrs Christine Bye

Number of Signatories: 2

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11

Summary of Comment: Object to proposed Green Belt developments in Byfleet and West Byfleet.

Green Belt land is there to protect us from urban sprawl and maintain a habitat for wildlife. Infrastructure in the area will not cope with this scale of development. Doctors and schools are oversubscribed at present.

Roads will not cope with the traffic increase. All developments will feed onto the A245 which is already heavily congested, with Byfleet village being used as 'rat run'.

Rectory Lane is completely unsuitable for the amount of development proposed on GB5.

Contributor Proposed Modification: Please let common sense prevail and find alternative, more suitable, sites.
Modification Reference: U0000183
<p>Officer Response: The necessity of releasing land from the Green Belt for housing allocation and safeguarding for future development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2.</p> <p>The impact of the proposals on urban sprawl is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 21.</p> <p>Protecting wildlife is not one of the official purposes of the Green Belt, but wildlife factors were still taken into account in the Green Belt Boundary review, both at the initial screening stage and in the consideration of environmental constraints. More generally, the impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19.</p> <p>The impact of the proposals on local infrastructure, including schools and doctors, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of the proposals on traffic congestion and road infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The assessment of alternative sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 11.</p>
Response Reference: U0001625
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06911/1
Name: Byfleet Residents
Number of Signatories: 1173
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB12, GB18
<p>Summary of Comment: A total of 454 signatures (together with 719 signatures from the online petition) from those living predominantly in the KT14 area (Byfleet and West Byfleet), who strongly object to losing remaining Green Belt to development. It should be protected.</p> <p>No land should be removed from the Green Belt unless there are very special circumstances and all other options, including brownfield sites, have been exhausted. The proposed Flood Alleviation Plan should be implemented before any major development is approved in Byfleet.</p> <p>Revised ONS projections demonstrate fewer new homes are needed than previously thought - the DPD therefore has questionable longterm forecasts and does not include recent developments.</p>
<p>Contributor Proposed Modification: No land should be removed from the Green Belt unless there are very special circumstances and all other options, including brownfield sites, have been exhausted.</p> <p>The proposed Flood Alleviation Plan should be implemented before any major development is approved in Byfleet.</p>
Modification Reference: U0000480
<p>Officer Response: The Council acknowledges the strength of support in Byfleet and West Byfleet to retain land in the Green Belt. The Council has prepared a Regulation 19 Issues and Matters Topic Paper to describe in detail why the Council believes very special circumstances exist to allocate and safeguard Green Belt land to meet future development requirements in the Borough (Sections 1 and 2). Section 11 describes how alternative</p>

<p>sites in the urban area have been assessed ahead of Green Belt sites. Concerns around vulnerability to flooding are also acknowledged - a detailed response is provided in Section 7 of the Topic Paper. The Byfleet Flood Alleviation Scheme as identified in the Infrastructure Delivery Plan is being progressed, with the aim of improving flood resilience in the Byfleet area. The comment regarding ONS household projections is addressed in paragraph 1.5 of the Topic Paper. In February 2019, the Government confirmed that the 2016-based household projections should not be used to calculate housing need. The housing figures quoted in the Site Allocations DPD, which have informed the allocation and safeguarding of sites in the DPD, are based on up to date evidence in the SHLAA (2017) and the latest Housing Land Supply Position Statement. The figures in this evidence base include residential development sites currently benefitting from planning permission or prior approval, or a Planning Committee resolution that planning permission be granted subject to a Section 106/Legal Agreement, and applications that were pending consideration on 1 April 2017. The figures also take into account any developments that have commenced and those that have been completed. It is therefore wrong to say that the DPD 'does not include recent developments'.</p>
<p>Response Reference: U0001750</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06903/1</p>
<p>Name: Byfleet Residents Neighbourhood Forum</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10</p>
<p>Summary of Comment: Flaws in the DPD specifically relating to Byfleet include:</p> <ul style="list-style-type: none"> - No consideration given to National Transport Infrastructure project HS4 Air which includes land at sites GB4, GB5 and Byfleet SANG area; - No consideration given to possible future widening of M25; - Inadequate research into land ownership - a third of site GB5 is owned by St Mary's Church and is registered as burial land. Safe access to the remainder of the site would lead to a forced acquisition of this bequeathed land, which would be entirely inappropriate. - GB4 is prone to flooding as are areas to the north and south of the site. GB5 is also part flood zone. GB10 is also subject to frequent and severe flooding. Development would lead to additional flood issues and increase flood risk to neighbouring properties. Byfleet SANG area is subject to extensive and frequent flooding - use of the area would be compromised seasonally. Wooden walkways would not mitigate this problem. Flood assessments from both river and surface water in Byfleet have not been carried out adequately. - The much larger Martyrs Lane site includes areas of developed Greenbelt which could be available for some housing or traveller sites, and reasons for its exclusion are insufficient. The same reasons could equally be applied to GB4, GB5 and GB10. Reasons for excluding Pyrford Greenbelt sites are also inadequate and could equally be applied to GB4, GB5 and GB10. - Pollution sensors on the A245 showed the highest pollution readings in Woking (lower readings have recently been due to repositioning the sensors). Increased traffic from GB4, GB5 and GB10 will increase pollution levels, including noise pollution (which has not been assessed). - The DPD does not consider reduced ONS housing projections and is therefore using inaccurate housing targets. There are 5000 houses planned over the next 10 years - a surplus of 2000 even before a likely reduction in housing need is announced. If housing

need is already met or in fact exceeded, there is no justifiable reason or exceptional circumstance to release any Greenbelt for development.

- The IDP lacks sufficient detail and infrastructure provision will be wholly inadequate to support such an increase in population e.g. the traffic flow improvements on the A245 are unlikely to be even moderately successful in managing 1500+ extra cars; healthcare services are already overstretched with 1 health centre in West Byfleet serving both villages, with no mention of new facilities; both West Byfleet School and St Mary's School have undergone expansion with insufficient space for any further buildings or classes - the IDP does not make proper recommendations for school place provision.
- Allocating land beyond 2027 is unnecessary - GB4 and GB5 do not need to be included in the DPD. Predicting needs beyond 10 years would lead to inaccuracies, resulting in unsuitable, unsustainable recommendations.
- Lack of evidence commissioned to identify brownfield sites, and thus to suitable alternatives to Greenbelt. WBC's knowledge of suitable brownfield locations is likely to be lacking. Professional external assessment should have been sought.
- Inaccurate statements regarding the greenbelt function of GB4, GB5 and GB10 - these sites provide an area of green space between Byfleet and West Byfleet and successfully prevent urban sprawl; the level of development proposed will merge the two villages together, conflicting with this Greenbelt purpose; the sites maintain clear areas of countryside with an already well-defined boundary - development will adversely impact upon the countryside; and the sites as Greenbelt preserve the setting and special character of historic towns (Byfleet is a historic village named in the Domesday Book and also home of former royal palace Byfleet Manor).

Contributor Proposed Modification: Including GB4 and GB5 in the DPD is unnecessary as sites should only be allocated for development to 2027.

Modification Reference: U0000207

Officer Response: The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network. The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper. The concern regarding vulnerability of the sites to flooding is addressed in section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

Sections 1 and 2 of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. Paragraph 1.5 gives clarity on how the latest housing need figures would not affect the Borough's housing requirement. In February 2019, the Government confirmed that the 2016-based household projections should not be used to calculate housing need. It was emphasised that although the latest household projections are lower than previously published projections, this does not directly mean that fewer houses are needed in the future than thought. Based on the 2014 household projections, Woking's housing need is estimated at 409 dwellings per year. This is higher than the current housing requirement

<p>of 292 houses per year. Under the duty to cooperate, Waverley and Guildford Borough Council's local plans are meeting the unmet need arising from Woking.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>The representation regarding unnecessary, excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper. Section 2 sets out in detail why sites GB4 and GB5 need to be safeguarded for development beyond 2027. Sites GB4 and GB5 have not yet been allocated for development, only safeguarded, in recognition of the fact that needs, and the planning policies reflecting them, may change beyond 2027.</p> <p>The Council conducted the brownfield site assessment in-house, because it has the necessary expertise and resources to do so, rather than waste public money on engaging consultants to do the study. This is set out in detail in section 11, particularly paragraph 11.7, of the Topic Paper.</p> <p>It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl.</p>
Response Reference: U0001142
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06374/1
Name: Byfleet, West Byfleet and Pyrford Residents Association
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11, GB18
<p>Summary of Comment: The DPD process has taken a long time and has many long complicated documents which are difficult to follow. The RA is very concerned that existing infrastructure is under pressure, in the following areas:</p> <ol style="list-style-type: none"> 1. Traffic levels on the A245 and surrounding roads 2. Lack of school places 3. Full doctors practices 4. Lack of NHS dentists

5. Waste water management

6. Existing river and surface water flooding

Of the three villages, Pyrford is considered the least impacted by the DPD as there are no proposed traveller sites, no release of Green Belt nor any allocated sites. Nonetheless the extra traffic generated by the additional dwellings in Byfleet and West Byfleet will have an impact as there are three routes through the village to get to the A3 and M25.

Byfleet village has two sites safeguarded for Green Belt release after 2027, with a capacity of 210 dwellings, and 4 temporary traveller pitches due to become permanent.

The village regularly suffers from surface water and river flooding, as well as traffic congestion in the morning and evening on the A245.

West Byfleet is significantly impacted by the DPD proposals as it will completely change the character of the area. GB10, GB11 and GB18 will result in the loss of 50.8 hectares of Green Belt, 60% of the current Green Belt in the village.

The number of dwellings proposed by GB10 and GB11, when added to Sheer House outline application (PLAN/2017/0128 for 255 dwellings), will result in an additional 1,150 dwellings which, based on the 2011 census, is a significant 50% increase in dwellings.

The resulting population and traffic increase will have serious and detrimental infrastructure consequences which the mitigation proposals totally fail to address.

The document contains inconsistencies and/or lack of details:

1. Appendix 1 of the Sustainability Appraisal Report shows the West Byfleet

Neighbourhood Plan as not fully adopted. However it has been adopted. Have all the plan's policies been considered when appraising West Byfleet?

2. Why has the DPD used the SHLAA (2014) rather than the more up-to-date and relevant SHLAA (2017)?

3. The SHLAA (2017) Table 1 shows a windfall provision of 42 dpa for the period 11-16 years, but not in the years 0-5 years or 6-10 years. Surely this is inconsistent

4. There is inconsistency regarding the yield for UA44. The DPD doesn't include an estimate, as it does for other sites, while the Sustainability Appraisal shows 992 based on an developer's proposal, and the SHLAA shows it as 40. There is a significant discrepancy in the evidence bases which will impact the deliverable number of dwellings in the period 0-6 years. What confidence can anyone have in the different numbers, and what number has been used in the DPD

5. For many of the proposed sites, it is unclear which part of the site is being proposed for development. For example GB5 includes a playground and land transferred to the church as a burial ground. It seems that only half the site has actually been promoted by the landowner for development. The lack of detail has caused great consternation in the Byfleet community.

Paragraph 134 of the NPPD summarises the five purposes of the Green Belt, and paragraph 137 sets out the process for changing Green Belt boundaries. In this context, a review was carried out into options for changing the Green Belt boundary. However there appears to be no equivalent report into "making as much possible use of suitable brownfield sites and underutilised land", except possibly the SHLAA (2011, 2014 and 2017).

WBC notes that it periodically contacts planning agents, landowners and other interested parties, to request that potential sites are put forward for consideration. This is referred to as a Call for Sites and provides the Council with up to date information on potential sites for development across the Borough.

This is a reactive process which only identifies land offered by landowners, rather than a review of all possible brownfield sites.

Paragraph 136 of the NPPF is noted, regarding the exceptional circumstances in which the Green Belt boundary can be justifiably altered. As set out below, the evidence suggests that to deliver the target of 4,964 to March 2017, it is not required to remove any further land from the Green Belt.

Regarding delivery trajectory, the DPD only shows one table, which is from the SHLAA (2011) since which two reports have been issued. It projects a total supply of 3,966 over 15 years.

If the SHLAA (2017) figures were used, it would read as below:

Pre-SHLAA (2010/11-2016/17): 1,789 residential units (through dwelling completions)

0-5 years (2017/18-2021/22): 1,654 residential units (through commenced or unimplemented planning permissions and sites with potential for redevelopment)

6-10 years (2022/23-2027/28): 2,103 residential units (through commenced or unimplemented planning permissions, sites with potential for development and Green Belt)

11-15 years (2028/29-2032/33): 1,661 residential units (through commenced or unimplemented planning permissions, sites with potential for development, Green Belt and windfall sites)

Total: 7,207 residential units which is 783 in excess of the Core Strategy requirement.

If one were to include the developer's application number of 992 for the Woking Football Club, include windfall sites in all periods and remove all Green Belt sites, the table would be as below:

Pre-SHLAA (2010/11-2016/17): 1,789 residential units (through dwelling completions)

0-5 years (2017/18-2021/22): 2,806 residential units (through commenced or unimplemented planning permissions, sites with potential for redevelopment, adjustment for Woking Football Club and windfall sites)

6-10 years (2022/23-2027/28): 1,753 residential units (through commenced or unimplemented planning permissions, sites with potential for development and windfall sites)

11-15 years (2028/29-2032/33): 1,266 residential units (through commenced or unimplemented planning permissions, sites with potential for development and windfall sites)

Total: 7,614 residential units which is 1,190 in excess of the Core Strategy requirement. Even if 25% of the 992 dwellings were delivered, the surplus number would be 670.

The Core Strategy, adopted in 2012, assumed the need to release Green Belt land for 550 homes. The numbers above show that as Woking Borough Council has decided to use the Town Centre instead of the Green Belt, none of the latter need be released. There are clearly sufficient dwellings proposed in Woking Town Centre and Sheerwater regeneration.

The SHLAA (2017) shows a yield of 408 dwellings as part of the regeneration. However planning application PLAN/2018/0337, not determined as at 7 December 2018, seeks 869 dwellings. The increase of 461 eliminates the deficit of 194 (the proportionate deficit against the requirements in years 11-15).

As a result the RA contends that no Green Belt land needs to be released.

Regarding infrastructure it is noted that the A245 is congested both morning and evening between the Sheerwater Road/Albert Drive junction and the A3 interchange. The A245 Mitigation Study states that "the Byfleet Road/Seven Hills Road junction is currently at or just above capacity", the Parvis Rod/Camphill junction is currently "at or just below its capacity", "the A245 between Old Woking Road and Broadoaks is one of the most heavily congested areas in the study" and that "the A245 Parvis Road is already at its theoretical capacity." It also notes that the WSP Review (2002), which identified no ideal solution due to the constraints of urban development, is used as the basis of mitigation options. As circumstances have changed, a more up to date mitigation study is required; other significant nearby developments include Sheerwater, Fair Oaks and Wisley Airfield.

Regarding school places it is noted that St Mary's Church of England Primary School, Byfleet Primary School, West Byfleet Infant and Junior Schools, Marist Catholic School and Pyrford Church of England Primary School are already oversubscribed. Over the past few years some of these schools have increased their PANs. The Draft Infrastructure Plan notes a requirement of 22 primary classes, a significant proportion of which will be in West Byfleet. However the West Byfleet Infant and Junior Schools have recently expanded, and

there is insufficient land to expand again. Fullbrook, the nearest secondary school to major developments, has reduced its PAN in September 2016 from 280 to 240 per year "to improve the learning environment." The Draft Infrastructure Plan also notes a need for 16 secondary classes, some of which will be located at Bishop David Brown School, St John the Baptist School and Hoe Valley School. Bishop David Brown has only one service from Byfleet and West Byfleet scheduled at the right time in the morning. No education infrastructure is allocated in the DPD.

The local GP practices for the three villages in West Byfleet Health Centre are over-subscribed. The Draft Infrastructure Report accepts that "overall there is inadequate GP provision across the borough. The average in Surrey is 1,994 patients per GP, whereas the national average is 1,364 per GP. The average practice size in Woking is 8,645 while the national average is 7,685.

The dental practices are oversubscribed. According to the Infrastructure Report, there are 27 dental clinics in Woking, but only 13 offer NHS funding. The report indicates gaps in provision include Pyrford.

In Byfleet, surface water flows into foul sewers and poor maintenance means that significant surface water causes flooding. In December 2013, the waste pumps failed and there was surface water flooding. The Infrastructure Report notes Thames Water's comments from 2015 that in the case of Land at Station Approach, West Byfleet; Land surrounding West Hall; Land South of Murray's Lane and Land rear of Lovelace Drive, Pyrford (now removed from the DPD) "waste water capacity...is unlikely to be able to support the demand anticipated. The comments note that it "would take 18 to 36 months to deliver a solution." Three years later, waste water infrastructure is still causing major concern.

Much of Byfleet is in Flood Zone 2 and 3, yet not flood alleviation scheme has been agreed.

The process has been implemented in such a way that the residents of Byfleet and West Byfleet are unable to comment on the proposed Traveller pitches in the villages during the Regulation 18 consultation. During Regulation 18, no Traveller pitches were allocated in the East of Woking; now 19 are proposed, and the detail of GB4 and GB5 suggests these sites may be suitable for further pitches. There appears to be a disproportionate allocation in Byfleet and West Byfleet.

The RA believes that the Green Belt in the three villages should not be used for future development. The Green Belt protects the land, and prevents the merging of the villages. The RA believes that the DPD is unsound because the tests have not been met:

1. Procedural requirements: Travellers sites in the East of the borough were not included in the Regulation 18 consultation.
2. Positively prepared: The allocated sites in East Woking are not sustainable due to inadequate infrastructure, now and in the future.
3. Justified: Reasonable alternatives in Kingfield regarding Woking Football Club have not been properly taken into account
4. Effective: It is not clear that sufficient joint working has been undertaken to consider fully the proposed developments at Fair Oaks and Wisley Airfield.

The RA wishes to appear at the public examination to defend the existing Green Belt boundaries by seeking to convince the Planning Inspector that there is sufficient availability in existing non-Green Belt land.

Contributor Proposed Modification: The RA contends that no Green Belt land needs to be released in the Borough, including in Byfleet, West Byfleet and Pyrford. A more up to date and realistic A245 mitigation study is needed.

Modification Reference: U0000491

Officer Response: The Site Allocations DPD has evolved through various stages. Each stage had been used to inform and improve the subsequent version. A draft DPD was

published for Regulation 18 consultation between 18 June and 31 July 2015. About 1,692 individuals and organisations submitted comments comprising 32,712 separate representations. The Council also consulted on the possibility of substituting the sites safeguarded in the draft Site Allocations DPD to meet future development needs between 2027 and 2040 with land to the east of Martyrs Lane. 3,018 individuals and organisations submitted comments comprising 32,164 separate representations. The representations received during these two separate consultations have informed the Publication Version of the DPD that was published for Regulation 19 consultation between 5 November and 17 December 2018. All the above takes time to manage and process. The preparation of a local plan is complex and time consuming due in part to the statutory requirements to be met and the extent of evidence base studies needed to inform the plan. The Council has, however, worked expediently at each stage of the process and taken due care to simplify the process and content of the DPD as much as it can.

Section 6 of the Regulation 19 Issues and Matters Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools, waste water and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Dental practice provision is addressed in the IDP which confirms that although there are no known plans for new dental surgeries to 2027, a Surrey and Sussex Dental Local Professional Network has been established to promote a strategic, clinically informed approach to the planning and delivery of dental services that reflects the needs of local populations. The Council continues to engage with the North West Surrey CCG regarding any commissioning decisions.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The representation regarding the loss of Green Belt land in West Byfleet has been addressed in Section 5 of the Topic Paper.

The comment regarding the Sustainability Appraisal and the West Byfleet Neighbourhood Plan having not yet been adopted is noted. As set out in Section 16 of the Topic Paper, the Council is satisfied that there is conformity between the Site Allocations DPD and the West Byfleet Neighbourhood Plan.

In regards to the DPD only showing the SHLAA 2014 figures, the Site Allocations takes into account the latest land supply for deliverable and developable sites identified in the 2017 SHLAA, but it also draws attention to the historical context to which the Site Allocation DPD has been derived from 2011-2019.

In Table 1 of the SHLAA, windfall allowance has been discounted from the periods 0-5 years and 6-10 years. This is to account for non-implementation of developments currently in the pipeline, either as extant permissions and/or as allocated sites. It should be noted that windfall sites that are completed in years 0-10 are counted towards the overall housing completions. This is considered consistent with the Inspector's Report from the Core Strategy examination which found that "the Council has identified a consistent stream of small sites that have resulted in an average of more than 40 additional dwellings per year...the leeway that such small sites provide would nonetheless appear capable of compensating for any delay in the housing which is anticipated to be delivered from, for example, Moor Lane or Brookwood Farm."

With regards to UA44 the yield of 992 is not included in the Site Allocation DPD. Council has rightly decided that the main objective and driver is redevelopment of the stadium. The scheme to redevelop the stadium will determine the redevelopment of land that will be used for housing and consequently, its overall yield. This will be determined through the planning application process. The Site Allocations DPD will take that into account when and if a planning application comes forward. Regarding the enhancement of the football club at Kingfield Road, it is noted that the Council has entered into a Development Agreement with GolDev. GolDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this year. The planning merits of the scheme will be determined by the Council's Planning Committee. There will be extensive public consultation as part of the planning application process. This is a separate matter to the preparation of the Site Allocations DPD.

The Sheerwater Planning application PLAN/2018/0337 was approved on the 9 April 2019 and the DPD will be updated to reflect this.

The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper.

As set out in section 1 of the Topic Paper, there is a justification for the release of Green Belt land to meet future development requirements of the Borough. The capacity of the urban area to accommodate further growth has been assessed through the SHLAA. The evidence continues to justify the principle established in the Core Strategy that land will be required to be released from the Green Belt to meet housing delivery between 2022 and 2027, and in particular, the need for family homes that could not be met by high density flatted units at the Town Centre.

Sections 11 and 22 of the Topic Paper provide further detail regarding the assessment of alternative sites and the SHLAA. The Sustainability Appraisal also provides evidence of assessment of alternative sites.

It is noted that the SHLAA takes a comprehensive approach to identifying and appraising sites for residential development. As set out in the SHLAA (2017) methodology, the Council, taking into account Planning Practice Guidance, has identified the following sources of sites for inclusion in the Assessment:

1. Sites identified in the Core Strategy and emerging Development Plan
2. Existing employment sites
3. Unimplemented and commenced planning permissions
4. Sites where there has been a previous planning refusal or application withdrawn
5. Sites of previous development interest/sites where there is an undetermined planning application
6. National Land Use Database
7. Sites considered as part of PFI and land in public ownership
8. Previous Housing Potential Study sites
9. Sites for which unimplemented planning briefs have been prepared
10. Sites put forward by stakeholders

As discussed in paragraph 1.7 of the Topic Paper, it is noted that the Site Allocations DPD allocates a quantum of land within the urban area which might be sufficient to meet development needs over the plan period. It is important that sufficient deliverable and developable sites that have a realistic prospect of coming forward to deliver the homes that are required are identified. Given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing needs across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

The Council is aware that some of the infrastructure implications for developing the allocated sites could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Regulation 19 consultation and at each key stage of the plan preparation process. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account.

In regards to Traveller pitches and inadequate consultation for Regulation 19 see Section 3 and 9 of the Topic Paper.

Response Reference: U0001478

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06748/2

Name: CALA Homes

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB07

Summary of Comment: Submitted by Turley on behalf of CALA Homes, who has a land interest at Egley Road which forms part of the proposed GB7 allocation.

Considers the DPD to be legally compliant, and compliant with the Duty to Cooperate. Does not consider the DPD to be sound.

1. A technical critique has been submitted demonstrating a historic reliance on town centre sites to meet housing needs in the Borough which has failed to meet the needs for family and affordable housing (illustrated in Appendix 1). The DPD as currently drafted will exacerbate this issue. Additional sites should be allocated to meet these needs. Indeed the current quantum of housing being planned for is in itself insufficient to meet identified housing needs. Upon adoption of the Core Strategy in 2012, the housing requirement fell short of meeting the full need for housing in Woking despite its location within an area of significant housing need pressure. The DPD should take a more proactive approach in identifying land which provides for needs beyond the level suggested by the Core Strategy. CALA Homes' land interest is an appropriate location to accommodate this need.

2. Supports the removal of the entirety of the proposed allocation site GB7 from the Green Belt. The justification for this has been further strengthened as a result of the development which has taken place since the original Green Belt assessment was undertaken - the construction of the school and leisure centre has resulted in a change in the character of the area which has not been reflected in an update to the Green Belt Boundary Review (GBBR). A critique of the current context against the Green Belt purposes as set out in the NPPF has been provided. The site is in a sustainable location, and considered an appropriate location for development as set out in the spatial strategy and supported by the sustainability appraisal. It has good access to services and

amenities and is located close to the town centre. The northern part of the site will in fact have commensurately stronger sustainability than the southern parcel.

3. The decision at the Council meeting on 18 October 2018 for part of the allocation to become an area of separation (to provide a visual gap) rather than residential development has not been considered through due process. There is no evidence to support this decision, and has been applied to the site without prior scrutiny process in advance of the Council meeting or given consideration on a Borough wide basis. The amendment is not supported by any updated or additional evidence base. A detailed critique with supporting evidence has been submitted on behalf of the client demonstrating that residential development can be appropriately accommodated on this deliverable site and would make an important contribution to the need for family and affordable housing. A landscape, townscape and visual resources assessment has been provided - it demonstrates that the site is well contained by existing landscape and topography; the perception of a wooded character, albeit closely associated with urban areas, could be preserved and the perception of passing through a comparatively rural landscape between Woking and Mayford could be retained. A vision document at Appendix 2 has been provided to demonstrate how residential development would be successfully accommodated on the site, which would include the continuation of the wide verge which forms part of the transition past the Hoe Valley School. The site is deliverable. The strategy put forward in the DPD is unsound in that it is neither justified nor effective. The client's site should be allocated for residential development to help address the flaws in the strategy - this would enable the DPD to be considered sound. Wishes to appear at Examination in Public.

Contributor Proposed Modification: Northern part of site GB7 should be allocated for residential development with the indicative capacity of the allocation increased accordingly to reflect this.

Modification Reference: U0000288

Officer Response: The comments made in the representation regarding up-to-date needs for family and affordable housing are noted. It is not the purpose of the Site Allocations DPD to determine the housing requirement of the Borough, but rather to deliver the objectives of the Core Strategy. Given that the Council has an up to date Core Strategy (having sought guidance on its review directly from the Ministry of Housing, Communities and Local Government) , it is imperative and necessary that the Site Allocations DPD is prepared to be consistent with its requirements. Not to do so would be contrary to the Planning and Compulsory Purchase Act 2004 (as amended), the Town and Country (Local Plan) (England) Regulations 2012 (as amended) and the requirements of the Core Strategy. Section 14 of the Council's Regulation 19 Issues and Matters Topic Paper responds to this aspect of the representation in detail. Section 1 of the Topic Paper also responds to calls to increase the quantum of housing being planned for to meet housing needs - see in particular paragraphs 1.1-1.6. Paragraphs 1.7-1.8 describes how the Council is satisfied that it has identified a range of sites to meet the variety of housing need across the Borough, in particular the need for family homes and affordable homes. Core Strategy Policy CS12 - Affordable housing, indicates that between 2010 and 2027 the overall target for Affordable Housing is 35% of all new homes, equivalent to 1,737 new affordable homes. Key requirements have been included in all relevant site allocation policies to ensure that contributions are made towards affordable housing in accordance with policy CS12.

Support for the removal of site GB7 from the Green Belt is noted. However, the Council is satisfied that the part of the site allocated as an area of local separation rather than residential development is justified and based on sound planning judgements. It is acknowledged that the GBBR report has recommended that the northern section of the site be released from the Green Belt to meet future development needs of the Borough. Since publication of the Regulation 18 draft of the DPD, the circumstances on the site

have changed due to the completion of the secondary school and leisure centre. The orientation of buildings pursuant to the planning permission has resulted in buildings to the south of the playing fields; thus the recommendations made in the GBBR that the school buildings be located to the north, adjacent to the urban area of Woking, retaining open fields to the south to maintain openness, cannot be accommodated. It is therefore logical to encourage development to the south of the site and leave the north of the site to maintain the integrity gap between Mayford and Woking, which is considered by the Council to reflect the advice within the GBBR in light of the situation on the ground. The Council is confident that this decision is well informed by the careful consideration of all the available evidence, including that of the GBBR, and is defensible. The Regulation 19 consultation provided an adequate opportunity for the public and interested parties to comment on this policy amendment.

It is also worth noting that the Green Belt boundary review report is only one of a number of evidence base documents used to inform the Site Allocations DPD. Other evidence, such as representations received during previous rounds of consultation and the Sustainability Appraisal report, has also contributed to the planning judgements which have informed the latest draft DPD.

Response Reference: U0001757

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06647/1

Name: Mrs Claire Calder

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB12

Summary of Comment: Concerns about the DPD specifically relating to Byfleet include:

- No consideration given to National Transport Infrastructure project HS4 Air which includes land at sites GB4, GB5 and Byfleet SANG area;
- No consideration given to possible future widening of M25;
- Inadequate research into land ownership - a third of site GB5 is owned by St Mary's Church and is registered as burial land. Safe access to the remainder of the site would lead to a forced acquisition of this bequeathed land, which would be entirely inappropriate.
- GB4 is prone to flooding as are areas to the north and south of the site. GB5 is also part flood zone. GB10 is also subject to frequent and severe flooding. Development would lead to additional flood issues and increase flood risk to neighbouring properties. Byfleet SANG area is subject to extensive and frequent flooding - use of the area would be compromised seasonally. Wooden walkways would not mitigate this problem. Flood assessments from both river and surface water in Byfleet have not been carried out adequately.
- The much larger Martyrs Lane site includes areas of developed Greenbelt which could be available for some housing or traveller sites, and reasons for its exclusion are insufficient. The same reasons could equally be applied to GB4, GB5 and GB10. Reasons for excluding Pyrford Greenbelt sites are also inadequate and could equally be applied to GB4, GB5 and GB10.
- Pollution sensors on the A245 showed the highest pollution readings in Woking (lower readings have recently been due to repositioning the sensors). Increased traffic from GB4, GB5 and GB10 will increase pollution levels, including noise pollution (which has not been assessed).
- The DPD does not consider reduced ONS housing projections and is therefore using inaccurate housing targets. There are 5000 houses planned over the next 10 years - a

surplus of 2000 even before a likely reduction in housing need is announced. If housing need is already met or in fact exceeded, there is no justifiable reason or exceptional circumstance to release any Greenbelt for development.

- The IDP lacks sufficient detail and infrastructure provision will be wholly inadequate to support such an increase in population e.g. the traffic flow improvements on the A245 are unlikely to be even moderately successful in managing 1500+ extra cars; healthcare services are already overstretched with 1 health centre in West Byfleet serving both villages, with no mention of new facilities; both West Byfleet School and St Mary's School have undergone expansion with insufficient space for any further buildings or classes - the IDP does not make proper recommendations for school place provision.
- Allocating land beyond 2027 is unnecessary - GB4 and GB5 do not need to be included in the DPD. Predicting needs beyond 10 years would lead to inaccuracies, resulting in unsuitable, unsustainable recommendations.
- Lack of evidence commissioned to identify brownfield sites, and thus to suitable alternatives to Greenbelt. WBC's knowledge of suitable brownfield locations is likely to be lacking. Professional external assessment should have been sought.
- Inaccurate statements regarding the greenbelt function of GB4, GB5 and GB10 - these sites provide an area of green space between Byfleet and West Byfleet and successfully prevent urban sprawl; the level of development proposed will merge the two villages together, conflicting with this Greenbelt purpose; the sites maintain clear areas of countryside with an already well-defined boundary - development will adversely impact upon the countryside; and the sites as Greenbelt preserve the setting and special character of historic towns (Byfleet is a historic village named in the Domesday Book and also home to former royal palace Byfleet Manor).

Contributor Proposed Modification: Including GB4 and GB5 in the DPD is unnecessary as sites should only be allocated for development to 2027. These sites perform well against the purposes of the Green Belt.

Modification Reference: U0000206

Officer Response: The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network. The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper. The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson

Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

Sections 1 and 2 of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. Paragraph 1.5 gives clarity on how the latest housing need figures would not affect the Borough's housing requirement. In February 2019, the Government confirmed that the 2016-based household projections should not be used to calculate housing need. It was emphasised that although the latest household projections are lower than previously published projections, this does not directly mean that fewer houses are needed in the future than thought. Using the 2014 based projections to calculate Woking's housing need, the Council would have to make provision for 409 dwellings per year.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure

<p>provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion.</p> <p>The representation regarding unnecessary, excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper. Section 2 sets out in detail why sites GB4 and GB5 need to be safeguarded for development beyond 2027.</p> <p>The Council conducted the brownfield site assessment in-house because it has the expertise and resources to do so, rather than waste public money on engaging consultants to do the study. This is set out in detail in section 11, particularly paragraph 11.7, of the Topic Paper.</p> <p>It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made a greater contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Paragraph 20.2 describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 addresses concerns about urban sprawl.</p>
Response Reference: U0001105
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06889/1
Name: Jeanne Campbell
Number of Signatories: 1
Comment Type: OBJ
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Pleased that WBC have dropped fields at Upshot Lane from the Site Allocations, and that you recognise the validity of Regulation 18 objections.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06619/1
Name: Camphill Club
Number of Signatories: 2
Comment Type: OBJ
Site Reference: UA43
Summary of Comment: The representation is submitted on behalf of the Camphill Club UA43 was originally gifted by Mr Stoop, who formed the Stoop Foundation of which Camphill Club is part, to the people of West Byfleet. Written documentation confirms that it

<p>was designated for the recreational purposes of the local community only, and not for residential use.</p> <p>The Camphill Club and its members object in the strongest possible terms to redevelopment of the site for residential, including affordable housing, and community use.</p>
<p>Contributor Proposed Modification: As the proposal would be against the original wishes of Mr Stoop and the Stoop Foundation, remove UA43 from the DPD as well as any other proposals relating to the change of use of this land.</p>
<p>Modification Reference: U0000175</p>
<p>Officer Response: As set out in Paragraph 10.3 of the Regulation 19 Issues and Matters Topic Paper, the Site Allocations DPD is informed by a sufficiently comprehensive, adequate, proportionate and robust evidence base to inform planning judgements about the preferred sites. One document within the evidence base is the SHLAA which concludes that the Camphill Club is developable within 6-10 years. The site was originally submitted to the Council by the landowner and is therefore considered available for development. Furthermore, the site is identified as suitable for residential development, notwithstanding the need to justify the loss of an existing leisure and community use, unless this can be retained as part of any redevelopment.</p> <p>This assessment is reflected in proposed Policy UA43 which is allocated for residential, including Affordable Housing, and community use. As outlined in the reasoned justification, it is considered that due to the size of the site, it is possible to re-provide the existing community facilities within the site as part of mixed use scheme. In this respect the site would continue to serve a recreational purpose for the community, while also meeting the identified need for housing in a sustainable location.</p>
<p>Response Reference: U0001308</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06715/1</p>
<p>Name: Mr Thomas Canedi</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10</p>
<p>Summary of Comment: 1. HS4 Air - no consideration or assessment has been given to the fact that GB4 and GB5 and the Byfleet SANG are potential sites for HS4 Air, a National Transport Infrastructure Project.</p> <p>2. M25 Widening - no consideration has been given to the future widening of this busy stretch of the M25 at a future date.</p> <p>3. Inadequate research on land ownership - the document has been prepared without knowledge or reference to the fact that a third of GB5 is owned by St Mary's Church, bequeathed to the church as land to extend the graveyard. It is registered burial land with burial rights granted into perpetuity. Due to the area's existing road layout, safe access to the remaining two thirds of GB5 can only be obtained by building a road through the church's land, which would mean forced acquisition of this bequeathed land. Development of this land would be entirely inappropriate.</p> <p>4. Inadequate consideration and assessment of flooding, for sites GB4, GB5 and GB10, which are part of flood zones and subject to periodic flooding. Development would lead to additional flood issues and increase flood risk to neighbouring properties.</p> <p>5. and 6. Inadequate reasons for excluding Martyrs Lane and Pyrford Green Belt sites, which may provide land that could be available for housing and travellers sites. The same</p>

criteria that resulted in the removal of these sites from the Plan could equally be applied to GB4, GB5 and GB10.

7. Pollution assessments - sensors show the highest pollution readings in Woking are on the A245. In 2016 the sensor was repositioned away from the A245 and lower readings were recorded, which are inaccurate and misleading of true pollution levels. Increased traffic will further impact on pollution levels. There has been no proper consideration of noise pollution for GB4 and GB5 which ite alongside the M25.

8. ONS Housing Numbers - is expected that previously stated housing requirements will be reduced by central government. The DPD does not plan for this expected change and is therefore an inaccurate target. Guildford BC has already requested a reduced housing target is incorporated into their DPD.

9. Inadequate infrastructure provision - the infrastructure report lacks basic detail. On traffic, the improvements suggested are minimal and are very unlikely to improve current traffic flow, let alone for another 1500+ cars. Access points for Byfleet sites are all on the A245. Healthcare is already overstretched, with one GP serving both West Byfleet and Byfleet. Walk in centre provision in Weybridge was lost in a fire and has not been replaced. On education, the report fails to make proper recommendations. Expansion has already taken place at West Byfleet School and St Mary's School, and Byfleet Primary School has insufficient space for further buildings.

10. Overdevelopment - WBC has stated there are 5000 houses planned over the next 10 years. This is a surplus of 2000 on the requirement, even before the likely reduction in need is announced. The numbers are unnecessary and excessive , and mean there is no reason or exceptional circumstance to release any Green Belt for development.

11. Exceeding the plan term - the DPD is only required to make recommendations up until 2027, and the allocation of Green Belt land (GB4 and GB5) is therefore unnecessary. Predicting need beyond 10 years is subject to a high degree of change and inaccuracy, which lead to unsuitable, unsustainable recommendations.

12. Inadequate consideration given to alternative sites - no report was commissioned to identify brownfield sites, in the same was that one was prepared to identify Green Belt sites. There is a lack of knowledge and external assessment of suitable brownfield locations.

13. Inaccurate statements on the Green Belt function of GB4, GB5 and GB10 - the DPD states that these sites are not performing their Green Belt function, but contends that they do meet the following purposes: to check the unrestricted sprawl of built up areas; to prevent neighbouring towns merging together (development on the sites above will merge the two villages, which are currently separate, together); to assist in safeguarding the countryside from encroachment (development will adversely affect the countryside, the sites form a well defined GB Boundary); and to preserve the setting and special character of historic towns (Byfleet is named in the Domesday book and is the home of a former royal palace, Byfleet manor. As a historic village is should be preserved and not merged with West Byfleet - the Green Belt is required to maintain this.

Contributor Proposed Modification: There should be a thorough externally prepared report to identify brownfield sites for development, to ensure that all suitable alternatives are considered.

Modification Reference: U0000185

Officer Response: 1. HS4 Air - The Council is aware of these proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

2. M25 Widening. The Council is aware of Highways Englands M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case,

Highways England, who are responsible for the Strategic Road Network, have been consulted on the DPD and have not raised any fundamental objection to the site allocations, in particular about their impact on the Strategic Road Network. Highways England will continue to be consulted at the point when GB4 is re-considered for development as part of a review of the Core Strategy and/or Site Allocations DPD, with regard to up to date evidence.

3. The point is noted but does not change the suitability of the site for safeguarding nor mean that development can not be accommodated on parts of the site not owned by the Church. Details of any future allocation will be considered with regard to up to date evidence, as part of a review of the Core Strategy and/or Site Allocations DPD.

4. Flooding is comprehensively addressed in section 7 of the Council's Regulation 19 Issues and Matters Topic Paper.

5. and 6. The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.

- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;

- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.

- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.

- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.

- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

Regarding the reasons for excluding the Pyrford Green Belt sites, paragraph 14.12 of the Council's Regulation 19 Issues and Matters Topic Paper sets out in detail why the Council

believes a very special circumstances justification does not exist to safeguard these sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10.

7. Pollution assessments - please refer to section 8 of the Council's Regulation 19 Issues and Matters Topic Paper.

8. ONS Housing Numbers and the Borough's housing requirement - please refer to paragraph 1.5 of the Council's Regulation 19 Issues and Matters Topic Paper.

9. Inadequate infrastructure provision - please refer to section 6 and 13 of the Council's Regulation 19 Issues and Matters Topic Paper.

10. Overdevelopment - as stated, the Borough's housing requirement and exceptional circumstances for release of Green Belt land is addressed in section 1 (particularly paragraphs 1.5 to 1.9) of the Council's Regulation 19 Issues and Matters Topic Paper.

11. Exceeding the plan term, and the justification for safeguarding Green Belt land for future development needs is covered in section 2 of the Council's Regulation 19 Issues and Matters Topic Paper.

12. Inadequate consideration of alternative sites is addressed in section 11 of the Council's Regulation 19 Issues and Matters Topic Paper.

13. On statements made about the Green Belt function of sites GB4, GB5 and GB10, these are supported by the evidence contained in the Council's Green Belt Boundary Review (GBBR). While the sites put forward may meet some of the Green Belt purposes set out in the NPPF, the GBBR and Site Allocations DPD have also had to consider the most sustainable location for development (see section 6 of the Green Belt Review) and have appraised and tested the sites in a thorough Sustainability Appraisal, which can be found on the Council's website. As background to policy GB10, contained in the GBBR, is the presumption that large parts of the site should not be built on and left green to help maintain a good transition between the urban area and Green Belt. It is proposed that the site should contain substantial areas of public open space and green infrastructure, including large areas of woodland and parkland setting which should be strengthened where possible. This will serve residents of the development, and also help conserve the distinctive function of green infrastructure and links to the Wey Navigation corridor, which contribute to the character of the area. These points are included as key requirements in the policy for GB10 and will help to ensure that the landscape value and attractive character of the site is minimally impacted by the development, and will help ensure that development fits the area's character.

It should be noted that for sites GB4 and GB5, the sites are safeguarded for future (post-2027) development need and will only be released for development through the plan-making process as part of the review of the Core Strategy and/or the Site Allocations DPD, after 2027. In terms of details to help to conserve character and green space and gaps between settlements, the key requirements for any development at these sites will be set out as part of the review of the Core Strategy and or the Site Allocations DPD and will be informed by up to date evidence at the time. It should be noted that any development at the sites prior to 2027 will need to be acceptable development in the Green Belt, in accordance with Policy CS6: Green Belt of the Core Strategy. Other Core Strategy policies also apply to these sites prior to 2027, including CS20 Heritage and conservation, and CS24 Woking's landscape and townscape.

Response Reference: U0001669

Officer Proposed Modification: This issue has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, section 11. No modifications are required as a result.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06711/1

Name: Mr Bob Carey
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Objects to the WBC development of the Green Belt For Byfleet and West Byfleet. The roads around the area are appalling and the addition of 775 New properties will increase congestion. The roads are not maintained to an even fair standard with appalling pot holes and flooding when it rains.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Objection noted. Sections 1 and 2 of the Regulation 19 Issues and Matters Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.
Response Reference: U0001165
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06718/1
Name: Ms Sheila Carroll
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB18
Summary of Comment: Does not consider the proposed plan is legally compliant or sound for reasons given below. HS4 Air: no consideration has been given to the most well known proposal from Heathrow Southern Railway Ltd which would link to the existing South West Mainline between Byfleet and Woking which goes through West Byfleet. WBC has failed completely to consider the potential compromising impact of its proposals in its assessments on this National Transport Infrastructure project. Transport infrastructure linked to GB10 and GB11 both currently in the green belt, limited scope to introduce sustainable transport mitigation measures to address the traffic impacts of the development. Traffic issues on the A245 Parvis Road which passes through the heart of West Byfleet. This same road would see over 800 new homes built on the green belt that runs alongside (these would be in addition to the 255 new homes already agreed for the centre of West Byfleet).

The West Byfleet Neighbourhood Development Plan 2017-27 adopted by WBC in 2017 refers to the existing traffic problems on the A245 and states that an earlier A245/A320 Multi Modal Traffic Study carried out by SCC concluded that the A245 was 'over-trafficked' and 'burdensome to local communities'. It also confirms that the Strategic Transport Assessment 2015 published by WBC addresses the impact of any proposed 'West Hall' housing development and shows that the levels used to categorise the performance and capacity of sections of a road, giving the desirable maximum congestion, would be exceeded on Parvis Road by housing development on the West Hall site. Surrey CC has acknowledged that the A245 is already an overloaded traffic corridor and the traffic impact of large scale housing development would worsen this existing situation.

Pollution assessments are inadequate. Given the issues mentioned re the transport infrastructure concerns around Parvis Road A245, it is important to note that the pollution sensors on this stretch of road showed the highest pollution readings in Woking. Increased traffic numbers will further impact on pollution levels. Not only has WBC failed to address the issues around pollution but it has also ignored that the A245 runs alongside the only park open recreation land in West Byfleet.

Education infrastructure in West Byfleet (linked to GB 10, GB11 and GB18): inadequate mitigation. It is unclear how any additional demand for new school places would be met with the proposal for over 800 new homes in GB10 and GB11 and the agreed plans for Sheer House Development in the centre of West Byfleet (with 255 homes planned) i.e over 1000 new homes/ households. With over 1000 new households being proposed in West Byfleet it is likely that demand for local school places would outstrip supply. According to Surrey Council's School Places in 2018-2027, the West Byfleet Infant School has recently had to permanently increase its planned admission number from 60 to 90; followed by a similar increase in planned admissions at the West Byfleet junior school. Even if local school applications in 2019-2020 followed trends in other parts of the Borough and saw a small drop of 4.2% in admissions, the proposed overdevelopment would in all likelihood create significant additional demand. WBC's Infrastructure Delivery Plans are inadequate. We know that WBC does not have the funds to build a new school; Surrey CC has stated that its own medium term budget plan highlights the serious financial situation faced by the county council and the outlook for future years. WBC Planners admitted (at a public meeting) that any CIL/ Section 106 funding from the proposed development is unlikely to be sufficient to fully fund/build a new school and so it appears to be the Council's plan to rely on/draw on central Government funds to deliver essential infrastructure. The "where" is another issue. Inadequate reasons for excluding Martyrs Lane greenbelt: This is a much larger area of land that already includes 3 sites that are almost unused, partly pre-developed and derelict. In 2012 planning permission was granted to McLarens for a 60,000 sq m factory facility on an area extending to over 22 hectares. The factory was cancelled but at the time there was no concerns about the development being a risk to unsightly merger of buildings or urban sprawl which would harm the greenbelt. This site should have been prioritised by WBC but instead WBC has overlooked it and instead sought to remove West Byfleet sites from the greenbelt and add to local traffic congestion and other infrastructure problems.

Inadequate reasons for excluding Pyrford Greenbelt: in the recent Greenbelt Review Report commissioned by WBC, Pyrford was identified as having good access to local communities and whilst some areas may be unsuitable for development, that same report noted sites with minor constraints that could accommodate development with design or mitigation.

Level of Development proposed for GB10 and GB11 alongside GB4 and GB5 is too high: in addition to the reasons given above, the amount of planned development will inevitably merge the villages of West Byfleet and Byfleet. They are distinctly separate villages, each with their own centres and communities. The Green Belt Review noted that GB10 (West

Hall site) is particularly sensitive in landscape terms and if it was prioritised over other sites, it would need green infrastructure.

Removal of Greenbelt for West Byfleet Infant and Junior Schools including playing fields (GB18 Reg19): other than a requirement for WBC to create additional Suitable Access to Natural Green space (SANGs) there is no good reason to remove the schools and their playing fields from the greenbelt. The schools and playing fields should be retained in the greenbelt. National Planning Policy highlights the importance of promoting healthy and safe communities and only altering greenbelt boundaries where exceptional. No exceptional reason is given but instead assumptions are made about the level of development. And in looking at open space, it is important to note that WBC does not have a good record on open space in West Byfleet and has already admitted it is encouraging a pub chain to build on the West Byfleet recreation ground (which incidentally was gifted in perpetuity to the people in the parishes of West Byfleet and Byfleet). Under no definition is a pub a good use of open recreational space.

Does not wish to participate at the oral part of the examination and wishes to be informed on its progression.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. In regards to the concentration of housing, as noted in Section 5 of the Topic Paper, the Council accepts that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development. Paragraph 1.7 of the Topic Paper reiterates the need to allocate a range of sites to meet the variety of housing need across the Borough. Green Belt sites will contribute towards the provision of family homes, for example. Section 21 of the Topic Paper addresses concerns about urban sprawl.

Site GB18 which will not be developed and will continue to provide open space and sports provision for the Junior and Infant schools. The site was recommended for removal by the Green belt Boundary Review as the site would form a Green Belt island which would not be logical. The site will be protected under Policy CS17 for Urban Open space. In regards to the pub being built on the recreation ground this is a separate Council matter and is not part of the Site Allocation DPD. However, it should be noted that the developer is no longer pursuing the proposal.

Response Reference: U0001367
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06723/1
Name: Mrs Jean-Marie Carroll
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, RG18GB12, RG18GB13
<p>Summary of Comment: Does not consider Draft Site Allocations Development Plan (DPD) to be legally complaint or sound for the following reason. The Local infrastructure as it is would not support 800 new homes there are traffic problems already they would be greatly exacerbated. There are inadequate reasons for excluding Pyrford and Martyrs lane from these developments. Believe The Byfleets are being singled out for all developments, where these should be spread out over the boroughs.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The Site Allocations DPD has been prepared in accordance with legal and procedural requirements. Its preparation follows strictly the requirements of the Regulations, including on consultation, preparation of the Sustainability Appraisal and meeting the timescales set out in the up-to-date LDS.</p> <p>Section 6 of the Regulation 19 Issues and Matters Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:</p> <ul style="list-style-type: none"> - The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives. - The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF. - The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of

<p>the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;</p> <ul style="list-style-type: none"> - It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land. - The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful. - There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course. - A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development. <p>The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. In regards to the disproportionate allocations in Byfleet see Section 5 of the Topic Paper.</p>
Response Reference: U0001189
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06824/1
Name: Caroline & Graeme Carter
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: The DPD is unsound. GB10 should not be released from the Green Belt because:</p> <ul style="list-style-type: none"> - it would not comply with the West Byfleet Neighbourhood Development Plan; - access to the site along Parvis Road would place even more pressure on this busy road; - healthcare facilities and schools are overstretched and cannot take more growth; - the site is vulnerable to flooding.
Contributor Proposed Modification: Site GB10 should not be released from the Green Belt.
Modification Reference: U0000472
<p>Officer Response: The Regulation 19 Issues and Matters Topic Paper provides a response to concerns regarding conflicts with the West Byfleet Neighbourhood Development Plan (Section 16); concerns regarding sufficient infrastructure (Section 6); and flooding (Section 7). Details of any access arrangements will be determined as part of the development management process, at planning application stage. In all sites that have been identified for allocation, the Council is confident that suitable and safe access can be provided, with any impacts on existing roads appropriately mitigated.</p>
Response Reference: U0001500

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06545/3

Name: Carter Jonas on behalf of Burhill Developments Ltd

Number of Signatories: 1

Comment Type: OBJ

Site Reference: RG18GB12

Summary of Comment: Wishes to participate in oral examination and to be kept informed as the DPD progresses.

Supports the Sustainability Appraisal (SA, p218) and considers it legally compliant, sound and compliant with the Duty to Cooperate. Satisfied that the document is positively prepared and objective, based on robust and credible evidence and effective.

The comments relate to the background evidence supporting allocation of former site GB12 [referred to as GB11 within the Sustainability Appraisal and the representation, and referring to SHLAAPYR003: Land rear of 79 - 95 Lovelace Drive, Teggs Lane, Pyrford, Surrey GU22 8QZ], which endorse the site's release from the Green Belt. This relates specifically to points identified in the SA, on delivery of housing, including affordable housing, to contribute to the Borough's housing requirement, and the sustainable location of the site, in terms of access to services, the Neighbourhood Centre and being within Flood Zone 1. Also refers to evidence summarised from the Green Belt Review, supporting the release of the land from Green Belt.

Contends there is no evidence to support the decision to exclude the site from the Site Allocations DPD, following the meeting of the LDF Working Group on 5 Sept 2018 and Council meeting on 18 Oct 2018. The minute of the Council meeting refers to the Chairman of the WG and Council Leader Cllr Bittleston forming ' a different planning judgement to Officers, based on harm to heritage assets', giving the site 'a critical Green Belt function' and removal from the Green Belt offending various sustainability objectives. The respondent has commissioned and submitted two evidence based documents, to support release of the site from Green Belt, on the effect on heritage assets and on landscape, specifically the Escarpment and Rising Ground of landscape Importance. These show that impact is acceptable and that any (less than substantial) impacts could be mitigated. Provides pertinent detail from these assessments.

Considers that the evidence provided gives robust endorsement of the findings of the SA, to support the safeguarding of the site, and rebuts the unsubstantiated arguments used by Councillors.

Contributor Proposed Modification:

Modification Reference:

Officer Response: Support for the Sustainability Appraisal is noted. Former site GB12 (referenced in the representation as GB11, based on the Reg 19 Sustainability Appraisal, referring to SHLAAPYR003: Land rear of 79 – 95 Lovelace Drive, Teggs Lane, Pyrford, Surrey GU22 8QZ) was identified in the draft Site Allocations DPD to be safeguarded to meet future development needs beyond the plan period between 2027 and 2040, and was published for Regulation 18 consultation between June and July 2015. The Council has considered the representations received during this consultation and has also reviewed all the available evidence and the policy context for safeguarding the sites, and has come to the conclusion that very special circumstances justification does not exist to safeguard the sites for the following reasons:

The site would give rise to a certain level of harm to the sustainability objectives of the Sustainability Framework used for the Sustainability appraisal. Whilst GB12 is not within the Escarpment of Rising Ground of Landscape Importance designation, it is adjacent to the Escarpment and forms part of an important rural landscape setting to the southerly

<p>boundary with the urban area of Woking and is considered to also be protected by policy CS24. Moreover, GB12 together with GB13 form part of the setting of the Registered Park and Garden at Pyrford Court and the Aviary Road Conservation Area (both designated heritage assets). In their present open and rural form these sites make an important contribution towards the respective heritage significance of those designated heritage assets. Paragraph 193 NPPF requires "great weight" to be attached to the conservation of designated heritage assets. The Council is therefore of the view that exceptional circumstances do not exist so as to justify the release of proposal site GB12 from the Green Belt because the use of those sites for residential development would: (i) conflict with policy CS24 Core Strategy and thus not be in accordance with the development plan's strategy for sustainable development contrary paragraph 139(a) of the NPPF, (ii) fail to protect or enhance a valued landscape in accordance with paragraph 170(a) of the NPPF, (iii) in the case of GB12 and GB13 fail to conserve designated heritage assets and (iii), result in the permanent loss of Green Belt land assessed within the Green Belt Review as performing variously a "critical" and "major" role to check urban sprawl and a "critical" and "major" role towards safeguarding the countryside from encroachment. Moreover, contrary to Policy CS6 of the Core Strategy, it is considered that the development of GB12 and GB13 would individually and certainly collectively, critically undermine the overall purpose and integrity of the Woking Green Belt. The decision to determine whether very special circumstances justification exist to safeguard the sites is a matter of planning judgment. It is clear from the above reasons that the decision of the Council is well informed by the careful consideration of all the available evidence and defensible. The evidence submitted as part of the representation seeks to demonstrate that the site could be sustainably developed. The Council is of the view that this evidence is not significant enough to outweigh the in principle harm that the development of the site could cause to the landscape, heritage assets, and to Woking's Green Belt, as detailed above.</p>
<p>Response Reference: U0001779</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick): T</p>

<p>Contributor Reference: 06627/2</p>
<p>Name: Ms Joy Cassidy</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB07</p>
<p>Summary of Comment: Object to GB7 proposals. They will affect the major infrastructure of the area They will destroy the woodland and wildlife on the site (many trees have preservation orders). They will have a disastrous and long term effect on the environment and seriously affect many people's lives.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The impact of the proposals on infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on trees and wildlife in general is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. However, the importance of the woodland within Site GB7 does merit further recognition and additional text will be inserted into the policy to ensure its protection.</p>

The impact of the proposals on the environment and public amenity is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 4, 7, 8, 13, 19 and 23.
Response Reference: U0001022
Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site". Amend third paragraph of reasoned justification to read 118 dwellings.
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06917/1
Name: CEPF II (Woking) Limited
Number of Signatories: 1
Comment Type: COMM
Site Reference: UA04
<p>Summary of Comment: CEPF II (Woking) Ltd has an interest in site UA4 (1-12 High Street and 24-36 Commercial Way), and proposes to bring forward a planning application(s) for redevelopment of land with the site boundary. Comments focus on issues affecting client's interests and ensuring the policy context facilitates the beneficial redevelopment of the land. In summary, CEPF II (Woking) Ltd supports the allocation of the site UA4 for development, but the DPD could be made more effective through policy amendments.</p> <p>1. The DPD has been prepared to meet needs identified in the Core Strategy. However, the housing requirement falls considerably short of meeting the full need for housing in Woking. Due to the recent reluctance of neighbouring boroughs to absorb Woking's unmet needs, and in an up-to-date context which indicates a need to provide in order of 1,727 dpa across the housing market area (including 431 homes pa in Woking), the DPD should take a more proactive approach by identifying land which provides for housing needs beyond Core Strategy levels. This need could be met by ensuring a maximum possible contribution is made via sustainably located brownfield sites within the urban area, including the UA4 site.</p> <p>2. DPD should recognise the changing context of Woking Town Centre. Recent developments e.g. Victoria Square, 20-32 Goldsworth Road, in addition to likely future developments e.g. land at 2-24 Commercial Way and 13-28 High Street (immediately west of UA4) will achieve mixed, large-scale retail, commercial and residential redevelopment, resulting in emerging clusters of tall buildings. The Design SPD also recognises the emergence of higher density development and tall buildings in proximity to UA4. As supported by the surrounding redevelopment context - increasingly with tall building components, in addition to supporting text in the Design SPD and Core Strategy policy, the site's location within this tall building cluster should be referenced in either the policy or the reasoned justification. A tall building would fully align with local and national policy to maximise the efficiency of the site and create a strong sense of place.</p> <p>3. Supports the proposed allocation of the UA4 site for a mix of appropriate town centre uses, but would like to shape the policy to ensure it will deliver redevelopment and not unnecessarily constrain development opportunities. Key requirements need to be amended so as not to act as an impediment to development of the site. Suggested modifications have been suggested. Supports active retail frontages at ground floor level - reference in reasoned justification to retail should include A1, A2, A3 and A4 uses. The policy should, however, be clear that there is no absolute requirement to provide all of the specified uses - particularly in respect of the office floorspace. This could prejudice the</p>

delivery of development. This should be an 'acceptable' use rather than a requirement. Considers hotel use to be potentially suitable, to meet unsatisfied demand.

4. DPD should make reference to whether a phased approach is permissible. There have been recent investments in refurbishment and there are different characteristics of each of the site frontages - this indicates that a phased approach is most likely.

5. In order to complement development on adjacent allocation sites (UA6 and UA7), it would be helpful for the DPD to provide clarity to prospective developers regarding the scale and form of development considered acceptable on allocated sites, and to be clear on what contingencies there are in relation to surrounding developments. In order to avoid delay in delivering development on UA4 whilst adjoining sites' proposals are formulated, the assessment of 'complementarity' between sites should be made at the level of policy compliance rather than detailed design.

6. Whilst requirements to protect and enhance heritage assets and settings is recognised, they must be interpreted having regard to the nature and significance of the assets and to the degree of change which is proposed within the town centre. The site context will change fundamentally over the plan period. The NPPF (paras 186 and 200) is clear that the concept of conservation is not devalued through lack of special interest and that there will be circumstances in which the loss of buildings within a Conservation Area will be justified, as not all elements will contribute to its significance. UA4 policy should provide alter this requirement so as not to preclude the removal and replacement of existing buildings and that loss of buildings will be permitted if the public benefits of the proposal outweigh the harm to the Conservation Area.

7. Experience of recent, major site redevelopment within the town centre has demonstrated that the costs of bringing forward regeneration projects have made provision of affordable housing potentially unviable. UA4 is likely to be affected by similar constraints to e.g. Victoria Square and Rat & Parrot proposals. The wording of UA4 should be amended to simply state that the sites ability to contribute to affordable housing will be considered in line with policy CS12.

8. The site is opposite the railway station and bus services and is a highly sustainable town centre location. As per Parking SPD guidance, the key requirement should be amended to explicitly state that parking below minimum standards will be accepted.

9. There is little opportunity for public realm enhancement beyond that which has recently taken place at Commercial Way, High Street, Church Path and part of Chapel Street. Redevelopment can complement these recent improvements, but the key requirements should recognise limitations for further enhancement either within or immediately adjacent to the site.

10. Key requirements should recognise that the multi-modal transport interchange will not be created as a direct consequent of the development of the UA4 site: it will be an interchange which benefits the town centre and the wider population of Woking as a whole. It is already being progressed, and significant works already completed.

11. Lifetime Homes standards have been replaced by the requirements of 2015 Building Regulations Part M4 (2), incorporating 2016 amendments. Whilst the needs of designing adaptable homes is recognised, the reference to Lifetime Homes should be omitted.

12. There are no trees in the site allocation boundary: thus the requirement to retain trees of value should be omitted.

Wishes to participate in Examination.

Contributor Proposed Modification: Uses proposed:
 The reference to retail should include A1, A2, A3 and A4 uses.
 As drafted the policy implies a requirement to provide all of the specified elements i.e. residential, office and retail floorspace. We consider that it may not be possible to incorporate all components and the policy should be clear that there is no absolute requirement to do so in respect of the office floorspace. We consider that the policy should require the provision of residential development, together with complementary uses which

will achieve active ground floor frontage, but should not require inclusion of an office component. Office floorspace should be identified as an acceptable use (rather than a requirement).

We request that hotel use is also included as a potentially suitable use for part of the site.

Phased redevelopment: the policy should expressly recognise that phased development of the site is an acceptable approach.

Suitability for tall buildings: when the site is considered in the changing Town Centre context we consider that the site's location within the emerging tall buildings cluster in Woking Town Centre should be referenced in either the policy or the reasoned justification and the sites' suitability to accommodate a tall building should be expressly referenced.

Relationship to adjacent sites and buildings: reword requirement that development should complement that of other Woking High Street Allocated Sites. Given the complexity of bringing forward these previously-developed town centre sites the assessment of 'complementarity' between the development proposals for each site should be made at the level of policy compliance rather than detailed design.

Heritage assets: UA4 policy should clarify that the requirement for protection and enhancement of the Conservation Area does not preclude the removal and replacement of existing buildings and that the loss of buildings will be permitted where it can be demonstrated that the public benefits of the proposal outweigh harm to the Conservation Area.

Affordable housing: the 'Affordable housing' key requirement should be revised to omit any reference to a specific percentage requirement and should simply state that the sites' ability to contribute to affordable housing will be considered in line with Policy CS12. The affordable housing contribution will be determined by viability considerations (in line with Policy CS12 and the availability of Vacant Building Credit in respect of existing floorspace).

The key requirement in relation to parking should explicitly state that the UA4 site is one where residential parking below minimum standards will be accepted, given the highly sustainable location.

Key requirements should recognise that there is little opportunity for further public realm enhancement either within or immediately adjacent to the site.

Contribution to enhance the multi-modal transport interchange should not be a requirement for UA4 - significant works have been completed, and it is not a project that should be required as a direct consequence of the development of UA4 site. Reference towards a contribution to this project should be removed.

Lifetime Homes standards have been replaced by the requirements of 2015 Building Regulations Part M4 (2), incorporating 2016 amendments. Whilst the needs of designing adaptable homes is recognised, the reference to Lifetime Homes should be omitted.

There are no trees in the site allocation boundary: thus the requirement to retain trees of value should be omitted.

Modification Reference: U0000344

Officer Response: Support for the proposed allocation of site UA4 (Land at 1-12 High Street and 24-36 Commercial Way) is noted.

The Council has provided a full response to the point regarding meeting the full housing need in its Regulation 19 Issues and Matters Topic Paper, in Section 14. Section 18 sets out how the Council takes the view that the estimated yields and proposed anticipated densities are reasonable and broadly in line with the Core Strategy, based on ranges provided in policy CS10.

Planning legislation requires development to be determined in accordance with the development plan for the area, unless other material considerations demonstrate otherwise. The policy wording of UA4 and its key requirements set out to make development acceptable and are necessary to ensure a policy compliant scheme. It is up to an applicant at the development management stage to demonstrate why the policy requirements should be set aside for any scheme that comes forward. With regard to

retail uses: the site falls within an area designated as secondary shopping frontage. In accordance with policy CS2, the Council will consider favourably change of use proposals to other A class uses within secondary frontages if it can be determined they would not have significant harmful effects on the frontage, crime and disorder and the vitality and viability of the town centre. In this regard, the Council would not want to explicitly state within policy UA4 or its reasoned justification that all types of A class retail floorspace are suitable for the site. There is scope for the applicant to demonstrate its appropriateness for the site.

With regard to office uses: the Employment Topic Paper (2018) sets out the current position on need for office space. The quanta of each type of use in the policy and supporting text are indicative. Any proposal for a comprehensive redevelopment scheme that includes a different configuration of uses across the site could come forward as a planning application, but would need to be justified by material considerations that indicate that the development plan should not be followed in that particular case - for example, a loss of or reduction in office space. This also applies to additional uses such as hotel use - the onus is on the applicant to demonstrate a need for such a use, to be assessed at development management stage.

The representation makes reference to the phased redevelopment of the site. The Council would prefer a comprehensive redevelopment of the site to maximise the efficient use of land. However, in recognition of the nature of land ownership a phased approach could be supported as long as it is underpinned by a development framework which sets out a clear vision for the site to ensure that any phasing doesn't compromise the delivery of other parts of the site. A planning application including a development framework setting out the aspirations of the site will be considered on its own merits. The reasoned justification will be amended to make this clearer.

It is recognised that the town centre has undergone change, but the main context for the Site Allocations DPD continues to be the strategic policies of the Core Strategy, including those on housing provision and distribution (CS10) and design (CS24). The reasoned justification of policy UA4 already recognises the nature of the site as a gateway to the town centre, and states that there is scope to provide higher density development. The Council considers that there is sufficient in principle support for such schemes if they are appropriate for the context and are of high quality design - in line with policy CS24. The emergence of a surrounding cluster of tall buildings - as referenced in the representation - is evidence that higher density schemes will be supported if appropriate in the absence of policies which explicitly support such schemes. The Core Strategy is clear to emphasise that actual capacity of a site can only be confirmed when an acceptable scheme is considered through the development management process.

Clarity on the requirement for protection and enhancement of heritage assets is already set out in policies CS20 of the Core Strategy and DM20 of the Development Management Policies DPD. There is in-principle support to protect and enhance heritage assets in line with policy CS20. The onus is on the applicant to demonstrate how the benefits of a scheme may outweigh this objective; policy DM20 details the exceptional circumstances where the Council may decide for the total or partial destruction of a heritage asset, and the supporting information required with any planning application. This is supported by guidance in supplementary planning documents. It is not necessary to provide further clarity within policy UA4.

Policy CS12 of the Core Strategy sets out the Council's affordable housing policy. It is unacceptable to rule out the provision of affordable housing in principle as part of the redevelopment of the site. However, in recognition that, currently, the majority of the land is not in public ownership, the key requirement referring to the percentage of affordable housing to be provided will be deleted to allow for a contribution in line with CS12 depending on the circumstances at the time of a planning application. If circumstances have changed at the point of determining a planning application, and land is in public ownership, a 50% target as per policy CS12 will apply. Policy CS12 allows scope for an applicant to make a case based on evidence of viability if it is felt that the development of

the proposed is unique to the extent that the requirements of Policy CS12 cannot be met. However, this can only be determined at the development management stage based on the specific merits of the scheme that would come forward for determination. Due to the site's sustainable location in the Town Centre, the considerations within the Parking SPD will be triggered such that on-site parking provision below the minimum standards may be deemed acceptable if that would not compromise highway safety. It is not necessary to explicitly state this within policy UA4. With regards to public realm: whilst the Council recognises that surrounding streets have recently been improved, the Design SPD sets out how new development can offer opportunities to further enhance the streetscape and public realm, such as appropriately designed cycle parking, providing places to sit, introduction of landscaping, and satisfactory integration with Commercial Way pedestrian area. The Council believes there are, therefore, opportunities to further enhance the public realm.

The Council acknowledges that the Lifetime Homes standard has been replaced with Building Regulations standards. A guidance note has been written setting out new requirements - including for residential dwellings which do not fall under the scope of policy CS13. The Council will encourage all new dwellings to meet M4(2) standards where relevant, practical and viable. The reference to Lifetime Homes will be removed. The reference to trees of amenity value will be retained as circumstances could have changed by the time any redevelopment of the site takes place.

The wording of the first key requirement will be amended in recognition of concerns raised in the representation. Development will be expected to complement other existing developments in the vicinity of the site and to avoid compromising the future development of allocated sites in the area.

Reference to making a contribution to enhance a multi-modal transport interchange facility in the vicinity of the north of the station will be retained: there continues to be a need to improve transport infrastructure in the vicinity of the site and any development coming forward, along with other developments, will have to contribute towards this infrastructure to minimise the impact of development on what is already a congestion hotspot.

Response Reference: U0001780

Officer Proposed Modification: Amend first key requirement of policy UA4 to read: "Development to take account of other existing developments in the vicinity of the site and to avoid compromising the future development of allocated sites in the surrounding area". Reasoned justification text to be modified to reflect this change: merge fourth and fifth paragraphs to read: "The development of the site would have a regenerative effect in its vicinity and contribute significantly towards the continuous enhancement of the Town Centre. In order to achieve this, it is important that the development takes account of other existing developments in the vicinity of the site and avoids compromising the future development of nearby allocated sites, to ensure effective integration and sustainable development of the entire area and to maximise the benefits of developing this prominent area of the Town Centre".

Amend the fifth key requirement of policy UA4 on p42 to read: "Contribution towards Affordable Housing provision in accordance with Policy CS12: Affordable Housing of the Core Strategy".

Remove reference to Lifetime Homes from key requirement. Amend to read: "Building(s) should be designed to be adaptable or capable of being adaptable to allow scope for changes to be made to meet the needs of the occupier(s); the residential element of the scheme should incorporate 'Optional requirement M4(2): Category 2 - Accessible and adaptable dwellings' where practical and viable".

Add a paragraph in the RJ of UA4 to read: "The Council will support the comprehensive redevelopment of the site to maximise the efficient use of land. However, a phased approach would be considered on its own merits as long as it is underpinned by a development framework or a masterplan which sets out a clear vision for the entire site, to ensure that any phasing doesn't compromise the overall delivery of other parts of the site".

Wishes to Attend Examination (T = Tick): T
Contributor Reference: 06757/1
Name: Ms Pauline A. Chapples
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Raises concerns over omissions in the DPD. There is presently congestion on the A245 Parvis Road, especially when there are incidents on the M25 and A3. When these incidents occur, it can lead to a lock in situation for the South side of Byfleet. Raises concerns about the impact of major building in Byfleet which is a small village.
Contributor Proposed Modification: In order to ensure a safe living environment for the growing number of residents in Byfleet, it is considered that no more developments should be approved or commenced until: 1. A Health Centre provision is permitted in Byfleet. 2. Adequate provision is made for road/traffic improvements to the A245 Parvis Road to avoid significant congestion and to eliminate air pollution. 3. A new school is provided on the former Manor School site.
Modification Reference: U0000348
Officer Response: Paragraph 13.3 of the Regulation 19 Issues and Matters Topic Paper provides that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed. Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses the due consideration which has been given to infrastructure to support the Site Allocations DPD. In particular, Paragraph 6.12 confirms that due consideration has been given to GP provision. It is further noted that the 'key requirement' within the policies of the Site Allocations DPD describe how any site specific requirements will be determined on a case by case basis depending on the scheme that comes forward. Paragraph 6.9 of the Regulation 19 Issues and Matters Topic Paper confirms that Surrey County Council has provided a detailed assessment of education needs to support the Core Strategy. It is satisfied that the combination of expanding capacity at existing schools and the allocation of the specific site for a secondary school in the DPD will meet the education needs of the area for the plan period. In this respect a new or extended school at the former Manor School site will not be justified by need or evidence. Section 4 of the Regulation 19 Issues and Matters Topic Paper recognises that any land taken out of the Green Belt will lead to a reduction of the total amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensure through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. Furthermore, while there is a loss of open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents, as set out in Core Strategy Policy CS17: Open space, green infrastructure, sport and recreation. This is reinforced by Development Management Policies DPD Policy DM1: Green Infrastructure.
Response Reference: U0001332
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06902/1
Name: Mr Godfrey H. Chapples
Number of Signatories: 1
Comment Type: COMM
Site Reference:
<p>Summary of Comment: The most significant factor relating to the harmonious growth of Woking Borough is the need to save the Green Belt.</p> <p>The decision to concentrate on high rise development in Woking Town centre is supported, provided that extreme caution is exercised with respect to the provision of services and utilities. Key issues raised are water pressure, disposal of refuse and the conduct of residents.</p> <p>The Core Strategy and Site Allocations must ensure that priority is given to brownfield sites. Removal of harmful matter and transport improvements should be a prime consideration at these sites.</p> <p>In rural areas of the borough, safe usage of the land is paramount. Areas susceptible to flooding should be excluded from development. for now. It is important to consider future generations by safeguarding land and therefore constructing efficient flood alleviation schemes. Certain of these schemes have been completed, for instance in Westfield. Much more is required in and around the Byfleets and is important to leave the land in this area as Green Belt/open green space until a flood alleviation project has been completed. Given the proximity of this Green Belt and open space land to the M25 motorway, it is important to ensure safe distances due to air pollution.</p> <p>Consideration should be given to an additional route of access/egress to reduce pressure on the A245.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Core Strategy Policy CS1 sets out a spatial strategy for Woking Borough wherein "most of the new development will be directed to previously developed land in the town, district and local centres" and that "in the town centre, well designed, high density development that could include tall buildings and which enhances its image will be encouraged, but without compromising on its character and appearance and that of nearby areas." Support for this broad spatial strategy is noted. Regarding disposal of refuse, it is noted that Woking Borough Council has a guidance document 'Waste and Recycling provisions for New Residential Developments' that can be used as a design tool and to assess planning applications.</p> <p>The Council has given comprehensive consideration to PDL before seeking to release Green Belt. This process is detailed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>Land contamination will be addressed by the application of Policy DM8 of the Development Management Policies DPD, including provision for early identification of issues and appropriate mitigation measures.</p> <p>The Council has given significant consideration to flood risk in preparing the Site Allocations DPD. This is comprehensively addressed in Section 7 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>Air quality is addressed in Section 8 of the Regulation 19 Issues and Matters Topic Paper. Significant consideration has been to the impact of development on the road network. Paragraph 6.7 and Section 13 of the Regulation 19 Issues and Matters Topic Paper provide relevant details. In particular Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the mitigation measures that might be necessary to address development impacts on the network.</p>
Response Reference: U0001032

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06762/1

Name: Churchgate Services

Number of Signatories: 1

Comment Type: OBJ

Site Reference:

Summary of Comment: Considers that the DPD is neither legally compliant nor sound. Wishes to participate at the publication examination of the DPD to discuss the evidence of need for C2 uses, and that the lack of any specific allocations creates an unsound and ineffective DPD that is not in accordance with national policy. Wishes to be informed when the DPD progresses to the next stages.

In general these representations, prepared on behalf of Churchgate Services, relate to the need to allocate sites for C2 Extra Care within Woking, and specifically the land at the Meadows, Woking. Without the allocation of this site, it is considered that the Plan is unsound, the DPD is not fully justified or effective and is not consistent with the NPPF. Churchgate Services have a land interest in the site of The Meadows, Bagshot Road, Woking, GU21 2RP, a 0.5ha site in the Green Belt. There is a vacant two-storey building on site which was last used as a 24-bedroom C2 care home, but which has been subject to extensive vandalism, including fire damage.

CS13 of Woking's Core Strategy provides that the "Council will allocate specific sites through the Site Allocations DPD to assist in bringing suitable sites forward to meet need." The review of this document found that no modifications were necessary, and refers to an increasing number of older people continuing to need specialist accommodation. These allocations are therefore still required. However the Site Allocations DPD refers to only one site (GB11) which can provide accommodation to meet the needs of the elderly as part of the mix of dwellings. It has therefore not been fully evidenced that the requirement for further C2 uses within the borough can be provided throughout the plan period. The DPD fails to allocate sufficient sites to deliver Extra Care/C2 uses and is not in accordance with national policy.

As regards the need for specialist accommodation, the 2015 SHMA estimated that within Woking 918 units will be required over the plan period 2013-2033. This is reflected by a Needs Assessment undertaken by Healthcare Property Consultants in December 2018 which shows the following dynamics within a 3 mile radius of The Meadows site:

Statistical Demand: 232 units

Supply of documented units: 151

Under-supply of documented units: 81

This study found a comparable level of statistical under-supply in the Borough as a whole:

Statistical demand (2018): 371 units

Current supply of documented units: 201

Under-supply of documented units: 170

Extra Care comprises specialist housing usually accompanied by 24 hour care on site, and has been heavily championed by public bodies over recent years as the optimum alternative to registered care provision. The study notes that public policy, at a national and local level, is supportive of Extra Care provision. It is highlighted that Surrey County Council seeks to promote the Extra Care concept not only for funded residents, but the wider population.

In 2018, Edmund Williams Architects prepared plans for a 60-unit Extra Care scheme at The Meadows. A Landscape Appraisal and Green Belt Review has been prepared by SLR to support these plans. The key conclusions of this appraisal and review are as below.

The redevelopment scheme would give rise to the following local impacts:

1. A slight beneficial townscape effect
2. A slight adverse effect on Surrey Landscape Character Area SS7: Windlesham to Knaphill; and
3. A slight adverse effect on local views as the new extra-care apartment building would be partially screened and framed by surrounding vegetation and where visible will be seen in the context of adjacent existing development.

The potential impact of the proposed redevelopment scheme on the Green Belt will be very localised, as it will:

1. Have no significant impact on the openness of the Green Belt;
2. Not prejudice the existing availability of views across the Green Belt from, and towards, Knaphill;
3. Not prejudice the existing gap between the settlement edges of Knaphill and Brookwood;
4. Not represent significant urban sprawl or encroachment into the adjoining countryside; and
5. Will represent a positive re-use of derelict urban land.

It is argued that the proposed redevelopment would achieve the below benefits:

1. The provision of much needed C2 care use within the Borough
2. Redevelopment of a brownfield site
3. Continued care provision retained and enhanced (in accordance with Policy CS13)
4. Improvement of the current vandalised state of the site
5. It would continue to serve the five purposes of the Green Belt in that it would not lead to the sprawl of a built up area and would prevent the merging of towns. In addition it would safeguard the countryside from encroachment.

Contributor Proposed Modification: The inclusion of The Meadows site within the Site Allocations DPD would strengthen its compliance and soundness as a suitable site would be allocated to meet the need of specialist accommodation for older people. The Core Strategy policy is positive in encouraging specialist accommodation for older people but the Site Allocations DPD is not proactive in requiring any such allocations. Therefore inclusion of the site would improve the effectiveness of the DPD.

It is proposed that the site at The Meadows is allocated for provision of 60 Extra Care apartments, within Class C2.

Modification Reference: U0000298

Officer Response: The Council considers that it has taken a robust approach to making provision for the accommodation of older people.

It must first be noted that Policy CS13 of the Core Strategy provides in principle support for the development of specialist accommodation for older people in suitable locations. Policy CS13 also specifies that the Council will allocate specific sites through the Site Allocations DPD to assist in bringing suitable sites forward to meet need. Indeed a suitable site, GB11, has indeed been identified to contribute to meeting this need, and the site has extant permission for 155 C2 units.

Furthermore, the provision in CS13 clarifies that the Site Allocations DPD is not intending to allocate a quantum of sites to meet need for C2 units in full, but rather to contribute to this objective. The Council considers that such an approach is sound, given the current development pipeline. It is recognised that over the past five years, completions have been relatively modest; twenty dwellings/bed spaces have been delivered between 2013/14 and 2017/18. However, a significant number of units have been permitted more recently. 231 dwellings/bed spaces have been permitted between 2015/16 and 2017/18. This equates to an average of 77 permitted units per annum.

The West Surrey Housing Market Area Assessment specifies a projected need of 918 units between 2013-2033. Taking into account historic undersupply of 209.5 units over the past five years, this creates an extant annual need of 75.2 units per year over the next fifteen years to 2033. While it is acknowledged that not all permissions will be

<p>implemented, the number of permissions that have been issued in the past three years provides assurance that market values are sufficient to ensure that schemes for older people's accommodation continue to come forwards. Indeed the permission of 155 units at Broadoaks in February 2019 lends further weight to this argument.</p> <p>The Core Strategy sets out the spatial strategy for the borough, including the broad spatial distribution of development and the timing for the release of Green Belt land. Policy CS1 directs most new development to previously developed land in the town, district and local centres which offers the best access to a range of services and facilities. Land in the Green Belt will only be released to enable housing provision between 2022 and 2027. Policy CS10 specifies the overall quantum of housing units to be accommodated in the Green Belt during the plan period. This is specified as 550 dwellings. The brownfield first approach adopted by the Core Strategy is necessary to ensure sustainable development across the Borough. The Inspector who conducted the Core Strategy Examination had this to say about the spatial strategy of the Core Strategy: 'with due regard to its means of production, the Core Strategy provides the most appropriate spatial strategy for sustainable development within the context of the Borough with clear objectives for the plan period in accord with the aims of national planning policy'. The Core Strategy recognises that Green Belt land will be needed to meet development needs between 2022 and 2027. The Green Belt and the Town Centre are therefore identified as future direction of growth.</p> <p>Policies CS1 and CS6 prescribes the means for selecting Green Belt land for future development. These policies require the Council to carry out a Green Belt boundary review to ensure that the land that is released from the Green Belt will not undermine its purposes and integrity. Against this backdrop, any land that is being promoted that is not supported by evidence in the Green Belt boundary review will be resisted. Very special circumstances justification would not exist to allocate or safeguard such land. As outlined in the SHLAA (2017), "the Green Belt Boundary Review (GBBR) does not identify this site as having any potential to be removed from the Green Belt for residential development."</p>
Response Reference: U0001264
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06674/1
Name: Mr Robin Churchill
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Concerns regarding the proposed allocation of traveller site accommodation in the Byfleet area.</p> <p>In favour of providing affordable housing for all and understand the pressures of a growing population, especially on councils, concerned about imposing a change in our community that this will cause.</p> <p>Concerns over the cost of providing accommodation for travellers and impact on the local area.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation regarding the Traveller accommodation been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3.

Response Reference: U0000921
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02980/2
Name: Mr John Clark
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports the decision to exclude the Upshot Lane Fields (GB12 and GB13) from the DPD as a result of comments made at Regulation 18 consultation. Reiterates comments: - the roads surrounding these sites are already very busy, especially at school drop-off and pick-up times. Any further traffic would put pedestrian safety at risk. Junctions at main roads are also very busy. Provides details of which roads and pinch-points will be affected by increased traffic, which would be exacerbated by traffic from cumulative development at West Byfleet and Byfleet, and at Wisley airfield. - Local infrastructure would need to be upgraded, but this would change the character of the area. Existing facilities are at capacity, and parking is difficult. Any measures to improve this would in turn cause congestion. An extension to Crossrail 2 to Woking and Guildford would increase pressure on roads, as well as increases in rail commuters. - the semi-rural setting and character of Pyrford would suffer, as well as the nature of Pyrford as a village with a separate identity. It would merge with Woking. Heritage assets and their settings would suffer i.e St Nicholas Church and conservation areas.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support is noted. The reasons for excluding the sites GB12 and GB13 (Regulation 18 reference) from the latest DPD are set out in detail in paragraph 14.12 of the Council's Regulation 19 Issues and Matters Topic Paper.
Response Reference: U0001235
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06886/1
Name: Mr Roger Clark
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Considers the DPD is not legally compliant. This Site falls within the boundary of the West Byfleet Neighbourhood Development Plan (NDP2017) and forms part of their Greenbelt designation. One of the objectives of the NDP2017 is to maintain, enhance and protect the distinctive and special character of West Byfleet. Any future application for Planning Permission on the Site would be contrary to the NDP2017 and therefore not compliant with Planning Law as defined in the NPPF paragraph 47. The NDP2017 places great emphasis on the protection and enhancement of all existing green spaces which would be significantly undermined if the Site was released from the Greenbelt for housing.

<p>This submission is founded on the disproportional impact of the proposals on West Byfleet and immediate surrounding area to satisfy council targets, which have been developed to satisfy government edict, to protect other areas.</p> <p>No modifications proposed.</p> <p>Duty to cooperate not met, because A lot of technical moves behind the scenes over the years and at times incomprehensible and selected-content briefings by Council staff has not been sufficient to properly inform the public affected by the proposals.</p> <p>The DPD is not positively prepared, not justified, not effective and unsound. No comment to the DPD being consistent with national policy.</p> <p>The proposals are seriously unsound. They do not properly address traffic, pollution, water displacement and social impact on an already well populated neighbourhood.</p> <p>Furthermore, even if those key matters had been properly addressed, the current and planned infrastructure in West Byfleet.</p> <p>No modification proposed.</p> <p>Would like to be informed of the next stages.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. In regards to the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>In regards to the disproportionate impact on West Byfleet see Section 5 of the Topic Paper.</p> <p>In terms of the Council meetings and public consultations see Section 24 and 9.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.</p> <p>The concern regarding water displacement of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding.</p>
<p>Response Reference: U0001378</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06550/1</p>
<p>Name: Mr And Mrs Terry And Adele Clarke</p>
<p>Number of Signatories: 2</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: Strongly objects to the development of site GB10 for the below reasons:</p>

<p>1. The site is currently allocated as Green Belt, and as a safeguarded concrete aggregate site.</p> <p>2. This will cause significant traffic issues, compounding existing issues</p> <p>3. There will be significant increase in noise and traffic pollution</p> <p>4. The infrastructure is already strained and cannot take any more.</p> <p>5. There are deliverable Traveller sites in urban areas and therefore Traveller pitch provision is not necessary at this site.</p> <p>6. The site floods</p> <p>7. Overdevelopment of housing</p> <p>Overall this will be detrimental to residents in West Byfleet and surrounding areas. West Byfleet cannot sustain this. It is not practical; the infrastructure is not there, and there are more than enough people/cars in the area already.</p> <p>Considers that the proposals should be rejected.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The issues raised in this representation are addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 17 addresses the safeguarding of GB10 by Surrey County Council's Minerals Plan.</p> <p>Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to be acceptable in transport terms. Traffic and congestion are further addressed in Section 13. In particular, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the networks. With appropriate mitigation, the transport impacts of development can be addressed.</p> <p>Section 8 addresses noise and air pollution.</p> <p>Section 6 comprehensively addresses the infrastructure provision to support the Site Allocations DPD.</p> <p>Section 3 addresses the Council's approach to allocating Traveller sites. In particular Paragraph 3.6 confirms that there is a demonstrated lack of deliverable sites in the urban area to meet the identified need to provide a robust case on special circumstances grounds to justify the use of Green Belt land to deliver Traveller pitches.</p> <p>Section 7 addresses the proper assessment of the flood risk implications of the Site Allocations DPD. It is further noted that the key requirements of GB10 include inter alia that "the site is within Flood Zone 1 but features a number of existing drainage channels, meaning there is a risk of flooding. The site is also adjacent to Flood Zones 2 and 3 whilst a principle aquifer is located within the site. Consideration of sustainable drainage and flood attenuation within the landscape are potential options. Early engagement with the Environment Agency is required. Flood Risk from onsite and adjacent ordinary watercourses will need to be assessed and details submitted as part of a Flood Risk Assessment with any planning application."</p> <p>It is not considered that the allocation of GB10 would lead to overdevelopment. The indicative yield for the site has been calculated at an assumed density of 40 dwellings per hectare which is considered suitable for the location. Furthermore, as set out in Section 6, thorough consideration has been given to infrastructure capacity.</p>
<p>Response Reference: U0001270</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06707/1</p>

Name: Mr And Mrs John And Celia Clarke
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Strongly object to building on Green Belt land in Mayford. Mayford is a small, historic village, which has always (since before the Domesday book) been separated from Woking's urban sprawl and concrete jungle by Green Belt land. Development will significantly harm the quiet, rural lifestyle of Mayford. It may lose its identity and its rural character would be drastically changed. The site plays an important role in preventing further urban sprawl, and is a 'green lung'. Removing the site from the Green Belt will expose Egley Road to unlimited development, including housing and a private members' club (approx 5000 members at David Lloyd). Development will increase traffic on Egley Road - the busiest road in Woking supporting up to 30,000 car movements per day - turning it into a huge car park which will trash the village. It could take 45mins to drive to the station to catch a train in rush hour. This will also cause major road, air, noise and light pollution, and be dangerous for thousands of school children (three schools within proximity). A near fatality occurred recently. The Mayford section of the A320 may end up servicing five gyms/leisure centres (Woking Leisure Centre, Sports Box, David Lloyd, Woking Athletics Club with Stadium and Woking Gym Club). The A320 and general infrastructure does not have capacity to accommodate housing and leisure development.
Contributor Proposed Modification: Retain land at GB7 as Green Belt land.
Modification Reference: U0000325
Officer Response: The concerns raised in the representation are comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Section 9 addresses concerns that the public consultation was inadequate; Section 13 addresses concerns about congestion and how detailed transport assessments will be undertaken as part of any planning application to ensure safety of, for example, residents and school users will be maintained; Section 19 responds to concerns about impacts on wildlife; Sections 20 and 21 respond to comments about the Green Belt purposes of land at Egley Road and impacts on Mayford's identity; Section 8 responds to comments about air and noise pollution; Section 6 responds to comments about infrastructure capacity.
Response Reference: U0001756
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06530/1
Name: Mr James Clegg
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Support GB11 (Broadoaks) as a brownfield redevelopment. Oppose GB10 (West Hall). The Duty to Cooperate is not met since too much development is focussed on West Byfleet, rather than shared around. The DPD is unsound due to: - over-development of West Byfleet without it being shared elsewhere - environmental impact - over-strain on local services - removal of Green Belt for future generations Wishes to participate in examination in relation to Duty to Cooperate.

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 5. In terms of volume of housing development, rather than Green Belt loss, the number of dwellings allocated in Woking Town Centre is much greater.</p> <p>The impact of the proposals on the environment is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 4, 7, 8, 13, 19 and 23.</p> <p>The necessity of releasing Green Belt land for housing development is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1. The removal of additional land from the Green Belt and its safeguarding for development after 2027 is intended to avoid the need for further Green Belt loss until at least 2040, and to ensure the enduring permanence of the Green Belt boundary.</p>
Response Reference: U0001708
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06625/2
Name: Mr Michael Collisson
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB12, GB18
<p>Summary of Comment: Object to housing and Traveller site development on the Byfleet and West Byfleet Green Belt.</p> <p>The area cannot sustain this level of development:</p> <p>Parvis Road already frequently suffers traffic gridlock with ensuing health dangers; this must not be allowed to deteriorate.</p> <p>Currently extremely dangerous to cross the road near Tesco to reach the play school and children's recreation area; there are no pedestrian crossings.</p> <p>Services infrastructure as existing is completely inadequate, and will be unable to cope with the proposed volume of additional housing. e.g. there is already frequent surface water flooding around the junctions of Parvis Road / Green Lane and Parvis Road / Brooklands Road, the existing surface water drainage provisions are unable to cope.</p> <p>Facilities such as schools and surgeries are already at saturation point, and will be totally unable to contend with the proposed increases in population.</p> <p>Concerned over Traveller sites.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The impact of the proposals on infrastructure, including education, healthcare and drainage, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The issue of flood risk in relation to the proposals is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>Issues associated with the proposed Traveller pitches are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p>
Response Reference: U0001028

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02635/2
Name: Mr Ronald Colvin
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Support decision to drop sites at Upshot Lane, Pyford, from the DPD. Pleased that WBC has recognised the validity of objections made at Preferred Options stage: The process of identifying Green Belt sites for removal was flawed and the scoring criteria inconsistently applied. The fields contribute significantly to the semi-rural setting and character of Pyrford, and if built upon, the character and setting of the Pyrford Conservation Area would suffer enormously. Traffic through Pyrford is already dangerously high for the narrow roads, and the addition of 500 homes on Upshot Lane would be unsupportable.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06488/1
Name: David Colwell
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Object to proposed Green Belt developments in Byfleet and West Byfleet. There are no exceptional circumstances justifying these Green Belt developments. The proposed sites are a soft option for developers, more use should be made of brownfield sites. The Byfleet area has been proposed for disproportionate volumes of development, including of Traveller pitches. There is no evidence provided to justify these numbers. Infrastructure provision seems not to have been considered: -Health services are already stretched to the limit, and the need for Byfleet residents to drive along the A245 to reach the Health Centre means it takes them longer and they may miss appointments- this will get worse. -Surface water flooding of minor roads has been a major problem in Byfleet for 40 years. This will be worsened by the proposals. They are also on or close to the flood plain, where flood alleviation schemes are planned. - Sewerage only just copes at present, especially around the A245 and Darnell Park. It was never designed to accomodate the proposed increase in housing. - The A245 is continuously busy, and stationary when there is a problem anywhere between Brooklands Road and Sheerwater Road, or a major problem on the M25 or A3. This blights the lives of all road users. No information on potential upgrades.

<p>- Where will children be educated? Should not put all responsibility for this on the county while developers profit. Manor County school has recently been demolished.</p> <p>Site GB5: The road adjacent to this site is already busy and potentially dangerous, with buses and a school entrance nearby. Whatever is done on access will not improve this situation.</p> <p>Site GB4: Potential access to this site from Parvis Road would be opposite Queens Avenue, which is already a difficult junction. Potential access from Stream Close would put traffic past families visiting the Recreation Ground, older residents visiting the day centre, and small children being picked up from activities at the Methodist Church Hall-risk to life.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The exceptional circumstances justifying the release of Green Belt in Byfleet and West Byfleet, and Gypsy and Traveller developments in the Green Belt, are addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1, 2 and 3. The concentration of Green Belt loss in the Byfleet and West Byfleet area is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p> <p>The impact of the proposals on infrastructure, including health services, sewerage and schools, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The impact of the proposals on traffic and highways is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p>
<p>Response Reference: U0001693</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06716/1</p>
<p>Name: Mr And Mrs Colwell</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11, SA1</p>
<p>Summary of Comment: Green Belt should not be developed, unless there are exceptional circumstances. No exceptional circumstances exist and the proposals are a 'soft option'.</p> <p>The Byfleet area has been unfairly targeted with disproportionate amounts of residential development. There is no evidence to validate these numbers.</p> <p>There is a lack of information to show how local infrastructure will cope with the increased population. Health services are already overstretched, the main road (which has to be used to get to the health centre) is the busiest A road in Surrey and there is insufficient and very expensive patient car parking. Concerned about capacity of education services to deal with new families, and the demolition of Manor County school, showing the planning process to be flawed.</p> <p>Surface water drainage and sewerage are already under pressure and problematic, and will be exacerbated by new development.</p> <p>Raises concern about traffic flow and congestion on the A245. Problems on the M25 or A3 result in immediate gridlock in the area, meaning Byfleet becomes a prison. There is no information about how transport infrastructure will be upgraded.</p> <p>Questions why WBC are not making more use of Brownfield Sites.</p>

<p>Travellers Pitches - a necessary evil but why three times as many in Byfleet as in the rest of the Borough?</p> <p>Specifics on GB5: raises access issues based on current narrow access near a sharp bend and school entrance. Development will not improve an already dangerous section of road.</p> <p>Specifics on GB4: raises concern about safe access to the site, which is likely to be up a steep slope up to the M25 bridge close to the Queens Head car park. Alternative access via Stream Close and Rectory Lane would create a hazard for families using the Recreation Ground and older residents visiting St Mary's Day Centre. An exit onto Rectory Lane is on a significant bend and close to a busy mini-roundabout. Extra traffic from development will exacerbate existing issues.</p> <p>There is no justification for 'grabbing local Green Belt' for major development at the detriment of all existing residents.</p>
<p>Contributor Proposed Modification: WBC should make more use of Brownfield Sites</p>
<p>Modification Reference: U0000184</p>
<p>Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1-7, 11, 13. With regard to the specifics for GB4 and GB5 on access, these sites are not allocated for development at the current time, but are safeguarded for future development need and will only be released for development through the plan-making process as part of the review of the Core Strategy and/or the Site Allocations DPD, after 2027. In terms of the detail raised about safe access, the key requirements for any development at these sites, including access, will be developed and set out as part of the review of the Core Strategy and/or the Site Allocations DPD, and will be informed by up to date evidence at the time. However, Surrey County Council as the Highways Authority have been involved and consulted on the sites put forward in the DPD, and have not raised an objection to the safeguarding of these sites with regard to access or other transport issues. Paragraph 6.7 of the Council's Regulation 19 Issues and Matters Topic Paper provides more detail on this.</p>
<p>Response Reference: U0001715</p>
<p>Officer Proposed Modification: This issue has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, section 11. No modifications are required as a result.</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06927/1</p>
<p>Name: Congregation Of St Mary's Church Byfleet</p>
<p>Number of Signatories: 17</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10</p>
<p>Summary of Comment: DPD is unsound and non compliant with Duty to Cooperate. GB5 is not legally compliant. All sites should remain as Green Belt land. Land at GB5 is designated burial ground. Does not wish to participate in oral examination. Wishes to be informed of next stages.</p>
<p>Contributor Proposed Modification: All sites should remain as Green Belt land.</p>
<p>Modification Reference: U0000407</p>
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding release of Green Belt land. Section 9, paragraph 9.2 addresses the issue regarding Duty to Cooperate. Section 15 addresses the issue regarding the burial ground in GB5. Issues regarding soundness and legal compliance are addressed throughout the Topic Paper.</p>

Response Reference: U0001313
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06640/1
Name: Mrs Charlotte Cook
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is not sound; in particular, not justified, because: Greenbelt Land: the site is a concrete aggregated safeguarded site as well as allocated Greenbelt Land. Traffic Issues: Parvis Road cannot sustain even further traffic. It is congested terribly already at peak times. Noise and Air Pollution: This has not been properly considered. Infrastructure: schooling and healthcare have not been adequately considered. Traveller pitches: the site would not have safe access and adequate turning and parking areas.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The issue of concrete aggregate safeguarding on site GB10 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 17. The traffic implications of the proposal are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The pollution implications of the proposal are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The implications of the proposal for schooling, healthcare and other infrastructure are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The proposed allocation includes key requirements on parking, access and transportation improvements to accompany development, which would ensure safe access and adequate turning and parking for Traveller pitches as for other housing.
Response Reference: U0000958
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02051/2
Name: Mr Michael Cooke
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB09
Summary of Comment: In most cases the DPD complies with NPPF para 136 regarding changes to Green Belt boundaries. Site GB9 and former parcel '20g' (land to the north of GB9) should be retained in the green belt; their removal from it does not comply with NPPF para 136. The removal of GB9 from the Green Belt was originally justified as creating a strong defensible Green Belt boundary. That was when land north of Saunders Lane was also proposed for removal from the Green Belt. Now it has been decided (correctly, owing to its landscape importance) that land north of Saunders Lane will stay in the Green Belt, there

is no need to remove site GB9 from the Green Belt. The decision to leave land north of Saunders Lane in the Green Belt has not been followed by a review of what to do with the other sites close by.

Site GB9 is proposed for green infrastructure- a use which is by its nature not inappropriate in the Green Belt. Unlike with proposed housing sites, there is therefore no justification for removing this land from the Green Belt, and the proposal to do so is unsound.

The only reference to site '20g' in the DOD is a statement that it adjoins site GB9 and will become part of the Urban Area. There is no evidence or justification for this designation as part of the Urban Area, especially since most of the site is only suitable for Green Infrastructure uses (as stated in the Green Belt Review) which is not inappropriate in the Green Belt.

Since the proposal to remove land north of Saunders Lane from the Green Belt has been scrapped because of its recognised status as 'rising ground of landscape significance', the same approach should be taken to sites GB9 and 20g, which are arguably just as important. This would produce a defined, continuous Green Belt corridor along the Hook Heath escarpment, thus achieving a defensible Green Belt over the long term.

GB9 and 20g are not mentioned in policy SA1. They should have been if the Council had a strategic plan for them; too late now to produce such a plan as it would not have been consulted on. Therefore the sites should remain in the Green Belt.

Retaining GB9 and 20g in the Green Belt would have no impact on the availability of land for housing, which was the original justification for a Green Belt review.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Site GB9 and land to its north are excluded from the Green Belt to ensure a strong, defensible Green Belt boundary, that endures beyond the plan period. This approach is consistent with national policy. The new boundary on Hook Heath Lane is considered to provide a much more defensible boundary than the existing one, some of which appears not to follow any features on the ground. In addition the allocation of site GB7 for development will leave the area surrounded by the urban area on three sides. It is acknowledged that green infrastructure is a use compatible with the Green Belt. This does not affect the principle of revising the boundary here, since the principal purpose of this is to produce a more defensible Green Belt boundary, as well as specifically to deliver green infrastructure.

Given that the site is proposed for safeguarding rather than allocation, it is to be expected that there is no current evidence for precise Green Infrastructure needs to support the site's development for that use. Proposals for green infrastructure on the site will be set out as part of the plan review after 2027, to be informed by up-to-date evidence at the time. Further justification for safeguarding can be found in section 2 of the Council's Regulation 19 Issues and Matters Topic Paper.

Agree that an area of land north of site GB9 and south of Allen House Park (known as 'Parcel 20g') needs more detailed treatment in the DPD. Officers are proposing a modification to provide further protection from development to Parcel 20g within the plan period. This modification will extend site GB9 northwards to include this parcel, to make it part of the safeguarded land. This means that while it will be released from the Green Belt upon adoption of the plan, it will not be released for any form of development until 2027, through a review of the Core Strategy and/or the Site Allocations DPD. This parcel includes residential properties and for this reason a distinction will be made, using a hatched area on the site plan, to show that this area is not intended for green infrastructure. Until 2027 development at any part of the site will have to comply with the Green Belt policies in the development plan. A specific policy and key requirements to guide development of the site, noting the distinction in the amended proposed hatched

<p>area (parcel 20g) will be developed and determined as part of the review of the Core Strategy and/or the Site Allocations DPD.</p> <p>Policy GB9 safeguards the site for future use as green infrastructure. The supporting text makes clear that the site is situated at a high point of the Escarpment and Rising Ground of Landscape Importance, and is unsuitable for built development. Trees are safeguarded by a Tree Preservation Order.</p> <p>Policy SA1 relates to sites being released for the green belt for the purposes of current or future housing (including Gypsy and Traveller) development. As well as excluding site GB9 it also excludes site GB18, which is likewise proposed to be removed from the Green Belt to rationalise the boundary (as recommended by the Green Belt Boundary Review), but will remain in green infrastructure use.</p>
<p>Response Reference: U0001389</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 04463/1</p>
<p>Name: Mr Richard Cooke</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB07, GB08</p>
<p>Summary of Comment: Objects to the proposed removal of further Green Belt in Mayford. Understand the new school being enough of a special case to justify the loss of green space in Mayford Village, however, unhappy about the proposed housing and leisure facilities that are being suggested. Particularly concerned about the merging of Mayford into Woking.</p> <p>Loss of Trees at the bottom of Hook Hill Lane will cause a loss of wildlife habitat and will allow views across to the floodlights of the new leisure centre and tennis club.</p> <p>Request WBC to consider the Mayford residents feelings, especially those in Hook Hill Lane, when deciding the future of Mayford's Green Belt.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Objection noted.</p> <p>Site GB9 adjacent to Hook Hill Lane is not allocated for development but is allocated for green infrastructure and its key requirements will be determined as part of the review of the Core Strategy. The safeguarding of the site for Green Infrastructure will also help ensure that there is a defensible Green Belt boundary that will have enduring permanence.</p> <p>The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.</p>

In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess any site specific ecological issues. The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. The representation regarding Mayford Green Belt, Mayford character and merging have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21.
Response Reference: U0001185
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06655/1
Name: Ms Caroline Coomber
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Object to proposals for Green Belt development. Byfleet and West Byfleet's Green Belt should be protected- it is an important part of our Green Belt, the proposals would ruin our beautiful countryside. There would be too much pressure on the over subscribed local schools and healthcare There is already a huge amount of traffic in the area, the proposals would make this worse, increasing noise and air pollution.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of Green Belt loss in Byfleet/West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 4 and 5. The impact of the proposals on local infrastructure, including education and healthcare facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.
Response Reference: U0001140
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06605/1
Name: Ms Mandy Cooper
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Objects to the use of greenbelt land for the development of travellers pitches.
Contributor Proposed Modification: None Stated

Modification Reference: NOMODS
Officer Response: Section 3 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for the development of traveller accommodation.
Response Reference: U0001609
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06587/1
Name: Coplan Estates
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA06
<p>Summary of Comment: DPD is legally compliant, sound and complies with Duty to Cooperate. Wishes to participate at the oral examination.</p> <p>This is a major site and an essential component of the SADPD and the ability of Woking Town Centre to achieve the level of growth and development envisaged in the development plan. The development of the site and criteria to which it should comply are critical to the effectiveness of the plan, as the developer responsible for delivering the policy outcomes, attendance is important.</p> <p>Coplan Estates are the Council's development partner and are responsible for the delivery of development within the site identified in the policy, which is referred to as Woking Gateway.</p> <p>Fully supportive of the allocation of the land in UA6, and a planning application is being prepared. Some concerns regarding the drafting of the policy, these should be treated as detailed objections.</p> <p>In general terms, the policy is sound, however parts of the policy detail are not soundly based and do not comply with the requirements of the NPPF or Development Plan. This regards whether the DPD is as positive as it should be in relation to Town Centre development opportunities. The DPD should be corrected to be compliant with national policy to ensure optimum use of Town Centre land and achievement of mixed use development that is both positive and viable.</p> <p>Principal concern of UA6 policy is the lack of acknowledgement of the development scale, in terms of quantum and suitability as a sustainable location for tall buildings. The scheme which was considered the most appropriate for the site consists of three tall buildings, and is going through pre-app at present.</p> <p>Relevant background of proposed development: Woking Gateway is the next major regeneration project promoted by WBC and follows the Victoria Square development. The proposal reflects the scheme selected by the WBC through the bid process which led to the selection of the Council's development partner. The proposal will evolve further through the pre-app and design review process. However, the indicative proposal consists of three towers rising to 22, 28 and 39 storeys to provide residential apartments, together with retail, professional services and cafe/restaurant use, flexible commercial use, community use, public and private amenity space, gardens, car and cycle parking, servicing, landscaping and public realm improvements.</p> <p>DPD identifies the site as a development opportunity for mixed use development to comprise residential including affordable housing, retail and offices subject to a number of proposed criteria.</p> <p>The site is the most central of opportunity sites, and is sustainable and accessible in terms of rail, bus and pedestrian and cycle movement with access to Town Centre services and leisure facilities. The development would accord to both national and local policy, in</p>

relation to situating high density development close to major transport nodes within town centres.

The site forms a distinct and legible urban block, which provides clear circulation all-round. The existing buildings are of no particular merit, though those fronting Chapel Street are within the conservation area. Though, now the site is seen more in the context of larger surrounding development.

Proposals reflect and respect the existing street pattern, with new public realm and widening of Chapel Street to establish a more legible link between Commercial Way and the train station. This aims to be a key part of the development, linking the new commercial hub of Woking, which in policy aims to drive a more vibrant centre with increased activity and footfall.

The urban area of Woking and the Town Centre is the focus for growth of residential and commercial development within the borough. Policy requires the optimum use of land with highly accessible locations such as UA6. There is a need to increase footfall and resident population of town centres in order to support their future viability. It is important to encourage a diverse range of retail, leisure and services.

The most successful strategy for the development consisted of three stepping towers in triangular forms. This creates an interesting skyline that responds positively to surrounding developments and cityscape. The tallest tower enhances the "gateway" aspects of the development and acts as a 'flatiron' marker between Commercial way and the High Street. The other two towers will be situated on the west and east corners of the site, which will allow light to pass through commercial way and the podium level green space. The proposals conform to the emerging cluster of tall buildings in the area. The policy should provide for development that will form a central part of the cluster within the very centre of Woking. In townscape terms, the site is the right place for tall slender buildings to help complete this part of the skyline. The strategic location linking the station with the Town Centre and Victoria Square is key. The group of proposed buildings will vary in height to avoid a 'flat top' approach and enhance the character of the skyline. There is potential for tall buildings in the site, as this will be consistent with the adjacent Victoria Square development and the emerging cluster of tall buildings in the area.

Regarding heritage and conservation, the proposals take into account design and conservation constraints and opportunities, with consideration given to the wider townscape and short and long distance views. There are no listed buildings within the site, however there are some relatively nearby, though these will not be negatively impacted. The site includes a section of the Woking Town Centre Conservation Area, which consists of the properties fronting Chapel Street, though these are not of any local architectural or historical merit. The buildings present in the conservation area are of the late Victorian and Edwardian era, many of which have been significantly altered. Much of the town has redeveloped in the form of modern larger scale development, some of which lacks cohesion and interaction. The buildings in the site which sit within the conservation area are somewhat divorced from the rest of the area, and add little to its overall cohesion. The Character Study considers the nature of the Town Centre and simply notes the presence of differing styles and seeks to increase greenery in the Centre. UA6 is allocated for redevelopment and there is a requirement to regard the need to protect character, grain and appearance of the Conservation Area. There is also a requirement for good design quality that enhances the overall character and appearance of the Town Centre, and delivering regeneration through identified sites including Victoria Square. The regeneration priorities justify the loss of the buildings in the site which are situated in the conservation area.

The development will deliver around 500 residential dwellings, which will vary in size and target the appropriate demographic for town centre living. The development will deliver approximately 1880m² of retail, café/restaurant use and 163m² of community use. In addition there is provision for around 1867m² of commercial uses. There will be significant challenges in delivering affordable housing, however an appropriate viability

assessment will be undertaken once key components of the scheme are fixed and costs and values can be attributed.

The development will enhance public realm and integrate with Victoria Square and Commercial Way, widening Chapel Street to create attractive pedestrianised routes. Details of materials and finishes are to be agreed. An accessible green space will be introduced into the centre of Woking both in the form of a podium level garden and through the introduction of street trees. The development will feature shared private and private amenity space for residents.

There is a policy requirement to retain existing mature trees, however this is a generic policy and there are no mature trees on the site, therefore it should be deleted. The provision of new green space which may include trees, is provided for within the criteria requiring a detailed landscape scheme.

Provision has been made for 94 parking spaces. The younger resident demographic, which the scheme targets, tend to have lower levels of car ownership and use more sustainable forms of transport such as rail, cycling and buses, which are all provided for. The building will accord with the latest fire regulations and good practice to ensure a safe living and working environment.

Materials will be selected that deliver a high quality of finish consistent with the quality of the scheme. The pallet of materials will be discussed and agreed as part of the pre-application process to reflect the scheme vision set out within the pre-application pack and bid process.

Wishes to be informed of next stages.

Contributor Proposed Modification: Proposed Revised UA6:

This 0.45 ha site is allocated for high density, mixed use development to comprise of residential use including affordable housing, retail (A1), leisure (A3, D1, D2) and offices (B1) uses.

The site is considered suitable in principle for tall buildings, which make efficient use of the site's sustainable location, subject to their detailed design being of a high quality and appropriate to the emerging character of the Town Centre.

Contribution towards Affordable Housing provision in accordance with Policy CS12: Affordable Housing of the Core Strategy, in this case 40% to be provided on site subject to financial viability.

Appropriate and adequate provision of car and cycle parking that has regard to the adopted car and cycle parking standards and that takes into account the sites sustainable location and will not compromise on highway safety.

Building heights should consider the local and wider emerging Town Centre context whilst ensuring there are no adverse environmental effects in terms of micro-climate, wind, overshadowing and glare.

Design of development to protect and enhance the Conservation Area, listed buildings in the vicinity and their setting and to balance this with the overall enhancement in the character, quality and function of the town centre.

Building footprints should be of an appropriate scale to reflect the aims of regeneration and traditional street pattern.

Density of development should maximise the efficient use of the site and should contribute positively to regeneration and the emerging character of the town centre.

The surface water drainage strategy submitted to support the redevelopment of the site should aim where reasonably practicable and viable to be reduced to the pre development greenfield runoff rate, due to the existing surface water flooding incidents recorded within the area.

Existing office floorspace to be re-provided and new provision should seek to address the needs of small businesses where this is both financially viable and appropriate.

Any other site specific and other requirements will be determined on a case by case basis depending on the nature of the scheme that comes forward.

The following requirement should be deleted:

The development should retain any trees of amenity value.

Modification Reference: U0000359

Officer Response: In principle support for the allocation of land at 2-24 Commercial Way and 13-28 High Street (policy UA6) is noted.

Planning legislation requires development to be determined in accordance with the development plan for the area, unless other material considerations demonstrate otherwise. The policy wording of UA6 and its key requirements set out to make development acceptable and are necessary to ensure a policy compliant scheme. The majority of suggested modifications to the key requirements are not, therefore, considered necessary. It will be up to the applicant at the development management stage to demonstrate why the policy requirements should be set aside for any scheme that comes forward.

It is recognised that the town centre has undergone change, but the main context for the Site Allocations DPD continues to be the strategic policies of the Core Strategy, including those on Woking Town Centre (CS2), housing provision and distribution (CS10) and design (CS24). The anticipated capacity for the site is indicative and has been calculated using a consistent methodology. The Core Strategy is clear to emphasise that actual capacity can only be confirmed when an acceptable scheme is considered through the development management process. The proposed uses of Policy UA6 are necessary to help deliver the requirements of the Core Strategy, and as such the Council would expect a policy-compliant scheme on the site. At this stage, the level of prescription of the proposed uses by the representation is unacceptable given that the site has not got the benefit of planning permission. The policies of the Development Plan allow scope for the applicant to demonstrate appropriate uses for the site, such as leisure uses, at development management stage, and why any particular policy requirements should be set aside for any scheme that comes forward. The Council accepts that the key requirement regarding addressing the needs of small businesses should be amended to read: seek to address the employment needs of the borough.

The reasoned justification of policy UA6 states that there would be scope to provide higher density development, including retail development, at this 'gateway' site. Although the UA6 policy itself does not state that a high density scheme including tall buildings is desired for the site, there is in principle support for such schemes by policy CS1 of the Core Strategy if it is appropriate for the context and is of high quality design. The Core Strategy identifies the Town Centre as a location where tall buildings can be delivered, and this will be encouraged, provided that developments of this nature enhance the setting and are not detrimental to the character and appearance of nearby areas. It is stressed that gateway developments do not necessarily have to be tall buildings, similarly high density development does not always have to be tall buildings. Gateway developments are well designed developments that are exemplar within their surrounding contexts, stating the significance of their locations. The Council considers that there is sufficient in principle support for such schemes if they are appropriate for the context and are of high quality design - in line with policy CS21. The emergence of a surrounding cluster of tall buildings - as referenced in the representation - is evidence that higher density schemes will be supported if appropriate in the absence of Site Allocations DPD policies which explicitly support such schemes. The Core Strategy is clear to emphasise that actual capacity of a site can only be confirmed when an acceptable scheme is considered through the development management process.

Policy CS12 of the Core Strategy sets out the Council's affordable housing policy. This makes it clear that all new residential development on sites providing 15 or more dwellings, or on sites of over 0.5ha, will be required to provide 40% of the dwellings as affordable housing. Policy CS12 allows scope for an applicant to make a case based on evidence of viability if it is felt that the development is unique to the extent that the requirements of Policy CS12 cannot be met. However, this can only be determined at the development management stage based on the specific merits of the scheme that would come forward for determination.

<p>Clarity on the requirement for protection and enhancement of heritage assets is already set out in policies CS20 of the Core Strategy and DM20 of the Development Management Policies DPD. Policy CS20 sets out in-principle support for the protection and enhancement of heritage assets, and it will be for the applicant to demonstrate any exceptional circumstances where the Council should consider the total or partial destruction of a heritage asset, and the supporting information required with any planning application (as per DM20). This is supported by guidance in supplementary planning documents. It is not necessary to provide further clarity within policy UA4: the Council is satisfied that the key requirements regarding heritage assets should remain as they are. Suggestions made for minor editorial amendments to the policy will be taken into account at a later stage of DPD preparation.</p>
<p>Response Reference: U0001775</p>
<p>Officer Proposed Modification: Amend penultimate key requirement to read: "Existing office floorspace to be re-provided and new provision should seek to address the employment needs of the Borough". In line with proposed modifications to policy UA4, amend and merge first two key requirements of policy UA6 to read: "Development to take account of other existing developments in the vicinity of the site, including the Victoria Square Development, and avoid compromising the future development of allocated sites in the surrounding area". Reasoned justification text to be modified to reflect this change: merge fourth and fifth paragraphs to read: "The development of the site would have a regenerative effect in its vicinity and contribute significantly towards the continuous enhancement of the Town Centre. In order to achieve this, it is important that the development takes account of other existing developments in the vicinity of the site and avoids compromising the future development of nearby allocated sites, to ensure effective integration and sustainable development of the entire area and to maximise the benefits of developing this prominent area of the Town Centre".</p>
<p>Wishes to Attend Examination (T = Tick): T</p>
<p>Contributor Reference: 06810/2</p>
<p>Name: Mr Andy Cornwell</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05</p>
<p>Summary of Comment: Object to release of the majority of the remaining Green Belt in Byfleet for housing development/ Travellers site. Will put unmanageable pressure on the already stretched resources and infrastructure in the village. Green Belt should be protected, not destroyed.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The reasoning for the proposed release of Green Belt in Byfleet to meet future development needs is addressed by the Regulation 19 Issues and Matters Topic Paper, see sections 1, 2 and 3. The concentration of Green Belt loss in Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see section 5. The impact of the proposals on local infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see section 6.</p>
<p>Response Reference: U0001550</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

Contributor Reference: 06874/1
Name: Ms C Cornwell
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: The DPD is unsound, not positively prepared, justified, effective, or consistent with national policy. Objects to site GB10:</p> <p>Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces.</p> <p>The site is covered by a minerals allocation (concrete aggregate safeguarding), in a minerals plan running to 2026. This will make the site unattractive to developers, so its deliverability is questioned.</p> <p>The site performs the Green Belt functions of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment.</p> <p>Residents would be car reliant: the site is over 1km from West Byfleet railway station with significant upgrading needed to the route. There is a lack of public transport.</p> <p>Question the ability of the heavily congested Parvis Road to cope with additional traffic.</p> <p>Extremely close to the A245 and M25, so at risk of air and noise pollution, very difficult to mitigate against- contrary to NPPF para 170(e). No proper consideration of noise pollution.</p> <p>The Infrastructure Report does not address provision of healthcare and does not adequately address education for the increased population. Medical practices and schools are already under strain.</p> <p>The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk.</p> <p>Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.</p> <p>Inadequate reasons given for excluding Martyrs Lane Green Belt.</p> <p>The quantity of housing proposed is unnecessary over-development.</p> <p>Inadequate consideration of alternative sites, in particular PDL in sustainable locations.</p> <p>The Broadoaks and Sheer House developments will exacerbate a number of these issues.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The relationship of the SADPD to the West Byfleet Neighbourhood Development Plan is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16.</p> <p>The issue of the mineral safeguarding site on Site GB10 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 17.</p> <p>The impact of the proposals on urban sprawl are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 21. The Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that sufficient exceptional circumstances justification exists for the release of site GB10 from the Green Belt, based on its high potential to deliver sustainable development. A significant green gap will be retained between site GB10 and the motorway, with public access to this area enhanced by the creation of the Byfleet</p>

SANG and possibly off-site green infrastructure provided as part of the development of GB10, and the majority of the Green Belt on the west side of Byfleet will also be retained. It is true that only part of the site is within standard walking distance of West Byfleet District Centre and the station. However this level of proximity to services is still better than that for most other sites considered through the Green Belt Boundary Review. In addition, only slightly over half the total area of the site is considered to be developable, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is likely to limit development on the areas of the site furthest from the District Centre. The key requirements in policy GB10 include to 'improve sustainable transport infrastructure including pedestrian and cycle links and bus services to West Byfleet District Centre'. It is therefore not considered that the residents would be car reliant.

The impact of the proposals on traffic are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.

Issues of air and noise pollution in relation to the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.

The impact of the proposals on infrastructure, including education and healthcare facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.

The issue of flooding in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.

The necessity for allocating Traveller pitches in the Green Belt, and detailed issues relating to the development of those sites, are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.

The reasons for excluding the Martyrs Lane site are addressed by the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11.

The concentration of housing in Byfleet and West Byfleet is addressed in Section 5 of the Topic Paper. If the statement relates to the density of development on individual sites, the proposed anticipated densities are reasonable and are broadly in line with the Core Strategy, based on ranges provided in policy CS10. Actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage.

The consideration of alternative sites including PDL is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 11.

The Broadoaks and Sheer House developments were included in the traffic mitigation evidence base, and also provided to inform the planning of infrastructure providers.

Response Reference: U0001470

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06828/1

Name: Mr Aidan Corrigan

Number of Signatories: 1

Comment Type: OBJ

Site Reference: SA1

Summary of Comment: Concerned over proposed permanent Traveller pitches in Byfleet and West Byfleet.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Issues associated with the DPD proposals for Traveller pitches are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.

Response Reference: U0001594

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06863/1
Name: Mr Peter Coulter
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB18
Summary of Comment: The Plan is unsound. Strongly objects to removal of land from Green Belt in the Byfleets for more than 1000 homes. Site GB10 should be removed, and alternative brownfield land used. Development here would lead to over 1400 cars on the roads leading to further traffic congestion, especially as local amenities are not within walking distance. The proposed mitigation measures do not address current congestion issues, let alone future increases. Schools and health facilities are severely oversubscribed and overcrowded. There needs to be substantial investment in new resources to accommodate growth. The IDP does not adequately address infrastructure needs. Does not agree Traveller sites should be included at West Hall or Murrays Lane. Green Belt land should be protected for local community health and wellbeing, and other wildlife.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The concerns raised have been responded to in the Regulation 19 Issues and Matters Topic Paper, in sections 1, 2, 3, 4, 5, 6, 11, and 13.
Response Reference: U0001791
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06813/2
Name: Sally Coulter
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB18
Summary of Comment: Objects to 930 homes planned for the Byfleets, particularly on Green Belt land adjacent to M25. The area is already overcrowded, polluted and congested, and prone to flooding. Area adjacent to M25 is vulnerable to noise and traffic pollution. Loss of Green Belt is irreversible and would be shortsighted. Infrastructure such as Parvis Road, railways, schools and doctor surgeries is overcrowded. The sites are not near to shops or amenities and development would contribute to traffic. Residents would suffer health problems, exacerbated by loss of trees. Will prevent widening of M25 and passage of high speed railway.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The concerns raised are addressed in the Regulation 19 Issues and Matters Topic Paper, in sections 1, 2, 3, 4, 5, 6, 7, 8, and 13.
Response Reference: U0001790
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04106/1
Name: Miss J S Cowan
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
<p>Summary of Comment: Objects to GB7 The release of nursery land adjacent to Egley Road</p> <p>legal : proposal does not meet special circumstances used for previous green belt building. Removing green belt status to build housing and a David Lloyd gym adjacent to the just built Woking Sportsbox. Mayford Village is already very well equipped with sports facilities</p> <p>ethics : What existing agreement is in place between Woking council and the landowner regarding green belt development? Council members have repeatedly been asked this question - their continued silence does not explain it</p> <p>site access : proposed site is land locked with no access points. The roads and Rail bridges in the immediate vicinity are unfit for more traffic. Two of the roads have single alternate line bridges within a few hundred metres of the land, and the third, the main A320 is extremely busy, with the Hoe Valley School only half full - pupils have already been involved in serious traffic accidents in the first term of opening</p> <p>incorrect planning documentation: site plans should reflect the current state development. In the council meeting when this was discussed a map failed to show the school and in that way deliberately mislead all those unfamiliar with the site.</p> <p>Request that the Council fully engage with the residents of Mayford who are directly impacted by your proposed greenbelt development.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Objection noted.</p> <p>The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>The application for the Hoe Valley school and associated sports facilities at Egley Road were considered as part of the Development Management process, having regard to the Borough's statutory development plan at the time of the application (in 2015). This part of the site has been implemented and the school opened in September 2018. On balance, the merits of the proposal and need for a school and sports facilities were among a number of considerations that demonstrated very special circumstances for development in this Green Belt location. Following approval by the Council, the application was referred to the Secretary of State for consideration, but was not called in, meaning the Secretary of State did not consider it necessary to determine the application for the Council.</p> <p>These sports facilities will serve not only Mayford but the whole of the Borough.</p> <p>There are no legal agreements with land owners of the Green Belt sites. The Green Belt sites are justified by robust evidence, including on the availability of the sites for development when required</p> <p>Actual access can only be determined through the Development Management process. The Council is satisfied all the sites identified could have suitable access. Surrey County Council is confident that while development will have adverse impacts on these main routes they can be satisfactorily mitigated against. Section 13 of the Topic Paper goes into more detail about congestion.</p> <p>In regards to the site plan, the DPD has an up to date Site Plan showing the school, however the aerial photo and the proposal map does not and this shall be amended. The Council is satisfied that it has done what it can within the available resources to engage with the community. Please see Section 9 of the Topic Paper for further information on the Regulation 19 consultation.</p>

Response Reference: U0001269
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 01536/2
Name: Ms Lynn Cozens
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB12
<p>Summary of Comment: Inadequate research regarding land ownership - During the drafting of the DPD, it appears WBC did not carry out adequate research into land ownership and land registry purpose of site GB5 and incorrectly stated that the plot was all owned by a land developer. The document has therefore been prepared without knowledge or reference to the fact that 1/3rd of GB5 is owned by St Mary's church, having been bequeathed to the Church as an extension to the adjacent grave yard. It is registered as burial land with the Land Registry, with burial rights granted on it into perpetuity.</p> <p>Due to the existing road layout of this area it may be that safe access to the other 2/3rds of site GB5 can only be obtained by building a road on this church land. This would mean a forced acquisition on this bequeathed land. If houses can not be built on GB5 without causing harm to bequeathed burial land then this site is not appropriate for development.</p> <p>Contradictions in recommendations and Infrastructure Document</p> <p>In WBC's supporting Infrastructure Document (page 9 under Cemeteries) it states maximise capacity within existing facilities to meet growth.</p> <p>If the church owned land within GB5 is prevented from being used as burial ground (as detailed above) then this directly contradicts with the Infrastructure recommendations and leaves the area without sufficient, longer term burial facilities.</p> <p>The Eastern area of Woking Borough, where GB5 is located has very limited burial facilities. There are no burial facilities in the neighbouring villages of West Byfleet, New Haw or Pyrford. The church yard at St Mary's therefore serves a wide area incorporating Byfleet, West Byfleet, New Haw, Pyrford and also St George's Hill.</p> <p>To reduce burial capacity and remove existing burial land directly contradicts the objective of maximising capacity within existing facilities as stated in the Infrastructure document and leaves the area without sufficient, longer term burial facilities.</p> <p>Inadequate consideration of land flooding</p> <p>GB4- is subject to flooding as are the areas both North and South of this location. Photo evidence of regular periodic flooding of this entire area within the inside of the M25 has been provided to WBC. Development of this area will lead to additional flood issues and the increase of flood risk to neighbouring existing properties.</p> <p>GB5- is also part flood zone. Development of this area will lead to additional flood issues and the increase of flood risk to neighbouring existing properties.</p> <p>The Byfleet SANG area- is subject to extensive and frequent flooding. It is not suitable as a SANG as residents will have severely compromised use of this area in Autumn, Winter and Spring. Wooden walkways are not sufficient to offset this.</p> <p>GB10 is also an area subject to frequent and severe flooding.</p> <p>Adequate assessments regarding flooding in Byfleet from both river and surface water have not been carried out as WBC's claims that flooding is not an issue in this area are not supported by the contradictory photo evidence below.</p> <p>Map showing flood areas on the inside of the M25 in Byfleet.</p> <p>Blue - Byfleet Football Club Purple - Byfleet Cricket Club</p>

Green - GB4 Land behind the Queen's Head/Parvis Road, Byfleet

Red - Winern Glebe Allotments

Christmas 2013 and New Year 2014 was a significant flood year.

February 2016 (the GB 4 photo) was a normal winter with no significant flooding. GB4 shows an ordinary winter/spring flood area situation for this area of Byfleet.

It is not appropriate to plan houses in known flood areas and the building of houses that would be subject to flooding or would cause flooding in other areas to worsen, would be against planning policy.

Climate change factors which could worsen flooding in these areas should also be factored into the plans but the DPD does not appear to have done so.

Unsuitable Access to site GB4

Site GB4 is alongside the A245. The natural access point to this land from this road would be at the base of a bridge over the M25. This would not be safe as drivers would not have sufficient visibility of traffic already on the bridge. There is no existing road access here so a new road would be required through the Recreation Ground and children's play area. This would cause further reduction to the amount of green space available to Byfleet residents and further building on green belt land which is not specifically detailed in this report.

Inadequate reasons for excluding Martyrs Lane greenbelt

Inadequate consideration has been given to including Martyrs Lane Greenbelt. This much larger area of land which includes areas of developed greenbelt could be available for some housing or traveller sites. The reasons for its removal as a site for consideration are insufficient to support that decision. The same reasons for this land's removal from the Plan could also equally be applied to GB4, GB5 and GB10.

Inadequate reasons for excluding Pyrford greenbelt

The reasons for the removal of the Pyrford greenbelt sites from this plan are also inadequate. Again the same criteria that resulted in their removal from the draft plan could equally be applied to GB4, GB5 and GB10.

Pollution assessments

The pollution sensors on the A245 showed the highest pollution readings in Woking. In 2016 the sensor was repositioned to a location away from the A245 which resulted in lower readings.

These lower readings are however, misleading and give an inaccurate picture of true pollution levels in Byfleet and West Byfleet on the A245. Increased traffic numbers will further impact on the pollution levels. Developments at GB4, GB5 and GB10 will all increase traffic and therefore pollution levels on the A245.

No proper consideration has been given to noise pollution for locations GB4 and GB5 which sit alongside the M25.

Office of National Statistics Housing Numbers

It is expected that the previously stated housing requirement numbers will be reduced by Central Government. The DPD does not take this expected change into consideration and therefore is using inaccurate housing targets.

As a precedence neighbouring council Guildford has already requested a reduction to their housing target be incorporated into their DPD due to the expected change in housing requirement predictions.

Unexplained Omission of a number of sites under construction and/or delivered

A number of development projects that have already been delivered or are under construction appear to have been removed from the housing provision figures within this version of the DPD. These include:

UA4 - King's Court and Thomsen House, Church Street

UA9 - The Victoria Square development, Church Street West

UA22 - 73 Horsell Moor

UA44 - Former St Dunstan's Church, White Rose Lane.

It seems inappropriate for these developments to be omitted when they are providing houses within the stated plan period. The Victoria Square project in particular is providing

a high number of residences and these should be included within the overall housing numbers.

Inadequate infrastructure provisions

The infrastructure report, although lengthy, is lacking in even basic detail. The villages of Byfleet and West Byfleet are recommended for an increase of 800+ houses within a small geographical area. The provision and consideration given for infrastructure to support an increase of this size to the population of the 2 villages is wholly inadequate. For example: Traffic - The A245 is already heavily congested. The traffic flow improvements suggested are minimal and are very unlikely to be even moderately successful in improving traffic flow for even the current traffic volume let alone 1500+ additional cars. The only entry and exit points for Byfleet (only 3 in total) are all on to the A245.

Healthcare services for Walk in Centres and GP surgeries is already overstretched with 1 GP location in West Byfleet serving both villages as well as further neighbouring villages. The nearby Weybridge Walk In Centre was lost in a fire and has not been replaced, further stretching the services of other Walk In Centres.

The infrastructure report completely fails to address how and where adequate healthcare could be provided for an increased population.

The infrastructure report fails to make proper recommendations for school place provision. Both West Byfleet School and St Mary's School in Byfleet have already undergone expansion which required the construction of additional school buildings within their grounds. Byfleet Primary school is regarded as having insufficient space for any further building or classes as they are located on a small land area.

Overdevelopment, This report will increase the housing number in a relatively small geographical area by approximately 1,000 houses. This is a very high concentration in one small area which will result in over development.

WBC has stated that there are 5000 planned houses over the next 10 years. This is a surplus of 2000 to the number required even before a likely reduction in housing need is announced. This housing quantity is unnecessary, excessive and is overdevelopment. If housing need is already met or in fact exceeded there is no justifiable reason or exceptional circumstance to release any greenbelt for development.

It would also be more appropriate for housing requirements to be more equally spread throughout the whole of the Borough of Woking in order for it to be sustainable and for the infrastructure needs to be more adequately met.

Exceeding the required plan term. The DPD is required to make recommendations up to 2027. Any recommendations past this date, or specific allocation of greenbelt land for later development is therefore unnecessary. GB4 and GB5 are therefore not needed to be included within the report.

Predicting need and making recommendations beyond a 10 year span leaves recommendations subject to, too high a degree of change and inaccuracy. Inaccurate predictions will lead to unsuitable, unsustainable recommendations.

Inadequate consideration given to alternative sites. WBC commissioned an externally prepared report specifically designed to identify greenbelt land for development. No such report has been commissioned to identify brownfield sites. Therefore equivalent or adequate consideration has not been given to suitable alternatives. It is likely that WBC's knowledge of suitable brownfield locations is also lacking and professional external assessment should have been sought.

Insufficient Consideration to Potential Future National Transport Infrastructure Projects Alongside the M25. At regular intervals National Transport Rail Infrastructure projects have been suggested for the M25 area which would directly impact upon GB4, GB5 and the Byfleet SANG area.

In particular, suggestions for a rail link from Gatwick to Heathrow and also a circular rail line around the M25 have all been previously intermittently considered. This report was prepared without any consideration to the fact GB4 and GB5 plus the Byfleet SANG area were all potential sites for HS4 Air. This National Transport infrastructure project and the

compromising impact these proposals from WBC would have had on this were completely omitted from this document and from WBC's assessments.

HS4 Air route map. Red route incorporated GB4, GB5 and Byfleet SANG. Even if HS4 Air does not go ahead in this proposed form, this area of the M25 has regularly been included in other possible potential transport infrastructure proposals and this should be taken into account when assessing the sustainability of development in the GB4 and GB5 areas and the Byfleet area of SANG.

A rail link from Heathrow to Gatwick still remains a possibility for the future as well as the possibility of a future rail line around the circumference of the M25. These could be important longer term National Transport projects which could be compromised by housing developments in the GB4 and GB5 area. The Byfleet SANG could also be compromised. Houses should not be planned on land where known National infrastructure projects are periodically considered and are a future possibility. Houses here may well not be sustainable

No consideration has been given to possible future widening of the M25. GB4, GB5 and the Byfleet area of SANG run alongside one of the busiest stretches of the M25. No allowance has been made for potential motorway widening at a future date.

Inaccurate Statements regarding the greenbelt function of GB4, GB5 and GB10. The DPD states the selected greenbelt is not performing a greenbelt function.

The purposes of the greenbelt

-To check the unrestricted urban sprawl of built up areas.

GB4, GB5 and GB10 provide an area of green space between the two entirely separate villages of Byfleet and West Byfleet.

These areas of greenbelt are successfully performing the greenbelt function of preventing urban sprawl.

-To prevent neighbouring towns merging together.

The level of development proposed on GB4, GB5 in Byfleet and GB10 West Byfleet (over 800 extra houses in a small geographical area) will effectively merge the two villages together. Byfleet and West Byfleet are entirely separate villages with their own village centres, and are not separate regions of one larger town.

The greenbelt at GB4, GB5 and GB10 is required and performing the function of preventing merger.

- To assist in safeguarding countryside from encroachment

GB4, GB5 and GB10 are maintaining clear areas of countryside with an already well defined greenbelt boundary. Development of these areas will adversely impact upon the countryside.

- To preserve the setting and special character of historic towns

Byfleet is a historic village named in the Domesday Book and also the home of the former royal palace, Byfleet Manor. As a historic village it should be preserved and not merged with West Byfleet. The greenbelt is required to maintain this and development would go against the greenbelt function currently being performed.

Concerns Regarding Statements Made on Election Flyers and the DPD Consultation Process. Areas of development should be selected purely on their appropriateness as a development site. Engagement by Councillors or indeed any other political factors or influences should not have influenced any part of the planning process and DPD consultations.

If political engagement has been a factor in influencing the selection of sites GB4, GB5 or GB10 this would surely be against planning policy.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper. The concern regarding vulnerability of the sites to flooding is addressed in section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small

percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

Site GB4 is a safeguarded site and its key requirements for developing the site will be set as part of the review of the Core Strategy and or the site allocations DPD to be informed by up to date evidence at the time. Based on advice from the County Council, WBC is satisfied that all the sites identified could have suitable access and this will be looked at on a case by case basis. Access can only be determined through the Development Management process.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.

- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

Sections 1 and 2 of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. Paragraph 1.5 gives clarity on how the latest housing need figures would not affect the Borough's housing requirement. In February 2019, the Government confirmed that the 2016-based household projections should not be used to calculate housing need.

In regards to the omission of sites UA4, UA9, UA22 and UA44, they are in the DPD under Appendix 6. There are a number of sites which would have been completed by the time of the examination and therefore could not be included in the DPD. However, their estimated yields are still counted.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development along the corridor.

The representation regarding unnecessary, excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper.

Section 2 sets out in detail why sites GB4 and GB5 need to be safeguarded for development beyond 2027. Sites GB4 and GB5 have not yet been allocated for development, only safeguarded, in recognition of the fact that needs, and the planning policies reflecting them, may change beyond 2027.

In regards to the loss of Green Belt in Byfleet and West Byfleet see Section 4 of the Topic Paper.

The Council has the proven expertise to conduct assessment of brownfield sites in-house, rather than waste public money on engaging consultants to do the study. This is set out in detail in section 11, particularly paragraph 11.7, of the Topic Paper.

It is argued that the Green Belt sites perform several Green Belt functions. It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl.

<p>The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.</p> <p>The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network. In regards to the concerns raised about the political process see Section 24 of the Topic Paper.</p>
Response Reference: U0001234
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06871/1
Name: Miss Holly Cozens
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: No building on the Byfleet Greenbelt. If people build on the greenbelt the dogs can not run around and the kids can not play and climb trees. Please save the Byfleet greenbelt.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The representation has been noted. The Council has policies to protect the trees and open spaces for children to play on and for dogs to run around on. The DPD also allocates sufficient SANG land for this purpose.
Response Reference: U0001170
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06894/1
Name: Mr P Cozens
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB12
<p>Summary of Comment: Argues that:</p> <ol style="list-style-type: none"> 1. No consideration has been given to the potential compromising impact of GB4, GB5 and Byfleet SANG on the proposed HS4 Air route. 2. GB4, GB5 and Byfleet SANG run alongside one of the M25's busiest stretches. No consideration has been given to possible widening of the motorway. 3. 1/3 of GB5 falls within registered burial land, which is owned by St Mary's Church, and granted burial rights in perpetuity. Due to the existing road layout of the area, it is possible that safe access to the remaining 2/3 of the site would only be possible by building a road on church land, necessitating forced acquisition of bequeathed burial land. Development of this land or forced acquisition of church land for housing or access is entirely

<p>inappropriate; if houses cannot be built on GB5 without causing harm to burial land, then the site is not appropriate for development.</p> <p>4. GB4 and land to the North and South regularly flood. Development would lead to additional flood issues, including increased flood risk to neighbouring properties. GB5 is part flood zone. Development would lead to additional flood issues, including increasing flood risk to neighbouring properties.</p> <p>The Byfleet SANG floods extensively and frequently. It is therefore unsuitable as its use will be compromised in Autumn, Winter and Spring.</p> <p>GB10 is subject to frequent and severe flooding.</p> <p>Adequate assessments of fluvial and surface water flooding in Byfleet and West Byfleet have not been carried out.</p> <p>5. Inadequate consideration has been given to the Martyrs Lane site which could be available for housing or traveller sites. The reasons for its removal from the DPD are insufficient to support that decisions and could equally be applied to GB4, GB5 and GB10.</p> <p>6. The reasons for the removal of the Pyrford Green Belt sites are inadequate and could equally be applied to GB4, GB5 and GB10.</p> <p>7. In 2016, pollution sensors were repositioned to a location away from the A245, resulting in lower readings that give an inaccurate account of true pollution levels in Byfleet and West Byfleet along the A245. Developments at GB4, GB5 and GB10 will increase traffic-generated pollution.</p> <p>No proper consideration has been given to noise pollution for GB4 and GB5 which sit alongside the M25.</p> <p>8. Central government's previously stated housing requirement is likely to be reduced. As the DPD does not take this into account, it is using inaccurate housing targets. There is a precedent of Guildford BC requesting a reduction to their housing target due to this anticipated change.</p> <p>9. The infrastructure report lacks basic detail, and does not provide for adequate infrastructure to support 800+ new homes in Byfleet and West Byfleet. In particular: Traffic flow improvements are unlikely to mitigate the impact of 1500+ additional cars on the A245.</p> <p>The report does not address how healthcare how are and where adequate healthcare provision will be made for an increased population. It is argued that existing healthcare services are already overstretched.</p> <p>The infrastructure report does not make proper recommendations for school place provision. West Byfleet and St Mary's schools have already undergone expansion, and Byfleet Primary School is regarded as having insufficient space for further building.</p> <p>10. The proposed quantum of residential development is in excess of the identified need. If housing need is exceeded, there is no justification for releasing Green Belt land.</p> <p>11. The DPD is only required to make recommendations up to 2027. Recommendations beyond this period are unnecessary and subject to too high a degree of change and inaccuracy. GB4 and GB5 are therefore not needed.</p> <p>12. Inadequate consideration has been given to alternative sites as the Council did not commission a report to identify brownfield sites. In particular a professional external assessment should have been sought.</p> <p>13. The DPD states that GB4, GB5 and GB10 are not performing Green Belt functions. This is inaccurate as they provide green space between Byfleet and West Byfleet; prevent the merging of the two villages; safeguard the countryside from encroachment and preserve the historic setting of Byfleet village.</p>
<p>Contributor Proposed Modification: None stated</p>
<p>Modification Reference: U0000137</p>
<p>Officer Response: HS4 Air is presently at the stage of conceptual development, and is therefore not a significant consideration in preparing the Site Allocations DPD.</p>

The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network. The section of GB5 that comprises land which has been consecrated as a future burial ground is addressed in Section 15 of the Regulation 19 Issues and Matters Topic Paper. The issue of flooding is comprehensively addressed by Section 7 of the Regulation 19 Issues and Matters Topic Paper. In particular, Paragraph 7.7 provides confirmation that flood risk in Byfleet and West Byfleet will be minimised. Regarding appropriate evidence, Paragraph 10.2 details a number of studies that have informed the preparation of the Site Allocations DPD, including a Strategic Flood Risk Assessment (2015) and Sequential Testing of Sites in the Site Allocations DPD (2018).

Adequate consideration has been given to Land to the east of Martyrs Lane. As recognised in Paragraph 1.13 of the Regulation 19 Issues and Matters Topic Paper, the Site Allocations DPD is informed by a robust evidence base including inter alia the Green Belt Boundary Review and a Sustainability Appraisal Report. The latter found that Land to the east of Martyrs Lane "is not within reasonable distance to key services and facilities. Development of the site would result in adverse impacts on landscape character; urban sprawl and a significant encroachment into the countryside. It would also result in adverse traffic impacts (with limited scope for sustainable transport mitigation) and the loss of a recreational facility." Furthermore, a bespoke consultation on Land to the east of Martyrs Lane has been carried out, with officers' responses published in September 2018. The reasons for the removal of sites in Pyrford are considered sufficient, as set out in Paragraph 14.12. Furthermore, as per Paragraph 1.12 of the Regulation 19 Issues and Matters Topic Paper, the Council considers that the sites which are allocated and/or safeguarded are the most sustainable when compared against other reasonable alternatives.

The issues of air quality and noise pollution are comprehensively addressed by Section 8 of the Regulation 19 Issues and Matters Topic Paper. In particular, Paragraph 8.7 confirms that key requirements for the development of sites GB4 and GB5 will be defined as part of the review of the Core Strategy or Site Allocations DPD. This will be informed by the up to date evidence and policies at the time.

Paragraph 1.5 clarifies that the Council is taking the correct approach in continuing to plan for its housing requirement of 292 dwellings per annum as set out in the Core Strategy. Indeed Paragraph 14.1 provides that the Core Strategy is up-to-date and therefore constitutes a legitimate strategic policy context for the preparation of the Site Allocations DPD.

Section 6 addresses the due consideration which has been given to infrastructure. In particular, Paragraph 6.9 addresses education provision, and paragraph 6.12 addresses GP services provision. Paragraph 6.7 addresses transport infrastructure, as does Section 13. In particular Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify potential mitigation measures that might be necessary to address development impacts on the network.

Section 1 comprehensively addresses the need to release Green Belt land for development to meet the requirements of the Core Strategy. In particular Paragraph 1.7 addresses the need to ensure a buffer to cater for non-implementation. Paragraph 1.8 also outlines the contribution which the Green Belt sites make to meeting the evidenced need for family homes.

Section 2 addresses the need to safeguard sites to meet future development needs beyond the plan period.

Section 11 addresses the need to assess reasonable alternatives to inform the selection of preferred sites. In particular, Paragraph 1.7 addresses the credibility and robustness of the SHLAA as an evidence base.

GB4, GB5 and GB10 fall within parcels of land recommended for release by the Green Belt Boundary Review. Further details are available in Section 12. As noted in Paragraph 4.1, the Council has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity.
Response Reference: U0000985
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 01215/2
Name: Ms Kate Craddock
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB18
<p>Summary of Comment: The DPD is unsound, not an appropriate strategy, not positively prepared, justified, effective, or consistent with national policy. Objects to site GB10 and GB18:</p> <ol style="list-style-type: none"> 1. Sites are designated Green Belt in the West Byfleet Neighbourhood Development Plan, and GB18 is 'local green space'. Effectively serve all purposes of Green Belt and forms part of a 'green' boundary between West Byfleet and Byfleet, and West Byfleet and Pyrford. The loss of 29.3ha at West Hall, 6.8ha at playing fields and 14.7ha at Broadoaks amounts to 60% of West Byfleet's Green Belt land. Council should be seeking to enhance the beneficial use of Green Belt as per NPPF, and considering alternative urban sites. Removing green space and reducing playing fields will not assist with the aim of tackling obesity, nor achieving mental wellbeing. Children need green spaces for exercise and mental health. 2. Approx 2,400 extra homes in the village (West Hall, Sheer House, Broadoaks) will put overwhelming pressure on traffic and infrastructure, particularly Parvis Road which is already significantly congested. Local schools have already been expanded to accommodate growth and are oversubscribed. The nearest state secondary is also oversubscribed. There is no mention of how healthcare facilities will be provided to accommodate growth. Existing issues with waste water in the centre of West Byfleet will also be exacerbated. 3. West Hall suffers from flooding. Flood risk has not been properly considered. 4. This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment. West Byfleet was once an intimate and safe village. The cost to the mental health and future of local residents is being ignored for financial gain. 5. Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt.
Contributor Proposed Modification: Retain Green Belt land in West Byfleet.
Modification Reference: U0000326
<p>Officer Response: The issues raised in the representation are comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper. Section 16 responds to comments about conflicts with the West Byfleet Neighbourhood Development Plan.</p> <p>The Council acknowledges that the land at GB10 contributes to some degree towards the purposes of the Green Belt, but it is a preferred site as per conclusions in the Green Belt Boundary Review due to its high potential to achieve sustainable development. The detailed justification for releasing land from the Green Belt, yet maintaining the overall integrity of the Green Belt, is in Sections 1 and 2 of the Topic Paper. Section 5 addresses concerns about a disproportionate amount of Green Belt land in West Byfleet being allocated for development. The Council needs to balance opportunities to enhance the</p>

<p>Green Belt that serves a critical purpose in the Borough, with other sustainability objectives such as housing a growing population and improving affordability. Section 11 of the Topic Paper sets out how the Council has comprehensively assessed alternative sites, prioritising previously developed land and sites in the urban area.</p> <p>The Council acknowledges that the proposed development will generate additional traffic. but is confident that the impacts can be mitigated. This is set out in detail in Sections 9 and 13 of the Topic Paper. Section 6 describes how infrastructure needs have been assessed and how it will be improved to meet growth from development, including education and healthcare facilities.</p> <p>The Council is working with the waste water and sewerage operator for Woking (Thames Water) and has included as a key requirement in relevant site allocation policies that developers engage early with Thames Water to identify any constraints on the capacity of waste water infrastructure, including for sites in West Byfleet. Should sites be constrained, developers would need to conduct a thorough assessment of infrastructure needs, and propose measures to mitigate any impacts, through, for example, a detailed drainage strategy.</p> <p>Section 3 addresses concerns raised about Traveller pitch assessments, and sequential testing.</p> <p>Section 7 of the Topic Paper addresses concerns about flooding.</p> <p>The Council takes the wellbeing and needs of its residents very seriously. Section 4 responds to these concerns, including paragraph 4.2 which explains how the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents, including children. There is no intention to make the playing fields smaller - this site is being proposed for removal from the Green Belt solely to create a defensible Green Belt boundary.</p>
Response Reference: U0001396
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06920/1
Name: Mrs Patricia Creedan
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Objects to development on Byfleet's Green Belt due to concerns about the protection of the environment and wildlife.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper sets out the justification for releasing Green Belt land for development to meet the future development requirements of the Core Strategy.</p> <p>Section 19 of the Regulation 19 Issues and Matters Topic Paper confirms that due consideration has been given to development's impact on local habitats, including fields, woodlands, and their wildlife. In particular, Paragraph 19.1 provides that during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed.</p> <p>Paragraph 1.10 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has undertaken a Green Belt boundary review and other evidence base studies</p>

<p>such as the Sustainability Appraisal to demonstrate that special circumstances justification exist to allocate or safeguard each of the site in the DPD. This includes safeguarded sites GB4 and GB5 in Byfleet. As part of the Sustainability Appraisal due consideration has been given to environmental factors.</p> <p>It is further noted that for sites GB4 and GB5, key requirements will be set out as part of the review of the Core Strategy or the Site Allocations to be informed by up to date evidence at the time. This will include appropriate environmental and biodiversity considerations.</p>
Response Reference: U0001333
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 03697/1
Name: Mr Keith Creswell
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: DPD is unsound.</p> <p>Objects to the removal of GB10 from the Green Belt. It is not justified or effective and does not comply with national policy. The plan is detrimental to wildlife, increases flood risk and deprives the neighbourhood of green space.</p> <p>Concerns regarding inadequate educational, health, utility and road infrastructure. There is no scope to improve A245.</p> <p>Removing West Hall site from the Green Belt undermines the Green Belt policy objectives set out in the development plan.</p> <p>Proposed number of traveller pitches (15) for site is excessive and conflicts with national policy (4 to 5 pitches recommended). Number of sites inappropriate for Byfleet wards (2 4x pitches would be sufficient under original GB10 proposal).</p> <p>Unjustified amount of dwellings proposed for Byfleet in comparison to other wards throughout the borough.</p> <p>Undermines National Policy with regard to the detrimental impact on wildlife.</p> <p>Concerns regarding flooding on GB10, many flood alleviation methods needed making the development economically unviable.</p> <p>The A245 is already congested. With the addition of large-scale local developments including broadoaks, Sheer House and Fairoaks, this problem will worsen. In spite of A245 corridor study, no previous proposals have reduced congestion on this route.</p> <p>Incorrect assumption that pedestrian travel from the new developments to West Byfleet centre and station will occur. Congestion will raise the cost of the development and increase pollution.</p> <p>Local schools and medical facilities need to be expanded to accommodate increased population.</p> <p>Proposes that development should be focused in the northern half of GB10 at the required density, in order to preserve the southern portion of Green Belt land to ensure continuity of boundary and preserve wildlife habitats.</p>
Contributor Proposed Modification: Proposes that development should be focused in the northern half of GB10 at the required density, in order to preserve the southern portion of Green Belt land to ensure continuity of boundary and preserve wildlife habitats. Local schools and medical facilities need to be expanded to accommodate increased population.
Modification Reference: U0000178
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 4

<p>addresses the issue regarding loss of green space and section 5 specifically addresses the loss of Green Belt land and associated distribution issues in Byfleet and West Byfleet. Section 3 addresses the issue regarding traveller accommodation in Byfleet and West Byfleet. The practice guide for designing gypsy and traveller sites (2008) has since been withdrawn, however this stated an ideal maximum figure for pitches on one site as 15, which none of the proposed sites in the DPD exceed.</p> <p>Section 6 addresses issues regarding the adequacy of infrastructure and cumulative development impacts.</p> <p>As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 13 specifically addresses road infrastructure in greater detail.</p> <p>GB10 is identified as a sustainable site for development in terms of distance from the local centre and station. With improved connectivity to existing pedestrian and cycle networks, which the developer of the site is required to address, there will be greater incentive to walk and cycle.</p> <p>Section 7 addresses the issue regarding flooding in Byfleet and West Byfleet.</p> <p>Section 8 addresses concerns regarding pollution.</p> <p>Section 19 addresses the issue regarding impact of development on wildlife.</p>
Response Reference: U0001339
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06558/1
Name: Ms Fiona Creswick
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
<p>Summary of Comment: Object to proposals for Green Belt development in and near Byfleet.</p> <p>The area does not have the school, medical or road infrastructure to support the developments.</p> <p>The developments would increase air and noise pollution.</p> <p>Much of the proposed building area is on a flood plain.</p>
<p>Contributor Proposed Modification:</p> <p>I would therefore strongly ask that Woking Borough Council reject these proposals and preserve what little is left of our Greenbelt for the sake of the people they represent.</p>
Modification Reference: U0000180
<p>Officer Response: The impact of the proposals on infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of the proposals on air and noise pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7. In particular, none of the proposed building areas are flood plains.</p>
Response Reference: U0001612
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06714/1

Name: Ms Libby Crew
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Concerned about the potential loss of greenbelt on the Egley Road (GB7). A considerable amount has already been given over to development with all the associated problems and upset. The greenbelt on Egley Road plays a critical part in preventing the urban sprawl of Woking and further loss would swallow up the historic, rural village of Mayford. It is of vital importance to retain a green gap between Woking and Mayford and the survival of the woods and habitats on GB7. Concerned about the quality of life for not only human residents but also wildlife. Habitat destruction is the single greatest factor in species loss worldwide and the UK is no exception. Prevent Mayford becoming part of Woking's urban sprawl.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The representation regarding Mayford Green Belt and urban sprawl have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21. In regards to the loss of Green Belt and residents wellbeing see Section 4 of the topic paper. the Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development. In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess any site specific ecological issues.
Response Reference: U0001161
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 01103/2
Name: Ms Charlotte Cripps
Number of Signatories: 1
Comment Type: SUPP
Site Reference:
Summary of Comment: The DPD is legally compliant, no proposed modifications.

Does not wish to participate in public examination. Wishes to be informed of next stages.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06749/1
Name: Mr Richard Crockett
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: DPD is not legally compliant, is not positively prepared, justified, effective, sound, or consistent with national policy. No rationale for the council to meet significant housing needs by releasing Green Belt land. What is the law that requires the council to do this? With growing population demand will always outstrip supply - hence the need for the policy, why does the council think it had a right above all the previous thousands of application to develop on the Greenbelt? DPD is unsound due to encroachment on Green Belt land. All allocations to Green Belt should be removed from DPD. Does not wish to participate in oral examination. Wishes to be informed of next stages.
Contributor Proposed Modification: All allocations to Green Belt should be removed from DPD.
Modification Reference: U0000362
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Government policy requires the Council to plan positively to meet its development needs. It is important for the Council to do so because failure to do so could lead to speculative development in unsustainable locations. The Council could lose control in managing growth in the area without a sound local plan.
Response Reference: U0001685
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): F

Contributor Reference: 06459/1
Name: Mr Matthew Cromey
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Concerns regarding development of Green Belt land. Concerns regarding increased traffic congestion. Broadoaks (Brooklands [sic]) development is acceptable, with the exception of building additional housing on the Green Belt portion of the site. Proposes that development follows an environmentally sensitive approach by focusing development close to key train stations and limit parking.

Supports development close to West Byfleet train station, as it will improve the community due to an increase in people in the centre and prevent urban sprawl.
Contributor Proposed Modification: Proposes that development follows an environmentally sensitive approach by focusing development close to key train stations and limit parking.
Modification Reference: U0000380
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet. Section 21 addresses the issue regarding urban sprawl. Section 13 addresses the issue regarding adequacy of road infrastructure. The traffic impacts of the GB10 and GB11 allocation policies have been assessed. As part of the key requirements for developing the site, contributions must be made for the provision of essential transport infrastructure, including mitigation measures for the A245 corridor. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. The Green Belt Boundary Review found that Parcel 4, which contains sites GB10 and GB11, although particularly sensitive in landscape terms, has very high potential to deliver sustainable development. Among the criteria considered in this regard was strategic accessibility, and it was noted that Parcel 4 is less than 1km distance from a railway station. In addition the Sustainability Appraisal found that both sites GB10 and GB11 are within 20-30 minutes walking distance of a railway station.
Response Reference: U0001434
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06508/1
Name: Miss Alison Crosby
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
Summary of Comment: Objects to the allocation of UA44. There is a mistake in the policy of UA44 in the DPD. The highway improvements should be associated with Kingfield Road not Knaphill Road. Scale of the development will be out of keeping with the area. Commercial retail development is inappropriate for the area. High density development is appropriate for the town centre but not in a low-rise suburban area. The football ground needs improvements. However, there are already traffic problems and much of the surrounding road infrastructure is inadequate, as is provision for parking.
Contributor Proposed Modification: Change the highway improvements error from Knaphill Road to Kingfield Road.
Modification Reference: U0000466
Officer Response: The DPD does not state a potential yield figure for the UA44 (Football Club) allocation, therefore the scale of development that occurs on the site cannot be determined at this stage. The scale of development will be assessed at the development management stage, and will ensure that character is enhanced where possible and that the scheme contributes positively to the surrounding area. If a proposal for a high density scheme were to come forward, there are policies in place to ensure that the design of the scheme is appropriate for the area. Policy CS21 of the Core Strategy and the Tall

Buildings Supplementary Planning Document set out detailed criteria which new development should meet. The Core Strategy directs Town Centre uses such as retail to the main centres (Town, District, Local and Neighbourhood centres). Nevertheless, commercial retail uses will be acceptable at this location if it can be demonstrated that its impacts can be addressed. The Council in this case believe that there is no in principle objection, subject to the impacts of the development being adequately and appropriately addressed. This will be fully assessed at the development management stage when a specific scheme comes forward for determination. The Development Management process would address impacts of any proposed scheme regarding traffic, noise, overcrowding and general impacts on amenity and safety of existing residents. Transport and parking issues would also be considered in detail. The Council sets specific requirements within its Parking Supplementary Planning Guidance and has a policy framework for car parking in Core Strategy policy CS18 on Transport. The policy aims to ensure development proposals provide appropriate infrastructure measures to mitigate any adverse effects of development traffic and other environmental and safety impacts. Transport Assessments will be required for development proposals to fully assess the impacts and identify appropriate mitigation measures. These will be required during any planning application stage should a scheme come forward. The Regulation 19 Issues and Matters Topic Paper addresses general infrastructure in section 6 and specifically covers road infrastructure in section 13.
Response Reference: U0001266
Officer Proposed Modification: Amend key requirement 14 of UA44 to read: "Highway improvements may be required at the junction of the site with Kingfield Road and Westfield Avenue...".
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06721/1
Name: C J And A Crouch
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Objects to loss of Green Belt land at site GB7. This land is a green lung in an increasingly developed and overcrowded area, and is significantly beneficial to humans and wildlife. If removed, it will be gone forever, along with its important wildlife. It gives much solace for local residents. Leave this area green.
Contributor Proposed Modification: Retain land at GB7 in the Green Belt, as a green space.
Modification Reference: U0000319
Officer Response: A comprehensive response has been provided in Section 4 of the Council's Regulation 19 Issues and Matters Topic Paper. Section 19 also addresses concerns about the impacts on local habitats and wildlife.
Response Reference: U0001382
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06131/1
Name: Mrs Julia Cryer
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05

<p>Summary of Comment: Having lived in Byfleet for past 50 years, feels strongly that building on the Green Belt is grossly unfair - Byfleet has a small amount of Green Belt land compared to wards elsewhere in Woking. The village is prone to flooding, which will increase with more concrete. Lives in a house which has flooded several times since 1968. Access to GB5 would be dangerous and cause havoc on narrow road opposite the primary school entrance. Also would affect already gridlocked Parvis Road. GB5 land has been gifted to St Mary's Church for burial purposes. CPO of this land would be wrong. Lack of GP surgery in Byfleet to serve development, and schools are fully stretched.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The Council sympathises with the concerns raised in the representation, but will ensure through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. The Council has prepared a Regulation 19 Issues and Matters Topic Paper, and concerns raised in the representation are responded to in the following sections: Section 1 justified the release of Green Belt land; Section 5 responds to concerns about disproportionate release of Green Belt in the West Byfleet and Byfleet area; Section 7 provides a response regarding flood risk; Section 15 responds to concerns about land belonging to the church; Section 13 describes how congestion will be mitigated; and Section 6 details how infrastructure, including schools and healthcare facilities, will support new development.</p>
<p>Response Reference: U0001504</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 05864/1</p>
<p>Name: Mr And Mrs Simon And Jackie Curry</p>
<p>Number of Signatories: 2</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB07</p>
<p>Summary of Comment: Objects to the loss of Green Belt at Egley Road. Considers that the Leisure Centre should not have been permitted as it is a commercial enterprise. To remove more land from the Green Belt in order to relocate David Lloyd Tennis Club, which is also a commercial enterprise, is again breaking Green Belt rules. Argues that the Council has used the Hoe Valley School as an excuse to put a commercial venture in the Green Belt in order to create a precedent. Suggesting that the last remaining field should remain as "designated Green Space" does not maintain its Green Belt status or offer long-term protection. Considers that within a few hundred yards of Mayford, there will be 3 schools, one Leisure centre, an Olympic-sized running track, more than 5 football and multi-use pitches, one gym club building and one tennis centre, very little of which is freely available for Mayford residents. Considers that releasing land at Egley Road would lead to loss of leafy/rural character. The school development has harmed local trees, and that the last wooded area at the back of Chiltern Close provides protection against the increase in traffic pollution from the Egley Road since the school and leisure centre opened. There are not enough mature trees left to have an impact on pollution, resulting in breathing difficulties during high-traffic times. Raises concerns about stewardship and wildlife. Considers that the Council ignored arguments about the dangers of traffic volume along the A320 Egley Road. Development would heighten the risk of accidents and fatalities.</p>

Does not see a reason that this land should be developed, and considers that Mayford has been the subject of a concerted effort by the Council to adjoin it to the town centre. Given the unattractive high rise developments in the town centre, it is particularly important to retain the green space still in existence outside of this area.

Contributor Proposed Modification: GB7 should keep its Green Belt status. If GB7 is to be allocated, the woods and field should remain as designated green space with a long-term plan acceptable to residents and very restricted housing on the rest.

Modification Reference: U0000349

Officer Response: The Leisure Centre within GB7 already has the benefit of planning permission and was justified by very special circumstances through the development management process. It serves the school and has wider community benefits. The majority of the Hoe Valley School application site is owned by the Council, with the remainder of the GB7 site being highway land or land owned by a third-party. The Council's intentions for the site are set out in Council meeting reports which are accessible to the public, and which were discussed in detail at a Council meeting in July 2018. The report to the Council is available on the Council's website. It is proposed that the Egley Road land is purchased by the Council, subject to planning approval being obtained for the Kingfield Road and Egley Road schemes. The Egley Road scheme would involve the relocation of the existing David Lloyd Leisure Club along with new residential accommodation, in order to help facilitate the enhancement of the football club at Kingfield Road, which is considered to be an important community asset. The Council has entered into a Development Agreement with GolDev. GolDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this year. The planning merits of the scheme will be determined by the Council's Planning Committee. There will be extensive public consultation as part of the planning process. This is a separate matter to the preparation of the Site Allocations DPD.

Were the area of local separation proposed by Policy GB7 to be retained in the Green Belt, it would form an isolated pocket of Green Belt land within the urban area. This would not ensure a defensible Green Belt Boundary. The policy as drafted allows for such defensibility, but also confers protection on the land in question. Namely Policy GB7 provides that "this part of the site is not for built development."

It is noted that Policy CS19 of the Core Strategy includes schools, and indoor and outdoor recreation facilities within its definition of social and community infrastructure. The policy provides in principle support of such facilities, providing that "the Council will work with its partners to provide accessible and sustainable social and community infrastructure to support growth in the Borough."

Paragraph 20.3 of the Regulation 19 Issues and Matters Topic Paper addresses the identity and character of Mayford. In particular, it is noted that Core Strategy Policy CS6: Green Belt specifically highlights that development will not be allowed if it is considered to have an unacceptable effect on the primarily residential character of the village and Green Belt. Moreover, one of the key requirements of GB7 is that "density of development to the south of the site should maximise the efficient use of the site without compromising the general character of the area."

Section 19 of the Regulation 19 Issues and Matters Topic Paper confirms that due consideration has been given to local habitats and wildlife in the preparation of the Site Allocations DPD. In particular, Paragraph 19.1 confirms that during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed.

The Council has given due consideration to transport in preparing the Site Allocations DPD. In particular, Paragraph 6.7 of the Regulation 19 Issues and Matters Topic Paper confirms that the County Council as Highway Authority for the area is satisfied that the

approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 of the Regulation 19 Issues and Matters Topic Paper provides further information regarding transport and congestion issues. In particular, Paragraph 13.3 provides that the Council has worked with Surrey County Council to carry out the A320 Corridor Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed.

Regarding safety, it is noted that Policy CS18 of the Core Strategy aims to ensure that development proposals provided appropriate infrastructure measures to mitigate any adverse effects of development traffic and other environmental and safety impacts. It is also noted that one of the key requirements of Policy GB9 is for "appropriate and adequate provision of car and cycle parking in accordance with the adopted car and cycle parking standards but that takes into account the sites sustainable location and will not compromise on highway safety."

Section 1 of the Regulation 19 Issues and Matters Topic Paper sets out the justification for releasing Green Belt land for development to meet future development requirements of the Core Strategy. In particular, Paragraph 1.14 confirms that all the proposed sites will make a significant and a meaningful contribution towards meeting the housing requirement. Not allocating any or all of the sites (or not having new sites to replace any site that is rejected) could undermine the overall delivery of the Core Strategy.

Response Reference: U0001493

Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site".

Amend third paragraph of reasoned justification to read 118 dwellings.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06785/1

Name: Mr And Ms Adam And Miriam Dalton

Number of Signatories: 2

Comment Type: OBJ

Site Reference: UA44

Summary of Comment: Does not consider the DPD to be legally compliant, nor sound, nor compliant with Duty to Cooperate.

UA44 has been included in the DPD at a later date and has not been subject to full, legal consultation as per other sites.

Without further consultation and consideration of the overall impact, it is not lawful to include it in the DPD. There are advantages to redeveloping the site, but it needs to be done with full engagement of the local community and with clear limitations prior to developers starting proposals. This has all been done in reverse - arrangements have been made with GolDev. This does not prioritise the well-being of current nor future residents. The development is financially driven. It should be driven by needs of the local area.

The Sustainability Appraisal Report does not reflect the reality of the area. Although it is within walking distance of bus stops and the railway station, most people would rely on car e.g. to shop at supermarkets, for the school run (since local schools are oversubscribed) and to jobs. Roads cannot sustain more traffic - they are oversaturated already.

Proposed improvements will not resolve this.

On p360 an error should be amended (UA44 refers to a different site).

Contributor Proposed Modification: In order to be legally compliant, sound and comply with the Duty to Cooperate, a longer period and more in-depth consultation is needed. Further, it is necessary to conduct a more detailed Sustainability Appraisal which truly reflects the reality of the local area.

It is imperative to have clear and transparent limitations on the population density and size of the development- e.g. maximum height of residential buildings, maximum number of residences, guaranteed boundary limits so that the development can't spread into neighbouring properties or public spaces, assurance that the development won't negatively impact the current local residents' peaceful enjoyment of their homes or the value of their property.

Modification Reference: U0000226

Officer Response: The Woking Football Stadium site UA44 was identified as a potential redevelopment site later in the plan-making process. Although it has not been subject to a period of Regulation 18 consultation, the public have been given an opportunity to make comments during a Regulation 19 phase of consultation. Section 9 of the Council's Regulation 19 Issues and Matters Topic Paper describes how the Council believes it has done what it can with the available resources but has gone beyond the statutory requirements to engage the community for plan-making purposes.

The preparation of the Site Allocations DPD by the Local Planning Authority is a separate process to the actions of the wider Council regarding the redevelopment of Woking Football Stadium. The Council's intentions for the site are set out in Council meeting reports which are accessible to the public, and which were discussed in detail at a Council meeting in July 2018. The report to the Council is available on the Council's website, which sets out the reasons for the proposal and the benefits the Council believes it will achieve. The Council has entered into a Development Agreement with GolDev. GolDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this year. The planning merits of the scheme will be determined by the Council's Planning Committee in accordance with the Development Plan. The policies of the Site Allocations DPD will be given significant weight in decision-making to determine the planning application. There will be extensive public consultation as part of the planning process. This is a separate matter to the preparation of the Site Allocations DPD.

The Sustainability Appraisal Framework was carefully designed to assess each site against a series of sustainability objectives. The Council consulted statutory consultees and key stakeholders on the methodology, and is confident that the resulting SA Framework provides a consistent basis for describing, analysing and comparing the sustainability effects of each proposal of the Site Allocations DPD. It is accepted that against each SA objective there may be both positive and negative impacts. Where these were identified, suggestions for possible optimising / mitigation measures associated with allocating the site have been proposed. For example, where a risk of increased travel by car or increased traffic was identified, key requirements were included in site allocation policies. Policy UA44 includes key requirements for transport assessments and travel plans to assess likely transport impacts and to minimise car use to and from the site.

These should be submitted with any planning application for the site, which will then be assessed against policies in the Development Plan which aim to reduce reliance on car use. This is set out in more detail in Section 13 of the Council's Regulation 19 Issues and Matters Topic Paper. Other factors highlighted in the representation will also be assessed in detail at the development management stage, against the policies of the Development Plan as a whole: these include design policies which support development that respects and makes a positive contribution to the street scene and character of the area in which they are situated; policies which fully assess the impacts of building heights on an area; policies which assess proposed density of development and whether a proposal would have an overbearing effect or harmful impact on neighbouring properties due to bulk, proximity or outlook.

<p>The extent of the allocated site is defined by the red line on the site map accompanying each policy. Should a planning application come forward for any area outside of the site boundary, it would be determined through the development management process on its own merits.</p> <p>The reference to Knaphill Road will be updated to refer to Kingfield Road. Page 360 of the DPD refers to the Regulation 18 version of the DPD, in which the St Dunstan's Church site was referred to as UA44.</p>
<p>Response Reference: U0001509</p>
<p>Officer Proposed Modification: Amend key requirement 14 of UA44 to read: "Highway improvements may be required at the junction of the site with Kingfield Road and Westfield Avenue...".</p>
<p>Wishes to Attend Examination (T = Tick): T</p>

<p>Contributor Reference: 06885/1</p>
<p>Name: Ms Isabelle David</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: Would not like to speak at examination and wishes to be informed of the next stages of the DPD.</p> <p>The SADPD is not legally compliant. Site GB10 (Land surrounding West Hall, Parvis Road West Byfleet) falls within the boundary of the West Byfleet Neighbourhood Development Plan (NDP 2017). Any application to build on this land (as a consequence of its proposed release from the Green Belt) would be contrary to NDP 2017 and its specific objective to protect and enhance all existing green spaces.</p> <p>The SADPD is unsound. According to your Guidance it should be positively prepared - The DPD should be prepared based on a strategy which, at a minimum, seeks to meet the area's objectively assessed needs, ...</p> <p>Broadoaks (PLAN/2018/0359) GB11 - Current application in place to build 252 dwellings and provide an 80 Bed Care Home Sheer House (PLAN/2017/0128) - Outline application to build 255 dwellings</p> <p>West Hall - proposal to remove from Green Belt and allow construction of 555 dwellings and 15 permanent traveller pitches.</p> <p>The resulting increase of 1,157 dwellings is a disproportionate increase for West Byfleet and a volume which has not been objectively assessed against the stated requirements or additional housing needs in this area.</p> <p>The SADPD is unsound. According to your Guidance it should be justified - This means that the DPD should be the most appropriate approach when considered against reasonable alternatives, and based on proportionate evidence.</p> <p>The removal of GB10 from the Green Belt has not been justified. It's location on Parvis Road (A245), alongside an existing application (Broadoaks - PLAN/2018/0359) will cause traffic chaos and none of the stated mitigation measures reflect the current traffic volumes. The proportionate evidence is a full review carried out by consultants in 2002 - this is 16 years ago and the volume of traffic since then has grown exponentially. (Reference here is made to recent traffic delays experienced when the traffic lights in the centre of West Byfleet were replaced.)</p> <p>During the recent public consultations, much was made of the decision taken by WBC to develop upwards in Woking Town Centre rather than build outside the urban area. Given this decision, and the fact that the housing needs are already being met by existing planning application, it is not considered justifiable to overdevelop West Byfleet by removing GB10 from the Green Belt.</p>
<p>Contributor Proposed Modification: None Stated</p>

Modification Reference: NOMODS
Officer Response: Sections 1 and 2 of the Regulation 19 Issues and Matters of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. Paragraph 1.5 gives clarity on how the latest housing need figures would not affect the Borough's housing requirement. In February 2019, the Government confirmed that the 2016-based household projections should not be used to calculate housing need. Paragraph 1.7 goes into detail regarding the representation that there is sufficient land within the urban area to meet development need and not releasing land in the Green Belt. In regards to the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper. In terms of the disproportionate amount of development in West Byfleet see Section 5 of the Topic Paper. Section 13 of the Topic Paper goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. The potential mitigation report on the A245 was produced by Surrey County Council and is dated October 2017. In regards to the alternative sites and evidence see Section 11 and 10 of the Topic Paper.
Response Reference: U0001346
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05119/1
Name: Ms Katrina Davies
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Opposes the removal of GB7 from the Green Belt which would lead to the loss of the green lung between Mayford and Woking. Considers that: <ol style="list-style-type: none"> 1. GB7 plays an important role in preventing urban sprawl, and protecting the historical rural identity of Mayford. 2. There be a significance increase in road, air, noise and light pollution. 3. There will be an increased danger to school children at the newly created school due the increased volume of traffic. It is noted that there are 3 schools within 1000 yards which puts several thousand children at risk. 4. Proposals raise the possibility of 5 gyms/leisure centres accessing the Mayford section of the A320, with a negative impact on noise and air pollution, increasing traffic jams and accident rates. This is already the busiest road in Woking, supporting close to 30,000 car movements per day. 5. Once removed from the Green Belt, Egley Road would be in danger of unlimited development, including residential and leisure. The A320 and general infrastructure does not have the capacity to support this. 6. The rural character of the area would be changed forever, impacting the 1500 residents.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper sets out the justification for releasing Green Belt land for development to meet the future development requirements of the Core Strategy. Paragraph 4.1 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has ensured through a number of studies that any land that is released from the

Green Belt will not undermine its overall purpose and integrity. Taking into account the constraints of the Borough and the available evidence, the proposed allocations are the most sustainable to deliver the objectives of the Core Strategy when compared against reasonable alternatives.

Paragraph 21.1 of the Regulation 19 Issues and Matters Topic Paper confirms that the Green Belt Boundary Review assessed the parcels of Green Belt land against the purposes of the Green Belt, one of which is to check the unrestricted sprawl of large built up areas. None of the proposed allocations will lead to unacceptable urban sprawl.

Paragraphs 20.2 and 20.3 of the Regulation 19 Issues and Matters Topic Paper address the historic character of Mayford.

Section 8 of the Regulation 19 Issues and Matters Topic Paper addresses air and noise pollution. In addition, the key requirements of GB7 include inter alia:

1. "due to the proximity to the road and railway line, the development would need to consider the impacts on noise and air quality and ensure mitigation measures are implemented to protect residential amenity. A Noise Impact Assessment would be required. An Air Quality Assessment is recommended"
2. "any flood lighting should be sensitively designed to minimise impact in landscape/townscape terms. Screening/bunding to create a buffer between the development, railway and the escarpment landscape beyond"

A further key requirement of GB7 is: "Appropriate and adequate provision of car and cycle parking in accordance with the adopted car and cycle parking standards but that takes into account the sites sustainable location and will not compromise on highway safety." Policy CS18 of the Core Strategy also aims to ensure development proposals provide appropriate infrastructure measures to mitigate any adverse effects of development traffic and other environmental and safety impacts.

Section 6 of the Regulation 19 Issues and Matters Topic Paper outlines the consideration which has been given to the infrastructure provision necessary to support the Site Allocations DPD. Paragraph 13.3 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed.

As outlined in Paragraph 20.3 of the Regulation 19 Issues and Matters Topic Paper, the special character of Mayford is recognised by the Council and Core Strategy Policy CS6: Green Belt specifically highlights that development will not be allowed if it is considered to have an unacceptable effect of the primarily residential character of the village and Green Belt. It is further noted that one of the key requirements of GB7 is that "density of development to the south of the site should maximise the efficient use of the site without compromising the general character of the area."

Response Reference: U0001476
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06793/1
Name: Ms Lynette Davies
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Does not wish to speak at the examination of the SADPD and wishes to be informed when the SADPD progresses to the next stage.

Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by para 35 of the National Planning Policy Framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. Does not think GB10 in the Proposals Map should be taken out of Green Belt for the following reasons:

This is not a strategy to meet the area's assessed needs and takes no account of the West Byfleet Neighbourhood Plan, drawn up following extensive consultation with the local community and passed by Woking Borough Council.

The strategy appears to have taken no account of reasonable alternatives within the Borough.

The strategy will not be effective as the existing infrastructure cannot support the proposals and no plans are put forward to improve that infrastructure. In addition to the 255 homes about to be built at Broad Oaks and the 240 apartments included in the Sheer House outline planning, this proposes a further 555 homes on the West Hall Green Belt Land which would significantly increase the population of West Byfleet. Local services - doctors, dentists and schools - are already all at capacity as is the road network yet the Infrastructure Report completely fails to address how this will be dealt with.

The proposal to remove 60 percent of the Green Belt in the village for the provision of housing would significantly change the character of the village.

There has been no consultation about the proposal to place travellers' sites on the land at West Hall and this only became common knowledge when through the SADPD. The land is known to be prone to flooding and very close to the conservation area of the canal and therefore totally unsuitable for this development. In addition access is inadequate and there is no available infrastructure to support the sites nor a suggestion how this would be dealt with.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

The justification to release Green Belt land for development and the assessed housing need have been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

In regards to the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. The IDP did look at dentist provision and can be found on the Council website. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. The Council considers there can be suitable access to the GB10 site and will work with Surrey County Council to ensure this at the planning application stage.

<p>The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.</p> <p>Concern about the lack of assessment of alternative sites has been addressed in Section 11 of the Topic paper.</p> <p>The issue of the amount of Green Belt loss is addressed in Section 5 of the Topic Paper. The reasoning behind the allocation of Traveller pitches in the Green Belt, and at West Hall in particular, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p> <p>The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2, 3 and the River Wey navigation Conservation area. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.</p>
<p>Response Reference: U0001198</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06807/1</p>
<p>Name: Ms Fiona Davies</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference:</p>
<p>Summary of Comment: DPD has not met duty to cooperate, due to insufficient communication and consultation with local people over the number of tall buildings planned.</p> <p>DPD not justified, effective or sound, since planning ten or more 30-storey buildings in the town centre will have a severe negative impact, in particular on infrastructure- roads will be choked, there is insufficient parking, schools and health services are already stretched to the limit.</p>
<p>Contributor Proposed Modification: Reduce the height and number of these high rises. Ensure that these new buildings are of architectural merit. Consult again with the local populace - I don't think the original consultation was broad enough or explained the issues to people well enough. Ask people again - do they want 20 30 storey buildings in the town centre.</p>
<p>Modification Reference: U0000202</p>
<p>Officer Response: The principle of constructing tall buildings in the town centre, subject to certain criteria, was established in Policy CS1: A spatial strategy for Woking Borough and Policy CS21: Design, both contained in the Core Strategy, whose production involved three rounds of public consultation. The proposals for Town Centre development in the Site Allocations DPD have also been subject to two rounds of public consultation. The Site Allocations DPD does not contain any proposals specifically for buildings of 30 or more storeys; the indicative numbers of dwellings given in the supporting text for housing sites in the DPD reflects the methodology of the SHLAA for calculating housing potential, based on the indicative densities for each zone in the Core Strategy, 'exemplar' schemes for that type of zone, and the constraints present on the site. The Council will assess proposals for schemes which exceed these densities, such as 30-storey buildings, on their merits on a case-by-case basis against adopted policies and guidance, and each one would be subject to consultation at planning application stage.</p>

Response Reference: U0001540
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02978/2
Name: Mrs Carole Davis
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Land in Woodham Lane and surrounding area should not be developed- the surrounding roads are at saturation point, the Green Belt contains trees, vegetation and wildlife, and absorbs traffic fumes etc. Please reconsider decision to build on the Green Belt. The environment around Woodham Lane should not be changed to meet housing targets, brownfield sites should be used in preference. Schools, doctors' surgeries and hospitals in the Woodham Lane area are severely oversubscribed.
Contributor Proposed Modification: Please would the Council reconsider their decision to build on our beautiful green belt .
Modification Reference: U0000159
Officer Response: The draft SADPD does not include any plans for development at Woodham Lane. The reasons for WBC's rejection of the Martyr's Lane site (adjacent to Woodham Lane) are set out in the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11.
Response Reference: U0001692
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06839/1
Name: Ms Emma Davis
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is unsound. It is not an appropriate strategy taking into account all reasonable alternatives, nor is it consistent with national policy. 1. Green Belt at West Hall (GB10) prevents urban sprawl and prevents neighbouring towns from merging together. It also assists in safeguarding the countryside from encroachment. It should not be taken out of the Green Belt. 2. Development here, in conjunction with that at Sheer House and Broadoaks, will put too much pressure on local infrastructure such as schools and healthcare facilities (which are already overstretched), and cause significant traffic on congested local roads. It would constitute overdevelopment of the area and detrimentally affect the quality of life of residents. Mitigation measures proposed for traffic are not sound. The IDP does not adequately address how healthcare or school provision will be provided for the growing population.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. It is also

<p>acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl. Sections 1 and 2 of the Council's Regulation 19 Issues and Matters Topic Paper explains in detail why the Council believes exceptional circumstances exist to justify the release of Green Belt land, including that at site GB10.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. The cumulative effects of growth from potential development at Broadoaks, West Hall, and Sheer House were taken into account in the Infrastructure Delivery Plan. Sections 4 and 5 of the Topic Paper respond to concerns about wellbeing of residents and disproportionate release of Green Belt land in West Byfleet and Byfleet.</p>
<p>Response Reference: U0001645</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06686/1</p>
<p>Name: Ms Kirstin Dawe</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11, GB18</p>
<p>Summary of Comment: Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy.</p> <p>It will cause an increase in traffic and pollution along Parvis Road. This is already a busy road and allowing development in the area will only add to the traffic problems.</p> <p>Removing the green belt land would see a detrimental change to the wildlife, green space around both Byfleet and West Byfleet. This would also impact the infant and junior school from having green space for the children to use and enjoy.</p> <p>There has not been sufficient consideration to the overpopulation in schools, doctors, dentists, police and fire services cause by the increased size of the community.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>

<p>Officer Response: The representation regarding loss of the Green Belt impact on wildlife, residents amenity and the school see Section 19, 4 and 5 of the Council's Regulation 19 Issues and Matters Topic Paper.</p> <p>Concerns raised regarding pollution are addressed in section 8 of the Topic Paper.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Dentist, Police and Fire service capacity was considered in the Infrastructure Delivery Plan which can be found on the Council website. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p>
<p>Response Reference: U0001104</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06626/1</p>
<p>Name: Day Group Ltd</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: UA06, UA10, UA11, UA13, UA34, UA36</p>
<p>Summary of Comment: Regarding Allocation UA34: The DPD is legally compliant and complies with the duty to co-operate, but is not sound. Our clients Day Group Ltd operate a substantial rail served aggregates terminal, adjacent to and partly overlapping site UA34. Part of the terminal bringing in construction aggregates by rail, unloading and storing them on the site, and loading onto HGVs for redistribution by road. This process keeps around 15,000 long distance lorry loads per year off the road network and is vital to support development in and around Woking. The site operates under PD rights with no restrictions on operating hours and has potential for expansion on site. The site is identified in the Surrey Minerals Plan as a safeguarded rail aggregates depot (policy MC16) and protected by policy MC6 of that plan and by the NPPF (para 182 regarding the agent of change principle, and para 204(e) on safeguarded minerals sites). Also see NPPF para 203 re. supply of minerals. WBC proposed the broader Goods Yard site, including the whole aggregates depot, as a housing allocation in 2015, but have since accepted that the necessary alternative site for relocating the depot within the borough will not be found in the short to medium term; Day Group consider this is not likely in the long term either. The current site UA34 includes a non-operational area of land formerly occupied by Network Rail, but also covers Day Group's site offices, weighbridge and haul road. Object to the boundary of UA34 as proposed in the Reg 19 document, since it includes existing railway operational land (in the north) and also land in the south-west identified by NR as being available to Day Group for efficiency improvements. The proposed Reg 19 site boundary does not reflect the land which NR have given internal clearance for release for development. The boundary of UA34 needs to be changed to remedy the issues above, provide a more regular, clear and defensible boundary. See map attached.</p>

The introduction of housing adjacent to the aggregates depot may cause conflict (from noise and disturbance caused by on site activities and access), affecting the depot's operations. The safeguarding of sites like the depot is not limited to retaining the land they are on, but includes ensuring that surrounding development does not prejudice the site's use for its safeguarded purposes; hence the 200m consultation areas provided around such sites in the Minerals Plan.

The 'Agent of Change' required to provide suitable mitigation in the context of NPPF para 182 is both the plan-making authority in promoting the site allocation and the applicant who will ultimately take forward the development.

Network Rail have confirmed the depot site is safeguarded and they will only support residential development as part of a masterplan that works with the existing freight users. Engagement with the prospective residential developers has identified potential for new housing, provided it does not prejudice the existing use or potential future expansion of activities at the Goods Yard. The policy context must require this.

In order to be considered sound, any proposed allocation policy on or adjacent to the safeguarded site must ensure the residential environment provided for future residents will not give rise to the risk of complaints in respect of existing and lawful activities on the Goods Yard. The current policy does not provide sufficient guidance or clarity on this, so does not provide certainty to either the Goods Yard operator or any prospective residential developer.

The representation (Accompanying sheet, page 5) sets out requirements from the policy on general relationship with the aggregates depot, not constraining the operation of the depot, detail of transport assessment, engagement with the Minerals Planning Authority, with National Rail and with the depot site operator, and design to minimise the potential for conflict. Proposed modifications to the policy text are set out (as detailed under 'Comment Justification').

It is understood that representations are being made by NR and by Surrey County Council raising similar issues with regard to the need to safeguard the Goods Yard area to be retained and its relationship with proposed allocation UA34. It is hoped that early discussion will commence between the parties and WBC with a view to agreeing modifications to Policy UA34 by means of a Statement of Common Ground (SoCG) in good time ahead of the EIP.

Wish to participate in the oral examination to discuss critical issues in respect of national and Minerals Plan safeguarding requirements, unless these are resolved by means of a SOCG and modifications.

Regarding sites UA6, UA10, UA11, UA13 and UA36:

In the context of the matters raised with relation to site UA32, it is confirmed that these sites are within the minerals infrastructure consultation area as defined in the Minerals Plan.

To ensure that the DPD is sound and does not allow for development which could prejudice the existing and future operation of the safeguarded aggregates depot, each of these proposed allocations must ensure that it confirms the location of the proposed allocation in the consultation area and expressly requires that any proposals which come forward have full regard to the existing safeguarded aggregates depot.

Contributor Proposed Modification: ...the following modifications are required to Policy UA34: Coal Yard/Aggregates Yard adjacent to the railway line, Guildford Road/Bradfield Close, Woking, GU22 7QE and the supporting text to make the DPD sound. Proposed additions to the draft Policy wording are shown underlined and in italics and deletions shown struck through. The order of the bullet points have been altered to reflect the importance of particular requirements and provide a more logical progression in the identification of those key requirements:

This 1.09* ha site is allocated for residential development including Affordable Housing. [*site area will need to be reviewed in light of revised site boundary as detailed at Document 2 below]

To achieve this, the development must address the following key requirements:

- o Development to ensure a satisfactory relationship between the proposed residential development and the existing [ADD: safeguarded rail aggregates depot, as identified in the Surrey Minerals Plan, to ensure that its effective operation is not constrained] [DELETE: minerals aggregate site];
- o Engage with Surrey County Council (Minerals Planning Authority/MPA) [ADD: to ensure Minerals Plan Safeguarding Policy is addressed.] [DELETE: as the site is identified in the Surrey Minerals Plan as a Rail Aggregate Safeguarded Site.] The MPA will need to be satisfied, [ADD: in consultation with the site operator,] that future development would not prevent, directly or indirectly, the [ADD: important minerals function and] operational requirements of the site.
 - [ADD: Early consultation with NR and the safeguarded rail aggregates depot operator will be required to ensure that assessment of the proposals, and in particular noise and air quality, take fully into account all current site activities and unconstrained operating hours, as well as potential for future expansion, so that proposals do not constrain the effective operation of the depot and the basis on which it is safeguarded;]
 - [ADD: Proposals will need to be designed to minimise the potential for conflicts of use and disruption and ensure that operation of the safeguarded rail aggregates depot is not prejudiced. In particular proposals will need to consider issues such as siting, design and layout, noise and air quality, lighting, transport and access at an early stage]
 - o Detailed transport assessment to determine site specific transport mitigation measures. The transport assessment should take account of proposed developments in the vicinity of the site. [ADD: The transport assessment must demonstrate that the proposals have taken account of vehicle movements associated with the adjoining safeguarded rail aggregates depot and that access to the aggregates depot is not compromised or constrained in any way;]
 - o [ADD: Any planning application submitted will be required to demonstrate what engagement has been undertaken with the MPA, NR and safeguarded rail aggregates depot operator; how the relevant safeguarding requirements at national and county level and how the agent of change principle have been adhered to; and specifically to detail the means by which the design of the proposal and mitigation measures to be incorporated will ensure that the existing use, and any potential expansion, of the safeguarded rail aggregate depot will not be prejudiced.]
 - o Community Infrastructure Levy...

The reasoned justification provided for Site Allocation UA34 at page 187 and 188 should reflect the amendments proposed above. Specifically, this should include:

- o Reference to the requirement for engagement with NR and the safeguarded rail aggregates depot operator in addition to the MPA;
- o A description of the key features and operations of the retained safeguarded rail aggregates depot should be included;
- o Reference to the policy provision both in the minerals plan and NPPF should be provided -as relevant context supporting the reasoned justification for the site allocation requirements.

Proposed modifications to the red-line boundary of the proposed allocation UA34 are detailed on the plan attached at Document 2. This shows the existing proposed boundary (continuous red-line), operational railway land required to be retained but currently included in the allocation (shown in blue) and the proposed modified boundary (broken red-line) which reflects the boundary line as confirmed by NR as having had internal clearance for release for development.

The Proposals Map would also need to be amended to reflect the modifications sought to the boundary of UA34 as detailed above.

The following modifications to UA6, UA10, UA11, UA13 and UA36 would make the DPD Sound.

Addition of the following 'key requirement' as a new bullet point:

<p>o Development to have full regard to its location with the consultation zone for the safeguarded Downside Goods Yard aggregates depot as detailed in the Surrey Minerals Plan. Early consultation and engagement will be required with the MPA and the Goods Yard operator to ensure that proposals are sited, designed, laid out and appropriately mitigated to minimise the potential for conflicts of use and ensure that they do not constrain the effective operation of the depot and the basis on which it is safeguarded.</p>
<p>Modification Reference: U0000335</p>
<p>Officer Response: Agree with proposed revision to site boundary for site UA34. Agree with the principle of amending policy UA34 in certain locations, to strengthen the protection for the depot's operations, although not with all the wording proposed by the representor. It is for the minerals planning authority to determine the potential impacts of any development on the function that the depot site plays in the Minerals Plan. See 'Response justification' for proposed new wording. The proposed requirements for the policies UA6, UA10, UA11, UA13 and UA36 are not necessary, since this consultation mechanism is already in place for developments within the minerals infrastructure consultation zone.</p>
<p>Response Reference: U0001745</p>
<p>Officer Proposed Modification: On both the Proposals Map and site maps in the DPD, amend UA34 site boundary in accordance with the proposed boundary supplied with representation. Amend key requirements of policy UA34 to read (proposed new text in square brackets):</p> <ul style="list-style-type: none"> - Development to ensure a satisfactory relationship between the proposed residential development and the existing [safeguarded rail aggregates depot, as identified in the Surrey Minerals Plan, to ensure its effective operation.] - Engage with Surrey County Council [as the] Minerals Planning Authority/MPA [to ensure the Surrey Minerals Plan is taken into account in any decision for the future development of the site]. The MPA will need to be satisfied that future development would not prevent, directly or indirectly, the [minerals function and] operational requirements of the site. - Detailed transport assessment to determine site specific transport mitigation measures. The transport assessment should take account of proposed developments [and existing activities] in the vicinity of the site. [Surrey County Council as the Highways Authority for the area should be consulted to ensure that a satisfactory access is achieved for the development of the site and the adjoining uses.] <p>Introduce new key requirements to policy UA34 to read:</p> <ul style="list-style-type: none"> - Early consultation with Network Rail is recommended; - Any development proposal will need to be designed to minimise the potential for conflicts of use and ensure that the operation of the safeguarded rail aggregates depot is not prejudiced. In particular, proposals will need to consider issues such as siting, design and layout, noise and air quality, lighting, transport and access at an early stage.
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 03154/1</p>
<p>Name: Mr G.R. Deadman</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10, GB11</p>
<p>Summary of Comment: Objects to development of Green Belt land. There are too many houses planned for West Byfleet already, with Broadoaks and Sheer House. Concerns regarding increased traffic congestion on A245 and associated pollution. Concerns regarding traveller pitches.</p>

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt for development. Section 5 specifically addresses the loss of Green Belt in Byfleet and West Byfleet. Section 3 addresses the issue regarding travellers. Section 13 addresses the issue regarding road infrastructure and section 8 covers pollution.
Response Reference: U0001526
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06814/1
Name: Mr Jason Denman
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is unsound. It is not an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy, because: <ul style="list-style-type: none"> - The infrastructure cannot cope with growth - roads are an straining point; schools are at capacity (more children would put too much pressure on these community schools, and would ruin the feel and personality that they have); GP surgeries would fail to cope. Insufficient infrastructure provisions have been identified to cope with growth. - Building on this Greenbelt land would create out-of-character urban area and ruin the community. It amounts to overdevelopment and would lead to urban sprawl. Do not sacrifice the countryside.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The comments regarding strain on infrastructure are noted. Section 6 of the Council's Regulation 19 Issues and Matters Topic Paper provides a detailed response to this concern. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. <p>The Council recognises the many benefits of the Green Belt but believes that very special circumstances exist to justify the release of a small portion of land. This is detailed in Section 1 of the Topic Paper. It is acknowledged that land at GB10 made some contribution to the purposes of the Green Belt, but the Council believe that exceptional circumstances justification exists for its release from the Green Belt based on its high potential to deliver sustainable development. Many key requirements have been included in policy GB10 to ensure that any development proposal is designed to account for the landscape sensitivity of this area. Sections 4 and 5 of the Topic Paper go into more detail and respond to concerns about removal of Green Belt land to the detriment of the community. Section 21 responds to concerns about urban sprawl. It should be noted that</p>

the retention of a wedge of Green Belt between site GB10 and the M25 is intended to help to avoid perception of development narrowing the Green Belt separation between Byfleet and West Byfleet.
Response Reference: U0001539
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06759/1
Name: Mr And Mrs J Dernbach
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
Summary of Comment: Objects due to: Traffic issues - connections to A3, M25 and Cobham mean already bad traffic will be made worse. Increased traffic will be a risk for pedestrians in Byfleet village. Noise and air pollution - from congestion, will create a public health concern Infrastructure - there is not provision for adequate healthcare - services are already at capacity. Would like to keep Byfleet as a safe, small village.
Contributor Proposed Modification:
Modification Reference:
Officer Response: This representation is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 6 and 8. With the mechanisms in place to ensure that appropriate additional infrastructure is provided to support new development (see section 6 of the Regulation 19 Issues and Matters Topic Paper), the Council does not believe that safety in Byfleet will be negatively impacted.
Response Reference: U0001152
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06527/1
Name: Mr John Dewar
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Green belt sites on flood plain in Byfleet are unnecessary, brownfield land can meet the reduced demand. There is no room to alter the already congested Parvis Road. WBC seems a bastion of overdevelopment for profit.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The necessity of taking land out of the Green Belt and safeguarding it to meet future development needs is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 2. Flood risk issues in relation to the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 12. The capacity of alternative brownfield sites to meet demand is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 11. In addition, sites GB4 and GB5 are only intended for allocation after 2027, if needed to meet the Borough's development needs at that time. Without prejudice to the process of site selection at that

<p>time, if current trends and policies continue we would anticipate that most of the development allocated at that stage is likely to be on brownfield sites, as in the current Site Allocations DPD.</p> <p>Recent changes to the calculation of housing need are addressed by the Regulation 19 Issues and Matters Topic Paper, see Paragraph 1.5.</p> <p>The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p>
<p>Response Reference: U0001713</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06590/1</p>
<p>Name: Ms Sushmita Dharmarajasingham</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10, GB11, GB18</p>
<p>Summary of Comment: The DPD is legally non-compliant.</p> <p>The statement that 1.93% of Green belt is lost is incorrect: 57% of that loss is in West Byfleet, which is to lose 60% of its Green Belt. This is very significant for West Byfleet, vandalism on an unacceptable scale.</p> <p>The DPD is unsound because GB10 should not be taken out of the Green Belt: The land at West Hall performs all the Green Belt purposes, other than preserving the special character of historic towns.</p> <p>More detail required on how the land in GB10 will be used. If the site area is 29.33ha but developable area is 14.8ha plus 4.7ha for public open space/green infrastructure, the remaining 9.83ha of the site (including the 'large areas of woodland and parkland setting' the policy proposes to retain) should remain in the Green Belt or at least be designated as Local Green Space, as at GB18. Otherwise further development could be brought forward; residents will suspect this is WBC's intention.</p> <p>The site boundary seems defined by land ownership rather than making the best use of land. Clearly defined boundaries should be created by extending the site up to the road to West Hall Care Home in the east, and removing a green corridor including Tins Wood and Dodd's Wood on the west, which should be left as Green Belt (connected to the main Green Belt at its southern end) or at least designated as Local Green Space. This protection for green space will be needed since the proposed density means the homes on the site will have little garden space.</p> <p>I cannot recall any consultation over any possible changes to the size and shape of the site.</p> <p>The further use of Green Belt for highways, implied by the statement 'Access... could be provided through Green Belt land from Parvis Road', is absurd and unsound, and does not accord with NPPF para 138.f.</p> <p>In the statement 'the retention of the northern part of the parcel within the Green Belt', the meaning of 'parcel' and the extent of the land referred to is unclear.</p> <p>There is no detailed traffic modelling covering the flows that would arise from this development. Look forward to more detailed proposals on A245 mitigation options.</p> <p>Changes to site numbering between the previous consultation documents, much of the evidence base, and the current consultation documents, is confusing for residents.</p> <p>Local policy has changed since Core Strategy adoption, to promote higher densities in urban areas. WBC is using its powers under NPPF para 119 to buy land and increase housing density. This policy should be included in the SADPD, lowering or removing the</p>

need for Green Belt development (more research is needed on the impact it will have). Not taking it into account contradicts NPPF para 67.

Densification as at the Sheerwater Regeneration Scheme could be replicated elsewhere the Borough, creating many more homes on existing residential land. This policy is not in the Core Strategy and has not been taken into account, contradicting NPPF para 67.

Paragraph 5.74 of the Core Strategy states that the SADPD ; -"will specify the mix of dwellings that will be expected to be provided on specific sites". I can find no such information for GB10.

Paragraph 5.128 of the Core Strategy states that the Council will keep the Broadoaks site (GB11) under review when preparing the SADPD. This has only been done partially; the SADPD does not take into account the resolution to approve (pending S106) of 254 homes and an 80 bed care home there.

The Council acknowledges more care home beds are required but has no policy on how to take them into account; each such bed will probably release a home for occupation, so should be treated as perhaps 75% of a dwelling.

The number of dwellings built and permitted and expected in West Byfleet District Centre since 2010 is at least 305- compared to the 170 stated in the Core Strategy. Not clear whether infrastructure providers have been asked whether there is capacity for this increase, or that between the allocated and expected number at Broadoaks. Proposals for GB10 are not sound when the effects of existing and committed development have not been modelled, and the proposals fail to take into account existing proposals.

Only when the impacts of forthcoming developments in West Byfleet, and of the Council's densification policies, have been fully analysed should a strategic decision to release land from the Green Belt for housing be taken.

Why is phasing required for GB10? Surely only if infrastructure is not ready. Why does WBC not give a timescale? If timescales are not known how can infrastructure providers be asked about capacity?

Is phasing legally enforceable? Once GB10 is removed from the Green Belt, it will be far more viable to develop than the Broadoaks or Sheer House sites, and WBC will be unable to refuse permission on it after 2022. As a result the (more sustainable) Broadoaks and Sheer House sites may be left derelict or built out more slowly- breaching NPPF para 59.

If windfall sites are also under-utilised or fail to come forward as a result, that would contravene NPPF para 68. WBC have failed to properly assess the economic viability of other housing schemes in the Neighbourhood Area against the proposal.

WBC must respect and adhere to the Neighbourhood Plan; GB10 is in breach of this plan. The West Byfleet Neighbourhood Forum has applied NPPF para 17 in supporting development at Broadoaks, and now wishes under the same paragraph to recommend that GB10 remain in the Green Belt. The Forum does not think WBC have done a robust enough study of the size and shape of GB10 or of the impact of new homes at GB11 and Sheer House.

NPPF para 65 makes clear that authorities should set out a housing requirement for designated neighbourhood areas as well as their whole area. WBC have failed to do this. Under NPPF para 66 this letter is the formal request for WBC to provide an indicative number to the Forum.

The proposal is about satisfying the needs of the Borough, not of West Byfleet, for which a 50% growth in the number of dwellings from 2013 to 2027 is not sustainable.

The field adjacent to the Long Walk on GB10's southern boundary is prone to flooding, see the Neighbourhood Fom website for photographs. The proposals therefore contradict NPPF para 158.

The Regulation 19 consultation period seems to short to consider such a significant matter.

I look forward to discussing the proposals further with the Inspector at the Examination. The suggestions at the beginning of this letter about a reshaping of GB10 are a recognition that in the longer term more new homes will need to be provided in West

Byfleet. The Forum is ready to consult with residents and amend its Plan to incorporate continued growth in our community but only at a pace which is sustainable locally.

Contributor Proposed Modification: There is a Lack of detail regarding proposed use. The proposed modifications to GB10 recognise that in the longer term more new homes will need to be provided in West Byfleet. The Neighbourhood Forum is ready to consult with residents and amend its Plan to incorporate continued growth in the community but only at a pace which is sustainable locally.

Can the undesignated 9.83 hectares of land on GB10 remain in the Green Belt or be designated as local green space like the land at GB18? There will be a little amount of owned green space in the site (i.e. gardens), therefore surrounding land should be protected from further development.

Policy GB10 states that large areas of woodland and parkland should be retained, and strengthened where possible. This is not a specific protection, therefore these areas should remain in the Green Belt. A green corridor could be created on the site by retaining woodland to the west, which would then adjoin towards the south.

The size and shape of GB10 seems to be designed to allow WBC the simplicity of dealing with one landowner rather than to make best use of the land in the area. The boundary of this site should be amended to adjoin the road leading to West Hall Care Home and include the fields along it, and remove the heavily wooded areas on the west side.

Modification Reference: U0000371

Officer Response: The concentration of Green Belt loss in West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.

The performance of the parcel including site GB10 against Green Belt purposes was assessed in the Green Belt Boundary Review (2015) and the site found suitable for removal from the Green Belt. The credibility of the Green Belt Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12. The exact locations within site GB10 that will be developed have yet to be determined; to do this effectively will require more detailed design work, on the basis of the key requirements set out in the policy. This will be determined during the planning application stage. The revision of Green Belt boundaries needs to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent (NPPF paragraph 139). The proposed new Green Belt boundary at GB10 meets this requirement, following field boundaries marked by hedges, an access road, and a woodland edge. Key requirements of the policy, such as 'Retain... tree belts and strengthen with planting to enhance the site's landscape character' are likely to lead to the strengthening of these features. This is the boundary that was proposed in the Green Belt Boundary Review (2015). By contrast, any attempt to draw new Green Belt boundaries around an expected developable area within the site would be likely to mean those boundaries cutting across open land at least until the main development takes place (after 2022), and potentially longer if a different layout is ultimately granted planning permission. This would not comply with the NPPF. For similar reasons, it would be inappropriate at this stage to designate areas of the site as Local Green Space. The site is allocated for residential development and to meet the accommodation needs of Travellers. There are policies and key requirements to make sure that any development incorporates significant open space and Green Infrastructure to serve the development.

The proposed removal of land along the north-western boundary of GB10 from the allocation, and its retention in the Green Belt, would result in the creation of an isolated patch of urban area surrounded by Green Belt. It would focus development on the areas of the site further from West Byfleet district centre and railway station; make the creation of a link with the Broadoaks site more difficult; and push the developable area towards the new boundary of the Green Belt, potentially affecting the visual impact of the development on the surrounding countryside. The addition to the site of two additional fields to the north-east would mean a substantial further reduction in the remaining gap between West

Byfleet and Byfleet, including as perceived from Parvis Road. Both these proposed changes would be contrary to the recommendations of the Green Belt Boundary Review. The policy as it stands makes sure that the development of the site includes significant green infrastructure to service the development and make sure the development provides a better transition between the urban area and the Green Belt.

Since the site was consulted on at the Regulation 18 consultation in 2015, the site boundary and stated developable area have remained the same; the indicative number of standard dwellings proposed has reduced from 592 to 555, while a proposal for 15 Traveller pitches has been added. There is no requirement for separate consultation on this change prior to the Regulation 19 stage.

The suggested idea of access through Green Belt land from Parvis Road was recommended by the Green Belt Boundary Review.

Agree that the statement 'northern part of the parcel' is unclear. Clarification proposed to indicate that this refers to the land outside and to the north-east of the site. The 'parcel' refers to the broader area of land assessed in the early stages of the Green Belt Boundary Review.

The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.

Appreciate the confusion caused by changes in site numbering. However, this is inevitable given the changes that have been incorporated to reflect the amount of new evidence and the need to take account of consultation responses. The Regulation 19 document is produced as the version the Council intends to submit to the Secretary of State, so needs to have an internally consistent numbering system. Care has been taken to ensure that site names remain consistent.

The necessity of Green Belt development in the context of high density development taking place in the urban area is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. The opportunity for further densification is addressed in Section 18.

Policy CS11 of the Core Strategy states that proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs as evidenced in the latest SHMA. By the time the West Hall site is released for development the current latest SHMA (2015) will be seven years old; WBC intends to produce new evidence on housing need before that time, so it would be more appropriate for proposals to be governed by the latest need at the time of the planning application.

Regarding Broadoaks, at the time of publication of the Regulation 19 version of the Plan the revised application on this site had not yet been approved. The new planning permission (February 2019) is accompanied by proposed highways works and also a contribution to the Community Infrastructure Levy commensurate with the size of the development. In addition, the funding of transport mitigation measures will rely on public sector funding sources as well as on developer contributions but also .

Care homes are indeed taken into account when calculating the Housing Delivery Test. However, given the factors set out in the Regulation 19 Issues and Matters Topic Paper, Section 1, this will in any event not affect the necessity for Green Belt development.

The relationship of the proposals to infrastructure provision is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.

The timing for release of Green Belt land is prescribed by Policies CS1 and CS6 of the Core Strategy. They require land to be released from the Green Belt to meet housing need between 2022 and 2027. This is necessary to ensure that most new development is focused on previously developed land in the urban area which offers the best access to a range of facilities and services, in line with the objective of sustainable development.

Policy SA1 of the SADPD is drafted to be in general conformity with this objective. The Site Allocations DPD clearly demonstrates that sufficient land has been identified on previously developed land in the urban area (and also at Broadoaks, which already has planning permission) to meet development needs up to 2022. Therefore, the phasing of

<p>West Hall could improve the relative attractiveness of development at Broadoaks and Sheer House.</p> <p>The relationship of the SADPD to the West Byfleet Neighbourhood Plan is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16.</p> <p>The requirement to set out a housing requirement for neighbourhood areas in NPPF paragraph 65 only relates to situations where the authority is establishing a housing requirement figure for their whole area. In Woking this was last done in the production of the Core Strategy in 2012 (reviewed in 2018). When WBC next comes to establish a new housing requirement figure for the Borough, it will work with the relevant Neighbourhood Forums to consider establishing a requirement figure for the West Byfleet Neighbourhood Area, in accordance with the NPPF. This might require a review of the Neighbourhood Plan.</p> <p>The relationship of the proposals to issues of flood risk is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 7.</p> <p>The adequacy of the Regulation 19 consultation period is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 9.</p> <p>Welcome comments about the proposed further development of the West Byfleet Neighbourhood Plan.</p>
<p>Response Reference: U0001586</p>
<p>Officer Proposed Modification: Amend key requirement of policy GB10 on p280 to read as follows: "Access to the development could be provided through Green Belt land from Parvis Road, with a potential pedestrian access through Broadoaks which would give a more direct route into West Byfleet town centre and its services and facilities. The retention of the northern part of the parcel, adjacent to the boundary of the site within Green Belt, would help to avoid perception of development narrowing the Green Belt separation between Byfleet and West Byfleet..."</p> <p>Delete the next key requirement: 'Taking into account biodiversity and flooding constraints, form new Green Belt boundary along edge of development to retained wedge of land adjacent M25 and retaining land to the north of the development within the Green Belt'.</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06127/1</p>
<p>Name: Mr Stewart Dick</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10, GB11,GB18, UA42</p>
<p>Summary of Comment: Concerned about proposal GB10. Considers that this recommendation is flawed; it is unsupported by the process, and the proposed mitigations are unrealistic and if implemented will have little if any beneficial impact.</p> <p>GB10 serves all but purpose D of the Green Belt as set out in the NPPF. In particular it checks the unrestricted sprawl of large built-up areas, and prevents neighbouring towns merging into one another.</p> <p>WBC has stated that the proposals in the DPD would only result in a loss of 1.93% of existing Green Belt. However 57% of the Green Belt to be lost is situated in West Byfleet. GB10, GB11 and GB18 amount to 60% of the total Green Belt land in West Byfleet. The NPPF is clear that "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." It is not considered that exceptional circumstances exist nor that reasonable alternative options have been fully explored.</p> <p>The potential quantum of development in West Byfleet is 1,062 additional dwellings, plus the care home and 15 traveller pitches. As the village of West Byfleet has just under 2,400</p>

homes, this represents a 45% increase which would transform the structure and dynamics of West Byfleet in a manner that is considered unwelcome and unsupportable.

In addition, intensification of residential uses (including the Sheerwater regeneration scheme, and other schemes such as the Woking Football Club), a better use of existing brownfield sites, and an appreciation of high street retail closures resulting in further residential opportunities, it is considered that there is no need for release of Green Belt land over the plan period, and that it is quite likely that WBC will exceed its requirement. Recognises the requirement to provide Traveller pitches. However, it considered that West Byfleet would meet a disproportionate amount of the overall requirement. The total required number is 22, and West Hall will comprise 68% of that figure. Raises further concerns regarding disagreements.

Concerned that Woking Local Plan Potential Mitigation (2017) references the Route Management Study (2002), and that the Local Development Framework Infrastructure Capacity Study and Delivery Plan Fourth Draft (2018) refers to an assessment in 2010/2011.

The 2015 Strategic Study concluded that the Level of Service and the Ratio of Flow to Capacity on Parvis Road projected the worst possible ratings for performance. Nothing has improved since then; indeed quite to the contrary. The proposed mitigations will have little impact or are unrealistic. Further, the Government's Road Traffic Forecasts (September 2018) discusses the likely growth in car ownership and hence traffic. This compounds the problem of Parvis Road (A245).

The three General Practices at West Byfleet Health Centre are heavily subscribed.

Additional housing will create a significant increase in demand in the area.

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

Infrastructure is at or close to capacity. Proposals to enhance it to meet the proposed increase are inadequate.

Regarding general infrastructure, it is considered that development is not achievable if a reasonable quality of life and social amenities are to be maintained

Regarding process, four issues are raised:

1. It is only in the last two months that West Byfleet residents were informed of the proposed 15 Traveller pitches at GB10. There was no opportunity to comment at Regulation 18.
2. The land at West Hall makes an important contribution to urban sprawl; the purposes of Green Belt are being ignored for no good reason.
3. The original proposals in the Regulation 18 DPD were inter alia to distribute traffic more evenly across the Borough. This is not happening with Parvis Road (A245)
4. The development at West Hall would not amount to sustainable development. It is therefore contrary to the requirements of the NPPF.

Regarding whether the DPD is positively prepared, the respondent raises concerns that GB10 does not meet objectively assessed needs. There is no objectivity in a 60% loss of Green Belt and a 45% increase in the number of dwellings. The lack of detailed and costed infrastructure enhancements to support these changes exacerbates the irresponsibility of the proposals.

Regarding whether the DPD is justified, the respondent comments that while it is commendable to adopt a conservative approach to supply and demand, that should not be at the unnecessary and unjustified cost of loss of irreplaceable Green Belt.

No comment is made on effectiveness.

The DPD is not considered consistent with national policy as GB10 is not sustainable.

The proposal fails the tests of soundness, and has failed in its assessment of social, environmental and economic implications of the proposal.

Wishes to speak at the examination.

Contributor Proposed Modification: The A245 is at full capacity so do not build 550 homes at GB10.

Modification Reference: U0000210

Officer Response: Many of the issues raised in this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper.

Paragraph 12.2 confirms that the Green Belt Boundary Review is sufficiently robust to inform the Site Allocations DPD and ensure that any land released from the Green Belt does not undermine its purposes.

Section 5 recognises that the proposed allocation of sites for development is not evenly spread across the Borough. However, this could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives.

Paragraph 5.2 in particular is noted which provides that in West Byfleet, excluding GB18 which will not be developed, the total amount of Green Belt lost for development in West Byfleet is 37.8%. Whilst the Council sympathises with the concerns of local residents over the loss of this amount of Green Belt land, it has ensured through a number of studies that the land that is released from the Green Belt will not undermine its overall purpose and integrity.

Section 1 comprehensively addresses the justification for the release of Green Belt land.

Paragraph 1.7 in particular is noted which provides that the Council has identified a quantum of land for development which is capable of delivering in excess of the Borough's housing requirement. However this is considered to be a prudent approach as it allows for sufficient cushion to cater for non-implementation given the nature of brownfield sites that are allocated. Furthermore, Paragraph 1.8 notes the contribution that Green Belt land will make to the provision of the nature and type of family homes that the community needs.

Section 3 addresses the Council's process in allocating sites for Traveller accommodation. Paragraph 3.8 is of particular relevance in this instance. It is not the case that all the traveller pitches in the Borough will be concentrated in Byfleet and West Byfleet. Taking into account the existing sites, most of the need is being met at Five Acres and Hatchingtan.

As per Paragraph 10.3 the Council is satisfied that its evidence base is proportionate, sufficiently up-to-date and robust to inform the Site Allocations DPD. In particular, in accordance with Paragraph 6.7, the County Council as Highway Authority is satisfied that the approach taken to mitigation by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.

Regarding the A245 in particular, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify that the potential mitigation measures that might be necessary to address development impacts on the network. It is considered that with appropriate mitigation, the transport impacts of development can be addressed.

Section 6 comprehensively addresses infrastructure provision. In particular, Paragraph 6.12 addresses GP provision and Paragraph 6.9 addresses education provision.

The issue of Dentists provision is addressed in the Draft Infrastructure Delivery Plan (2018). In particular, it is noted that the latest Surrey Infrastructure Study estimated a need for an additional four dentists to serve population growth in Woking between 2015-2030. Although there are no known plans for new dental surgeries to 2027, a Surrey and Sussex Dental Local Professional Network has been established to promote a strategic, clinically informed approach to the planning and delivery of dental services that reflects the needs of local populations. The Council continues to engage with the North West Surrey CCG regarding any commissioning decisions.

Paragraph 6.11 addresses the issue of waste water. In particular it is noted that Thames Water have also responded to the Regulation 19 consultation, and their representations will be taken into account. Together with the introduction of SuDS, which Thames Water support, the Council is satisfied that wastewater and sewerage issues will be addressed at the planning application stages.

Regarding process, it is recognised that the proposed traveller pitches at GB10 were not included in the Regulation 18 consultation. Nonetheless, the Regulation 19 consultation

<p>has provided an opportunity for local residents to make representations. As set out in Section 9, the Council considers that the Regulation 19 consultation process was adequate.</p> <p>Regarding the potential impact of GB10, Paragraph 21 sets out that none of the proposed allocations will lead to unacceptable urban sprawl. Furthermore this site is considered to be sustainable, and its social, environmental and economic impacts have been thoroughly assessed in the Sustainability Appraisal which informs the Site Allocations DPD.</p> <p>It will be unrealistic to expect the Site Allocations DPD to distribute traffic more evenly across the Borough. The Council has carried out Transport Assessments to make sure that proposed development impacts are fully assessed. Where possible, mitigation measures have been identified. Detailed Transport Assessment will be undertaken as part of the development management process to determine any site specific measures of mitigation that might be necessary. In this regard, Paragraph 1.4 notes that the Site Allocations DPD should be judged on whether it has identified a sufficient deliverable range of sites in sustainable locations in the context of the spatial strategy of the Core Strategy to meet the development needs of the Borough. The Council considers that the DPD meets this criterion.</p>
Response Reference: U0001075
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06806/1
Name: Aileen Dick
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Process: The process has gone on too long An Executive Summary should have been provided. There are many discrepancies and out of date references in the document, some significant. Need more attention to quality control.</p> <p>Object to proposals for West Hall: More recent objections seem to have been given preferential treatment over the objections made by West Byfleet residents to the 2015 Reg 18 consultation. West Byfleet is a victim for no justified reason. Many reasons given for rejecting the Martyrs Lane and Pyrford sites could just as easily be applied to West Hall. West Hall serves the Green Belt purpose of checking unrestricted sprawl / preventing neighbouring towns (West Byfleet and Byfleet) merging into one another. What are the exceptional circumstances for removing land from the green belt, as required? 57% of proposed Green Belt removal is in West Byfleet, and that amounts to 60% of all West Byfleet Green Belt- disastrous. Positively prepared: Alarming and damaging deficiencies; knowingly damaging West Byfleet while protecting your own wards undermines trust and respect. As regards West Byfleet the policy does not address the local housing needs, it is massive overdevelopment, not meeting objectively assessed needs. Together with Sheer House and Broadoaks it would increase the number of homes in West Byfleet by 45%, totally transforming the valued characteristics of the village. Clear shortcomings against the requirement to be Justified. It is not necessary and unjustified for WBC to build on the green belt, considering other sources of dwellings e.g. Sheerwater regeneration, tall buildings, brownfield sites, schemes like Woking Football Club, conversion of shops to housing.</p>

Travellers' pitches have not been consulted on before, the proportion going to West Byfleet is too high.

The proposal is inconsistent with national policy:

Many references in the IDP (April 2018) and Woking Local Plan Potential Mitigation (October 2017) are to out- of-date documents- totally unacceptable. The 2015 strategic study concluded that the Level of Service and Ratio of Flow to Capacity on the Parvis Road projected the worst possible ratings for performance. Govt Road Traffic Forecasts 2018 reinforce this. Things have got worse since then, the road is already at full capacity. Proposed mitigations will have very little impact or are unrealistic.

The Health Centre GPs are heavily subscribed currently, the new housing will significantly increase demand. There is no current answer. Dentists and primary schools are oversubscribed, the nearest secondary school has reduced its intake to improve the learning environment, waste water capacity will be unable to cope. Proposals to enhance infrastructure are inadequate.

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

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

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The unusual length of the Site Allocations process has been largely due to the additional consultation held on the potential for safeguarding the site at Martyrs Lane for future development, as an alternative to sites in Byfleet among others.

It would be hard to summarise the Site Allocations in textual form as a traditional Executive Summary. The document does contain an Overview of Site Allocation Proposal Sites, Table 2, pages 6-15, which summarises the contents. Minor discrepancies and incorrect references have been picked up at pre-submission stage and will be rectified before submission.

Other things being equal, the same weight is given to representations received at the Regulation 18 consultation and that on land east of Martyrs Lane.

The reasons given for rejecting the site at Martyrs Lane are set out in the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11. The reasons for rejecting the sites in Pyrford are set out in Paragraph 14.11-14.13 of the same document. WBC does not consider that either set of reasons applies to the site at West Hall.

The impact of the proposals on urban sprawl are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 21. The Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that sufficient exceptional circumstances justification exists for the release of site GB10 from the Green Belt, based on its high potential to deliver sustainable development. A significant green gap will be retained between site GB10 and the motorway, with public access to this area enhanced by the creation of the Byfleet SANG and possibly off-site green infrastructure provided as part of the development of GB10, and the majority of the Green Belt on the west side of Byfleet will also be retained.

The exceptional circumstances which require the removal of land from the Green Belt are addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5.

The role of Councillors in the preparation of the Site Allocations DPD is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 24.

With regard to valued local characteristics, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that

development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

The necessity of and justification for building on the Green Belt is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2. The consideration of alternative sites, especially on previously developed land, is addressed in Section 11 of the same document.

The reasons behind the allocation of Traveller pitches in West Byfleet are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3. It is acknowledged that not every individual proposal in the DPD has gone through the Regulation 18 consultation. However, residents have had adequate opportunities to comment on the proposal during the Regulation 19 consultation.

No information is provided on which references in the IDP and Local Plan Potential Mitigation the representor considers out-of-date, which makes this point hard to address. Whether or not a document is out of date does not depend on its age alone in all cases, but sometimes also on the content and context of the document.

The impacts of the proposals on infrastructure are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.

The social, environmental and economic implications of the proposal are addressed in the Sustainability Appraisal, which WBC considers to be robust.

Response Reference: U0001522

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06525/1

Name: Mr And Mrs Brian And Susan Dossett

Number of Signatories: 2

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Concerned about proposals for Traveller site and general housing at West Hall, including:
 Increased traffic flow/congestion and existing traffic flow to West Hall.
 The length of hours worked by staff at West Hall care home
 Impact on wildlife and livestock
 Impact on maintenance of the West Hall access road
 The present sewage condition would not be suitable for further use.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. A key requirement of policy GB10 states that the existing West Hall drive, or part of it, would be used as a secondary access to the development site for emergency access purposes. For this reason it could be suggested that the route of such an access may receive maintenance but may not see a significant increase in vehicle movements that would cause problems to the existing users of this road, including staff travelling to and from the care home at

<p>unusual hours. In any event, another key requirement states that the development proposals should be informed by a Transport Assessment which would address any potential traffic issues.</p> <p>The impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. The impact on agricultural land has been considered through the Sustainability Appraisal and Green Belt Boundary Review.</p> <p>The impact of the proposals on infrastructure, including sewage infrastructure, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p>
Response Reference: U0001714
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05599/1
Name: Mrs Christine Dougherty
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: The DPD is not legally compliant.</p> <p>The DPD has not met the Duty to Cooperate, since there is insufficient existing or proposed infrastructure, roads, health, schools, flooding etc.</p> <p>The DPD is not positively prepared, justified, effective, consistent with national policy or sound, since the form has been made as complicated as possible to deter people from objecting; it should be user friendly as per Government guidelines.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The impact of the proposals on infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The impact of the proposals on flood risk is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The Duty to Cooperate has been met, and indeed, has resulted in part of Woking's housing need being met outside the Borough; without this there would be still more pressure for development.</p> <p>The adequacy of communications in the Regulation 19 consultation is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 9.</p>
Response Reference: U0001390
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04696/1
Name: Mr Gordon Dow
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Object that the DPD fails to indicate that WBC is intent on destroying the town centre or that it is intent on creating several 30+ storey buildings. No other town outside major cities has seen fit to adopt this approach.</p>

<p>Little or no thought has been given to transport for the new residents. Most will travel to London but the trains are already full to capacity. One major car park is about to be built on, with the other converted to multi-storey; I can't see that working.</p> <p>Do we really need all these additional flats? Surely many of the incomers will want to live in houses?</p> <p>No-one has ever put it to residents whether we wanted unsightly skyscrapers put up in the town centre; I am very annoyed by them.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: It is correct that the Site Allocations DPD (SADPD) does not include a number of proposals in the planning pipeline for tall buildings of 30 storeys or more in Woking town centre, instead proposing (lower) indicative densities for those sites. It should be noted that Policy CS1 of the Core Strategy offers an in-principle support for tall buildings in the Town Centre. Likewise, on part of site UA26, permission and prior approval has been granted for a density of housing substantially lower than the indicative density in the DPD (PLAN/2018/1320 and PLAN/2018/1301). The Council takes the view that the indicative densities in the DPD are reasonable and are broadly in line with the Core Strategy, being based on the density ranges provided in policy CS10 of the Core Strategy, which are in turn based on the character of the area and on exemplar sites. Actual densities can only be agreed on a case by case basis depending on the merits of each proposal within their respective contexts at the planning application stage. Densities could go up or down (in comparison with the indicative number under the allocation) depending on the nature of the scheme, and this will be managed at pre-application / planning application stage.</p> <p>The SADPD recognises the current and projected future capacity constraints at Woking Railway Station, and Policy UA7 includes all necessary measures to facilitate Network Railway's planned works to increase capacity (described in the Infrastructure Delivery Plan). Allocated sites in the Town Centre will also be expected to contribute to other capacity improvements at the station. Policy UA32, allocating the Oriental Road (East) car park for residential development, includes a key requirement that there should be no overall loss of parking serving the railway station; to comply with this, the site could not be developed without the parking being re-provided either on-site or elsewhere.</p> <p>The Core Strategy provides for a balance of dwelling types to meet the needs of the area, specifying numbers of dwellings to be delivered in the town centre (to be mainly flats) and on Green Belt sites (anticipated to be mainly houses). The SADPD meets the requirements of the Core Strategy.</p> <p>The Core Strategy, which was subject to three rounds of public consultation, expressly allows for the construction of tall buildings in the town centre, subject to certain criteria (policies CS1 and CS21). Every planning application for the construction of a tall building in the town centre is also subject to formal public consultation. The Council also encourages developers to carry out pre-application consultation with the community, according to recommendations set out in the Statement of Community Involvement (2015).</p>
<p>Response Reference: U0001040</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 02549/2</p>
<p>Name: Mr Martin Doyle</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: COMM</p>

Site Reference: RG18GB12, RG18GB13, GB10, GB11
Summary of Comment: Considers the DPD legally compliant, no modification proposed, duty to cooperate was met, considers the DPD was positively prepared, justified, effective, consistent with national policy and sound. No modifications proposed and does not wish to speak at examination but wishes to be informed of the next stages. The Council has taken regard of the huge number of written objections submitted during the Regulation 18 public consultation, such that both of the two fields, either side of Upshot Lane in Pyrford, are to remain in the Green Belt. It is gratifying to note that local democracy does work. These fields were identified in the Council's report as being of low suitability for removal from the Green Belt, yet were nevertheless put forward for safeguarding at the time of the Regulation 18 public consultation. The removal of sites GB12 and GB13 from the Regulation 18 proposals is a very positive step that improves the viability of the Regulation 19 proposals and makes the DPD sounder. In doing so, the revised plans preserve Pyrford's heritage, protect valuable farm land and above all preserve the unique character and setting of Pyrford that is enjoyed by so many from across the Borough and beyond. Concerned at the proposal to set aside three acres at West Hall, West Byfleet to provide 15 travellers' pitches. This proposal was a last minute addition, with no reasoned justification, no prior notification or due process. Assuming that Woking is obliged to provide this number of travellers' pitches, would favour spreading these across the borough in 3 or 4 separate sites. Does not believe sufficient consideration has been taken over the impact of increased traffic volumes on the streets in the east end of the borough of proposed and potential developments in Byfleet and West Byfleet. Th A245 is already heavily congested at rush hours.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted for Pyrford fields. The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper. Concerns raised regarding congestion is addressed in Section 13 of the Topic Paper, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.
Response Reference: U0001343
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06272/1
Name: John Draper
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Object to allocation GB7. The land in question is Green Belt and the location is entirely unsuitable for a major housing development. Also the road infrastructure is inadequate for any more development. Woking Borough Council has already wrongly released Green Belt at this site for the creation of Hoe Valley School. There was other, non Green Belt land available for the school but all alternatives were ignored by WBC. There are other, non Green Belt sites available for housing.

<p>This area of land has always been the green break between Woking main and the village of Mayford. WBC has a responsibility to preserve Green Belt and the character of Woking's villages. If the site goes forward I will consider changing my vote.</p>
<p>Contributor Proposed Modification: I would hope that the Woking Borough Council Planning Policy Team will also show some common and political sense, will now also listen to the Woking residents/electorate, and will remove any planning to destroy this Green Belt land.</p>
<p>Modification Reference: U0000260</p>
<p>Officer Response: The justification in principle for the existence of very special circumstances requiring the release of Green Belt land for housing is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. This also sets out the importance that WBC places on the protection of the Green Belt and ensuring its loss is kept to the minimum necessary. The impact of the proposals on highway capacity is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The existence of very special circumstances for the development of Hoe Valley School in the Green Belt was demonstrated adequately at the time of the application for that development in 2015. The Green Belt Boundary Review provided clear evidence to justify the allocation of the site for a school and for that to be developed if a need could be established. At the planning application stage, the Development Management case officer considered the need assessment to be robust. In combination with information from Surrey County Education Authority, and the Site Allocations regarding sites in the urban area, the case officer considered this was the only site available for the provision of a new secondary school to serve the identified need for secondary school places in Woking. The Secretary of State considered this case and decided not to call it in. The site was not removed from the Green Belt by the building of the school there. The proposal to remove site GB7 from the Green Belt for development is based on a separate evidence base document, the Green Belt Boundary Review. The availability of alternative non-Green Belt sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 11. The separateness of Mayford from Woking is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 20. With regard to local character, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Mayford village itself will also continue to have its character protected by Green Belt designation. Other villages in Woking borough retain great character and charm whilst being part of Woking's urban area. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.</p>
<p>Response Reference: U0001455</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

Contributor Reference: 04149/1
Name: Mr And Mrs David And Jill Drinkwater
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Concerns regarding loss of land for development at GB7. Concerns regarding increased traffic and associated safety issues. An accident has already happened since the school opened. Concerns regarding pollution and associated detriment to the school. Site should be retained as open space.
Contributor Proposed Modification: Site should be retained as open space.
Modification Reference: U0000363
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 8 addresses the issue regarding pollution. Section 13 addresses the issue regarding the adequacy of road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A320 Corridor Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Policy CS18: Transport and accessibility of the Core Strategy ensures that development proposals provide appropriate transport infrastructure measures to mitigate the adverse effects of development traffic and other environmental and safety impacts.
Response Reference: U0001621
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06522/1
Name: Ms Lindsay Druckman
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Health infrastructure in Byfleet and West Byfleet is already stretched for resources, e.g. it can take over two hours to get an emergency GP appointment and over three weeks to book in a blood test. How will the area cope with the proposed development? Are you going to open a new doctors' surgery? School infrastructure in Byfleet and West Byfleet is already stretched for resources, e.g. over 100 children applied for 30 places at my local school, and this is across the board for all schools in the ward. How will the area cope with the proposed development? Are you going to open two more schools? Transport infrastructure in Byfleet and West Byfleet is already stretched for resources, at rush hour the village comes to a standstill and incidents on the A3 or M25 cause hours of gridlock. How will the roads cope with the proposed development? You are asking to build on greenbelt land, next to the M25 and under electricity pylons. Why would you want to house families in accommodation which is polluted and under electricity pylons? Is this even safe? Have you considered the cumulative impact on infrastructure and traffic arising from your proposals together with the Octagon development? Wholeheartedly object to the scale of the plans. Why build 920 houses in one village, what is wrong with the others? There is only one cash machine in the entire village, and no bank.

The current Traveller site at Murrays Lane is fine, but why can the 21 additional sites not be spread around? Wholeheartedly object to the scale of plans.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on infrastructure, including health facilities and schools, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The issue of pollution in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. Building houses under pylons and transmission wires deprives the occupants of amenity and makes infrastructure maintenance harder, as well as the existence of statutory minimum distances below wires for safety purposes. National Grid therefore requests buildings not to be constructed beneath or adjacent to their transmission lines. This only affects a small proportion of site GB5, and the western side of site GB4 where development is not envisaged in any case. The issue will be addressed if and when the sites are allocated for development, for example through potential key requirements on layout. Development on the Broadoaks (Octagon) site has been factored into the transport evidence base and information on it provided to partners with responsibility for infrastructure delivery. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. The reasoning behind the scale and distribution of Traveller site allocations is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.
Response Reference: U0001718
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 02448/2
Name: Mr Chris Dunstan
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports the decision to exclude Upshott Lane sites, in recognition of validity of objections made at Regulation 18 stage. To include these fields would increase traffic through Pyrford to dangerously high levels (adding to danger and pollution from traffic) and do significant damage to the semi-rural character of Pyrford as a whole, and in particular to the character and setting of the conservation area around St Nicholas Church. Additional developments proposed in West Byfleet and Byfleet will make the A245 to and from the A3, and alternative routes through Wisley or Ripley villages (both with single lane bridges over the River Wey) even more congested.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted. Paragraphs 14.12 and 14.13 of the Council's Regulation 19 Issues and Matters Topic Paper describes in detail why the Regulation 18 sites GB12 and GB13 were excluded from the latest draft DPD.
Response Reference: U0001520

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02468/2
Name: Ms Fiona Dunstan
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Thanks to the Planning Committee for removing Upshot Lane fields from the Site Allocations. The previous proposals (in 2015) were ill-considered in not taking account of the current state of local infrastructure, including roads (under significant pressure at peak times, with long queues and air pollution posing a risk to residents). Since then the situation has deteriorated further. The fields contribute significantly to the semi-rural setting and character of Pyrford as a whole and if they were built upon the character and setting of the Pyrford Conservation Area would suffer enormously.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06703/1
Name: Mrs Kelly Dyer
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is unsound. It is not an appropriate strategy given the reasonable alternatives and based on evidence, nor is it consistent with national policy. - Development would introduce over 500 cars to the area, with only one entrance and exit point onto Parvis Road - this will have huge negative impacts on an already congested route. Extra vehicles will reduce air quality and contribute to noise pollution. Residents of Dartnell Avenue, Blackwood Close and surrounding closes experience access issues already. - Lack of healthcare facilities or schools planned to serve new residents. There is already insufficient capacity at existing facilities and schools. - Development would increase risk of flooding to existing and proposed housing. - Housing at this scale is unnecessary, accounting for existing developments at Sheer House and in Sheerwater. Viable and sustainable alternatives are already being delivered, which negates the need to use Green Belt land. Next the Council will be building on school fields.
Contributor Proposed Modification: Meet housing needs at alternative sites such as Sheer House and Sheerwater developments. The proposals on Green Belt land in West Byfleet should be reconsidered and relocated.
Modification Reference: U0000330
Officer Response: The Council has comprehensively responded to the issues raised in the Regulation 19 Issues and Matters Topic Paper. Section 13 of the Topic Paper sets

<p>out how the Council accepts that the proposed development will generate additional traffic, and how this will be mitigated. This includes mitigation measures for the A245. With appropriate mitigation measures identified in Transport Studies and additional transport assessments required at development management stage, the Council is satisfied that transport impacts of development can be addressed.</p> <p>Section 8 responds to concerns about air and noise pollution.</p> <p>Section 6 sets out the infrastructure assessment that has been conducted, to identify the level of infrastructure required to support growth. This includes school and health facilities.</p> <p>Concerns regarding flooding are addressed in detail in Section 7 of the Topic Paper. The housing figures generated by development at Sheer House and Sheerwater have been taken into account in preparing the DPD, and there is still a need to release and safeguard Green Belt land to meet future development needs. This is detailed in Sections 1, 2 and 5 of the Topic Paper.</p>
Response Reference: U0001228
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06679/1
Name: Ms Charlotte Earl
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Objects to GB10 proposed plans for the following reasons: The land is green belt land and should be protected as such and left to protect the surrounding area of beauty and not released to overdevelopment .</p> <p>Concerns over the ability of the Parvis Road where the access will come from, to be able to successfully maintain traffic flow when it already gets congested in peak hours. Additional house and therefore cars will make the road dangerously congested. Access to the train station will mean more crossing and lighting will be necessary to ensure pedestrian safety.</p> <p>The development is close to the M25 which already causes pollution to the air. This new development with increased traffic can only add to that and be detrimental to the local residents.</p> <p>Does not believe the local infrastructure can cope with the development. Where are the considerations for new schools and doctors to cope with increased population.</p> <p>Does not believe the area need such development in an already highly populated area.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Objection is noted.</p> <p>The justification to release Green Belt land for development and impact on woodland and fields have been comprehensively addressed in Section 1 and 19 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core</p>

<p>Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>The impact of the proposed development on noise and air pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>Key requirements of policy GB10 indicate that a detailed Transport Assessment should be submitted with any planning application, to analyse access requirements and any transport infrastructure required as a result of the development. This may include pedestrian crossings and other measures to ensure highway and pedestrian safety is maintained. Consultation with the highway authority - Surrey County Council - will take place as part of any planning application process.</p> <p>The Council has decided through the Core Strategy that the significant unmet need for housing justifies the in principle need to release Green Belt land for housing development. In doing so it has ensured that first and foremost development is directed to the most sustainable locations of the Borough in accordance with the spatial strategy of the Core Strategy. The Council accepts that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.</p>
<p>Response Reference: U0000922</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06583/1</p>
<p>Name: Miss Natalie Ebeling</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05</p>
<p>Summary of Comment: Oppose development on Green Belt in Byfleet: Development next to a children's nursery and care home would be inappropriate. Local infrastructure would not support the development. There is wildlife including badgers, foxes and hedgehogs in the village, these are in decline. Byfleet is a flood plain so should not be built on. Development would worsen existing traffic problems on Parvis Road. Green spaces and trees are important because of all the traffic and also for mental health, people need clean air and space, trees support this.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The impact of Green Belt loss on local amenity and the wellbeing of local people is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4.</p> <p>The impact of the proposals on infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of the proposals on wildlife and trees is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19.</p> <p>The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p>

The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.
Response Reference: U0001605
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06618/1
Name: Eco World
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA12, UA13
<p>Summary of Comment: Comments on Site UA12: Synergy House</p> <p>The DPD is legally compliant and complies with the Duty to Cooperate but is unsound. Support the allocation; the site is available.</p> <p>Support the plan as a platform to achieve the vision for Woking town centre; support the broad vision and strategic objectives; support the case for a 'brownfield-first' spatial strategy; support the principle of maximising development capacity on brownfield allocations.</p> <p>Describe the ethos and record of our client EcoWorld.</p> <p>The proposed development on site UA12 would be too small to attract longer term first class commercial occupiers, and does not make efficient use of brownfield land. The site should be incorporated into a wider development to achieve this. The site has a close relationship with land to its rear (allocations UA10, UA11 and UA13), and proposals should be cognisant of the development of those areas, including the potential re-alignment of Goldsworth Road.</p> <p>Flexibility on use should be written into the site allocation policy to allow for alternative uses to be brought forward on the site.</p> <p>For the plan to be sound, amendments required to the policy UA12 to support:</p> <ul style="list-style-type: none"> - Consideration of the benefits of combining policies UA12 and UA13, including the commitment by EcoWorld to making land available to enable the Council to deliver its Homes for the Homeless proposal on UA12 as part of a planning permission for UA13. - Flexibility and wording of specific elements of the combined policy to provide a framework for the delivery of the optimal form of development between the two sites. - Exploration of the opportunity to re-align Goldsworth Road in pursuit of place-making - Recognition of the potential for more development on allocation UA12, if need for housing increases prior to Examination or other sites are unable to accommodate the growth anticipated. - Flexibility to allow commercial office space not to be delivered on the site, in response to market conditions at the time of delivery. - to deliver a homeless shelter rather than office development, cognisant with recent discussions with the Council. <p>The ownership situation of UA12 and UA13, and development on surrounding sites, has evolved since previous iterations of the SADPD, the potential on both sites should be reviewed as a result.</p> <p>Highlight problems with meeting the objectively assessed housing need of West Surrey. Cite paragraph 15.32 of the Sustainability Appraisal as providing a collective justification for all sites allocated in the urban area.</p> <p>EcoWorld will endeavour to keep the Local Plan process well informed of progress on pre-application discussions on site UA13, to ensure the supporting policy is closely aligned.</p> <p>Comments on Site UA13: 30-32 Goldsworth Road, Woking Railway and Athletic Club, Systems House and Bridge House</p>

The DPD is legally compliant and complies with the Duty to Cooperate but is unsound. Support the allocation; the site is available. Would support exploring the capabilities of the site in the context of a wider place-making exercise in this part of the town centre. Support the plan as a platform to achieve the vision for Woking town centre; support the broad vision and strategic objectives; support the case for a 'brownfield-first' spatial strategy; support the principle of maximising development capacity on brownfield allocations. Describe the ethos and record of our client EcoWorld, and the current status of the site. Pre-application discussions are underway on the site. The existing resolution to grant permission has established the principle of high density redevelopment on the site. Recommend a flexible approach is given to the levels of commercial floorspace and of affordable housing required on the site to ensure the development is market facing and viable. Any development on UA13 should be cognisant of the development potential of UA11 and potential for re-alignment of Goldsworth Road. Discussion of Woking Core Strategy policy CS2, and the site's importance to its delivery. For the plan to be sound, amendments required to the policy UA13 to support:

- Consideration of the benefits of combining policies UA12 and UA13, including the commitment by EcoWorld to making land available to enable the Council to deliver its Homes for the Homeless shelter proposal on UA12.
- Flexibility and wording of specific elements of the combined policy to provide a framework for the delivery of the optimal form of development between the two sites.
- Exploration of the opportunity to re-align Goldsworth Road in pursuit of place-making
- Recognition of the potential for more development on allocation UA13, if need for housing increases prior to Examination or other sites are unable to accommodate the growth anticipated.
- A lower quantum of commercial office space across the allocation to allow for a response to market conditions at the time of delivery.
- The need for appropriate phasing of the development to secure the delivery of infrastructure requirements, including the realignment of Goldsworth Road.

The ownership situation of UA12 and UA13, and development on surrounding sites, has evolved since previous iterations of the SADPD, the potential on both sites should be reviewed as a result. Highlight problems with meeting the objectively assessed housing need of West Surrey. Cite paragraph 15.32 of the Sustainability Appraisal as providing a collective justification for all sites allocated in the urban area. EcoWorld will endeavour to keep the Local Plan process well informed of progress on pre-application discussions on site UA13, to ensure the supporting policy is closely aligned. Wish to participate in all relevant sessions of the examination dealing with matters of legal compliance and soundness, in particular with sites UA11 [may mean UA12] and UA13.

Contributor Proposed Modification: For the plan to be sound, amendments required to the policy UA12 to support:

- Consideration of the benefits of combining policies UA12 and UA13, including the commitment by EcoWorld to making land available to enable the Council to deliver its Homes for the Homeless proposal on UA12 as part of a planning permission for UA13.
- Flexibility and wording of specific elements of the combined policy to provide a framework for the delivery of the optimal form of development between the two sites.
- Recognition of the potential for more development on both sites, if need for housing increases prior to Examination or other sites are unable to accommodate the growth anticipated.
- Exploration of the opportunity to re-align Goldsworth Road in pursuit of place-making
- To deliver a homeless shelter rather than office development on current site UA12, cognisant with recent discussions with the Council.

- Flexibility to allow commercial office space not to be delivered on current UA12, and a lower quantum of commercial office space across the whole allocation, to allow for a response to market conditions at the time of delivery.
- The need for appropriate phasing of the development to secure the delivery of infrastructure requirements, including the realignment of Goldsworth Road.

Modification Reference: U0000328

Officer Response: Support welcomed

The policy requires the development of sites UA12 and UA13 to be complementary to and integrated with the development of other sites in the vicinity (each other, plus sites UA10 and UA11). It is considered that this already provides the flexibility required for the sites to come forward together as a single proposal, and for any potential highway realignment that may be proposed as part of such a scheme. WBC would not however wish to require such a combined development, which could be implied by combining the site allocation policies. Should a change in circumstances lead to the sites coming forward separately, this would also be acceptable.

The types of development required on sites UA12 and UA13 and the proportion of affordable housing required on site UA13 reflects the importance of these sustainable locations to delivering on the requirements for various types of development set out in the Core Strategy. The Employment Topic Paper (2018) sets out the current position on need for office space. The quanta of each type of development in the supporting text are indicative. Any proposal for a combined development (potentially also including sites UA10 and UA11) that included a different configuration of uses across the sites, or different quanta of development altogether, could come forward as a planning application but would need to be justified by material considerations that indicate that the development plan should not be followed in that particular case.

Any proposals to deliver a homeless shelter on this site would be reviewed on their merits, having due regard to the policies in the SADPD (in particular when adopted) and of any proposals to deliver additional office floorspace on-site or nearby in the local area.

The issue of meeting objectively assessed need is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 14.

Response Reference: U0001733

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 05183/1

Name: Mrs Chrissie Ecob

Number of Signatories: 1

Comment Type: COMM

Site Reference:

Summary of Comment: Considers that WBC have made the correct decision to remove Regulation 18 sites GB12 and GB13 from the DPD, and is pleased that WBC recognises the validity of objections made during the Regulation 18 consultation.

Other comments are:

1. There are problems with parking at the junction of Oakfield Road and Old Woking Road, causing congestion and difficulties for bus navigation.
2. There should be a yellow box at the junction by Lloyds and Waitrose in West Byfleet to stop drivers blocking the road when the traffic lights alter.
3. The Rosemount shops are more difficult to park at now building work has started.
4. Would delivery lorries come from Send, West Byfleet or Ripley?
5. Will roads be widened everywhere in the near proximity of the new housing estate?

6. How will utilities networks cope?
7. How much disruption will upgrading the utilities cause?
8. Most householders have two vehicles; how will the roads cope, and what about parking?
9. Will there be additional parking provided at West Byfleet and Woking for commuters?
10. Will additional buses be provided for people to get to work/station?
11. Will more frequent trains be put on from West Byfleet?
12. Parvis Road will be even more gridlocked due to development at West Hall.
13. Will the new bridge at Newark Abbey be able to sustain increased volume and weight of traffic?
14. Will Church Lane be widened and made safer for pedestrians to accommodate additional people and cars?
15. There will be increased traffic from the newly approved kennels at Lady Place Farm
16. The Council has not fixed or diverted the leaking pipe at the bottom of Church Hill which runs straight onto the road at a sharp corner, causing a serious potential hazard during cold weather.
17. Asks what proportion of houses will be given to council/housing associations. Expresses concerns relating to amenity.
18. Footpaths, woods, and open countryside are important. Dog walkers, joggers and hikers have requested for the footpath to be altered and constantly have to ask for footpaths to be cleared of vegetation. Considers that there is a need for affordable housing, but is concerned about a lack of open spaces for recreation. Raises concerns about the loss of history and natural beauty if Green Belt is not looked after; concerned the Pyrford will lose its village character and become an extension of Woking which is more urban in character.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Support for the decision to remove Regulation 18 sites GB12 and GB13 from the Site Allocations DPD is noted. A number of issues have been raised that are beyond the scope of the Site Allocations DPD.

Regarding transport infrastructure, Paragraph 6.7 of the Regulation 19 Issues and Matters Topic Paper notes that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.

Regarding utilities networks, Paragraph 6.1 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has worked with infrastructure providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand arising from the delivery of the Core Strategy and/or Site Allocations DPD. Policy CS16 (infrastructure delivery) and Section 6(implementation and monitoring) of the Core Strategy provide assurance that the Council will work with infrastructure service providers and developers to ensure that the infrastructure need to support development is provided in a timely manner. Paragraph 6.2 provides that the Council has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD.

Regarding parking, it is noted that the purpose of the Site Allocations DPD is to deliver the requirements of the Core Strategy set out in Paragraph 1.3 of the Regulation 19 Issues and Matters Topic Paper. This includes a quantum of residential, office, warehouse and retail floorspace. In this regard, the Site Allocations DPD does not directly address parking. Nonetheless the Council has an up-to-date Parking Standards SPD to address appropriate provision for all new development. This document sets minimum standards for residential parking to ensure appropriate levels of parking are provided. Maximum

<p>standards are set for non-residential parking and minimum cycle parking standards have been set to promote sustainable transport choices to influence a shift to non-car modes. Paragraph 6.2 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and Site Allocations DPD. Paragraphs 6.68 to 6.72 and 6.84 to 6.94 of the IDP address planned provision for bus and rail infrastructure respectively.</p> <p>Paragraph 13.3 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed.</p> <p>Paragraph 1.3 of the Regulation 19 Issues and Matters Topic Paper sets out that the Core Strategy makes provision for inter alia 4,962 net additional dwellings, with an overall affordable housing provision target of 35%, between 2010 and 2027. Policy CS12 of the Core Strategy provides detail regarding the affordable housing requirements for differing types and sizes of site.</p> <p>Paragraph 6.8 of the Regulation 19 Issues and Matters Topic Paper sets out the Council's commitment to open space provision. In particular, Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy provides a robust policy framework for securing and protecting open space provision in the Borough. In May 2016, Woking Borough Council published a guidance note entitled National Affordable Housing Threshold and Vacant Building Credit addressing the implementation of CS12 in light of changes in national policy.</p> <p>It is noted that the Site Allocations DPD does not seek to release Green Belt land in Pyrford. The reasons for the removal of Regulation 18 sites GB12 and GB13 are set out in Paragraph 14.12 of the Regulation 19 Issues and Matters Topic Paper.</p>
Response Reference: U0000987
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05982/1
Name: Mr Paul Egginton
Number of Signatories: 1
Comment Type: COMM
Site Reference: GB07
<p>Summary of Comment: GB7 is a critical and highly valued section of Green Belt. It is the only site Mayford that performs all of the required Green Belt purposes. It prevents the conurbation of Woking and Mayford, therefore preserving the character of the historic village of Mayford. The two settlements have been separate since before the Domesday Book.</p> <p>The north end of GB7 contains one of the Borough's few Areas of High Archaeological Potential.</p> <p>The site contains significant biodiversity in the form of wildlife habitats and heavily wooded areas. Policy CS7 of the Core Strategy sets out the Council's commitment to protect and preserve such biodiverse assets. The respondent does not feel that enough assurances have been included in the Regulation 19 document to assure that all the trees and habitats on site will be preserved.</p> <p>Development would bring additional problems for the village's traffic infrastructure, would impact air pollution, and adversely impact the character of the village which has suffered dramatically from mass development.</p>

The respondent is happy that WBC has recognised the importance of the green gap/visual separation of urban Woking and Mayford village. Fully supports the open space provision of GB7 but questions why it should be removed from the Green Belt to achieve this. Argues that it is critical to keep the separation between Woking and Mayford.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Paragraph 4.1 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. This includes GB7.

Section 20 of the Regulation 19 Issues and Matters Topic Paper addresses the separation between Woking and Mayford. In particular, Paragraph 20.1 notes that the northern part of site allocation GB7 (Nursery Land adjacent to Egley Road) has been designated as an area of local separation to provide a visual gap between Mayford and the rest of the urban area, in order to strengthen the visual separation between Mayford and the rest of Woking. Paragraphs 20.2 and 20.3 address the identity and character of Mayford village. The Area of High Archaeological Potential at the north end of GB7 is contained within the area of local separation which is not for built development. Furthermore, the key requirements of GB7 include inter alia that "the site features an Area of High Archaeological Potential in the north of the site. To ensure full information about heritage and archaeology informs its development, the developer will need to undertake an archaeological investigation and submit full details of this to the Local Planning Authority, in accordance with Core Strategy Policy CS20."

Section 19 of the Regulation 19 Issues and Matters Topic Paper addresses the consideration which has been given to biodiversity. In particular, Paragraph 19.1 provides that during the preparation of the Site Allocations DPD, the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed. It is also noted that the key requirements of GB7 include inter alia: "take opportunities to make positive contribution towards biodiversity through the creation of green infrastructure, retention/enhancement of any features of nature conservation value on-site, and creation of linkages with GI network, the design solution should build in wildlife features/corridors" and "conduct landscape assessment/ecological survey/tree survey to determine levels of biodiversity and valuable landscape features on site and adjacent to site."

Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses infrastructure provision. In particular, Paragraph 6.2 confirms that the Council has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD. In particular Paragraph 6.7 provides that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 provides further detail regarding transport and congestion considerations, and Paragraph 13.3 in particular provides that the Council has worked with Surrey County Council to carry out the A320 Corridor Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

Air quality is addressed by Paragraphs 8.1 to 8.5 of the Regulation 19 Issues and Matters Topic Paper.

Were the separation gap to the north of GB7 not to be released from the Green Belt, it would result in an isolated pocket of Green Belt within the urban area. This would not ensure a defensible boundary.

Response Reference: U0001450
Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site". Amend third paragraph of reasoned justification to read 118 dwellings.
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06624/1
Name: Mr And Ms Paul And Susan Egginton
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB12, GB18
Summary of Comment: Strongly object to proposals to build on Green Belt land, in particular to all proposed Green Belt sites in Byfleet and West Byfleet. The proposals are unacceptable given the resulting loss of Green Belt land and open, accessible green space for public enjoyment. We must protect existing urban green spaces for the well-being, mental and physical health benefits they provide to current and future generations. The extra pressure on Byfleet amenities, traffic volumes, noise and increased developed landscape are unjustified and unacceptable.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The necessity of releasing land from the Green Belt for housing allocation and safeguarding for future housing development is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2. The effect of the loss of Green Belt land on the general wellbeing and amenity of residents is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 4. The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5.
Response Reference: U0001033
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06664/1
Name: Mr Alexia Egginton
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: No comment on legal compliance. Modification proposed. Site GB7 in Mayford is a critical and highly valued section of Greenbelt. It is the only site in Mayford that performs all of the required green belt purposes. It prevents the urban sprawl of Woking swallowing up the historic village of Mayford therefore preserving the character of the historic settlement of Mayford.

Following the Norman Conquest of 1066, William the Conqueror gave the church and manor of Woking to the Norman, Osbern and Mayford to William Malet. The Village has been separated from Woking since before the doomsday book.

The North End of GB7 also contains an area of high Archaeological importance, one of the few that exist in the entire borough.

The site contains significant biodiversity in the form of wildlife habitats and heavily wooded areas. Policy CS7 of the adopted core strategy tell us the commitment the council has given to protect and preserve these biodiversity assets. The Biodiversity on this site is a significant asset to the village of Mayford, especially due to the loss of much wildlife and habitats due to development on the greenbelt.

Does not feel that enough assurances were written into the Regulation 19 documents to assure that all trees and habitats on the site will be preserved.

Any development on this site would bring problems on top of problems for the traffic infrastructure of Mayford, Air Pollution and the Character of the Village that has already suffered dramatically with the mass development built and currently approved on its green belt.

The site should remain and the Green Gap/ Visual Break between Mayford and Woking and remain protected in the Green belt.

No comment on duty to cooperate.

Does not consider the DPD has been positively prepared, is not justified, not effective, not consistent with national policy and no comment on soundness.

Would not like to attend examination and wishes to be informed of the next stages of the DPD.

Contributor Proposed Modification: Keep GB7 as the vitally important green break between Mayford and Woking and leave it in the Green Belt as it performs a very important Green Belt function.

Modification Reference: U0000379

Officer Response: The representation regarding Mayford Green Belt, Mayford character and visual gap have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21.

The area of high archaeological potential to the north of the site is acknowledged. One of the requirements of the DPD is to ensure the developer will undertake an archaeological investigation and submit full details to the Planning Authority in accordance with Core Strategy Policy CS20.

The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess any site specific ecological issues.

In regards to traffic, infrastructure and air pollution these issues have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 13, Section 6 and Section 8.

Response Reference: U0000904

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06664/2

Name: Alexia Egginton

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB07

Summary of Comment: Site GB7 in Mayford is a critical and highly valued section of Greenbelt. It is the only site in Mayford that performs all of the required green belt purposes. It prevents the urban sprawl of Woking swallowing up the historic village of Mayford therefore preserving the character of the historic settlement of Mayford. Following the Norman Conquest of 1066, William the Conqueror gave the church and manor of Woking to the Norman, Osbern and Mayford to William Malet. The Village has been separated from Woking since before the doomsday book.

The North End of GB7 also contains an area of high Archaeological importance, one of the few that exist in the entire borough.

The site contains significant biodiversity in the form of wildlife habitats and heavily wooded areas. Policy CS7 of the adopted core strategy tell us the commitment the council has given to protect and preserve these biodiversity assets.

The Biodiversity on this site is a significant asset to the village of Mayford, especially due to the loss of much wildlife and habitats due to development on the greenbelt.

Does not feel that enough assurances were written into the regulation 19 documents to assure that all trees and habitats on the site will be preserved. Any development on this site would bring problems on top of problems for the traffic infrastructure of Mayford, Air Pollution and the Character of the Village that has already suffered dramatically with the mass development built and currently approved on its green belt.

Contributor Proposed Modification: None Stated.

Modification Reference: U0000493

Officer Response: The representation regarding Mayford Green Belt, Mayford character and visual gap have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21.

The area of high archaeological potential to the north of the site is acknowledged. One of the requirements of the DPD is to ensure the developer will undertake an archaeological investigation and submit full details to the Planning Authority in accordance with Core Strategy Policy CS20.

The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on

<p>species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.</p> <p>In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess any site specific ecological issues. In regards to traffic, infrastructure and air pollution these issues have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 13, Section 6 and Section 8.</p>
Response Reference: U0000908
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06915/1
Name: Elmbridge Borough Council
Number of Signatories: 1
Comment Type: COMM
Site Reference:
Summary of Comment: No comments, but would like to be kept informed in line with Duty to Cooperate requirements.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Comments noted. Elmbridge Borough Council will be kept informed of progress.
Response Reference: U0001410
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06632/1
Name: Ms Caroline Emmet
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Page 14 gives the reference for West Hall as GB10, whereas page 19 refers to it as GB13.</p> <p>Referring particularly to the West Hall site, the DPD is unsound; the strategy does not seem to be appropriate or consistent with national policy:</p> <p>The site performs the Green Belt functions of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment. Changing its allocation devalues the strength of previous and future allocations.</p> <p>Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces; this would be significantly undermined by the proposals.</p>

The site is covered by a minerals allocation, in a minerals plan running to 2026. This will make the site unattractive to developers, so its deliverability is questioned. Therefore Green Belt land will have been released, Green Belt and NDP principles compromised for no reason.

Residents would be car reliant: the site is over 1km from West Byfleet railway station with significant upgrading needed to the route, which is unpleasant and dangerous due to traffic speed, including a reduction in the speed limit for safe pedestrian crossings and access to the development. This would further increase congestion as there are limited opportunities for widening the road without losing the pedestrian/cycling space.

Question the ability of the heavily congested Parvis Road to cope with additional traffic. The Infrastructure Report does not address provision of healthcare and or education for the increased population.

The West Byfleet health centre is already overstretched, practice sizes significantly above the Woking and national averages. A 'Field of Dreams' approach of 'Build it and they will come' is unrealistic and irresponsible given the pressures on the NHS and GPs.

Close to the A245 and M25, so at risk of air and noise pollution, very difficult to mitigate against- contrary to NPPF para 170(e). Therefore question whether the site will be an attractive prospect for residential development.

The proposals also do not meet the criteria on Gypsy, Traveller and Travelling Showpeople allocations for safe highway access, parking and turning provision; safe and reasonable access to schools and other local facilities; adequate infrastructure and on-site utilities; adequate amenity for occupiers, and no unacceptable impact on visual amenity/character of the area.

The area is prone to regular and severe flooding; no formal assessment of river or surface water flood risk. Allocating this land to housing is irresponsible and senseless. Flood defences could create local environmental issues and push the flooding problem to another part of the Borough; homeowners may find it hard to obtain buildings and contents insurance, making the Site unattractive for residential development.

This housing quantity seems to be unnecessary, excessive and to constitute overdevelopment. Inadequate consideration of alternative sites, in particular PDL in sustainable locations.

The Broadoaks and Sheer House developments will exacerbate a number of these issues. There are no modifications which could make GB10 legally compliant or sound or strengthen its legal compliance or soundness. The site should be removed from the DPD.

Contributor Proposed Modification: The proposals for the Site should be removed from the SADPD.

Modification Reference: U0000313

Officer Response: Reference to incorrect numbering noted; this will be amended.

The necessity of removing sites from the Green Belt is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1.

The performance of the parcel including site GB10 against Green Belt purposes was assessed in the Green Belt Boundary Review (2015) and the site found suitable for removal from the Green Belt. The Green Belt Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12.

The relationship of site GB10 with the West Byfleet NDP is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16.

The implications of the minerals allocation for site GB10 are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 17.

It is true that only part of the site is within standard walking distance of West Byfleet District Centre and the station. However this level of proximity to services is still better than that for most other sites considered through the Green Belt Boundary Review. In addition, only slightly over half the total area of the site will be developed, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the

<p>Green Belt'; this is likely to limit development on the areas of the site furthest from the District Centre. The key requirements in policy GB10 include to 'improve sustainable transport infrastructure including pedestrian and cycle links and bus services to West Byfleet District Centre'. It is therefore not considered that the residents would be entirely car reliant.</p> <p>The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The impact of the proposals on infrastructure, including healthcare and education, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The issue of pollution in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>Issues with the proposed Gypsy and Traveller pitches are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p> <p>Issues of flood risk are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>Broadoaks and Sheer House were included in the traffic mitigation evidence base, and also provided to inform the planning of infrastructure providers.</p>
<p>Response Reference: U0001054</p>
<p>Officer Proposed Modification: Amend sixth paragraph under 'Traveller accommodation' on page 19 to read: "There is also the opportunity to provide Traveller pitches at Land surrounding West Hall (GB10) which has been identified in the GBBR for release from the Green Belt to meet development needs up to 2027. Proposal sites GB2 and GB10 are therefore....". Amend reference in Table 9 to GB10 (rather than GB13).</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 03185/1</p>
<p>Name: Mrs Lynden England</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: RG18GB12, RG18GB13, GB04, GB05, GB10, GB18</p>
<p>Summary of Comment: No modifications proposed, the DPD is not justified.</p> <p>Wishes to be informed of next stages.</p> <p>Objects to building on open green space in Byfleet.</p> <p>Concerns regarding increased traffic and flooding.</p> <p>Confusion regarding traveller sites.</p> <p>Questions why there are no longer sites allocated to Pyrford.</p> <p>No more houses should be built in Byfleet.</p>
<p>Contributor Proposed Modification: No more houses should be built in Byfleet.</p>
<p>Modification Reference: U0000431</p>
<p>Officer Response: Section 3 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding development of traveller pitches in Byfleet and West Byfleet.</p> <p>Section 5 addresses the issue regarding development of open green space/Green Belt in Byfleet and West Byfleet. Section 4, paragraph 4.2 addresses the loss of open space in more detail.</p> <p>Section 7 addresses issues regarding flooding.</p> <p>Section 13 addresses the issue regarding increased road traffic.</p> <p>Section 14, paragraphs 14.11-14.13 address why sites are no longer allocated in Pyrford.</p>
<p>Response Reference: U0001132</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

Contributor Reference: 03185/2
Name: Mrs Lynden England
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB18
Summary of Comment: Objects to allocations in Byfleet and West Byfleet. Doubts regarding feasibility studies. Concerns regarding inadequate road infrastructure, particularly Parvis Road, as well as flooding and lack of alleviation measures. Disproportionate amount of development occurring in Byfleet and West Byfleet. DPD is unsound and does not comply with Duty to Cooperate.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council is satisfied that the evidence base which is used to underpin the DPD is robust and able to withstand scrutiny. There are specific key requirements to ensure that the site specific impacts of development are appropriately assessed and the necessary mitigation measures introduced to address any adverse impacts. The associated issue of flood risk assessment is addressed in Section 7 of the Regulation 19 Issues and Matters Topic Paper. Section 6 addresses the issue regarding adequacy of infrastructure. Section 13 specifically addresses road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 1 addresses the issue regarding the release of Green Belt land for development. Section 5 specifically addresses the loss of Green Belt in Byfleet and West Byfleet.
Response Reference: U0001460
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06667/1
Name: Environment Agency
Number of Signatories: 1
Comment Type: COMM
Site Reference: UA01, UA07, UA08, UA19, UA20, UA22, UA25, UA27, UA28, UA29, UA31, UA32, UA40, GB01, GB02, GB03, GB10, GB11, GB12, GB13, GB15, GB16, GB17
Summary of Comment: There should be a minor change to Policies GB1, GB2 and UA1 to include a requirement for a 'sequential approach' to also apply to the layout of development and the impacts of climate change considered within the site specific flood risk assessment in accordance with the most up to date climate change projections and guidance. Reference should also be made for ensuring that flood risk assessments make use of Environment Agency guidance on climate change which was updated on February 2017. The groundwater in the Bagshot Beds Aquifer to the south west of GB3 may be shallow. Since burials should not be in groundwater, there should be a requirement to carry out an investigation to determine the maximum seasonal depth to groundwater and if shallow parts of this extension site may only be suitable for single burials. The key requirements of Policies GB12, GB15, GB16, GB17 should be amended to include the following requirement: 'a minimum 10 metre undeveloped ecological corridor alongside the River Wey will be protected from development and proposals to enhance the ecological value of the river corridor and steps to improve habitat linkages will be

provided. The enhancements should have regard to the Thames River Basin Management Plan and the Wey Landscape Partnership Catchment Plan and be agreed in consultation with the Environment Agency'.
Policy UA7 should include similar requirement to address current and historic contaminated uses that may have led to soil and groundwater contamination.

Contributor Proposed Modification: GB1 - We recommend that minor changes are made to this policy to include the requirement for the sequential approach to be applied to the layout of development, and the impacts of climate change considered within the site specific Flood Risk Assessment in accordance with the most up to date climate change projections and guidance, in addition to the requirements of Core Strategy Policy CS9 (which does not specifically refer to climate change).

This will ensure the plan is compliant with paragraphs 149 and 155 of the National Planning Policy Framework which seeks to ensure development that is shown to be necessary in flood risk areas is safe for its anticipated lifetime.

We also recommend reference is made to ensuring Flood Risk Assessments make use of Environment Agency guidance on climate change which was updated on 03 February 2017.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Please note that climate change projections (UKCP18) have just been revised in November 2018 and this may result in changes to guidance on flood risk assessments and climate change allowances in 2019.

<https://www.metoffice.gov.uk/research/collaboration/ukcp>

GB2 - We recommend that minor changes are made to this policy to include the requirement for the sequential approach to be applied to the layout of development, and the impacts of climate change considered within the site specific Flood Risk Assessment in accordance with the most up to date climate change projections and guidance, in addition to the requirements of Core Strategy Policy CS9 (which does not specifically refer to climate change).

This will ensure the plan is compliant with paragraphs 149 and 155 of the National Planning Policy Framework which seeks to ensure development that is shown to be necessary in flood risk areas is safe for its anticipated lifetime.

We also recommend reference is made to ensuring Flood Risk Assessments make use of Environment Agency guidance on climate change which was updated on 03 February 2017.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Please note that climate change projections (UKCP18) have just been revised in November 2018 and this may result in changes to guidance on flood risk assessments and climate change allowances in 2019.

<https://www.metoffice.gov.uk/research/collaboration/ukcp>

GB3 - Part of this cemetery extension is over an historic landfill, but it appears that part of the existing cemetery is already over this landfill. Therefore there is obviously provision on site for the management of the disturbed waste and we assume that management of this historic waste will continue for this extension. There are issues marked on the OS map, 460 m to the south west of this site (SU95519 55804) at an elevation of 44 m AOD that suggest that the groundwater in the Bagshot Beds Aquifer in this locality may be shallow. Since burials should not be into groundwater, an investigation should be carried out to determine the maximum seasonal depth to groundwater and if shallow parts of this extension site may only be suitable for single burials.

We consider this requirement could be accommodated through this policy which specifies case by case requirements dependent on the nature of the scheme being proposed.

While we do not consider the policy unsound, we do recommend that minor changes are made to the supporting text in order to provide some clarity and guidance for any development proposals pursued at this site.

GB12 - We recommend that minor amendments to the policy are made to include the following key requirements:
A minimum 10 metre undeveloped ecological corridor alongside the River Wey will be protected from development and proposals to enhance the ecological value of the river corridor and steps to improve habitat linkages will be provided.
These enhancements should have regard to the Thames River Basin Management Plan and the Wey Landscape Partnership's Catchment Plan and be agreed in consultation with the Environment Agency.

GB15 - We recommend that minor amendments to the policy are made to include the following key requirements:
A minimum 10 metre undeveloped ecological corridor alongside the River Wey will be protected from development and proposals to enhance the ecological value of the river corridor and steps to improve habitat linkages will be provided.
These enhancements should have regard to the Thames River Basin Management Plan and the Wey Landscape Partnership's Catchment Plan and be agreed in consultation with the Environment Agency.

GB16 - We recommend that minor amendments to the policy are made to include the following key requirements:
A minimum 10 metre undeveloped ecological corridor alongside the River Wey will be protected from development and proposals to enhance the ecological value of the river corridor and steps to improve habitat linkages will be provided.
These enhancements should have regard to the Thames River Basin Management Plan and the Wey Landscape Partnership's Catchment Plan and be agreed in consultation with the Environment Agency.

GB17 - We recommend that minor amendments to the policy are made to include the following key requirements:
A minimum 10 metre undeveloped ecological corridor alongside the River Wey will be protected from development and proposals to enhance the ecological value of the river corridor and steps to improve habitat linkages will be provided.
These enhancements should have regard to the Thames River Basin Management Plan and the Wey Landscape Partnership's Catchment Plan and be agreed in consultation with the Environment Agency.

We recommend that minor changes are made to this policy to include the requirement for the sequential approach to be applied to the layout of development, and the impacts of climate change considered within the site specific Flood Risk Assessment in accordance with the most up to date climate change projections and guidance, in addition to the requirements of Core Strategy Policy CS9 (which does not specifically refer to climate change).

This will ensure the plan is compliant with paragraphs 149 and 155 of the National Planning Policy Framework which seeks to ensure development that is shown to be necessary in flood risk areas is safe for its anticipated lifetime.

We also recommend reference is made to ensuring Flood Risk Assessments make use of Environment Agency guidance on climate change which was updated on 03 February 2017.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>
Please note that climate change projections (UKCP18) have just been revised in November 2018 and this may result in changes to guidance on flood risk assessments and climate change allowances in 2019.

<https://www.metoffice.gov.uk/research/collaboration/ukcp>

UA1 - We recommend that minor changes are made to this policy to include the requirement for the sequential approach to be applied to the layout of development, and the impacts of climate change considered within the site specific Flood Risk Assessment in accordance with the most up to date climate change projections and guidance, in addition to the requirements of Core Strategy Policy CS9 (which does not specifically refer to climate change).

This will ensure the plan is compliant with paragraphs 149 and 155 of the National Planning Policy Framework which seeks to ensure development that is shown to be necessary in flood risk areas is safe for its anticipated lifetime.

We also recommend reference is made to ensuring Flood Risk Assessments make use of Environment Agency guidance on climate change which was updated on 03 February 2017.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Please note that climate change projections (UKCP18) have just been revised in November 2018 and this may result in changes to guidance on flood risk assessments and climate change allowances in 2019.

<https://www.metoffice.gov.uk/research/collaboration/ukcp>

UA7 - We recommend that minor changes are made to this policy to include the requirement for a site investigation to be carried out in relation to the railway station and bus/rail interchange development.

Our suggested wording is:

Current or historical contaminative uses may have led to soil and groundwater contamination that will need to be considered during any development of the site, dependant on detailed proposals and consultation with Environmental Health and the Environment Agency.

This is the same wording used in other policies within the Site Allocations Plan where contamination is or may be a constraint.

UA22 - We recommend that minor changes are made to this policy to include the requirement for the sequential approach to be applied to the layout of development, and the impacts of climate change considered within the site specific Flood Risk Assessment in accordance with the most up to date climate change projections and guidance, in addition to the requirements of Core Strategy Policy CS9 (which does not specifically refer to climate change).

This will ensure the plan is compliant with paragraphs 149 and 155 of the National Planning Policy Framework which seeks to ensure development that is shown to be necessary in flood risk areas is safe for its anticipated lifetime.

We also recommend reference is made to ensuring Flood Risk Assessments make use of Environment Agency guidance on climate change which was updated on 03 February 2017.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Please note that climate change projections (UKCP18) have just been revised in November 2018 and this may result in changes to guidance on flood risk assessments and climate change allowances in 2019.

<https://www.metoffice.gov.uk/research/collaboration/ukcp>

UA25 - We recommend that minor changes are made to this policy to include the requirement for the sequential approach to be applied to the layout of development, and the impacts of climate change considered within the site specific Flood Risk Assessment in accordance with the most up to date climate change projections and guidance, in addition to the requirements of Core Strategy Policy CS9 (which does not specifically refer to climate change).

This will ensure the plan is compliant with paragraphs 149 and 155 of the National Planning Policy Framework which seeks to ensure development that is shown to be necessary in flood risk areas is safe for its anticipated lifetime.

We also recommend reference is made to ensuring Flood Risk Assessments make use of Environment Agency guidance on climate change which was updated on 03 February 2017.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Please note that climate change projections (UKCP18) have just been revised in November 2018 and this may result in changes to guidance on flood risk assessments and climate change allowances in 2019.

<https://www.metoffice.gov.uk/research/collaboration/ukcp>

UA27 - We recommend that minor changes are made to this policy to include the requirement for a site investigation to be carried out.

We recommend you use the same wording that is included in other policies where land contamination is a factor which reads:

"Current or historical contaminative uses may have led to soil and groundwater contamination that will need to be considered during any change of use of the site, dependent on detailed proposals and consultation with Environmental Health and the Environment Agency. Investigation required and remediation may be necessary."

UA42 - We recommend that minor changes are made to this policy to include the requirement for a site investigation to be carried out.

We recommend you use the same wording that is included in other policies where land contamination is a factor which reads:

"Current or historical contaminative uses may have led to soil and groundwater contamination that will need to be considered during any change of use of the site, dependent on detailed proposals and consultation with Environmental Health and the Environment Agency. Investigation required and remediation may be necessary."

Modification Reference: U0000388

Officer Response: In accordance with Section 14 of the NPPF, it is reasonable to require as a key requirement site specific flood risk assessments to take into account the most up to date climate change projections and the Environment Agency's latest guidance on Climate Change. This should apply to all proposals where site specific flood risk assessment has been made a key requirement.

The Council has said that where part of an allocated or safeguarded site falls within Flood Zones 2 or 3, the physical development will be focused in Flood Zone 1 or the area with the least risk of flooding. In this regard, the request to include a key requirement to make sure this is achieved is reasonable. It is highlighted that a sequential approach in this context is not a requirement to undertake a sequential test. It is recommended that a key requirement be added to Proposals GB1, GB2, GB3, GB17 and UA1 to read as follows: 'a sequential approach should apply to the layout of development on the site'.

The proposed amendment is useful information that would enhance the operational effectiveness of the site. It is recommended that the following be added to the reasoned justification of Proposal GB3: 'The groundwater in the Bagshot Beds Aquifer to the south west of GB3 may be shallow. Since burials should not be in groundwater, there should be a requirement to carry out an investigation to determine the maximum seasonal depth to groundwater and if shallow parts of this extension site may only be suitable for single burials'

Proposals GB12, GB15 and GB16 are allocated for the purposes of SANG. Whilst it is appropriate to have access to the SANGs and enjoy the amenity and wildlife within them, it is critical that this is done in a very sensitive manner to avoid harm to habitats and the species that thrives in them. It is proposed for another key requirement to be added to the list of key requirements to read as follows: the design of the SANGs including the circular walks should be sensitive to the biodiversity and the ecological corridor along the River Wey. Where any physical ancillary development or infrastructure is to be provided, it should be set back to create a 10 metre undeveloped buffer.

Current and historic uses of land has the potential to cause contamination that has to be addressed for future uses to be acceptable on the land. In this regard, the proposed amendment is reasonable. A key requirement should be added to Proposal UA7 to read as follows: Current and historic contaminative uses may have led to soil and groundwater contamination that will need to be considered during any development of the site, dependent on detailed proposals and consultation with Environmental Health and the Environment Agency. Investigation and remedial required.

Response Reference: U0001227

<p>Officer Proposed Modification: Add a sentence to the key requirement for policies UA1, UA8, UA19, UA20, UA22, UA25, UA27, UA28, UA29, UA31, UA32, UA40, GB1, GB2, GB10, GB11, GB12, GB13, GB15, GB16, GB17 regarding Flood Risk Assessments as follows: "Assessments should take into account the most up to date climate change projections and the Environment Agency's latest guidance on Climate Change".</p> <p>Add a sentence to existing key requirements of policies GB1, GB2, GB3, GB17 and UA1 regarding flood risk to read as follows: 'a sequential approach should apply to the layout of development on the site'.</p> <p>The following text should be added to the reasoned justification of policy GB3: 'The groundwater in the Bagshot Beds Aquifer to the south west of GB3 may be shallow. Since burials should not be in groundwater, there should be a requirement to carry out an investigation to determine the maximum seasonal depth to groundwater and if shallow parts of this extension site may only be suitable for single burials'</p> <p>Add a key requirement to policies GB12, GB15, and GB16 to read as follows: the design of the SANGs including the circular walks should be sensitive to the biodiversity and the ecological corridor along the River Wey. Where any physical ancillary development or infrastructure is to be provided, it should be set back to create a 10 metre undeveloped buffer.</p> <p>A key requirement should be added to Policy UA7 to read as follows: Current and historic contaminative uses may have led to soil and groundwater contamination that will need to be considered during any development of the site, dependent on detailed proposals and consultation with Environmental Health and the Environment Agency. Investigation and remedial required.</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 05343/1</p>
<p>Name: Mrs Annette Van Essen</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10, GB11</p>
<p>Summary of Comment: There has been a lot of recent development in West Byfleet. Allowing development of over 600 houses will put strain on already busy roads, public transport, schools and health centre. There are already high levels of pollution, which will be worsened. The proposed sites are prone to severe flooding, which the respondent has witnessed, and are unsuitable for building houses. The Council should scrap the plans to build so many houses in an already very busy part of Surrey.</p>
<p>Contributor Proposed Modification: Scrap the plans to build so many houses on these sites.</p>
<p>Modification Reference: U0000204</p>
<p>Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1 and 6-8. The level of development recently permitted and going ahead in West Byfleet has been accounted for in DPD.</p>
<p>Response Reference: U0001572</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 05661/1</p>
<p>Name: Mr Leslie Evans</p>
<p>Number of Signatories: 1</p>

Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy.</p> <p>Back in the 60's West Byfleet, Byfleet, Pyrford were village like. There was no M25. The quality of life was a lot better. Now it is more like living in a city. There are cars, double parked every where so when you go out you are continually giving way to traffic. This area is too congested now. The roads round here can't cope with the volume of traffic already. Cramming more houses in this area is not progress.</p> <p>This Site is currently allocated as Greenbelt land and also as a concrete aggregate safeguarded site. Does not understand what that means and the more technical side of things.</p> <p>traffic levels on the A245 and surrounding roads, lack of school places, full doctor practices, lack of NHS dentists, waste water management, and existing flooding - river and surface water</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. In regards to the loss of Green Belt land and wellbeing see Section 4 of the Topic Paper.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. The IDP includes dentists provision which can be found on the Council website. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>In regards to the mineral allocation (aggregate site) see Section 17 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.</p>
Response Reference: U0001205
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06569/1

Name: Ms Natalie Evans
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Object to Green Belt housing in Byfleet. Current traffic is horrendous, the village couldn't cope with more- it would increase pollution- concerned for children. Development will have an impact on schools and doctors which are already struggling. You shouldn't be able to build on green belt regardless, otherwise where does it stop?
Contributor Proposed Modification: Urge woking borough council to reject these proposals
Modification Reference: U0000182
Officer Response: The necessity of releasing land from the Green Belt for housing allocation is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The impact of the proposals on local infrastructure, including schools and doctors, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The way limits to Green Belt development have been identified is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 14. The process of identifying Green Belt land for release has had great regard to the purposes of the Green Belt and sustainable development principles as well as other factors. The removal of land from the Green Belt to be safeguarded for future development is intended to ensure Green Belt boundaries are not changed again until at least 2040.
Response Reference: U0001624
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06868/1
Name: Ms Melanie Evans
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Objects to the proposals to release of the green belt land in Byfleet for the purpose of housing developments. Enjoys the village atmosphere, the local shops and the beautiful countryside. However, several families were flooded on Christmas Day 2013. Understand steps are being taken and in 5 or so years we might have a flood prevention measures. Building more houses on greenbelt land will jeopardised the flood resilience of our village. The roads will not be able to take on more traffic. Travelling to work (Woking) currently takes 15mins just to get to West Byfleet during rush hour, with extra traffic of commuters and school runs will not help this area.

The infrastructure is not adequate for the proposed new development. there is no doctor's surgery in the village and an additional 500 homes will bring more patients that will need to travel to West Byfleet. The schools are at full capacity.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Objection noted. The issues of flood risk are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.
Response Reference: U0001107
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05595/1
Name: Mr Tony Fearon
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Too much damage to the Greenbelt will be caused by the proposals. Parvis Road - upon which our house backs onto - is in constant gridlock from heavy traffic; infrastructure is overloaded; the West Byfleet Health Centre and diminishing local shops will not cope. There will be wall to wall traffic gridlock. Releasing the playing fields from the Greenbelt is a retrograde step given the problem of childhood obesity through lack of physical exercise. Travellers need somewhere to live, but will the interests of council tax paying neighbours be safeguarded at a time when there is ever decreasing law enforcement to deal with potential unwelcome social problems. The impact of the Development Plan is not shared equitably between local residents, as council tax payers.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council has produced a Regulation 19 Issues and Matters Topic Paper which addresses many of the concerns raised in the representation. Section 13 sets out the Council's response to concerns about congestion, particularly along Parvis Road. Section 6 sets out how the Council has considered infrastructure provision, including health services. The proposed release of the playing fields from the Green Belt will not affect its existing use - the land will continue to be used as playing fields and will be protected by alternative planning policy that protects this green space i.e. CS17 on Open space, green

<p>infrastructure, sport and recreation. The release from the Green Belt is sought only on practical terms so that an 'island' of Green Belt is avoided.</p> <p>Section 3 of the Topic Paper describes how the Council has conducted its Traveller accommodation needs assessment. Section 5 addresses concerns about the disproportionate allocation of sites for development in Byfleet and West Byfleet.</p>
Response Reference: U0001209
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06796/1
Name: Ms Claire Ferguson
Number of Signatories: 1
Comment Type: COMM
Site Reference:
Summary of Comment: Concerned about building on Green Belt at West Byfleet Recreation Ground, a key community area.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: West Byfleet Recreation Ground is not proposed as an allocated or safeguarded site within the Site Allocations DPD. The adjacent playing field (referred to as GB18) is proposed for release from the Green Belt. However, as per Paragraph 5.2 of the Regulation 19 Issues and Matters Topic Paper, GB18 will not be developed and will continue to provide open space and sports provision for the Junior and Infant schools.
Response Reference: U0001042
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06482/1
Name: Nigel Field
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Opposes housing and traveller pitch allocations in Byfleet and West Byfleet. The current infrastructure would not be able to support any additional development.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 3 of the Regulation 19 Issues and Matters Topic paper addresses the issue regarding the development of traveller pitches in Byfleet and West Byfleet. Section 6 addresses the issue regarding adequacy of infrastructure.
Response Reference: U0001090
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06726/1

Name: Mr Paul Flaherty
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Strongly objects to removal of land at GB7 from Green Belt. Main concern is impact on traffic - the A320 is already overloaded and commuting is awful. The new school, along with another new sports centre, means congestion will spread to weekends e.g. when events are being held there. Increased traffic will reduce air quality and cause noise pollution. This section of the A320 is the busiest in Woking as the main artery between Guildford / A3 / M25. This and surrounding roads do not have capacity to accommodate further concentration of development.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: A comprehensive response to the concerns raised regarding congestion, air and noise pollution is provided in sections 8 and 13 of the Regulation 19 Issues and Matters Topic Paper.
Response Reference: U0001381
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 03204/1
Name: N W Fletcher
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA20, UA21
Summary of Comment: Opposes the inclusion of sites UA20 and UA21 in the DPD. A feasibility study for the scheme in Barnsbury was carried out and concluded that it was unfeasible. This is not mentioned in the DPD. The DPD is considered to contain inaccuracies: <ol style="list-style-type: none"> 1. Barnsbury is described as being served by local shops. However the only shop in Ash Road is a fast food outlet and in Blackbridge Road, there is only a convenience store and hairdressers, which can only be reached by crossing the busy A320. 2. The DPD states that there is no risk of flooding. However, the existing houses are served by soakaways in the gardens, and proposed development would greatly increase run-off and decrease the capacity for absorption. 3. The 50% affordable housing target is considered unrealistic. Considerable expenditure on infrastructure will be required. 4. Concerned that other issues may have been overlooked.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Regarding feasibility, it is noted that Sites UA20 and UA21 have been informed by a robust evidence base including the SHLAA (2017) which concluded that the sites are deliverable within a 6-10 year period. The suitability and sustainability of the sites' locations have been considered holistically, and both UA20 and UA21 are considered to have good accessibility to key local services (schools, GP surgeries and to Woking Town Centre.) In both cases, accessibility to the nearest village centre by bike and foot is also good. Section 7 of the Council's Regulation 19 Issues and Matters Topic Paper addresses flood risk. In particular, Paragraph 7.3 notes that the Site Allocations DPD is informed by an up-to-date Strategic Flood Risk Assessment (2015). Moreover, Paragraph 7.5 notes that

<p>where relevant key requirements of proposed allocated sites set out conditions for the need for detailed flood risk assessment. This includes site UA20 for which a key requirement is: "Flood Risk Assessment and suitable scheme design to address flood risk in line with Policy CS9."</p> <p>The requirement for 50% affordable housing is established by Core Strategy Policy CS12, which also provides that full details of policy implementation will be set out in the Affordable Housing Delivery SPD. Section 8.2 of the latter sets out that if it is not considered viable to apply Policy CS12 in full, the applicant will need to prove that the site is unviable by submitting a Financial Viability Appraisal.</p> <p>Regarding concerns that other issues that may have been overlooked, the Council is satisfied that it has taken a thorough and comprehensive approach to the preparation of the Site Allocations DPD.</p>
Response Reference: U0000946
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02378/2
Name: Mr Nick Forde
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Duty to Cooperate is not met, since the huge increase in housing is inappropriate and not compatible with the Green Belt</p> <p>Proposed development is inappropriate since existing facilities, such as roads, could not cope with the increase in traffic.</p> <p>The DPD is not positively prepared, justified, effective, consistent with national policy or sound.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The necessity of releasing land from the Green Belt for housing allocation is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. The methodology of the Green Belt Boundary Review which informed the selection of sites for release, including by assessing their contribution to the purposes of the Green Belt, is addressed by Section 12 of the same document.</p> <p>The impact of the proposals on infrastructure in general and roads in particular is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 6 and 13 respectively.</p>
Response Reference: U0001613
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06648/1
Name: Mr Stephen Foreman
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA15
<p>Summary of Comment: I would like the Phoenix Cultural Centre relocated when it is demolished. The centre is important for the community, providing further education, health, social and community infrastructure, and preserving and enhancing culture. Please also refer to the submissions provided by Susan Adams.</p>

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The allocation of UA15 does not deal with individual companies or operations, but focusses on uses. The allocation policy does require development to include community and leisure uses. This could include the provision for the retention of the Fiery Bird/Phoenix Centre. The operators of this venue may well engage with the potential developers of the site to secure this retention.
Response Reference: U0001129
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06812/1
Name: Ms Nina Foreman
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, UA01
<p>Summary of Comment: Endorses the points made under the heading "Proposals for Byfleet Village," and makes the following points:</p> <p>In the past 20 years, traffic in Byfleet Village has significantly deteriorated. How was Brooklands and the surrounding area developed into a major hub without corresponding improvement in transport infrastructure? Vans and lorries from various distribution centres cause congestion throughout the area. Many of the offices are unoccupied; what will the impact on congestion be if they return to use?</p> <p>One of the flaws of the DPD is to overlook the transport situation for existing buildings. The High Road that runs from one end of the village to the other has become a dangerous alternative route for drivers trying to avoid the blockage on Parvis Road (A245). During the recent council election, such traffic made it difficult to reach the polling station.</p> <p>"Proposals for Byfleet Village."</p> <p>1. Road Infrastructure.</p> <p>The A245 is subject to sever congestion daily, and this is compounded when there are accidents on the A3 and A245. Access to anywhere beyond Byfleet village becomes impractical at such times. It is noted that at present there are a number of large unoccupied buildings, whose use would further compound these issues. To add a substantial number of additional houses on former Green Belt land would be foolish. The proposal to alleviate traffic issues by stopping a right hand turn at Seven Hills Road, and have that traffic navigate the roundabout from the A3 is impractical, as that road already becomes impassable at times with the volume of traffic from the A3 Cobham and Byfleet.</p> <p>The volume of large articulated lorries servicing the industrial areas of Byfleet and Brooklands without suitable road provision is large. This is worsened by traffic lights at the Seven Hills Road junction which cause traffic to back up. To send a further volume to the roundabout would be unlikely to improve traffic in Byfleet village.</p> <p>2. Health Infrastructure.</p> <p>The only access to health provision for the village is in West Byfleet or hospitals outside the immediate area. Since the fire at the Weybridge drop-in clinic, the nearest such centre is in Woking, and serves an area that reaches as far as Fleet in Hampshire. The health infrastructure for the village needs improving before further development is considered. There should be provision within the village to avoid further pressure on roads and to assure timely assistance in an emergency.</p> <p>3. Educational infrastructure.</p>

Both primary schools are oversubscribed, requiring some students to attend schools outside the village. All secondary education is outside the village. Schooling that takes place outside the villages requires use of the A245 at peak times.

4. Byfleet floods

The areas of Green Belt are effectively soakaways when Byfleet floods. Photographic evidence is available of such flooding. To designate parts of the green Belt for building will reduce absorption of water, and result in floods extending beyond areas they have covered before. Existing buildings, new buildings and the village will be more vulnerable.

5. Location of the proposed sites

Issues regarding GB4 and GB5 include: the impact of electricity pylons on amenity; the damp and its impact on health; the impact of air pollution from the M25 on health; and noise.

Before further development of any sort is contemplated for the village, the M25 needs to be resurfaced.

6. Incorrect assignment of land

Part of GB5 has been included in the areas of Green Belt, in apparent ignorance of the fact that it is deeded to the Church in perpetuity for burial purposes.

At present, it also forms an important community green space, part of which is a children's playground. Following the loss of the playground at Byfleet Recreation Ground, to remove another would be harsh.

Contributor Proposed Modification: Before any further building can be permitted, the infrastructure within Byfleet would need to be substantially reviewed and changed. There should be provision of health infrastructure within the village boundaries. Before any further development of any sort is considered for the village, the M25 needs to be resurfaced.

Modification Reference: U0000214

Officer Response: Section 13 of the Regulation 19 Issues and Matters Topic Paper comprehensively addresses the impact of proposed development on congestion in the Borough. Paragraph 13.5 notes that the Council County as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. More specifically, Paragraph 13.3 notes that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed. Paragraphs 6.12 and 6.9 of the Regulation 19 Issues and Matters Topic Paper address GP and education provision respectively.

Section 7 of the Regulation 19 Issues and Matters Topic Paper addresses the proper assessment of flood risk implications of the Site Allocations DPD. In particular, Paragraph 7.7 confirms that the DPD takes due care to make sure that the risk of flooding is minimised.

The reasoned justification for GB4 provides inter alia that "whilst significant constraints affect the western portion of the site, notably substantial electricity infrastructure (pylons) and noise from the M25, the eastern part of the site south of the existing building line is considered suitable for residential development. Use of the remaining land to the west will retain its open nature and assist in buffering Byfleet from the M25."

Section 8 of the Regulation 19 Issues and Matters Topic Paper addresses air quality and noise pollution. In particular, Paragraph 8.7 notes that the Sustainability Appraisal considered noise pollution and identified it as an issue affecting sites including GB1, GB4, GB5, GB7, GB10 and GB11. Key requirements for the development of sites GB4 and GB5 will be defined as part of the review of the Core Strategy or Site Allocations DPD. This will be informed by the up to date evidence and policies at the time.

<p>Regarding the location of the air quality monitoring tube, it is noted that it was moved away from the road in order to be more reflective of what residents living along the road were being exposed to. The tube was not moved very far, but in line with the facade of properties facing Parvis Road. There have been no subsequent concerns with this location.</p> <p>The issue of damp is addressed through the Building Control process.</p> <p>As part of the Strategic Road Network, the M25 is the purview of Highways England. It is noted that Highways England has not raised any fundamental objection to the Site Allocations DPD, in particular its impact on the Strategic Road Network.</p> <p>Section 15 of the Regulation 19 Issues and Matters Topic Paper addresses the part of GB5 which is owned by the Church and consecrated as future burial land.</p> <p>Regarding the playground it is noted that Core Strategy Policy CS17 (Open space, green infrastructure, sport and recreation) provides that "there will be a presumption against any development that involves the loss of a sport, recreation or play facility except where it can be demonstrated that there is an excess of provision, or where alternative facilities of equal or better quality will be provided as part of the development."</p>
Response Reference: U0001257
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05945/1
Name: FORM Architecture and Planning
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Considers the DPD to be legally compliant. Modification proposed : The document needs to broaden the range of sites to include more smaller sites for family housing more dispersed throughout the Borough</p> <p>No comment on duty to cooperate.</p> <p>Does consider the DPD has been positively prepared, no comment on is the DPD justified, not effective, not consistent with national policy and unsound.</p> <p>The Councils strategy needs to give more consideration to the aims and objectives of the Housing White Paper Feb 2017 Fixing our Broken Housing Market and the need to provide a more diverse range of accommodation which not only meets the needs of the local community in range of accommodation, but also geographic location. the Council focuses development in the Town Centre.</p> <p>Whilst the aim should be to develop in a sustainable manner there is an over reliance on this type of development and the need to bring together several parties in order to facilitate a development.</p> <p>The allocation of large numbers of units in limited locations has resulted in opposition. The provision of more smaller family housing sites dispersed across the urban area would be more welcomed by the local communities. It would provide for the needs of the local community providing the right houses in the right locations.</p> <p>There is a need for more sites capable of accommodating between 15 to 35 family units which is currently missing within site allocations document.</p> <p>Modification proposed, to include more smaller family housing sites dispersed throughout the Borough including site at Manor Farm, Mill Lane, Byfleet, Surrey and The Brambles, Pyrford Road, West Byfleet.</p> <p>Would not like to participate at the examination and wishes to be informed of the next stages of the DPD.</p>

Contributor Proposed Modification: To include more smaller family housing sites dispersed throughout the Borough including site at Manor Farm, Mill Lane, Byfleet, Surrey and The Brambles, Pyrford Road, West Byfleet

Modification Reference: U0000395

Officer Response: The Council has an up to date Core Strategy to set the strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. In accordance with Section 6 of the Core Strategy, the Council is committed to the comprehensive delivery of the requirements of the Core Strategy and the preparation of the Site Allocations DPD is a key means to achieving this objective.

The Site Allocations DPD has a clear purpose set out in the Core Strategy to identify specific sites to enable the delivery of the Core Strategy. Policies CS1 (A spatial strategy for Woking Borough), CS2 (Woking Town Centre), Policy CS6 (Green Belt), Policy CS10 (Housing provision and distribution) and Section 6 (Monitoring and implementation) of the Core Strategy all highlights the role of the Site Allocations DPD to identify sites to enable the delivery of the Core Strategy. Previous Local Development Schemes also highlights the distinct purpose of the Site Allocations DPD. The Site Allocations DPD has been prepared to meet this objective by identifying sufficient land to enable the delivery of the Core Strategy. In accordance with paragraph 139 of the NPPF, the DPD goes further and safeguards land to meet future development needs beyond this plan period to ensure the enduring permanence of the Green Belt boundary.

The Core Strategy sets out the spatial strategy for the borough, including the broad spatial distribution of development and the timing for the release of Green Belt land. Policy CS1 directs most new development to previously developed land in the town, district and local centres which offers the best access to a range of services and facilities. Land in the Green Belt will only be released to enable housing provision between 2022 and 2027. Policy CS10 specifies the overall quantum of housing units to be accommodated in the Green Belt during the plan period. This is specified as 550 dwellings. The brownfield first approach adopted by the Core Strategy is necessary to ensure sustainable development across the Borough. The Inspector who conducted the Core Strategy Examination had this to say about the spatial strategy of the Core Strategy: 'with due regard to its means of production, the Core Strategy provides the most appropriate spatial strategy for sustainable development within the context of the Borough with clear objectives for the plan period in accord with the aims of national planning policy'. The Core Strategy recognises that Green Belt land will be needed to meet development needs between 2022 and 2027. The Green Belt and the Town Centre are therefore identified as future direction of growth.

Policies CS1 and CS6 prescribes the means for selecting Green Belt land for future development. These policies require the Council to carry out a Green Belt boundary review to ensure that the land that is released from the Green Belt will not undermine its purposes and integrity. Against this backdrop, any land that is being promoted that is not supported by evidence in the Green Belt boundary review will be resisted. Very special circumstances justification would not exist to allocate or safeguard such land. Site The Brambles falls within Parcel 8 and the site Manor Farm falls within Parcel 7 in the Green Belt boundary review report. The merits of the sites has been assessed as part of the parcel and the evidence has concluded that these sites should not be removed from the Green Belt.

Section 19 of the Planning and Compulsory Purchase Act (2004) and Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) expects the Site Allocations DPD to take into account the requirements of the Core Strategy. It is critical that the Site Allocations DPD is prepared in the context of the above requirements. The preparation of the Site Allocations DPD is informed by a number of evidence based studies such as the Green Belt boundary review, which is prescribed by policy and the Strategic Land Availability Study which is prescribed by national policy. All the sites that

are either allocated or safeguarded are justified by the available evidence. The Council has also carried out a Sustainability Appraisal of reasonable alternative sites urban and Green Belt sites to demonstrate that the allocated and safeguarded sites are the most sustainable when judged against all the other alternatives. Based on the evidence, the Council does not think that these site the Brambles and Manor Farm should be allocated for development.

Regarding the Green Belt sites, there has been an additional material consideration to be taken into account. As required by paragraph 136 of the NPPF, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. It is therefore important that very special circumstance justification exists for the sites that are allocated or safeguarded in the DPD. The Council is confident that the sites that are allocated or safeguarded meets this particular test. The same cannot be said for the alternative sites that are being promoted. For any other site to be accepted, a case has to be made to demonstrate that the site being promoted is the most sustainable when compared against the sites that are allocated and safeguarded in the DPD. No credible evidence has been provided so far to convince the Council that the alternatives sites being promoted are better alternatives.

The development requirements of the Core Strategy, including the housing requirement have been identified in an integrated manner and justified by a significant body of evidence base studies. These include an Infrastructure Delivery Plan, Employment Land Review and an Employment Topic Paper. The studies have informed the necessary scale and type of infrastructure and economic growth necessary to support and align with the expected quantum of housing growth. To allocate land to meet the objectively assessed need up to 2027 without due regard and a corresponding review of office floorspace, warehouse floorspace, retail floorspace and the necessary infrastructure to align with the revised housing requirement would at best be irresponsible, overly simplistic and ill conceived. It would undermine the overall purpose of the plan-led system to plan in a holistic manner and would also undermine the sustainable development of the Borough, which is the overall aim of national policy.

The Council's Green Belt boundary review report provides evidence to demonstrate that there is no further scope to release any Green Belt land other than those recommended in the report for strategic development without damaging the overall purpose and integrity of the Green Belt. This point is highlighted in paragraph 3.5.22 of the Green Belt boundary review report. It states 'we do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development'. The site The Brambles and Manor Farm were not identified by the Green Belt boundary review report. Its allocation or safeguarding will be damaging to the purposes of the Green Belt. Very special circumstances justification would therefore not exist to allocate the site.

The overall objective of the Housing White Paper is to boost the supply of high quality housing. The Site Allocations DPD achieves this aim by allocating sufficient land to enable the housing requirement for the area to be met at sustainable locations with minimum damage to environmental assets.

Response Reference: U0001354

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06503/1

Name: Mr John Foster

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10
Summary of Comment: DPD is not positively prepared, justified or effective. DPD is sound. Alternative options have not been considered. Inadequate consultation with local people before the plans were developed. GB10 should be rejected unless better transport infrastructure and public amenities are provided. Concerns regarding traffic congestion and resulting pollution on Parvis Road. Wishes to be informed of next stages.
Contributor Proposed Modification: GB10 should be rejected unless better transport infrastructure and public amenities are provided.
Modification Reference: U0000489
Officer Response: Section 8 The Regulation 19 Issues and Matters Topic Paper addresses the issue regarding pollution. Section 9 addresses the issue regarding the adequacy of the Regulation 19 Consultation. Section 11 addresses the matter regarding alternative options for the DPD. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 13 covers the issue regarding adequacy of road infrastructure in greater detail. As stated in the GB10 policy, the developer will contribute to the provision of essential transport infrastructure related to the mitigation of the impacts of the development of this site, in addition to the relevant Community Infrastructure Levy (CIL) contribution. Also stated in the GB10 policy, there is a requirement for the creation of new/improvement of existing open space for leisure and recreation as part of site development. Section 6 The Regulation 19 Issues and Matters Topic Paper covers the provision of infrastructure/public amenities in greater detail.
Response Reference: U0001291
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06142/1
Name: Mr Roger Gahagan
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, UA42
Summary of Comment: Raises three concerns regarding GB4, GB5 and GB10. Also notes concern that the DPD makes no mention of the development of 250 additional dwellings on the Broadoaks site, and the anticipated redevelopment of Sheer House of approximately 200 dwellings. 1. There is no room for expansion of the West Byfleet Health Centre to accommodate up to 2000 new residents as all practices are full and there are no plans to provide further capacity elsewhere. 2. There are no plans to increase the capacity of primary, middle or secondary schools in the area. 3. Transport is the area of greatest concern. The A245 has long been a problem, and many attempts have been made to improve it without almost no success. The addition of over 1000 new dwellings would result in an intolerable increase in traffic. Mitigation focuses on increasing traffic flows on two existing roundabouts with marginal improvements. No allowance has been made for Broadoaks which will contribute two uncontrolled T-junctions within 400 metres of the Camphill traffic lights.

It is suggested that the Chertsey Road roundabout could be modified to allow the parallel movement of two vehicles in an eastbound direction. It should be noted that four years ago the eastbound approach to Oyster Lane, 300 metres further along, was reduced to a single lane.

The Camphill Road/Pyrford Road traffic light improvements assist at peak times as they do not change to green when there is no traffic waiting in Station Approach, Camphill Road or Pyrford Road, but at peak times this is rarely the case.

The report does not address the fact that during the morning peak the traffic light controlled by the pedestrian crossing at the Marist school is in constant use, causing long tailbacks towards Byfleet and often reaching it.

In 2015, the respondent carried out traffic analysis for two scenarios. The first (Scenario B) modelled all developments already agreed by WBC. The second (Scenario F) modelled all developments already agreed by WBC, and the proposed development at West Hall. Since 2015, the potential residential yield at West Hall has reduced from 590 residential units to 570 residential units. To account for this change, traffic flows for Scenario F have been reduced by a factor of 0.958. The results detailed below indicate that the A245 is not amenable to the type of 'quick fixes' suggested. It is already full and by definition cannot carry more traffic; any improvement will merely displace or delay traffic elsewhere.

Respondent provides an analysis of the Strategic Traffic Assessment Document 2015, updated for the revised GB10 allocation.

Level of Service (LOS) is used to qualitatively describe the operating conditions of a section of road or turning movement at a junction. The level runs from A to F, from best to worst.

Ratio of Flow to Capacity (RFC). An RFC value between 0.85 and 1 suggest that the stretch of road is beginning to struggle with the weight of traffic. A value greater than 1 means that the stretch of road has a higher level of traffic flow than its theoretical capacity. The Highways Agency Design Manual for Roads and Bridges states that the desirable maximum RFC is 0.85. All sections of the Old Woking Road and Parvis Road are classed as LOS F and RFC 1.6 or greater in both scenarios. Therefore there is little or no scope for future traffic growth.

Table 3.5 shows 387 additional trips between 8am and 9am caused by the West Hall development: 298 departing and 88 arriving. Assuming an even split of traffic between east and westbound traffic on the A245, that equates to an additional 193 additional journeys on Parvis Road westbound. Table 4.5 shows the absolute increase in westbound traffic as 88, with 44 being the westbound arrivals. This leaves 149 vehicles attempting to depart westbound, which suggest that the other 105 vehicles failed to enter Parvis Road due to congestion and remain queued in the West Hall access road. This would of course affect traffic attempting to turn in the eastbound direction as it would be queued with the westbound traffic on the access road. It may be suggested that other traffic has found an alternative route and the number of 88 is the net result, however there would appear to be no realistic alternative for westbound traffic and, if there were, it should appear in Table 4.5.

Table 4.5 also indicates that the West Hall development has caused a number of A3-bound vehicles to run through Pyrford and onto Newark Lane (B367), implying that the West Hall junction would cause a serious degradation to the eastbound A245 flow in West Byfleet centre. It is noted that the increase in traffic on the B367 Newark Lane is on a road which has a single lane section controlled by traffic light about 80 metres apart and 50 metre section at the southern end in Ripley.

Using increase in absolute flow as a sieve to identify problems is not useful for those with an RFC greater than 1. This has prevented the Parvis Road eastbound from appearing in most tables. By definition these roads are full, and simply cannot accommodate a large increase in flow.

The general tenor of the analysis is to examine the effect of development on existing roads which in the case of extremely congested roads is necessarily small. No attempt is made to analyse the effect on traffic attempting to enter these roads from the new

developments, and in particular the tables assessing delays at junction (4.10 and 4.11) make no mention of the necessary new junction on Parvis Road, implying that through traffic is not greatly delayed to permit access to the A45. These two tables do however highlight the large vehicle delays within Pyrford and on the A245 at Byfleet caused by Scenario F at existing junctions.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Regulation 19 Site Allocations DPD allocates Broadoaks as Policy GB11, with an indicative yield of 155 additional dwellings. This was informed by the SHLAA such that it is congruent with the planning permission granted under PLAN/2015/0987. Likewise the Sheer House development has been allocated in the Regulation 19 Site Allocations DPD as Policy UA42: Land at Station Approach, West Byfleet, KT14 6NG, with an indicative yield of 91 dwellings. This was similarly informed by the SHLAA. It is further noted that the proposed densities are indicative and actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. Paragraph 6.12 of the Regulation 19 Issues and Matters Topic Paper addresses GP provision in the Borough. Paragraph 6.9 of the Regulation 19 Issues and Matters Topic Paper addresses education provision in the Borough. Paragraph 6.7 of the Regulation 19 Issues and Matters Topic Paper confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 of the Regulation 19 Issues and Matters Topic Paper provides further detail regarding transport and congestion issues. In particular, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed.
Response Reference: U0001415
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 02331/2
Name: Ms Carole Gale
Number of Signatories: 1
Comment Type: COMM
Site Reference: RG18GB12, RG18GB13
Summary of Comment: DPD is legally compliant, sound and complies with Duty to Cooperate. Does not consider safeguarding sites as a legal requirement. Concerned that green space needs to be protected due to climate change. Supports the removal of sites from the Green Belt in Pyrford.
Contributor Proposed Modification: Green space needs to be protected due to climate change.
Modification Reference: U0000413
Officer Response: Support is noted for the removal of the Pyrford sites. Section 2 of the Regulation 19 Issues and Topic Paper addresses the matter regarding safeguarding of Green Belt land. The effects of development on climate change have been acknowledged. The DPD is underpinned by numerous climate change studies and strategies, which ensure that any

adverse impacts of development on climate change is minimised. Mitigation methods in the form of green infrastructure are included in the key requirements for a large majority of the allocated sites. In particular, land released for housing development in the Green Belt will be expected to integrate sufficient green infrastructure. The loss of open space and Green Belt land is covered in further detail in section 4 paragraph 4.2 of the Regulation 19 Issues and Matters Topic Paper.
Response Reference: U0001250
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06518/1
Name: Mr Ivan Gale
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports the removal of sites from the Green Belt in Pyrford.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06881/1
Name: Mr David Gardiner
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07, GB08
Summary of Comment: Object to urban sprawl closing the gap between Woking town and the village of Mayford, enveloping Mayford into Woking. Need to protect the village status of Mayford. I see no justifiable reason for removing the Green Belt status of land around Mayford- Green Belt is in place to protect the countryside between towns and villages. The green belt land around Mayford is a hugely important area of woodland, a valuable habitat for multiple species of wildlife.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The issue of protecting the separateness of Mayford from Woking is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 20. The impact of the proposals on wildlife in general is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. However, the importance of the woodland within Site GB7 does merit further recognition and additional text will be inserted into the policy to ensure its protection.
Response Reference: U0001423
Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the

site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site".
Amend third paragraph of reasoned justification to read 118 dwellings.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 04418/1

Name: Miss Hellen Gardner

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB07

Summary of Comment: Object to allocation GB7, the land is special and unsuitable for housing:

The site is Green Belt and should remain so; there are many non-Green Belt sites around Woking that would be more suitable in all ways for a major housing development.

It is a vital green gap between Woking and Mayford (and has been so since the Domesday Book); losing it would blend the village of Mayford with Woking for the first time.

It is vital for the survival of woods and habitats on site.

The A320 is the most congested road in Woking with close to 30,000 car movements per day, and three schools in close proximity, with the new Hoe Valley school still only at half capacity. The proposals would add to the traffic, and pose dangers to children crossing the road (there was a near fatality at the crossing recently), and dangers to the health of residents from air and noise pollution. Should consider the proposals on top of the traffic impact of major leisure facilities in the area.

Green Belt adjacent has already been lost to the Hoe Valley School. Why did WBC ignore all other, more suitable sites for this school? The Planning Policy Team did not act in Woking's best interests on this. Proposals to remove even more Green Belt here would add weight to this question, MP/Government should investigate.

The proposal would greatly change the character of this area and of Woking. If Woking does not preserve the rural character of its charming villages like Mayford, St John's, Horsell, Knaphill and Bisley, it will become an urban sprawl.

In October, Woking Borough Councillors voted overwhelmingly to preserve this land, to preserve the green gap between Mayford and Woking main that is so important, to preserve the character of Woking.

Contributor Proposed Modification:

I hope that Woking Borough Council Planning Policy Team will this time also act in the best interests of Woking and its electorate by removing this land from development plans and so preserve this area of Green Belt and the important character it adds to Woking.

Modification Reference: U0000249

Officer Response: The justification in principle for the existence of very special circumstances requiring the release of Green Belt land for housing is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. The availability of alternative non-Green Belt sites is also addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 11.

The separateness of Mayford from Woking is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 20. In addition, the historic settlement of Woking is to the east of Mayford, so site GB7 did not play a role in separating Mayford from Woking until the 19th century.

The impact of the proposals on wildlife in general is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. However, the importance of the

woodland within Site GB7 does merit further recognition and additional text will be inserted into the policy to ensure its protection.

The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.

The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.

The existence of very special circumstances for the development of Hoe Valley School in the Green Belt was demonstrated adequately at the time of the application for that development in 2015. This included an alternative site assessment carried out for the Education Funding Authority (JLL, 2015) which assessed a range of alternatives in and out of the Borough but found that no others were suitable for use as a new secondary school. The Development Management case officer considered this assessment to be robust. In combination with information from Surrey County Education Authority, and the Site Allocations regarding sites in the urban area, the case officer considered this was the only site available for the provision of a new secondary school to serve the identified need for secondary school places in Woking. The Secretary of State considered this case and decided not to call it in. The site was not removed from the Green Belt by the building of the school there. Through a separate exercise, the Green Belt Boundary Review found the site would be suitable for school development as part of the Green Belt release process; however, the planning application for the school came forward ahead of Green Belt release and was therefore justified by the very special circumstances described above. With regard to local character, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Mayford village itself will also continue to have its character protected by Green Belt designation. The other villages referred to (apart from Bisley) retain their character and charm whilst being part of Woking's urban area. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined. The policy on site GB7 supported by the vote of Councillors in October was to support housing development on the site, to be focussed on the southern part, while designating the northern part of the site as an undeveloped 'area of local separation to provide a visual gap',

Response Reference: U0001424

Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site".

This area will be excluded in estimating the capacity of the site. Amend third paragraph of reasoned justification to read 118 dwellings.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 05735/1

Name: Mrs Elizabeth Gathercole
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
<p>Summary of Comment: Object to Green Belt sites in Byfleet and West Byfleet. I realise that large sites tick the boxes faster than taking the time to find small sites spread more widely over the borough. But it is totally unfair to propose the bulk of dwellings and green belt loss on the last remaining stretches of green belt in one little corner of the borough. We don't have the infrastructure in place to cope. Parvis Road is already made static when there are problems on it or on the M25. The proposals will cause unimaginable traffic problems, as well as pollution.</p> <p>There are not enough schools and doctors in the area as things stand.</p> <p>The same number of dwellings as proposed for the green belt sites in Byfleet and West Byfleet could be delivered on brownfield sites eg. Emerald House in Byfleet, and speeding up redevelopment of Sheer House and Sheerwater- problems there are not insurmountable.</p> <p>Would be morally wrong to build houses so close to the M25 and A245, with massive pollution issues and noise from traffic on both sides.</p> <p>Houses would have to be built on stilts due to regular flooding here.</p>
Contributor Proposed Modification: Please spread the load more thinly across the borough.
Modification Reference: U0000162
<p>Officer Response: The assessment of alternative sites, including brownfield sites, and the potential for them to meet the requirements for housing development, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 11.</p> <p>The concentration of Green Belt loss on Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. The largest proportion of dwellings, as opposed to Green Belt loss, in the SADPD are located in the Town Centre.</p> <p>The impact of the proposals on infrastructure, including schools and doctors, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 13.</p> <p>The issue of air and noise pollution in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 8.</p> <p>Development at Sheer House and Sheerwater is already included in the Site Allocations DPD.</p> <p>The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 7.</p>
Response Reference: U0001698
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 05735/2
Name: Mrs Elizabeth Gathercole
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB12
Summary of Comment: If the M25 is widened, GB4, GB5 and GB12 are unsustainable as development would have to be demolished.

<p>One third of GB5 is not available for development as it was left to the church in perpetuity and needed for burials.</p> <p>GB4 is subject to flooding. Development will cause further flooding in nearby properties. GB5 is also an area named as a flood zone.</p> <p>GB10 and GB12 are subject to regular and severe flooding. It is not sustainable to build here. Wooden walkways are not practical. The increased flooding would have a serious impact.</p> <p>Not enough research concerning flooding in Byfleet has been conducted.</p> <p>Houses built on floodplain will likely lead to severe flooding. Houses built on Brooklands were built on flood plain, and flooded badly, as did houses built by the roundabout leading from Byfleet to Weybridge. Surely lessons must have been learnt from this.</p> <p>Requests an explanation as to why the Pyrford Green Belt sites have been removed from this plan, and asks which criteria apply to this land that do not apply to GB4, GB5 and GB10.</p> <p>Considers that inaccurate pollution readings have been taken along the A245 in Byfleet and West Byfleet, where pollution levels have previously been shown to be the highest in Woking Borough.</p>
<p>Contributor Proposed Modification: Please leave our last bit of Green Belt.</p>
<p>Modification Reference: U0000199</p>
<p>Officer Response: The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network.</p> <p>Section 15 addresses the part of site GB5 which is consecrated as future burial land. Flooding is addressed by Section 7 of the Regulation 19 Issues and Matters Topic Paper. In particular, Paragraph 7.7 confirms that the DPD takes due care to make sure that the risk of flooding could be minimised in Byfleet and West Byfleet. Furthermore Paragraph 10.2 provides that the evidence base supporting the Site Allocations DPD includes inter alia the Strategic Flood Risk Assessment (2015) and Sequential Testing of Sites in the Site Allocations DPD (2018).</p> <p>The reasons for the removal of Regulation 18 sites GB12 and GB13 are set out in Paragraph 14.12 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>Air quality has been comprehensively addressed by Section 8 of the Regulation 19 Issues and Matters Topic Paper. In particular, Paragraph 8.3 recognises that only two areas of the Borough have previously not met the government's standards, and have been declared Air Quality Management Areas: the junction at the top of Anchor Hill, and a section of Guildford Road.</p>
<p>Response Reference: U0001002</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 03002/2</p>
<p>Name: Ms Yvonne Geaves</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: SUPP</p>
<p>Site Reference: RG18GB12, RG18GB13</p>
<p>Summary of Comment: The withdrawal of the sites referred to as GB12 and GB13 at the Regulation 18 consultation make the plan more sustainable and robust because:</p>

<p>1. The Environment - proximity to common land, open farmland and the countryside is a remarkable asset for Woking as a whole, not just Pyrford. The community will be able to continue enjoying this environment with these sites retained as Green Belt.</p> <p>2. The proposals would have destroyed the unique views from Pyrford Escarpment, and change the rural feel of the area. Designated heritage assets are included in the Green Belt and wider area, such as St Nicholas Church, Pyrford Court (a registered park and garden), the conservation area and some of Surrey's oldest farm buildings. 'Heritage vandalism' should be deplored by any authority planning sustainable community development, and the conservation of this land makes the plan more sustainable and robust.</p> <p>3. Part of Pyrford's charm is that it is served by very old and narrow B roads. Traffic congestion has already built up to a point of standstills at peak times and presenting a safety threat for children being walked to and from school. Dropping the proposals means this situation will not be worsened.</p> <p>To conclude dropping the proposals improves the plan not just for Pyrford but for Woking as a whole.</p> <p>No desire to attend the examination, will be represented by Pyrford Neighbourhood Forum if necessary. Respondent would like to be kept informed on next stages of the plan.</p>
Contributor Proposed Modification:
Modification Reference:
Officer Response: Support and comments noted. The heritage and landscape value of the sites are part of the reason for the Council retaining them in the Green Belt. Further detail can be found in the Council's Regulation 19 Issues and Matters Topic Paper, paragraphs 14.11 to 14.13.
Response Reference: U0001514
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 03018/2
Name: Mr Geoff Geaves
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
<p>Summary of Comment: For the current consultation, sites referred to as GB12 and GB13 in the earlier consultation, have been withdrawn. This restructuring of the proposals eliminates inconsistencies in the planning process and thereby make the plan more robust because it removes and validates the points made at the Regulation 18 consultation.</p> <p>Process behind the Selection of DPD Sites</p> <p>Whilst the process for selection of sites is clearly laid out in the DPD tracking through the process to the conclusions drawn for Regulation 18 proposals was difficult and beset with anomalies that are unexplained. For example GB12 and GB13 was consistently evaluated as unsuitable in the Peter Brett Associates Green Belt Review but was recommended for inclusion on the basis that the land was available. The inclusion of both these sites in Regulation 18 proposals were not justified by professional input from the Council's consultants and to remove them both for the Regulation 19 proposals removes serious inconsistencies in the original plan and makes the plan more robust for the Regulation 19 consultation.</p> <p>This land is currently open and productive farm land that has been significantly improved over the last 2 years. The land includes the local high spot on the Pyrford Escarpment that offers uninterrupted views across Ripley to the Surrey Hills, especially in winter and is adjacent to the conservation area around the Grade 1 listed St Nicholas Church. By deleting these sites from current Regulation 19 proposals the land is retained in Green</p>

<p>Belt and conserves the unique character and setting of the village for the continued enjoyment of residents and walkers not just from Pyrford but from all parts of the Borough. By so doing precious Green Belt is conserved, the separation of communities maintained, and urban sprawl reduced, all of which are key objectives of NPPF.</p> <p>.</p> <p>This results in a better, more sustainable and more robust plan for the Regulation 19 consultation.</p> <p>Impact on Infrastructure</p> <p>GB12 and GB13 are bounded by narrow 'B' roads (B367 and Pyrford Common Road) that extend into the busy B382 between Old Woking in one direction and Byfleet in the other. These roads are busy during peak times and the proposed development and other developments nearby will exacerbate this.</p> <p>By withdrawing the Pyrford sites from proposals the situation in and around Pyrford will be relieved to some extent. This in turn will make the current planning proposals more robust and acceptable to local residents in the east of the Borough although it should be noted that with 1000 houses proposed for West Hall and Broadoaks sites in West Byfleet it is believed that there will still be a major traffic problem on the main thoroughfares in the east of the Borough.</p> <p>In summary the DPD was riddled with contradictions and inconsistencies in the process up to the Regulation 18 consultation but withdrawal of sites proposed for development in Pyrford has an important impact on the Green Belt, productive farmland, the protection of conservation assets and the retention of the area for the enjoyment of many people from across the Borough.</p> <p>The current plan is an important improvement that makes the plan more practical and robust for the reasons set out above.</p> <p>Does not want to appear at the Examination in Public as an individual but if there are any late changes introduced to proposals will likely seek representation with the Pyrford Neighbourhood Forum representation team.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Support Noted.</p> <p>The issues regarding infrastructure to serve proposed development in West Byfleet is addressed in sections 6 and 13 of the Regulation 19 Issues and Matters Topic Paper.</p>
<p>Response Reference: U0001788</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick): T</p>

<p>Contributor Reference: 05545/1</p>
<p>Name: Mr Alan George</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference:</p>
<p>Summary of Comment: Considers that the infrastructure will not be able to cope with the building of new homes and Traveller pitches. The A245 is currently at a standstill in the morning and late afternoon, and this is compounded when there is an accident in either direction.</p> <p>Flooding, which happens once or twice a year, has been given inadequate consideration; adequate assessments of river and surface water flooding have not been carried out.</p> <p>There is a need for extra school and medical places.</p> <p>Very few of the residents knew about the planning proposals, and adding a deadline so close to Christmas is considered a little underhand.</p>

Additional concerns about the M25 widening, pollution and inadequate research regarding land ownership. Wholly objects to development of any Green Belt land.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Many of the issues raised by this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper. Section 6 addresses the consideration which has been given to the infrastructure required to support the Site Allocations DPD. Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 provides further details regarding transport and congestion. In particular, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 7 confirms that adequate consideration has been given to the flood risk implications of the Site Allocations DPD. Paragraph 6.9 addresses education provision. Paragraph 6.12 addresses GP provision. Section 9 outlines the robust approach which the Council took to the Regulation 19 consultation. In particular, as per Paragraph 9.3, the Council is satisfied that it has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network. Section 8 addresses air and noise pollution. Land ownership and/or availability has been considered as part of the SHLAA and the Green Belt Boundary Review. The SHLAA Methodology provides that "the assessment of whether or not a site is available for residential development involves a consideration of whether there are any legal or ownership problems with the site." Section 1 addresses the justification for releasing Green Belt land for development to meet future development requirements of the Core Strategy.
Response Reference: U0001304
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06592/1
Name: Mrs C M George
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB18
Summary of Comment: Objects to the development of Green Belt Land in Byfleet and West Byfleet. Concerns regarding the following; - Flooding; - Future development setting a precedence and associated increase in traffic congestion.
Contributor Proposed Modification: None Stated

Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet. Section 7 addresses the issue regarding flooding. Section 13 addresses the issue regarding road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. It is not envisaged that the development of the sites will set an unacceptable precedent, because each proposal would be determined on its own merits with full assessment of its impacts and any necessary measures of mitigation.
Response Reference: U0001599
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06209/1
Name: Mrs Teddy Gerretsen
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Considers that the DPD does not pass the test of soundness; it is not an appropriate strategy as there are alternatives and it is not consistent with national policy. Objections are as below: 1. There is no infrastructure in place to support the increase in population in West Byfleet. This includes additional schools, healthcare services, transport, roads, water and sewerage. 2. West Byfleet is a village and permission should not be granted to increase the population from 2,400 to 3,500 households (including the already permitted developments at Broadoaks and West Byfleet Centre) 3. There is no infrastructure in place for the already very congested Parvis Road. 4. Air pollution from the M25 and A245 is the highest in the Woking area. No consideration has been given to this. 5. No consideration has been given to noise pollution from the M25 and A245. 6. Green Belt at Martyrs Lane and Pyrford are suitable for development of housing and traveller pitches. There is no adequate reason for their removal from the DPD. 7. GB10 is prone to flooding and increased housing risks more flooding for the surrounding areas and roads. 8. Considers that traveller pitches and housing development sites do not go hand in hand. The development plan should be abandoned.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: A number of the issues raised in this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper. Infrastructure provision is comprehensively addressed by Section 6. In particular schools are addressed in Paragraph 6.9; healthcare services are addressed in Paragraph 6.12; water is addressed in Paragraph 6.10; sewerage is addressed in Paragraph 6.11; and transport is addressed in Paragraph 6.7. Further information on transport and congestion is provided in Section 13. In particular Paragraph 13.3 provides that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

As recognised in Paragraph 5.1, the proposed allocation of sites is not evenly spread across the Borough. However this could not be achieved because of the uneven distribution of constraints and the need to ensure that development is directed to the most sustainable locations when compared against all other reasonable alternatives.

Furthermore, as per Paragraph 4.2, whilst there is a loss of open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents.

As per Section 8, due consideration has been given to the air quality and noise pollution implications of the Site Allocations DPD.

Land to the East of Martyrs Lane is not considered suitable for housing and traveller pitches. Paragraph 3.11 sets out the reasons for this. In general terms, it would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

1. The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

2. The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.

3. The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;

4. It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.

5. The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.

6. There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.

7. A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

The reasons for the removal of Regulation 18 sites GB12 and GB13 from the Site Allocations DPD are set out in Paragraph 14.12.

Section 7 addresses the proper assessment of the flood risk implications for the Site Allocations DPD. In particular, Paragraph 7.7 confirms that the DPD takes due care to

make sure that the risk of flooding is minimised. Furthermore, as outlined in Paragraph 7.5, where relevant the key requirements of the proposed allocated sites sets out conditions for the need for detailed flood risk assessment. Site GB10 includes such a key requirement, namely that "the site is within Flood Zone 1 but features a number of existing drainage channels, meaning there is a risk of flooding. The site is also adjacent to Flood Zones 2 and 3 whilst a principle aquifer is located within the site. Consideration of sustainable drainage and flood attenuation within the landscape are potential options. Early engagement with the Environment Agency is required. Flood Risk from onsite and adjacent ordinary watercourses will need to be assessed and detailed submitted as part of a Flood Risk Assessment with any planning application."

The Council considers that housing development for the settled community and traveller sites could be compatible if attention is given to good quality design. It is noted that Planning Policy for Traveller Sites provides that "Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies: a) promote peaceful and integrated co-existence between the site and the local community."

Response Reference: U0001082

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06581/1

Name: Dr Konstantinos Giannoutakis

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB18

Summary of Comment: DPD is not legally compliant nor is it positively prepared, justified, effective or consistent with national policy. No comment is made regarding the duty to cooperate. The DPD is unsound.

GB18 is ill-considered; it is a greenfield site used by residents and tourists for recreation and dog walking. Building here would diminish the view of West Byfleet village, deprive pupils and the local community of recreational grounds and sporting facilities, and degrade the quality of life and education in the area. Furthermore there is no need to allow potentially inappropriate neighbours, for instance public houses and fast food outlets, to open next to the school, posing hazards to pupils. Increased traffic is also of concern; Camphill and Parvis Road are currently experiencing traffic problems and developing the surrounding Green Belt will worsen the situation, posing grave danger to the health and safety of young children.

Wishes to be informed when the DPD progresses to the next stage.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: This representation is comprehensively addressed by the Regulation 19 Issues and Matters Topic Paper.

In particular Paragraph 5.2 clarifies that GB18 will not be developed and will continue to provide open space and sports provision.

Response Reference: U0000997

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06581/2

Name: Dr Konstantinos Giannoutakis
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
Summary of Comment: The DPD is legally non-compliant, not positively prepared, not justified, not effective, not consistent with national policy and unsound. The proposals for Gypsy and Traveller sites at GB4, GB5 and GB10 are in breach of the Designing Gypsy and Traveller Sites: Good Practice Guide (DCLG, 2008), in particular: The sites' location does not take noise into consideration. The sites would not provide convenience and safety for their residents, due to traffic and proximity to railway station The sites would not provide privacy since the pitches would be overlooked by adjacent housing and would harm the existing privacy of neighbours. The sites would not be aesthetically compatible with the local environment. Large slow vehicles accessing the sites (especially Land south of Parvis Road and Land surrounding West Hall) would risk road safety. No evidence is provided of family support networks or historical residence of Gypsies near the proposed sites. Detailed site plans should have been made available at this consultation.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Issues relating to Gypsy and Traveller site allocations in the SADPD are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.
Response Reference: U0001634
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06581/3
Name: Dr Konstantinos Giannoutakis
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA40
Summary of Comment: Objects to UA40, Camphill Tip. DPD is not legally compliant, positively prepared, justified, effective, sound or consistent with national policy. The site is inappropriate for the development of 10,000 sqm of industrial use. Supportive of developing the area, however the land use is wrong. Site is unsound for the following reasons: Development would degrade the quality of life for nearby residents with noise and air pollution; It is too close to West Byfleet Nursery, West Byfleet Infant & Junior Schools and Cherrybrook nursery, as well as the NHS Renal Dialysis unit; The land is contaminated; Potential pollution of waters in Basingstoke canal with negative consequences to residents and wildlife; Increased traffic in Camphill Road and surrounding roads; Antiaesthetic view of potentially big industrial units situated too close to residencies and green space.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS

Officer Response: In line with the Core Strategy, the Council has a requirement to deliver industrial floorspace. The Camphill Tip is considered an appropriate location for the development of industrial uses, given the proximity to the existing industrial estate and the opportunity to complement this use.

Policy UA40 includes key requirements which development of the site must address, such as:

- The development should have a positive environmental impact on the adjacent Old Rive Ditch and Basingstoke Canal;

- Due to the proximity to the Rive Ditch and Basingstoke Canal, the development would need to consider the impacts on water contamination during and post construction;

- The proposed development should pay due regard to the size, scale and massing of adjacent employment buildings in its design;

- The proposed development should avoid significant harm to the environment and general amenity, resulting from noise, dust, vibrations, lights or other releases;

- Current or historical contaminative uses may have led to soil and groundwater contamination (in and around the former nursery/farm) that will need to be considered during any development of the site, dependent on detailed proposals and consultation with Environmental Health and the Environment Agency.

Any development that comes forward will be subject to the development management process, where these issues will be assessed in greater detail to ensure that the scheme makes a positive contribution to the setting and that any detriment is minimised. This includes any impact on the operations of neighbouring properties such as the Dialysis Unit.

Section 8 of the Regulation 19 Issues and Matters Topic Paper covers concerns regarding increased pollution.

Section 13 covers the issue regarding adequacy of road infrastructure in association with increased traffic.

Response Reference: U0001629

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06781/1

Name: Mr Chris Gibbins

Number of Signatories: 1

Comment Type: OBJ

Site Reference: UA44

Summary of Comment: The DPD is not legally compliant, nor justified, nor effective, nor sound, because:

Site UA44 was not subject to ongoing consultation, including Regulation 18 consultation, as described in the LDS. It is therefore not prepared in accordance with the Council's SCI. It is therefore not legal nor sound to be included in the current site allocations proposals map.

The DPD says "appropriate and adequate provision of car, coach and cycle parking in accordance with the adopted car and cycle parking standards but that takes into account the site's sustainable location and will not compromise on highway safety". There is no evidence that the site is in a sustainable location for more than a few additional properties. It needs a full sustainability appraisal. Desktop studies have identified the site as having "excellent accessibility" but have not measured the actual distance to local shops and amenities on foot or by bike. This is subjective, and lacks objective evidence to support it. The SHLAA identifies this site as suitable for 40 additional dwellings, but this has not been consulted on. The site in the SHLAA is smaller than the site in the DPD. There is no evidence a larger site is available for development.

The DPD does not meet the requirements of the Duty to Cooperate. Consultation for site UA44 has been inadequate. The Council has deliberately added this significant change to the plan with no intent to open the site to public consultation required by law. If the relocation of David Lloyd gym was subject to CPO, it must fail on the basis that the prerequisite consultation for the site has not taken place. The public perceive that unless actively scrutinised and challenged, developments such as that proposed for site UA44 will be forced through as 'done deals' by the Council.

Contributor Proposed Modification: To make the DPD sound and legally compliant: Loop Road should be designated as 'urban open space' so it is open to all local residents for outdoor exercise and protect it for future generations, including on the proposals map (coloured bright green).
Density of the development at UA44 should be consulted on - residents certainly do not want to increase the density of the development for the efficient use of land.
Remove site UA44 from the DPD as it has not been consulted on, and has not been appraised for sustainability.
Amend error on p360 of the DPD describing UA44 as 'Former St Dunstan's Church, White Rose Lane'.

Modification Reference: U0000225

Officer Response: Woking Football Stadium was only identified as a potential redevelopment site after the Regulation 18 consultation was conducted. As described in paragraph 15.12 of the Sustainability Appraisal (SA) Report, it has since been appraised through the SA process (see Appendix 11) and selected for inclusion in the DPD due to the significant contribution its redevelopment could make towards achieving sustainable development in the Borough. The site appraisal used GIS software to measure distance to local services and facilities by foot and by bike, using the parameters described in the Sustainability Appraisal report (see Figure 3 and Table 6, and the footnotes on pages 244 and 245).

The public have had an opportunity to comment on both the Sustainability Appraisal results, and the inclusion of the site in the DPD, through the Regulation 19 phase of consultation. Section 9 of the Council's Regulation 19 Issues and Matters Topic Paper describes how the Council is satisfied that the community has been effectively engaged through this process.

The estimation of capacity of sites is based on the indicative density range set out in policy CS10 of the Core Strategy. The actual densities achieved through redevelopment could go up or down, subject to further information being made available to the Council through a planning application, including detailed assessments of the impacts on amenity and character of the surrounding area. The local community will be fully consulted on all details of the proposal - including proposed density - at the planning application stage. Page 360 makes reference to sites which were removed from the Regulation 18 version of the DPD. The former St Dunstan's Church used to be site reference UA44, but has now been removed as the site is under construction.

Since preparing the SHLAA, the landowner has confirmed that the extended site illustrated in policy UA44 of the DPD is available for development. The Council's intentions for the site are set out in Council meeting reports which are accessible to the public, and which were discussed in detail at a Council meeting in July 2018. The report to the Council is available on the Council's website. It is proposed that the Egley Road land (shown in policy GB7) is purchased by the Council, subject to planning approval being obtained for the Kingfield Road and Egley Road schemes. The Egley Road scheme would involve the relocation of the existing David Lloyd Leisure Club along with new residential accommodation, in order to help facilitate the enhancement of the football club at Kingfield Road, which is considered to be an important community asset. The Council has entered into a Development Agreement with GolDev. GolDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this

<p>year. The planning merits of the scheme will be determined by the Council's Planning Committee in accordance with the Development Plan. There will be extensive public consultation as part of the planning process. This is a separate matter to the preparation of the Site Allocations DPD, although the policies of the DPD will be given significant weight in the decision-making process at development management stage.</p> <p>The Council accepts that Loop Road recreation ground is a valuable resource for local communities. The dedicated Urban Open Space areas on the Proposals Map were identified in an Open Space, Sport and Recreational Facility Audit conducted in 2008. Whilst Loop Road recreation ground is not specifically designated as Urban Open Space, it is still afforded protection by Core Strategy policy CS17, which seeks to prevent the loss of recreational facilities. Loop Road play areas are also identified in the updated Infrastructure Delivery Plan. The designations will be reviewed when the Core Strategy policy is reviewed. In the meantime, there may be an opportunity to identify this land as Local Green Space through an emerging Neighbourhood Plan should it meet the criteria in paragraph 100 of the NPPF.</p>
<p>Response Reference: U0001507</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick): T</p>

<p>Contributor Reference: 05805/1</p>
<p>Name: Julie, John And Martin Gilbert</p>
<p>Number of Signatories: 3</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB07</p>
<p>Summary of Comment: Concerned about the possible loss of Green Belt on Egley Road (GB7). This area is vital to maintaining the unique properties of Mayford as a separate village from Woking, with its sites of scientific interest and wildlife habitats.</p>
<p>Contributor Proposed Modification: Maintain the gap between Woking and the village of Mayford for the enjoyment and health of future generations in both Woking and Mayford.</p>
<p>Modification Reference: U0000192</p>
<p>Officer Response: Section 20 of the Regulation 19 Issues and Matters Topic Paper addresses the physical separation of Woking and Mayford. In particular Paragraph 20.1 provides that the northern part of GB7 has been designated as an area of local separation to provide a visual gap between Mayford and the rest of the urban area in order to strengthen the visual separation between Mayford and the rest of Woking.</p> <p>It is noted that Sites of Special Scientific Interest (SSSI) is a designation within Natural England's purview. GB7 does not contain a SSSI. Nonetheless GB7 does include a key requirement to "conduct landscape assessment/ecological survey/tree survey to determine levels of biodiversity and valuable landscape features on site and adjacent to the site." A further key requirement is to "take opportunities to make positive contributions towards biodiversity through the creation of green infrastructure, retention/enhancement of any features of nature conservation values on-site, and creation of linkages with GI network, the design solution should build in wildlife features/corridors." In this respect, due regard will be given to local habitats.</p> <p>The Council does not intend to take forward the proposed modification. As previously outlined the northern part of GB7 includes an area of local separation sufficient to provide a visual gap.</p>
<p>Response Reference: U0001027</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06683/1

Name: Gladman Developments

Number of Signatories: 1

Comment Type: OBJ

Site Reference:

Summary of Comment: Considers the Council has taken the wrong option in progressing the Site Allocations Development Plan Document rather than reviewing the Core Strategy. The Council reviewed the strategic policies of the Woking Core Strategy. However, we fail to see when considering the Framework as a whole, that modifications are not required. At the time of the review the Core Strategy has less than 9 years to run. Paragraph 22 of the NPPF 2018 is clear that strategic policies should look ahead over a minimum of 15-year period adoption.

The Woking Core Strategy was adopted with unmet housing needs, which the review document quantifies as 225 dwellings per annum. Waverley has recently adopted its Local Plan with a commitment to meet about 50 percent of Woking's unmet housing need, with Guildford's Local Plan, currently undergoing examination, expected to accommodate around 20 percent of Woking's unmet housing need. Even with significant assistance from Housing Market Area partners there will be remaining unmet housing needs arising from Woking in the period to 2027. There is therefore strong justification for the undertaking of a wider review of the strategic policies of Woking Core Strategy now, rather than the continuation of the preparation of the Site Allocations DPD. A review of the Core Strategy amending the plan period up to 2035 and beyond, could incorporate the work on the Site Allocations DPD that has been undertaken to date.

Concurs with The Sustainability Appraisal Report of the Woking Core Strategy the review that the constraints of the area have not changed however, given the current housing situation building more houses for socio economic benefits outweigh the impacts of the environment.

The review states that the Green Belt boundary report states at paragraph 3.5.22 that it does not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development and uses this as a justification for not modifying the Core Strategy. This may well be the case but each of these parcels could contribute to the housing needs of a modified plan period with Waverley and Guildford potentially assisting with any further identified unmet need when each of these Local Plans is reviewed.

It is further claimed that undertaking modifications to the Core Strategy would mean that the earliest a review could be adopted is 2020/2021. Progress on the Site Allocations DPD has been disappointingly slow and the Council should have therefore sought to progress a comprehensive review of the Core Strategy including an extension to the plan period.

Concerns have been raised by Woking's HMA partners regarding the Duty to Cooperate. This is a significant failing of the review of the Core Strategy.

There is a stronger justification for the allocation of the identified proposed safeguarded sites from the Green Belt in an extended and modified plan period. Considers it to be a difficult task trying to justify removing sites from the Green Belt but not having allocated them for development now when it is clear that the housing needs of Woking up to 2027 are not going to be met.

Does not consider that progressing with the Site Allocations DPD rather than modifying the Core Strategy is a sound approach. The Site Allocations DPD is not positively prepared because it would not meet the remaining unmet needs identified in the Woking Core Strategy, and it is not agreed by other authorities that the Site Allocations is the best

approach. It is not effective as cross-boundary strategic matters will not have been dealt with and have in fact been deferred.
Should it be necessary we will appreciate the opportunity to discuss the issues raised in the examination to the Site Allocations DPD.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: It is appropriate and necessary for the Site Allocations DPD to facilitate the delivery of the requirements of the Core Strategy. The Woking Core Strategy and the Site Allocations DPD are two distinct and separate development plan documents but with clear interrelationships. They have distinct purposes, processes and timescales for their preparation that should not be conflated. The purposes and timing for the preparation of these documents are set out in the current and previous Local Development Schemes with no ambiguity. Runnymede, Waverley and Guildford Borough Councils had all made representations during the review of the Core Strategy which were taken into account by the Council before the review was approved. It would therefore be unreasonable to use the Site Allocations DPD as another means to revisit this matter. Woking Borough Council therefore has an up to date Core Strategy to provide a sound strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the National Planning Policy Framework (NPPF) was reviewed in October 2018. The NPPF requires plans to be reviewed at least once every five years. It will be unreasonable and indeed burdensome to expect the Council to review its Core Strategy again within six months of its latest review. That is certainly not what the NPPF had intended, and obviously that will not provide the necessary certainty that developers, the general public and anyone who has an interest in investing in the Borough need. It is important to highlight that the fact a Core Strategy is 5 years old does not automatically makes it out of date. Regulation 8(4) of the Town and Country (Local Plan) (England) Regulations 2012 (as amended) requires policies contained in a local plan to be consistent with the adopted development plan. Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) (the Act) emphasises this by stating that in preparing a local development document the local planning authority must have regard to any other local development document which has been adopted by the authority. Section 15 of the Act requires the Council to prepare a Local Development Scheme (LDS) which must specify which development plan documents they wish to prepare and the timetable for preparing them. The Council has published an up to date LDS (October 2018). The LDS identifies the Site Allocations DPD as a development plan document that the Council wishes to prepare. It specifies the overall purpose of the Site Allocations DPD to identify and allocate sites for development. In particular, to identify sufficient employment and housing land and infrastructure to cover the period up to 2027, in accordance with requirements, vision and spatial strategy set out in the Core Strategy. Given that the Council has an up to date Core Strategy, it is imperative and necessary that the Site Allocations DPD is prepared to be consistent with its requirements. Not to have done so would be contrary to the Act, the Regulations and the requirements of the Core Strategy. The Government has prescribed that unless special circumstances would justify, local authorities should use the standard method to calculate local housing need. It has also prescribed the steps to follow in calculating the need, and in particular, it requires the Council to use the most recent growth projections. At the time the Council carried out the review of the Core Strategy, the most recent growth projections was the 2016 household projections. To have used any other data at the time would have been inconsistent with national guidance. The Council recognises that since the review, the Government requested the use of the 2014 household projections instead of the 2016 projections. The review of the Core Strategy addressed the implications of using the 2014 projections.

In regards to the safeguarded sites, it would be simplistic and bad planning to bring forward the safeguarded sites for development to meet Woking's objectively assessed housing need up to 2027. The development requirements of the Core Strategy, including the housing requirement are identified in an integrated manner and justified by a significant body of evidence base studies. This includes an Infrastructure Delivery Plan, Employment Land Review and Topic Paper, that identifies the necessary scale and type of infrastructure and economic growth necessary to support and align with the expected quantum of housing growth. To bring forward the safeguarded sites for development up to 2027 without the corresponding review of office floorspace, warehouse floorspace, retail floorspace and the necessary infrastructure to support the outcome of such reviews would at best be irresponsible, overly simplistic and ill conceived. It would undermine the overall purpose of the plan-led system to plan in a holistic manner to ensure sustainable development.

Whilst it would be for future reviews of the Core Strategy to determine future housing requirements, it is very likely that bringing forward the safeguarded sites for development during this plan period would lead to significantly lower housing requirement in the next plan period. There is no scope to release any more Green Belt land for strategic development without damaging its overall purpose and integrity. This point is highlighted in paragraph 3.5.22 of the Green Belt boundary review report. It states 'we do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development'.

Paragraph 139 of the NPPF provides guidance on safeguarded sites. It advises that plans should where necessary identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period. The plan should make clear that the safeguarded land is not allocated for development at the present time. To bring forward the safeguarded sites as suggested by the representation would be contrary to this advice and the intended purpose of this national policy.

The Site Allocations DPD allocates land to deliver more homes than the housing requirement. This is sufficient to ensure that at least the housing requirement is delivered and to also cater for any non-implementation.

The Council has and is acutely aware of its responsibility under the Duty to Cooperate to engage with its neighbouring authorities, and has done so in a constructive manner throughout the process. The Council will continue to engage throughout the process and with regards to any post adoption delivery and monitoring that might be necessary. The Council will in due course publish its Duty to Cooperate Statement to set out how it has engaged with key stakeholders throughout the preparation of the DPD.

Response Reference: U0001106

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06809/1

Name: Olwen Glynn-Owen

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB10, GB11

Summary of Comment: Objects to GB4, GB10 and GB11 on the following grounds:
 1. The proposals are far too large in scale and will significantly negatively impact the health and quality of life of existing residents, the local environment and the area's wildlife.
 2. Development will result in worse air quality for new and existing residents due to increase in vehicular emissions. In addition there will be more litter and a diminished

number of open and green spaces. The problem is exacerbated by the proposed removal from the Green Belt of infant and junior schools' playing fields in West Byfleet.

3. It is presently extremely difficult and hazardous for residents of roads leading off Parvis Road to access the latter. The problem would be exacerbated by the increased traffic that will result from this development. Residents would be more restricted, and subject to increasing levels of stress.

4. The proposed site for development is a flood plain and unsuitable for intensive development. Flooding problems will increase within the neighbourhood, closing roads, impeding traffic mobility and consequently impacting local businesses and residents' quality of life.

5. The proposed number of dwellings for the West Byfleet sites is so great that they can likely only be built in large blocks of flats. Advice to residents is that Green Belt development would comprise aesthetically pleasing architecture and green space. Along with the 16-21 traveller pitches, the respondent considers that this is unlikely to deliver such an amenity and is out of character with the Dartnell Park area and village.

6. New housing and traveller pitches should be distributed more evenly among neighbourhoods in Woking where there are more likely to be employment and business opportunities.

7. West Byfleet has 5,600 residents spread out over several neighbourhoods. The proposed development of GB4, GB10 and GB11, will result in 795 dwellings, alongside 16 traveller pitches. This will generate a population that will unfairly outnumber the residents of Dartnell Park and village centre neighbourhood. Including other sites in Byfleet, the total of new dwellings proposed is 930. Assuming an average of two people per dwelling that is an increase in population of at least 2000, over a one third increase.

8. Infrastructure cannot support this proposed development and increased population density. The car parks, medical centre, primary school, supermarket and railway station are inadequate for a population increase of this size. Overcrowding, congestion and air pollution will increase stress and ill health and greatly diminish the quality of life of current residents.

9. The proposed number of new dwellings in Byfleet and Byfleet is already surplus to requirements. After Brexit the need for additional housing should diminish. The market for properties is already stagnant. The new properties being built above the shops on Station Approach, and those proposed by the Sheer House redevelopment are more than adequate. If more are needed, the increasingly derelict Emerald House building and car park on High Road, Byfleet could be purchased and redeveloped by the Council.

10. The publication of the plan and the opportunity to comment was inadequate. The local process is not adequate to disseminate information regarding a matter of this magnitude and its life-altering consequences. No notice appear to have been posted in prominent places. Each household should have received a letter or email informed the occupants of what is being proposed. In the run up to Christmas there was insufficient time to view documents and collect evidence.

Contributor Proposed Modification: The consultation period should be extended and notices posted to every household likely to be impacted by the proposal to gauge the true response to the plan in a fair manner.

Modification Reference: U0000212

Officer Response: Many of the issues raised by this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper.

Section 4 addresses the impact of the proposed allocations on the general wellbeing and amenity of residents. In particular Paragraph 4.2 provides that while there is a loss of open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents, as set out in Core Strategy Policy CS17: Open Space, green infrastructure, sport and recreation. Core Strategy Policy CS7 is also noted which provides that "the Council is committed to conserving and protecting existing

biodiversity assets within the Borough. It will require development proposals to contribute to the enhancement of existing biodiversity and geodiversity features and also explore opportunities to create and manage new ones where it is appropriate."

Section 19 addresses biodiversity. In particular, Paragraph 19.1 confirms that during the preparation of the Site Allocations DPD, the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed. The issue of air quality is comprehensively addressed in Paragraphs 8.1 to 8.5. It is noted that, in accordance with Paragraph 5.2, GB18 will not be developed and will continue to provide open space and sports provision for the Junior and Infant schools. Flooding has been comprehensively addressed by Section 7. In particular, Paragraph 7.7 confirms that the DPD takes due care to make sure that the risk of flooding is minimised. The Site Allocations DPD does not address detailed design matters. However, it is noted that the indicative yield for GB10 is calculated based on an indicative density of 40 dwellings per hectare which is in accordance with Policy CS10 of the Core Strategy. As regards GB11, it is noted that extant planning permission PLAN/2018/0359 provides a mix of dwelling types. An indicative yield and density has not yet been proposed for GB4 as it is a safeguarded site. Furthermore, the Regulation 19 Issues and Matters Topic Paper Paragraph 3.10 provides that traveller site allocations include key requirements that will "ensure that the siting, layout and design of the site minimises any adverse impacts on the amenity of nearby residents and the landscape setting of the area."

Paragraph 5.1 recognises that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. The overall distribution of development across the borough is in line with the spatial strategy for the borough.

Section 6 comprehensively addresses infrastructure. In particular, Paragraph 6.7 addresses transport, Paragraph 6.12 addresses GP and Paragraph 6.9 addresses education provision. Paragraph 6.4 confirms inter alia that the Council is working with Network Rail to deliver significant improvements to the rail network. Section 13 comprehensively addresses congestion, and Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

The Council does not consider that it is allocating an unnecessarily large quantum of land to meet its housing requirement. The Council has an up to date Core Strategy to set the strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. In accordance with Section 6 of the Core Strategy, the Council is committed to the comprehensive delivery of the requirements of the Core Strategy and the preparation of the Site Allocations DPD is a key means to achieving this objective. In this regard, continuing to plan for the annual housing requirement of 292 dwellings per annum to 2027 is a credible approach. Sufficient land has been identified to meet this need and, as per Paragraph 1.7, the Council has included within the overall quantum a sufficient cushion to cater for non-implementation.

Section 9 sets out the approach that the Council took to public consultation. As confirmed in Paragraph 9.3 the Council is satisfied that it has done what it can within the available resources and has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. It has done so in accordance with the Statement of Community Involvement and all other statutory and policy requirements. It is therefore not considered appropriate to extend the period of consultation.

Response Reference: U0001259

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05660/1
Name: Mr Anthony Goddard
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Point out the benefits of protecting the Green Belt and resisting encroachment. Giving up greenfield sites is contrary to the expectation that the Council will look after the well being of its electorate. Questions about land ownership should have been resolved before the consultation stage. Traffic in Byfleet has worsened over the last 34 years, Parvis Road has the reputation of one of the busiest in Surrey. The additional vehicles will make the situation much worse, leading to traffic gridlock over a large area. I am sure similar arguments apply to other forms of infrastructure. Should not make special provisions for Travellers, which are not made for other groups. Should make more provision for housing of ex-service people.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The reasoning behind the removal of land from the Green Belt is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. WBC is very conscious of the benefits provided by the Green Belt and seeks to keep its loss to the minimum necessary. The impact of Green Belt loss on the amenity of local residents is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. The issue of land ownership on site GB5 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 15. The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The need to make special provision for Travellers is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3 (in particular paragraph 3.1). WBC (together with other councils in the West Surrey Housing Market Area) has assessed housing need for a range of groups, including service families. This information is contained in the West Surrey SHMA (2015), the conclusions of which informed the SADPD.
Response Reference: U0001226
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04172/1
Name: Mr Trevor Golding
Number of Signatories: 1
Comment Type: OBJ
Site Reference: RG18GB12, RG18GB13
Summary of Comment: No comment on legal compliance, Duty to Cooperate or consistency with national policy. Consider that the DPD is not positively prepared, not justified and not effective. Considers that the DPD is unsound.

It is believed that there are geological faults in the ground at the fields either side of Upshott Lane. The same applies to the next field over (to the south of Sandy Lane) where a number of years ago, a large sink hole appeared that was rapidly filled with rubble and top soil. It would be dangerous for development to take place at this land without first conducting an independent geological survey.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The fields either side of Upshot Lane were proposed for development by the Regulation 18 Draft Site Allocations DPD. However these sites (previously referred to as GB12 and GB13) are no longer proposed for development.
Response Reference: U0001050
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05596/1
Name: Mrs Helen Golding
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Object to proposed Green Belt development in Byfleet. Green belt should remain as such. Local infrastructure could not cope- local school and West Byfleet Health Centre could not accomodate the proposed additional population. Traffic is already horrendous, and the proposals would have a serious impact on this. Traffic in the Brooklands area has significantly increased in the last 9 years. The proposal to stop traffic turning right from Seven Hills Road would not work, people would either turn left up to the A3 roundabout and then come back, or they'll cut through Weybridge and the Brooklands road.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The necessity of releasing land from the Green Belt for safeguarding for future development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 2. The impact of the proposals on local infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.
Response Reference: U0001630
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06682/1
Name: Mrs Théo Goldsmith
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Objects to anymore houses or traveler sites. Understands when there was going to be a school on the Broadoaks site. The local schools are full, the

center of West Byfleet is a mess at the moment, there isn't enough parking now and will get worse over the next 2 years as the West Byfleet Junior Sch continues to increase in size. There are too many large scale proposed building plans in the area, you can't increase the population by 25% and there not be consequences. Strongly object to building on greenbelt land.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Objection noted. Section 6 of the Regulation 19 Issues and Matters Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. The IDP considered parking provision in the Borough see Section 6 of the IDP which can be found on the Council woking2027 website. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery. The justification to release Green Belt land for development has been comprehensively addressed in Section 1 and 2 of the Regulation 19 Issues and Matters Topic Paper.
Response Reference: U0001186
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02390/2
Name: Mrs Nora Goodman
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11, SA1, UA42
Summary of Comment: The Draft Site Allocations DPD does not pass the required test of soundness required by para 35 of the NPPF 2018. The DPD is not an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy. Reasons for these assertions are as follows: Firstly, the number, length and complexity of documents produced by WBC to support their conclusions make it impossible for ordinary residents to find time to read, digest or comment. I assume this will be borne in mind by the Inspector. Green Belt Land - the proposals do not meet WBC's Core Strategy 2012 or the NPPF 2018, clause 134. Outlines the purpose of GB in those documents. The removal of West Hall GB10 does not meet these Green Belt criteria. The proposals see the removal of around 60% current Green Belt in West Byfleet. The SA DPD removes only 1.83% Woking's Green Belt, but 1.09% of this is in West Byfleet. A lion's share of housing provision up to 2027 will fall in this village and its neighbour, Byfleet. NPPF 2018 policy 137 says authorities should make as much use as possible of suitable brownfield and unidentified land. The Council spent a lot of money on the Brett report on which sites to remove from the Green Belt, but there is no evidence of major expenditure to independently and proactively gain advice on brownfield sites instead of taking precious Green Belt.

Has no problem with the release of site GB11 Broadoaks, but the development does impact significantly the infrastructure of West Byfleet and should be considered with regard to the release of further land.

WBC appear to have no respect for open spaces, and in order to protect it, the Junior School and Infant School (GB18) should remain Green Belt. It may have been isolated by earlier decisions, but as the Council is currently seeking to build a pub on the recreation ground, which is designated Open Space, these playing fields need stronger protection and should be kept in the Green Belt.

West Hall GB10 -

Described in the Landscape Assessment of the Green Belt Review as a site with 'significant landscape concerns' and a 'strong attractive character'. It is of critical importance to the landscape value of the wider area.

The site has a small frontage on Parvis Road but widens out across the field behind. There is a well-used and pretty public footpath at Dood's Lane that leads to the Wey Navigation and acts as a valuable Green Corridor. There is the feel of open countryside due the fields and woods of West Hall on one side and the golf course on the other. Earlier plans showed housing built across the fields up to Dodd's Lane. It is agreed that recreation and exercise are important to a community but with a housing estate and hundreds of extra people in new homes abutting the footpath, the walk and open view will be spoiled. The footpath will become a busy throughfare. With this encroachment and sprawl of housing, the open nature of the countryside will be lost. The additional housing will create extra pressures on the Green Infrastructure Network.

Quotes from the Sensitivity to Change part of the Green Belt review for this land parcel, which includes reference to a largely unspoilt rural character, the recreation corridor referred to above, a strong boundary formed by the M25, separation from Byfleet visually and in terms of noise levels, and woodland and trees on the northern and western edges of the site meaning there is no visual association with the urban area. Broadoaks is contained by this woodland. "Overall the area has a high landscape sensitivity to change, except the Broadoaks site which is very well contained and lies within the settlement envelope."

At the far extent of the site, the walk to West Byfleet would be well over the kilometre stated in the DPD, and an unreasonable distance to walk, particularly for school children and the elderly. Questions the site's sustainability.

Noise and air pollution - future residents of West Hall will be at risk of high levels of noise and air pollution. A mile away from the M25, where the respondent lives, the M25 can be clearly heard in some wind conditions. There is little consideration given to these factors in the DPD, but emphasis is put on future mitigation. The NPPF requires that planning policies and decisions should contribute and enhance the local environment by preventing new development contributing to or being put at unacceptably high levels of soil, air, water or noise pollution. The decision to remove West Hall from Green Belt is unsound because it will result in increased pollution from congested traffic.

Character of West Byfleet - Population - West Byfleet is a smallish village which has been wrongly identified by WBC as a business centre mainly because it has a railway station. The congested A245 cuts it in half. The number of households was 2320 at the last count. Various developments, including Broadoaks, Sheer House and now the proposal at West Hall, bring the total of extra dwellings to 1150. This is a staggering 50% increase in dwellings in West Byfleet. This is overdevelopment and is irresponsible. no village should be asked to bear this as its character will be altered beyond recognition.

Infrastructure. Traffic and congestion on the A245 - The huge increase in residents from the proposed development and from mooted Green Belt development in adjoining boroughs (Fairoaks and Wisley airport) will see existing congestion, and associated pollution, become uncontrollable. There is no evidence that these effects can be mitigated. Tinkering with traffic lights suggested in the traffic report and installation of a roundabout from the development onto Parvis Road will only cause further holdups.

General infrastructure -the railway line through West Byfleet is one of the busiest railway lines in the country and the fast line to London is heavily used. West Byfleet station is already overcrowded in rush hours and commuter parking space is running out. Local schools, despite expansion, are full. Doctors surgeries and local hospitals are under pressure. Water supplied and sewage facilities are inadequate. There is insufficient parking and reliance on the Waitrose car park. Sheer House redevelopment did not increase parking provision by merely allotting 0.6 spaces for each of the 255 future flats. In short there is over[assume under] capacity at present in infrastructure and the village can not take more substantial development.

Traveller's Pitches - first heard about 20 pitches on West Hall site in Oct 2018, dropped in without consultation. 20 pitches -three quarters of Borough requirement - will be on Byfleet and West Byfleet with 15 of these at West Hall. If the aim was to distribute sites across the Borough, this has not been realised. The amenity value and character of the area surely precludes putting this site there [assume West Hall], there are no special circumstances to allocate this site adn no demonstrated lack of alternative sites in the urban area. The very large Martyr's Lane site, the subject of a recent report for suitability for removing from the Green Belt, should be examined. It was eliminated because of its contribution to the Green Belt, but on the evidence above, West Hall has an equal contribution.

Contributor Proposed Modification: Traveller's Pitches - locate at Martyr's Lane rather than at West Hall (GB10)

Modification Reference: U0000238

Officer Response: The Council is confident that the DPD is sound, legally compliant, consistent with national policy and an appropriate strategy accounting for reasonable alternatives and based on proportionate evidence. This is detailed in its Regulation 19 Issues and Matters Topic Paper and evidence to demonstrate this will be considered by the Inspector at public examination.

The point about the number, length and complexity of documents produced by the Council is noted, but is necessary to inform a document of this nature. Unfortunately it would be difficult to present an appropriate, justified strategy accounting for reasonable alternatives and with proportionate evidence without a large array of supporting, background documents and assessments. It is fair and transparent that the Council makes this information, which is technical in nature, available for the public to view. The option of producing a short, summary version of the SA DPD was considered, but was not taken forward due to the local level detail and specificity in the allocations being of use and value to the Council and the documents' audience. A summary document would, necessarily, gloss over large amounts of useful information contained in the DPD. To tackle the issue raised, Officers ran a number of consultation events and were available on the phone and by email to enable members of the public to ask questions, discuss or clarify information presented. These events and methods of contact were widely publicised. This is detailed further in section 9 of the Council's Regulation 19 Issues and Matters Topic Paper.

The following points raised are comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1, 4-6 and 10-11.

GB18's allocation is for open space. The site is excluded from the Green Belt in order to create a logical and defensible Green Belt boundary, and avoid a Green Belt island, in accordance with national planning policy. The site will be protected and designated as urban open space under Policy CS17 to serve the schools, which will be reflected on the Proposals Map.

While the point on the Landscape Assessment of the Green Belt Review at GB10 is noted, the site was also considered to be the most sustainable location for development in section 6.2 of the Green Belt Review. The sustainability of the site has been further tested through the Council's Sustainability Appraisal, which can be found on the Council's website. As background to Policy GB10, contained in the Green Belt Boundary Review, is the presumption that large parts of the site should not be built on and left green to help

maintain a good transition between the urban area and Green Belt. It is proposed that the site should contain substantial areas of public open space and green infrastructure, including large areas of woodland and parkland setting which should be strengthened where possible. This will serve residents of the development, and also help conserve the distinctive function of green infrastructure and links to the Wey Navigation corridor, which contribute to the character of the area. These points are included as key requirements in the policy for GB10 and will help to ensure that the landscape value and attractive character of the site is minimally impacted by the development. This point also indicates the respect the Council has for preserving green space (whilst delivering the required housing as set out in section 1 of the Council's Regulation 19 Issues and Matters Topic Paper) and the ensuring development fits with the area's character.

In addition to the strong boundary formed by the M25 the policy includes a key requirement 'Development will need to be sensitively designed to create a strong landscape edge'.

The extra pressures on the Green Infrastructure network mentioned are dealt with within the policy's key requirements, as mentioned above, and further catered for by the allocations for open space and SANG (suitable accessible natural greenspace) in section C of the Site Allocations DPD, which contains 7 sites. These sites provide the opportunity to improve infrastructure to serve existing communities as well as support planned new development.

Noise and air pollution are covered in section 8 of the Council's Regulation 19 Issues and Matters Topic Paper.

With regard to overdevelopment within the West Byfleet area, the projected increase in population is noted but its impacts in terms of infrastructure can be dealt with, as detailed in section 6 and 13 of the Council's Regulation 19 Issues and Matters Topic Paper. Also please see sections 4 and 5 of this paper about the concentration of development in the West Byfleet and Byfleet area. On maintaining the character of West Byfleet, the indicative capacity proposed at GB10 is at a density of 40 dwellings per hectare, which reflects the character and nature of existing built development in the area. Furthermore the green space requirements of the policy (detailed above) will help to maintain the overall green, attractive character of the area. The proposed allocations are not expected to lead to unacceptable urban sprawl.

With regard to distance from the site to West Byfleet, this site performed well in terms of accessibility ratings compared to other sites assessed and is supported in principle by Surrey County Council's Strategic Transport Assessment (see para 6.7 of the Council's Regulation 19 Issues and Matters Topic Paper). Details on site specific requirements for pedestrian and cycle infrastructure, and car parking provision and access will be addressed by a Transport Assessment alongside a planning application, and are included in GB10's key requirements. The development of the site will also be subjected to Core Strategy Policy CS18 Transport and Accessibility, which can be found on the Council's website.

The issue of Travellers Pitches is covered in section 3 of the Council's Regulation 19 Issues and Matters Topic Paper.

Response Reference: U0001633

Officer Proposed Modification: This issue of travellers pitches at land east of Martyrs Lane has been addressed in the Council's Regulation 19 Issues and Matters Topic Paper, section 3, particularly para 3.11. No modifications are considered necessary as a result of this representation.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 05067/1

Name: Mr Ross Goodman
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: DPD is unsound. Objects to the release of Green Belt land for dwellings. Two SHLAAs (2014 and 2017) inform the DPD, this is incompatible. Has provided data from the SHLAA (2017) which suggests that enough housing will be delivered over the plan period, meaning release of Green Belt land is unnecessary.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The figures from the 2017 SHLAA were used to inform the Site Allocations DPD. Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development, and the associated issue regarding housing delivery targets.
Response Reference: U0001567
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06690/1
Name: Ms Alice Goring
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Does not believe the Draft Site Allocations DPD has been thoroughly investigated nor does it pass the required test of soundness. The proposed Site is currently allocated as greenbelt land and is also a concrete aggregate safeguarded Site. The minerals allocation on this site still exist if it was to be removed from Greenbelt and run until 2026. The site allocations DPD run until 2027 and thus they will run in parallel. This puts a big question mark over the feasibility of being able to deliver this allocation and surely does not therefore make the site a favourable prospect for the intended development. One of the key objectives of the NDP2017 was to preserve the character and history of West Byfleet and therefore the proposed plan contradicts this entirely. It would force the merging of neighbouring areas and go against the emphasis which has been put in NDP2017 on protecting existing green spaces. Currently this piece of land performs the Greenbelt function of preventing urban sprawl and I believe that the statements regarding the Greenbelt function of the Site are inaccurate. Traffic congestion on Parvis Road will increase. The access to the site is over 1km from the railway station and therefore Parvis road would need a significant upgrade. Current and future residents of the imposed development rely on their cars to get to the station and to work. This location is not a feasible option. The site's close proximity to the M25 and other major roads such as the A245. Putting a development on this site would surely go against National policy which states that decisions should contribute to and enhance the local environment by preventing new development from contributing to or being put at unacceptable risk by high levels of soil, air, water or noise pollution (NPPF paragraph 170e). This development would be at risk of both noise and air pollution, something which I believe has not been properly considered.

This site is currently one of beauty. It is grazed all year round by horses most of which have been rescued from the meat man. It is the habitat for wildlife and the development would not only cause the death of wildlife but also force the relocation of many horses from this site.

The field for the proposed development becomes waterlogged with even the slightest bit of rain (see attached photo). Large amounts of surface water gather and drainage ditches have overflowed in recent weeks, despite the rainfall not being enough to flood our local rivers yet. This makes the site unsuitable for development. Other sites are more suitable such as Martyrs lane which has been excluded from the allocation without sufficient reasoning. Adequate assessments regarding flooding from both river and surface water have not been carried out.

This site is unsuitable for 15 traveller pitches, whether you were to split the pitches up into several sites or not. The policy set out by Woking Borough Council states that the use of Greenbelt sites for this purpose should be a last resort (paragraph 170e) and that urban sites should be considered first.

why is the number of pitches set to be on this development is so high and disproportionate to allocations elsewhere and does not think that other more suitable sites have been investigated thoroughly enough.

Looking at other sites such as the one in Chobham to see the horrifying mess that has been made. The proposed site seems completely out of place in such a densely populated area of West Byfleet. impact on house prices. Understands that there is a requirement and need to provide for the travelling community, but this site seems to be unsuitable and there surely must be better alternatives where appropriate infrastructure is already in place.

The proposed site falls short on many criteria which should be considered when deciding where to house Travellers such as; it should not have unacceptable impact on the visual amenity and character of the area and it should have enough space for related business activities to name a few. People will surely not want to buy the 555 new dwellings if they know that there are going to be interspersed travellers sites between these new houses, not to mention the strain that 555 dwellings and 15 travellers pitches will have on the local doctors, schools, water, sewage and roads which are already under extreme pressure. The development site for the Traveller Pitches is next to a nursery and large old people's home on one side and multi-million pound developments both opposite and on the other side. In conclusion, does not think that the West Hall, West Byfleet site has been thoroughly investigated and has the suitability required by paragraph 35 of the National Planning Policy framework 2018.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The concern regarding the designation of the site as a Concrete Aggregate safeguarded site is addressed in Section 17, and for the West Byfleet Neighbourhood Plan see Section 16, of the Regulation 19 Issues and Matters Topic Paper.

The site has been assessed through the Green Belt Boundary Review (2015) and found to be suitable for removal from the Green Belt. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12 and Section 1. In regards to urban sprawl see Section 21 of the Topic Paper.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides

<p>adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>The impact of the proposed development on noise and air pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8. In regards to soil contamination, the Council will consult with the relevant organisations including Environment Agency, and with the Environmental Health section of the Council, during the detailed planning application stage as well as require applicants to carry out prior assessments of the site, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.</p> <p>In regards to the impact on wildlife see Section 19 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>Issues of flood risk are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The reasons for not removing the Martyrs Lane site from the Green Belt are addressed in the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11.</p> <p>The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.</p>
Response Reference: U0001099
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06506/1
Name: Mrs Lisa Graae
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: DPD is not sound.</p> <p>Objects to building on the Green Belt as green spaces are needed to serve increasing population.</p> <p>Green Belt should not be released unless an equal amount of Green Belt (per capita) is made available to the public.</p> <p>If Green Belt land is released for development, this should be done so that the remaining Green Belt land forms a continuous area to serve as wildlife corridor and as recreational walking/cycling routes.</p> <p>Consultation did not include proposed changes to infrastructure.</p> <p>Concerns over agglomeration of traveller pitches leading to isolation from local community.</p> <p>Housing allocation too focused in Byfleet, should be distributed equally throughout borough.</p> <p>Wishes to be informed of next stages.</p>
<p>Contributor Proposed Modification: Green Belt should not be released unless an equal amount of Green Belt (per capita) is made available to the public.</p> <p>If Green Belt land is released for development, this should be done so that the remaining Green Belt land forms a continuous area to serve as wildlife corridor and as recreational walking/cycling routes.</p>
Modification Reference: U0000401
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 4

addresses the issue regarding loss of green space and section 5 specifically addresses the loss of Green Belt land and associated distribution issues in Byfleet and West Byfleet. The proposals in the DPD incorporate significant open space and green infrastructure. The allocation of Green Belt land for SANGs will provide new and enhanced areas for recreation.

DPD has set out to make green space more accessible. The release of Green Belt land will open up new and enhanced areas for recreation, as will the allocations for suitable alternative natural greenspace (SANGs). Within the Key Requirements for GB10, it is stated that any development will need to include significant elements of Green Infrastructure, having regard to the landscape's particular sensitivity to change. The Green Belt Boundary Review identified that significant areas of landscaping are needed to create an appropriate boundary to the Green Belt in this location and conserve as much of the landscape setting as possible. Taking this into account, the Council will ensure that development of the site respects the integrity of the remaining Green Belt, and that it is preserved and enhanced where possible. The Key Requirements also states that improvements to cycle routes need to be addressed.

Section 3 addresses the issue regarding traveller accommodation in Byfleet and West Byfleet. The practice guide for designing gypsy and traveller sites (2008) has since been withdrawn, however this stated an ideal maximum figure for pitches on one site as 15. Section 6 addresses issues regarding infrastructure provision.

Response Reference: U0001352

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06549/1

Name: Mr Stephen Grady

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11

Summary of Comment: Objects to GB4 and GB5 on the following grounds: the long-term damage to, and any future loss of valuable green space, wildlife habitat, and associated biodiversity.

Byfleet has undergone huge levels of development and change in character in recent decades, largely due to the construction of the M25 in the 1980s and the subsequent impacts of resulting development of the built environment.

Cites paragraphs 79, 81, and 86-88 of the NPPF. It is considered that the proposed developments will not keep land permanently open and, if developed, will not further prevent urban sprawl (in this case between Byfleet and West Byfleet). Cumulatively with GB10 and GB11, the development of these sites will exacerbate urban encroachment into the countryside in the space between Byfleet, West Byfleet and Pyrford. It is noted that GB10 extends to land previously set aside and now used for leisure purposes. The remaining Green Belt is therefore very important in terms of preventing urban sprawl, enhancing character and biodiversity. The remaining Green Belt should not be developed further.

The DPD does not demonstrate the "very special circumstances" that would justify proposed Green Belt development. Woking Borough Council should first carry out an own-initiative review of brownfield sites. This would confirm that there is no need, or significantly reduced need, to build on Green Belt land.

The proposals disproportionately impact Byfleet's Green Belt. This is considered unfair and unacceptable. The proposed developments are therefore inconsistent with national policy (i.e. not sustainable development) and unjustified (i.e. not an appropriate strategy taking into account the "reasonable alternatives").

GB4 provides the last green vista onto Byfleet village and is instrumental in setting the context of the special character of Byfleet as a village and in ensuring that Byfleet is not seen to be an ever-expanding urban conurbation.

GB4 and GB5 fall within the Thames Basin Heath Special Protection Area. Appropriate mitigation measures to counteract the severe impact of the proposals are not contained within the DPD, contrary to Core Strategy Policy CS8, the Thames Basin Heath Avoidance Strategy (2010-2015), saved policy NRM6 of the South East Plan (2009) and the Conservation of Habitats and Species Regulations (2010).

GB5 and GB5 provide a continuous green corridor to the eastern boundary of the M25. This performs a number of services, including noise and pollution mitigation; important habitat/corridor provision; encouraging biodiversity in the centre of Byfleet; acting as a 'stepping stone' for highly mobile resident species and seasonal migrating species; and helping to deal with climate change mitigation, for instance by reducing flood risk. Indeed it is noted that the wet grassland of GB4 and GB5 is inappropriate for development, with a history of flooding.

It is noted that GB4 and GB5 constitute existing Green infrastructure with no 'start-up' costs. In accordance with the Lawton Report, they should form the foundation of improved and more inter-connected GI. The loss of this GI would diminish local character and reduce the highly valued 'sense of place.' It would also perpetuate the loss of habitat, and likely cause a knock-on effect of diminished species abundance, likely including species on Annex 4 of the EU Habitats Directive. This would have an overspill impact on the surrounding area of Byfleet, and the wider Thames Basin Heath SPA.

In this way, the proposals would disconnect people from nature, contrary to Outcome 4 (People) in DEFRA's policy paper Biodiversity 2020. The proposals are also contrary to the NPPF, the key principles of which include the creation, protection, enhancement and management of networks of biodiversity; the preservation, restoration and recreation of priority habitats and ecological networks; and the recovery of priority species populations, including sections on legally protected species.

The proposals are contrary to the EU Birds Directive; by not allowing proposed development to go ahead, WBC could contribute to the maintenance of a sufficient diversity and area of habitat to help conserve these species in their current location. Removing trees and foraging areas inter alia will reduce the area and prey availability for resident and migrating. This will impact species abundance and richness. Considerations under the EC Habitats Directive area also importance.

By not allowing the proposed development to go ahead, WBC would also make a contribution to Aichi Biodiversity Targets 5, 12 and 14.

The proposed developments are not considered consistent with national policy (as they do not constitute sustainable development) and not justified (as this is not an appropriate strategy taking into account reasonable alternatives.)

Contributor Proposed Modification: The remaining Green Belt should not be diminished further.

WBC should first prioritise the identification of all brownfield sites, undertaking a full own-initiative inventory of all land parcels available for use. These should be the areas prioritised and used first for development, not the remaining Green Belt land. This would confirm that there is no, or a least a very dramatically reduced, need to built on Green Belt land as outlined by the plan.

Modification Reference: U0000256

Officer Response: Section 19 of the Regulation 19 Issues and Matters Topic Paper addresses concerns regarding the impact of the Site Allocations DPD on local habitats and wildlife. In particular it is noted that during the preparation of the Site Allocations DPD, the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural

England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed.

Section 1 sets out the justification for releasing Green Belt land for development to meet future development requirements of the Core Strategy.

The proposed allocation of GB10 and GB11 and the safeguarding of GB4 and GB5 are supported by robust evidence. Firstly, as outlined in Paragraph 11.5 of the Regulation 19 Issues and Matters Topic Paper, the Green Belt Boundary Review assessed parcels of land against various criteria to ensure that any land that is released from the Green Belt will not undermine its purposes and integrity. Further detail regarding the methodology is set out in detail in Section 1. In particular Paragraph 1.10 provides that the Council has undertaken a Green Belt Boundary Review and other evidence base studies such as the Sustainability Appraisal to demonstrate that special circumstances exist to allocate/safeguard each of the sites in the DPD.

The Council does not consider that there is a need to undertake a further review of brownfield sites. As set out in Section 11 of the Regulation 19 Issues and Matters Topic Paper, there has been a thorough assessment of reasonable alternative sites to inform the selection of preferred sites. It is noted that the SHLAA identified a number of sources of sites for inclusion in the assessment:

1. Sites allocated in the Core Strategy and emerging Development Plan
2. Existing employment sites
3. Unimplemented and commenced planning permissions
4. Sites where there has been a previous planning refusal or application withdrawn
5. Sites of previous development interest/sites where there is an undetermined planning application
6. National Land Use Database
7. Sites considered as part of PFI and land in public ownership
8. Previous Housing Potential Study sites
9. Sites for which unimplemented planning briefs have been prepared
10. Sites put forward by stakeholders

Paragraph 1.7 of the Regulation 19 Issues and Matters Topic Paper recognises that the Site Allocations DPD identifies a quantum of land within the urban area that may be sufficient to meet development needs over the plan period. Nonetheless, the Council considers that there is a need to release Green Belt land. Given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

Section 5 of the Regulation 19 Issues and Matters Topic Paper recognises that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives.

As outlined in Section 4 of the Regulation 19 Issues and Matters Topic Paper, while there is a loss of open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents, as set out in Core Strategy Policy CS17: Open Space, green infrastructure, sport and recreation. This is reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. These policies, together with key requirements in the Site Allocations DPD, set out how this will be achieved.

Policy CS8 of the Core Strategy provides that new residential development which is likely to have a significant effect on the Thames Basin Heath Special Protection Area will be required to demonstrate that adequate mitigation measures are put in place to avoid any potential adverse effects. It is noted that the Core Strategy covers the period to 2027 and that as safeguarded sites, GB4 and GB5 are not allocated for development during this period. Therefore they will be subject to provisions of up-to-date policy at the time of their release from the Green Belt.

Given that GB4 and GB5 are safeguarded sites, their key requirements are not specified in the Site Allocations DPD. Key requirements for the development of these sites will be defined as part of the review of the Core Strategy or Site Allocations DPD. This will be informed by the up to date evidence and policies at the time. In any case, environmental issues have been carefully considered as part of the Sustainability Appraisal. For site GB4, optimising/mitigating measures recommended by the Sustainability Appraisal include inter alia:

1. Design of the development would have to take into account SuDS and provide suitable surface and foul water drainage
2. Flood Risk Assessment (in part subject to the forthcoming Preliminary Surface Water Management Plan)
3. Locate development only on land within Flood Zone 1
4. Design of development to incorporate features to reduce surface water flood risk and any risk from Flood Zone 2 and drainage channel
5. Incorporate mitigation measures to reduce exposure to potential air and noise pollution from motorway - Noise Impact and Air Quality Assessment required
6. Conduct landscape assessment/ecological survey/tree survey to determine levels of biodiversity and valuable landscape features on site and adjacent to site
7. Contribution towards SANG and SAMM of the SPA
8. Take opportunities to make positive contribution towards biodiversity through the creation of green infrastructure, retention/enhancement of any features of nature conservation value on-site, and creation of linkages with GI network
9. Design of development to achieve Code for Sustainable Homes Level 5, and take account of layout, landform, orientation and landscaping to maximise efficient use of energy and adapt to the impacts of climate change

For site GB5, optimising/mitigating measures recommended by the Sustainability Appraisal include inter alia:

1. Design of the development would have to take into account SuDS and provide sustainable surface and foul water drainage
2. Flood Risk Assessment (in part subject to the findings of the forthcoming Preliminary Surface Water Management Plan)
3. Locate development only on land within Flood Zone 1
4. Design of development to incorporate features to reduce surface water flood risk and any risk from Flood Zone
5. Noise Impact Assessment to be conducted - detailed site layout may require landscaping to buffer against the noise impacts from the motorway
6. Air Quality Assessment to be conducted, and incorporate mitigation measures to reduce exposure to potential air pollution from motorway
7. Improve provision of and connectivity to GI assets, including recreation area to east of site, proposed SANG, and new GI provision in southwest of site
8. Flood Risk Assessment to be conducted, and design of development to incorporate features to reduce surface water flood risk and any risk from Flood Zone 2 to south of site
9. Conduct an ecological assessment/tree survey to determine levels of biodiversity and valuable landscape features on site and adjacent to site (such as TPO area and priority habitat Floodplain Grazing Marsh habitat) - design to have regard to biodiversity opportunities. Consultation with Surrey Wildlife Trust recommended.
10. Contribution towards SANG and SAMM of the SPA.

Section 7 of the Regulation 19 Issues and Matters Topic Paper confirms that there has been proper assessment of the flood risk implications of the Site Allocations DPD. In particular Paragraph 7.7 confirms that the DPD takes due care to make sure that the risk of flooding is minimised. It is also noted that the Site Allocations DPD seeks to protect and enhance biodiversity. Sites GB12, GB13, GB14, GB15, and GB16 are allocated as Suitable Alternative Natural Greenspace (SANG), and GB9 is allocated for Green infrastructure/open space.
Response Reference: U0001268
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06880/1
Name: Ms Eleanor Grady
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB014, GB05, UA01
<p>Summary of Comment: Object to GB4 and GB5: Strongly against any land being taken out of Green Belt. Exceptional circumstances to allow this have not been proven; no evidence seen that all viable options have been appropriately identified and investigated. SADPD is not sound, not consistent with national policy. Byfleet is bounded on all sides by major roads, rivers, a canal and a railway line, which have a significant impact on local flood risk, air quality and accessibility. Positively Prepared? A disproportionate amount of housing is proposed for Byfleet and West Byfleet, considering their lack of public services and restricted infrastructure. Part of GB5 allocated for burials by St Mary's Church cannot be considered by WBC. The proposals are not consistent with achieving sustainable development: The sites are very important in terms of biodiversity and habitat and their development would have a serious impact on this. Both have lain fallow for a number of years, and are part of an important green corridor from Old Wood (West Byfleet) to Manor Farm Nature Reserve and the River Wey. GB5 is very wet, and an important habitat (particularly as our summers warm) for insects, worms and flora which thrive in wetter climes. GB4 is a known grazing and probably nesting site for at least 3 species of bat as well as birds, insects, badgers and foxes. The Sustainability Appraisal is wrong to identify a positive impact in the 'Natural Environment' category: SANG can provide equivalent dog walking space, but not an equivalent to the specific biodiversity found on site. Proposals will increase emissions from private vehicles; both sites are some distance from railway station and Medical Centre (not walkable for senior residents) and buses are limited. For the same reason the SA should not rate the sites as having a 'Positive impact' in terms of 'Travel choices'. Air quality for the new residents would be compromised, not meeting WBC public health targets; both sites are near the M25. Both sites currently act as a buffer and emission trap alongside the M25. Noise pollution for the new residents would be unsustainable, causing stress. For many hours a day noise from the M25 is intense and continuous. Byfleet is on an island between the Wey, Wey Navigation and Basingstoke Canal; flooding has occurred in the past and adequate remedial work has not been done despite lobbying. GB4, and the Sanway area near GB5, are particularly prone to flooding. There would be a serious risk of damp living conditions in these areas.</p>

Traveller sites do not seem to have been drawn from an agreed medium- to long-term plan. Traveller sites should be provided on land which does not have to be taken out of Greenbelt.

The mitigation proposals for the A245 would not deliver sustainable road access for new or existing residents; their impact is overstated. Residents in the south of Byfleet can only leave via the A245, so cars are frequently backed up. The bottlenecks will still exist even if larger junctions e.g. A320/A3 are adjusted, because of the pure volume of cars entering and leaving the A245 at intermediate points. The analysis is not sound; traffic flow modelling needs to be more sophisticated and locally relevant. If the Martyr's Lane site was unsuitable for reasons of net traffic impacts (Executive Summary para 2.1), the same must apply to Byfleet. Frequent gear changes will increase emissions.

GB5 is at the end of a minor road with on street parking, buses are frequently unable to pass each other due to parked cars, blocking the traffic. Proposals would worsen congestion here.

Justified

The Plan is not justified in terms of analysing all possible non-Green Belt sites. No evidence that the full list of brownfield sites known to WBC (not just those put forward by landowners) have been researched, assessed and discounted. Green Belt loss cannot therefore be justified as 'exceptional'. Demographic projections are in a state of flux, and household size is reducing- large properties in Byfleet should be split up, with less impact on the 'look and feel' of Byfleet. Declining need for retail surface area may release land for housing, for example at Royston Road.

Consistent with National Policy

The Plan does not enable WBC to deliver sustainable development in accordance with the NPPF:

GB5 would increase the already heavy traffic around the gates of St Mary's Primary School, increase emissions and remove carbon-absorbing vegetation, contrary to Government policy on schools and proximity to traffic.

The proposals are informed by the Habitats Directive and rules about the Surrey Heath Basin area. The proposals would be contrary to recent planning application refusals around Rectory Lane and Murray's Lane for reasons of risk to the 'sylvan' aspect of the area.

The proposals are not sound in terms of the Green Belt purposes to assist in safeguarding the countryside from encroachment, and to preserve the setting and special character of historic towns.

Site UA1:

Agree that the Library should be replaced on the existing site. The library should be at the front of the new structure, and (together with the small area of green space in front of and beside it) must remain a strong feature of the area. Buildings should be in keeping with the gabled aspect of the surrounding area.

Contributor Proposed Modification:

Modification Reference: U0000255

Officer Response: The assessment of viable options is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1, 11, 12 and 22.

The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.

The presence of burial land within site GB5 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 15.

The impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. Biodiversity issues on sites GB4 and GB5 are appraised in the Sustainability Appraisal, which does not state that there will be an overall

positive impact from these sites in the natural environment category; a potential negative impact is identified on both sites in relation to biodiversity.

The Sustainability Appraisal also recognises that the sites are not within typical walking distance to some services, although they are within walking distance of others (those found in Byfleet Local Centre, including food shops and community facilities; a primary school and a bus route). The sites are also within easy cycling distance of the nearest station. This level of proximity to services is better than that for most other sites considered through the Green Belt Boundary Review.

The air quality and noise implications of the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.

The flooding implications of the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.

The process for selection of traveller site allocations is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 3.

The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 13. The transport related reason for rejection of the Martyr's Lane site reads, in full, 'There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.' The same is not true of sites GB4 and GB5 which, although they are beyond walking distance from some services, are within walking distance of the Byfleet Local Centre, Byfleet Primary School and to bus services on Parvis Road/ Rectory Lane, and are within easy cycling distance of the nearest station. The access arrangements to sites GB4 and GB5 would be subject to detailed requirements to be drafted if and when the site is allocated for development.

The adequacy of the assessment of non-Green Belt sites is addressed in the Regulation 19 Issues and Matters Topic Paper, see section 11. In particular, the Council has been active in searching for such sites, assessing existing employment sites, sites with planning permission, sites where planning applications were refused, withdrawn or undetermined, sites on the National Land Use Database and land in public ownership, previous Housing Potential Study sites, sites for which unimplemented planning briefs have been prepared, other sites close to key centres and transport hubs, as well as sites put forward by stakeholders in several 'call for sites' exercises in which WBC contacted hundreds of known landowners, agents and others.

The question of demographic projections to inform housing requirements is addressed in the Regulation 19 Issues and Matters Topic Paper, see paragraph 1.5.

The subdivision of large houses may well provide housing in future, but most will deliver a small number of dwellings each, and it is not feasible to assess every individual large house to see if it is likely to come forward (as opposed to those specifically identified for another reason). There is national guidance on how allowances can be made about such windfall sites in principle. WBC makes a windfall allowance for years 11-15.

The Strategic Housing Land Availability Assessment does include retail sites that have the potential for residential development, including the units at Royston Road, so if these were to become unviable for retail use that would be registered when the SHLAA is updated.

The impacts of the proposals on traffic and pollution are addressed in the Regulation 19 Issues and Matters Topic Paper, see sections 13 and 8 respectively. Specific requirements on issues such as site access, layout and landscaping at site GB5 could be included in a policy if and when the site is allocated for development.

Sites GB4 and GB5 would not be granted planning permission for development unless it can be shown at the time that their development would not adversely affect the integrity of the Thames Basin Heaths Special Protection Area. Given that they are both more than 400m from the SPA, it is not currently anticipated, given the existing framework for protecting the SPA, that this issue would prevent their development.

The respondent states that applications have been refused locally due to impact on the area's sylvan character. It is true that there have been refusals, due to impact on the rural

<p>(not sylvan) character of the area. However, this was in the context of the whole area being part of the Green Belt and outside the urban area. On the other hand, the incorporation of a site into the urban area for development, as would occur if and when sites GB4 and GB5 are allocated, means a change in the status of that site from rural to urban. Once this has been established in principle, the 'rural' character of the area would no longer be a reason in itself to refuse an application. The Council's evidence base indicates that these sites are among the most suitable locations for such a change. The Sustainability Appraisal found that the use of layout and landscaping could mitigate the general landscape impacts of developing these sites, with a neutral impact in the long term once green infrastructure assets have matured. Specific requirements on such issues could be included in a policy if and when the site is allocated for development. It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR.</p> <p>Support welcomed on the reprovision of Byfleet Library.</p> <p>Specification of architectural style and layout would not be appropriate in an allocation policy; this type of question is better considered at pre-application stage, relying on the Borough-wide and area-specific policies and guidance in the Core Strategy, Development Management Policies DPD and Design SPD.</p>
Response Reference: U0001429
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02190/1
Name: Ms Kathryn Grant
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Support the exclusion of Pyrford safeguarded sites in response to Regulation 18 consultation response. To include these sites would have caused a significant increase in traffic, which would be dangerous so close to a school; and significant impacts on the semi-rural character of the area including the conservation area around St Nicholas Church.
Contributor Proposed Modification: Release of Green Belt or arable land is against planning policy.
Modification Reference: U0000477
Officer Response: Support is noted. Sections 1 and 2 of the Council's Regulation 19 Issues and Matters Topic Paper explain why the Council believes exceptional circumstances exist to justify the release of Green Belt land in other areas of the Borough, some of which is arable land.
Response Reference: U0001652
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00543/4

Name: Mr Peter Graves
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports removal of previously safeguarded sites in Pyrford. Would oppose any move to re-introduce them to the DPD.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00543/5
Name: Mr Peter Graves
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: WBC was correct to remove Regulation 18 sites GB12 and GB13 from the DPD. Valid objections to this consultation include: 1. The process for identifying parcels of land that could be removed from the Green Belt was flawed and the scoring criteria inconsistently applied 2. GB12 and GB13 contribute very significantly to the semi-rural setting and character of Pyrford. Thier development would significantly harm the character and setting of the conservation area around St Nicholas Church. 3. The amount of land safeguarded for development beyond 2027 was excessive. 4. Traffic through Pyrford is dangerously high for the narrow roads. Traffic from a further 500 houses on Upshot Lane would be unsupportable.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support for the decision to remove Regulation 18 sites GB12 and GB13 from the Site Allocations DPD is noted. Section 12 of the Regulation 19 Issues and Matters Topic Paper addresses the Green Belt Boundary Review methodology.
Response Reference: U0000961
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06042/1
Name: Mr And Mrs Thomas And Christine Gray
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Objects to the proposed development of land north of Mayford village - specifically, policy GB7 (Nursery land adjacent to Egley Road). Properties are situated directly adjacent to the stretch of wooded green belt at the South of plot GB7, which includes a number of large trees protected by TPO Order 626/0154/1973. Good outlook and privacy provided by the woodland. As can be seen by the

<p>attached images, any development would seriously impact our privacy in addition to the damage to the natural beauty of the area.</p> <p>Mayford is a historic area of interest recorded in the Domesday book from 1086. The green and wooded spaces around the village are a significant part of its character, separating it from its parent town of Woking. The wooded area provides a rich wildlife. Request the Council considers the value that this woodland brings to the area, and ask that it remain protected and untouched by the development and expansion of Woking.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Objection noted.</p> <p>The representation regarding woodlands, wildlife, Mayford Green Belt and Mayford character have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 19, 20 and 21.</p> <p>During the Planning application stage the case Officer will assess the impact of development on privacy, amenity and outlook on existing and proposed dwellings. The Council has Policies CS21 Design and an Outlook, Privacy and Daylight SPD to assess adverse impacts of development. These are detailed matters that can best be addressed at the planning application stage.</p>
<p>Response Reference: U0001213</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06507/1</p>
<p>Name: Mr Alastair Gray</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB07</p>
<p>Summary of Comment: Commenting on GB7, with a particular focus on the woodland by the school.</p> <p>Retain as many trees as possible, particularly the oak trees.</p> <p>Ensure no buildings are erected on Green Belt land.</p> <p>Maintain Green Belt on Egley Road land.</p> <p>There is no concerted plan for roads and facilities for the new homes. Hook Hill Lane is becoming increasingly congested.</p>
<p>Contributor Proposed Modification: Retain as many trees as possible, particularly the oak trees.</p> <p>Ensure no buildings are erected on Green Belt land.</p> <p>Maintain Green Belt on Egley Road land.</p>
<p>Modification Reference: U0000404</p>
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses concerns regarding the release of Green Belt land for development, section 20 specifically addresses the release of Green Belt in Mayford.</p> <p>Section 6 addresses the issue regarding infrastructure.</p> <p>As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A320 Corridor Study to identify the potential mitigation measures that might be necessary to address development impacts on the network, section 13 addresses the issue regarding the adequacy of road infrastructure in greater detail.</p> <p>Section 19 addresses concerns regarding the impact of development on woodland. The Council has obtained further information regarding the woodland known as Hook Hill Woods to the south of the site and proposes to introduce the following wording into the</p>

policy: 'The area to the south of the site which is wooded and covered by an area TPO should not be developed. For any future development of the site, it is expected that the Council's Senior Arboricultural Officer will be consulted regarding the protection and conservation of this area of the site.'
Response Reference: U0001330
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06487/1
Name: Mr And Mrs Nikola Grenander-Cobb
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Object to proposed development near Parvis Road. Concerned about extra pollution and traffic arising from the proposed development near Parvis Road. Traffic in the area is already very busy. Schools in the area are already over-populated and under-staffed. The doctors already have a 2-3 week wait for appointments. Our house value will drop and can't see how the area will cope with the additional population. Upset about Greenbelt land being used for development.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 8. The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 13. The impact of the proposals on local infrastructure, including schools and doctors, is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 6. The potential for a drop in the value of nearby houses as a result of new development is not in itself a material planning consideration.
Response Reference: U0001699
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02126/2
Name: Mr Gerald Griffiths
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB09, SA1
Summary of Comment: In general applauds the Council's efforts to meet housing need. While welcoming the proposed Green Infrastructure at sites GB9 and '20g' (WGB020g), refutes the strategic need to i. release the sites from the Green Belt now the proposal to release land north of Saunders Lane is not going forward or ii. to designate the sites as green infrastructure. The proposals are not evidenced or justified and are therefore not sound with regard to the NPPF. The sites are important in maintaining the gaps between the settlement of Mayford and Woking's urban area, an essential purpose of the Green Belt.

GB9 nor 20g are not mentioned in Framework Policy SA1. If the Council has a strategic plan for these sites it should be made clear within SA1. Since it has not, the sites should remain in the Green Belt where they can provide the Green Infrastructure believed to be required.
Contributor Proposed Modification: Retain sites GB9 and '20g' (WGB020g) within the Green Belt.
Modification Reference: U0000203
Officer Response: The comment on the Council's efforts to meet housing need are welcomed. On GB9, the site is excluded from the Green Belt to ensure a strong, defensible Green Belt boundary that will endure beyond the plan period. This approach is consistent with national policy. It is acknowledged that Green Infrastructure is a use compatible with the Green Belt, and the Policy for the site makes clear that it is situated at a high point of the Escarpment or rising ground of landscape importance, and that the site is unsuitable for built development. Trees are safeguarded by a Tree Preservation Order. This is considered to provide sufficiently strong protection for the site to remain green while meeting long term Green Infrastructure needs. Further justification for safeguarding can be found in section 2 of the Council's Regulation 19 Issues and Matters Topic Paper. Regarding parcel 20g, Officers are proposing a modification to the site to extend it northwards and include this parcel, to make it part of the safeguarded land. This means that while it will be released from the Green Belt upon adoption of the plan, it will not be released for any form of development until 2027 (if needed), through a review of the Core Strategy and/or Site Allocations DPD. This parcel includes residential properties and for this reason a distinction will be made, using a hatched area on the site plan, to show that this area is not intended for Green Infrastructure. Until 2027, development at any part of GB9 will have to comply with the Green Belt policies in the development plan. A specific policy and key requirements to guide development at the site, noting the distinction in the amended proposed hatched area (parcel 20g) will be developed and determined as part of the review of the Core Strategy and/or the Site Allocations DPD. Officers are also proposing that policy SA1 be revised to refer to this land and intentions to safeguard it for future development needs.
Response Reference: U0001754
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02627/2
Name: Mr Andrew Grimshaw
Number of Signatories: 1
Comment Type: OBJ
Site Reference: RG18GB12, RG18GB13, GB10, GB11
Summary of Comment: Supports the removal of the Pyrford fields from the Reg 19 consultation. Sustainability Appraisal states the West Byfleet Neighbourhood Plan was not yet Adopted this is incorrect. It was adopted on 7 December 2017. The DPD process has taken a long time and has many long complicated documents which are difficult to follow and determine if the plan is sound. No public document commenting on all the changes made since Reg 18 and latest evidence. Does not consider the IDP a living document, changes made by Thames Water, reduction in PANs at Fullbrook School and no mention of the Sports box. The current proposals to allow building of an extra 1,500 plus homes along the A245 corridor at Sheerwater (495), Broadoaks (334), Sheer House (255), West Hall (570), and

safeguarding Parvis Road and Murrays Lane. Apart from the Town Centre most of the dwelling increase proposed is in the East of the Borough. Whilst WBC are "proud" ONLY 1.93% of the Green Belt will be removed, 1.09% is in West Byfleet - 60% of what there is now is proposed to be lost. The plans also represent a 50% increase in West Byfleet village households.

The impact on the existing village and its infrastructure will be significant.

traffic levels on the A245 and surrounding roads,

lack of school places,

full doctor practices,

lack of NHS dentists,

waste water management, and existing flooding - river and surface water

air pollution

The published A245 mitigation study is based on a WSP 2002 movement survey and Surrey CC traffic model. The mitigation report recognises that the proposed mitigation measures will only bring the traffic levels back to today's levels. Today's traffic levels are already very bad. The mitigation report only focussed on part of the A245 corridor. It excluded the roundabout at Marist school & the traffic lights at Albert Drive and it took no account of the proposed pedestrian crossing in West Byfleet near to Highfield Road, nor the existing one at Marist School. The movement study needs to be updated to reflect reality.

The number of school pupils will rise. The IDP recognises the overall need for more primary & secondary places, but there is no site allocation for the extra classrooms and the nearest Secondary School Fullbrook recently reduced its PAN.

The IDP recognises the current Doctor & Dentist practices are over subscribed but again there are no detailed solutions.

The IDP recognises, by quoting the West Byfleet Neighbourhood Plan, the lack of non-faith Community facilities in West Byfleet but unlike other areas there are no firm proposals.

The IDP recognises there are Flooding & Waste Water issues in Byfleet & West Byfleet but there are no specific proposals to solve the problems.

West Hall, Parvis Road & Murrays' Lane sites are all next to and below the M25. The 2018 Air Quality Status Report recognises that the M25 is a significant source of air pollution.

No mitigation proposals seem to be included in the various documents.

The infrastructure solutions need to be introduced before the demand is created not afterwards.

WBC should take a further 6 months to review & fully update the relevant documents and evidence base and then carry out a further & final Regulation 18 consultation reflecting all the latest proposals and then move to Reg 19 with weeks of that closing.

Would like to appear at the Examination in Public to defend the existing Green Belt boundaries by seeking to convince the Planning Inspector there is sufficient availability in existing non-Green Belt land.

Contributor Proposed Modification: Further consultation.

Amend Sustainability Appraisal. Sustainability Appraisal states the West Byfleet Neighbourhood Plan was not yet Adopted this is incorrect. It was adopted on 7 December 2017.

Modification Reference: U0000393

Officer Response: Support for the Removal of the Pyrford fields is noted.

The Site Allocations DPD has evolved through various stages. Each stage had been used to inform and improve the subsequent version. A draft DPD was published for Regulation 18 consultation between 18 June and 31 July 2015. About 1,692 individuals and organisations submitted comments comprising 32,712 separate representations. The Council also consulted on the possibility of substituting the sites safeguarded in the draft Site Allocations DPD to meet future development needs between 2027 and 2040 with land to the east of Martyrs Lane. 3,018 individuals and organisations submitted comments

comprising 32,164 separate representations. The representations received during these two separate consultations have informed the Publication Version of the DPD that was published for Regulation 19 consultation between 5 November and 17 December 2018. The plan making process with its in built statutory consultations takes time to complete. The Council is however committed to preparing the DPD in an expeditious manner, making sure all key stakeholders are appropriately consulted.

Although Appendix 1 of the Sustainability Appraisal has not been updated to reflect that West Byfleet Neighbourhood Plan has been adopted, column 2 of the table recognises that the Plan would be given full weight once adopted. The vision, objectives and policies of the Neighbourhood Plan have been taken into account in the Sustainability Appraisal Framework against which sites have been appraised.

Section 6 of the Regulation 19 Issues and Matters Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools, waste water and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development on this key transport corridor; and how any development proposals will be required to submit comprehensive transport assessments with any planning application coming forward.

Thames Water has submitted a representation for the Regulation 19 Consultation which will be taken into account and can be viewed on the Council website.

Dental practice provision is addressed in the IDP which confirms that although there are no known plans for new dental surgeries to 2027, a Surrey and Sussex Dental Local Professional Network has been established to promote a strategic, clinically informed approach to the planning and delivery of dental services that reflects the needs of local populations. The Council continues to engage with the North West Surrey CCG regarding any commissioning decisions.

In regards to the lack of non faith community facilities in West Byfleet, the Site Allocations DPD allocates UA42 and UA43 for mixed-use development to include community uses, which will help to meet demand.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding.

In regards to the Sports box, the Site Allocations DPD does not deal with individual companies or operations, but focusses on uses. This is a separate matter to the Site Allocations DPD.

The representation regarding the loss of Green Belt land in West Byfleet has been addressed in Section 5 of the Topic Paper.

The Council is satisfied that the depth and breadth of evidence used to support the preparation of the Site Allocations DPD was sufficiently comprehensive, robust and will be able to withstand scrutiny at the Site Allocations DPD Examination. The list of evidence base studies used to justify the DPD is in Appendix 1 of the DPD.

The opinion regarding sufficient availability for development on non-Green Belt land is noted. Section 1 of the Topic Paper details why the Council believes there is justification for releasing Green Belt land for development to meet future development requirements of the Core Strategy. Paragraph 1.7 onwards addresses claims that the Site Allocations DPD already allocates sufficient land within the urban area to meet development needs.

Response Reference: U0001467

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06601/1
Name: Ms Lucy Grivvell
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: The Council made the correct decision to remove Regulation 18 sites GB12 and GB13 from the DPD. Valid objections during this consultation included: 1. The process for identifying parcels of land for release from the Green Belt was flawed and the scoring criteria inconsistently applied. 2. GB12 and GB13 contribute very significantly to the semi-rural setting and character of Pyrford. Their development would have harmed the character and setting of the conservation area around Aviary Road and St Nicholas Church. 3. The amount of land safeguarded for development beyond 2027 was excessive. 4. Traffic through Pyrford is dangerously high given its narrow roads. A further 500 houses on Upshot Lane would be unsupportable and increase the danger of accidents
Contributor Proposed Modification: None stated
Modification Reference: U0000161
Officer Response: Support for the removal of the Regulation 18 sites GB12 and GB13 from the Site Allocations DPD is noted. Section 12 of the Regulation 19 Issues and Matters Topic Paper addresses the methodology of the Green Belt Boundary Review.
Response Reference: U0000971
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02142/4
Name: Mr Simon Grout
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: WBC have made the right decision to drop the Upshot Lane (Pyrford) sites from the Site Allocations and recognise the validity of Regulation 18 objections. Copies text previously sent in 2018: The Pyrford fields contribute to the area's distinctive and special character, as per the Neighbourhood Plan. Unlike the Martyrs Lane site, the Pyrford fields are in use for growing crops. Building a factory on the Martyrs Lane site was not considered by a WBC planning officer to present a risk of merger and sprawl. Not all the Martyrs Lane site needs to be built on (e.g. the New Zealand golf course), since only 1024 houses are needed. The Green Belt Boundary Review ranked the parcel containing Martyrs Lane more favourably for release than the parcel containing the Pyrford sites, against several factors. The Martyrs Lane site would be preferable to the Pyrford sites in terms of economies of scale for infrastructure provision, likelihood of providing affordable housing, traffic impacts, school provision, bus connectivity, and the impact on public rights of way and the setting of heritage assets.

<p>The process for identifying which parcels of land could be removed from Green Belt was flawed and the scoring criteria inconsistently applied. The Upshot Lane fields contribute very significantly to the character of Pyrford and the setting of the Pyford Conservation Area. The amount of land safeguarded for development beyond 2027 is excessive.</p>
<p>Contributor Proposed Modification: The amount of land safeguarded for development beyond 2027 (of which our fields were a part) is excessive and therefore the requirements for such land should be revaluated.</p>
<p>Modification Reference: U0000266</p>
<p>Officer Response: Support noted. The justification for the release of Green Belt land to meet future development needs is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.</p>
<p>Response Reference: U0001195</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 02184/2</p>
<p>Name: Ms Ann-Marie Grout</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: SUPP</p>
<p>Site Reference: RG18GB12, RG18GB13</p>
<p>Summary of Comment: WBC have made the right decision to drop the Upshot Lane (Pyrford) sites from the Site Allocations and recognise the validity of Regulation 18 objections. Copies text previously sent in 2018: The Pyrford fields contribute to the area's distinctive and special character, as per the Neighbourhood Plan. Unlike the Martyrs Lane site, the Pyrford fields are in use for growing crops. Building a factory on the Martyrs Lane site was not considered by a WBC planning officer to present a risk of merger and sprawl. Not all the Martyrs Lane site needs to be built on (e.g. the New Zealand golf course), since only 1024 houses are needed. The Green Belt Boundary Review ranked the parcel containing Martyrs Lane more favourably for release than the parcel containing the Pyrford sites, against several factors. The Martyrs Lane site would be preferable to the Pyrford sites in terms of economies of scale for infrastructure provision, likelihood of providing affordable housing, traffic impacts, school provision, bus connectivity, and the impact on public rights of way and the setting of heritage assets. The process for identifying which parcels of land could be removed from Green Belt was flawed and the scoring criteria inconsistently applied. The Upshot Lane fields contribute very significantly to the character of Pyrford and the setting of the Pyford Conservation Area. The amount of land safeguarded for development beyond 2027 is excessive.</p>
<p>Contributor Proposed Modification: The amount of land safeguarded for development beyond 2027 (of which our fields were a part) is excessive and therefore the requirements for such land should be revaluated.</p>
<p>Modification Reference: U0000268</p>
<p>Officer Response: Support noted. The justification for the release of Green Belt land to meet future development needs is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.</p>
<p>Response Reference: U0001196</p>

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 03004/2
Name: Ms Jane Groves
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: WBC have made the correct decision to remove Regulation 18 sites, GB12 and GB13 from the DPD. Valid objections raised during the Regulation 18 Consultation include: 1. GB12 and GB13 contribute very significantly to the semi-rural setting and character of Pyrford. Their development would significantly harm the character and setting of the conservation area around St Nicholas Church. 2. The process for identifying parcels of land to be removed from the Green Belt was flawed, and the scoring criteria inconsistently applied. 3. The impact on Green Belt would be severe and unjustifiable unlike other allocated sites more akin to infill or brownfield sites in nature. 4. Traffic through Pyrford, including from the A3, is dangerously high. The narrow roads could not support traffic from an additional 500 houses on Upshot Lane. 5. Local infrastructure could not cope with additional demands. 6. The amount of land safeguarded for development beyond 2027 was excessive and therefore the requirement for GB12 and GB13 required re-evaluation.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06700/1
Name: Guildford Borough Council
Number of Signatories: 1
Comment Type: COMM
Site Reference:
Summary of Comment: Considers it appropriate for Woking to plan to exceed the minimum housing requirement as set in the Core Strategy when allocating sites within the Site Allocations DPD based on Inspector comments on the Core Strategy. Considers that the SA DPD should allocate further sites in order to incorporate adequate flexibility to accommodate any change to Woking's local housing need position (in accordance with para 11(a) NPPF). Although it is necessary to factor in the contribution made by Waverley to Woking's need (83 dpa), there remains at least a possibility that greater flexibility will be required post the adoption of amendments to the standard methodology of housing need. A number of the safeguarded sites have been identified by the SHLAA as suitable, available and achievable. Woking has chosen to safeguard these sites, rather than allocate them. Allocating some or all of these sites would enable Woking to exceed housing requirements in the Core Strategy, maximise housing, reduce the need for further site allocations and reduce the pressure on other authorities.

Expects that there will be active engagement throughout the SA DPD process, including if and when the results of the Government's technical consultation on the standard method is known.

Amend the Green Belt Reviews methodology to include different ways of delivering 550 homes such as the impact of higher levels of housing on the Green Belt. In order to meet both local and the wider HMA. Considers Woking's approach is contrary to the NPPF para 11. The question of whether Green Belt releases are required to meet housing need can only be carried out within the context of what those benefits are in relation to the scale of need and the opportunities of meeting it.

The policies for all of the sites that include residential uses within the allocations state the need for a proportion of affordable housing on-site, however there appears to be some inconsistency over where this requirement is included in Appendix 4 (in Table 5: Anticipated Capacity of Sites). For Policy UA13 for example the requirement is absent, whereas it is stated in the wording of Policy UA13.

No changes are proposed to Policy CS12 of the Core Strategy based on the recent updated NPPF 2018. However, as the allocations in the Site Allocation DPD include requirements for affordable housing, this may benefit from some appropriate rewording or a caveat to clarify the applicability of relevant policies when units fall below 5 and 10 unit threshold.

Evidence to ensure alignment with the NPPF's definitions of deliverable and developable sites.

Allocating sites for an unspecified quantity of homes, employment and/or retail floor space could be argued to provide insufficient information to guide developers about the quantities of such uses that these sites could realistically and suitably accommodate. This remains our concern for the UA (urban area) allocations. Although numbers are included in appendix 4, it is unclear whether these are recommended amounts and how closely developers are expected to meet these figures in order to increase the likelihood of gaining permission for their proposed schemes. This information could also be placed more usefully in the site allocation policies themselves if it is intended to provide a guide for developers.

The Site Allocations DPD does not include any allocations that require the inclusion of care homes or other specialist accommodation within proposed developments to help meet the specific needs of older people or vulnerable groups, for which a specific need figure requirement is identified in the West Surrey SHMA.

Stronger wording for GB11 to enable a proposal for such accommodation of adequate scale to come forward.

Request Surrey County Council p24 evidence be published.

Supportive of Policy UA7: Woking Railway Station. This project is fundamental to solving the known capacity problems on the South West Main Line in the short term and longer-term benefits provided by Crossrail 2 and the Digital Railway programme.

Notes WBC has sufficient proposed SANG to mitigate harm to the SPA and deliver the level of homes you are proposing. We support measures that will ensure all suitable development is deliverable.

Contributor Proposed Modification: A number of the safeguarded sites have been identified by the SHLAA as suitable, available and achievable. Woking has chosen to safeguard these sites, rather than allocate them. Allocating some or all of these sites would enable Woking to exceed housing requirements in the Core Strategy, maximise housing, reduce the need for further site allocations and reduce the pressure on other authorities.

Allocating sites for an unspecified quantity of homes, employment and/or retail floor space could be argued to provide insufficient information to guide developers about the quantities of such uses that these sites could realistically and suitably accommodate. This remains our concern for the UA (urban area) allocations. Although numbers are included in appendix 4, it is unclear whether these are recommended amounts and how closely developers are expected to meet these figures in order to increase the likelihood of

gaining permission for their proposed schemes. This information could also be placed more usefully in the site allocation policies themselves if it is intended to provide a guide for developers.

Stronger wording for GB11 to enable a proposal for such accommodation of adequate scale to come forward.

Modification Reference: U0000390

Officer Response: In regards to the housing requirement, the Site Allocations DPD allocates land to deliver more homes than the housing requirement. This is sufficient to ensure that at least the housing requirement is delivered and to also cater for any non-implementation. It is also emphasised that any unmet need arising from Woking is being met within the Housing Market Area by Guildford and Waverley Borough Council's Local Plans.

In terms of allocating safeguarded sites, it would be simplistic and bad planning to bring forward the safeguarded sites for development to meet Woking's objectively assessed housing need up to 2027. The development requirements of the Core Strategy, including the housing requirement are identified in an integrated manner and justified by a significant body of evidence base studies. This includes an Infrastructure Delivery Plan, Employment Land Review and Topic Paper, that identifies the necessary scale and type of infrastructure and economic growth necessary to support and align with the expected quantum of housing growth. To bring forward the safeguarded sites for development up to 2027 without the corresponding review of office floorspace, warehouse floorspace, retail floorspace and the necessary infrastructure to support the outcome of such reviews would at best be irresponsible, overly simplistic and ill conceived. It would undermine the overall purpose of the plan-led system to plan in a holistic manner to ensure sustainable development.

Whilst it would be for future reviews of the Core Strategy to determine future housing requirements, it is very likely that bringing forward the safeguarded sites for development during this plan period would lead to significantly lower housing requirement in the next plan period. There is no scope to release any more Green Belt land for strategic development without damaging its overall purpose and integrity. This point is highlighted in paragraph 3.5.22 of the Green Belt boundary review report. It states 'we do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development'.

Paragraph 139 of the NPPF provides guidance on safeguarded sites. It advises that plans should where necessary identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period. The plan should make clear that the safeguarded land is not allocated for development at the present time. To bring forward the safeguarded sites as suggested by the representation would be contrary to this advice and the intended purpose of this national policy.

In terms of the Green Belt Review methodology, the Green Belt boundary review was comprehensive, borough-wide and assessed all land parcels within the Green Belt. The Council has a clear purpose supported by the Secretary of State to carry out a Green Belt boundary review to release land to enable the delivery of 550 dwellings to meet development needs between 2022 and 2027. This is clearly set out in Policy CS10 (Housing provision and distribution) of the Core Strategy. It is appropriate for the Site Allocations DPD to allocate land to achieve this policy objective. However, in addition, to ensure the enduring permanence of the Green Belt boundary, the Council has also sought to identify land to meet future development needs beyond the plan period. It is unlikely that another review of the Green Belt boundary will provide a different outcome. Given that the review has concluded that no further land can be released from the Green Belt for strategic development, no purpose would be served by undertaking another review to release more land.

In regards of active engagement, the Council has and is acutely aware of its responsibility under the Duty to Cooperate to engage with its neighbouring authorities, and has done so

in a constructive manner throughout the process. The Council will continue to engage throughout the process and with regards to any post adoption delivery and monitoring that might be necessary. The Council will in due course publish its Duty to Cooperate Statement to set out how it has engaged with key stakeholders throughout the preparation of the DPD.

In regards to the review of Policy CS12 of the Core Strategy, this is a matter for the Core Strategy to address and not for the Site Allocations DPD, and rightly so, this matter was specifically considered by the review of the Core Strategy. Guidance has already been published on the Council's website regarding how the latest national policy on Affordable Housing would apply in conjunction with Policy CS12. There is therefore no immediate need to review this policy in order for the Site Allocations DPD to proceed. Such a delay to the process would not be necessary or justified. It is important to highlight that national planning policy is a material consideration that needs to be taken into account in the preparation of local plans and in decision making at the development management stage. In this regard, the Core Strategy does not have to be reviewed for the national policy to apply.

The representation regarding the wording of the DPD and aligning it with the NPPF and the capacity of the sites. Where relevant, proposals in the Site Allocations DPD includes the anticipated capacities for the sites. These are appropriately included in the 'reasoned justification' section of each of the Proposals. The DPD therefore already addresses this particular concern in an appropriate manner.

With regards to the representation concerned with specialist accommodation, policy CS13 specifies that the Council will allocate specific sites through the Site Allocations DPD to assist in bringing suitable sites forward to meet need. A suitable site (GB11), has been identified to contribute to meeting this need, and the site has extant permission for 155 C2 bedrooms. It should be noted that policy CS13 of the Core Strategy provides in principle support for the development of specialist accommodation for older people in suitable locations, therefore development proposals can come forward on any sites allocated for residential uses if a need is identified in that area. The Site Allocations DPD and the SHLAA identify a range of sites that are deliverable or developable for residential development. The development of these sites could come forward to include elderly people's accommodation if there is market demand for it. The Council considers that such an approach is sound, given the current development pipeline. It is recognised that over the past five years, completions have been relatively modest; twenty dwellings/bed spaces have been delivered between 2013/14 and 2017/18. However, a significant number of units have been permitted more recently: 231 dwellings/bed spaces have been permitted between 2015/16 and 2017/18. This equates to an average of 77 permitted units per annum. The West Surrey Housing Market Area Assessment specifies a projected need of 918 units between 2013-2033. Taking into account historic undersupply of 209.5 units over the past five years, this creates an extant annual need of 75.2 units per year over the next fifteen years to 2033. Whilst it is acknowledged that not all permissions will be implemented, the number of permissions that have been issued in the past three years provides assurance that market values are sufficient to ensure that schemes for older people's accommodation continue to come forwards. Indeed the permission of 155 C2 bedrooms at Broadoaks in February 2019 lends further weight to this argument.

The Council has already published the Strategic Transport Assessment prepared by the County Council to inform the Site Allocations DPD. This can be accessed by the following link: <http://www.woking2027.info/ldfresearch>.

Support for Policy UA7 and SANG sites are noted.

Response Reference: U0001220

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06528/1
Name: Miss Lisa Von H
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA15
Summary of Comment: There is a promise to provide a community venue in Woking. Worried that the Fiery Bird/Phoenix Cultural Centre will become homeless after a long battle to set it up, when the building is demolished. It seems that live music is deemed less important than other issues. Also, the form is too complicated and wordy.
Contributor Proposed Modification: I believe there is a promise to provide a community venue in Woking.
Modification Reference: U0000123
Officer Response: The allocation of UA15 does not deal with individual companies or operations, but focusses on uses. The allocation policy does require development to include community and leisure uses. This could include the provision for the retention of the Fiery Bird/Phoenix Centre. Recommend that the operators of this venue engage with the potential developers of the site to secure this retention.
Response Reference: U0001728
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05653/1
Name: Mr Ralph Hales
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Traveller pitch proposals in Byfleet and West Byfleet are disproportionate in comparison to other areas of the borough. Burial ground at GB5 is unsuitable for development. Concerns regarding impact on infrastructure, particularly Parvis Road.
Contributor Proposed Modification: Burial ground at GB5 is unsuitable for development.
Modification Reference: U0000420
Officer Response: Section 3, paragraph 3.8 of the Regulation 19 Issues and Matters Topic paper addresses the issue regarding the disproportionate amount of traveller pitches allocated to Byfleet and West Byfleet. Section 6 addresses issues regarding impact of new development on infrastructure. Section 13 covers traffic congestion in more detail. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 15 addresses the matter regarding the burial ground on GB5.
Response Reference: U0001121
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06471/1

Name: Mr Mike Hales
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA07
<p>Summary of Comment: DPD is not legally compliant, sound and does not comply with Duty to Cooperate.</p> <p>Reasons why the DPD is non compliant and unsound are as follows; Under UA7 there is no mention of development of Guildford Road. However, consultation information was released elsewhere which detailed the proposals for Guildford Road, Victoria Arch and Station Approach. In this, it is clear that the property of the representor will be demolished, and a deadline for public comment was stated. The representor was not notified about this information, and was therefore unable to make a comment in time. The map issued with this consultation is of too smaller scale to make out any detail. The map given with the DPD shows that Guildford Road is outside the area of proposed development.</p> <p>Planning documents have been difficult to understand in terms of jargon. Proposed modifications are as follows; WBC should ensure that all residents and businesses affected by any development are notified in good time so that representations can be made. There was a lack of information sources, and those used to relay information such as newspapers and the council website are inadequate as the coverage is not wide enough and people do not follow online sources.</p> <p>Postcards had not been delivered, and public consultations have also been inadequate. To make documents legally compliant, they must contain less jargon and be made easy for the public to understand. The maps should also be of a more detailed scale.</p> <p>In terms of Duty to Cooperate, records from executive council meeting of 18th October 2018 shows that the council failed to consult with neighbouring authorities prior to deciding on the review. The review should make clear that Woking will not have an unmet need to be met by neighbouring authorities. There needs to be a review of the evidence base. The core strategy is over five years and the review is therefore overdue. Has attached a supplementary report of the core strategy review. Wishes to participate in oral examination for the following reason; "It will be the only way I, or my agent, will be able to explain fully to the inspector why we feel unable to decide on these documents, and hopefully get things changed. I, or my agent, would wish to produce necessary council documents to support my case" Wishes to be informed of next stages.</p>
<p>Contributor Proposed Modification: Proposed modifications are as follows; WBC should ensure that all residents and businesses affected by any development are notified in good time so that representations can be made. There was a lack of information sources, and those used to relay information such as newspapers and the council website are inadequate as the coverage is not wide enough and people do not follow online sources.</p> <p>Postcards had not been delivered, and public consultations have also been inadequate. To make documents legally compliant, they must contain less jargon and be made easy for the public to understand. The maps should also be of a more detailed scale.</p> <p>In terms of Duty to Cooperate, records from executive council meeting of 18th October 2018 shows that the council failed to consult with neighbouring authorities prior to deciding on the review. The review should make clear that Woking will not have an unmet need to be met by neighbouring authorities. There needs to be a review of the evidence base. The core strategy is over five years and the review is therefore overdue.</p>
Modification Reference: U0000376
Officer Response: The consultation for the road layout south of Victoria Arch was separate to the consultation for the Site Allocations DPD, the Regulation 19 consultation

does not consult on the proposals outside of the allocated site boundaries. The UA7 site includes the Victoria Arch and does not include any of the properties along Guildford Road. The DPD has included Victoria Arch within the UA7 allocation to facilitate the delivery of improvements to the infrastructure within this site. The proposals at Guildford Road will be subject to its own consultation process if the scheme is to be delivered.
Response Reference: U0001324
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06745/1
Name: Rita Hales
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Building nearly a thousand houses off Parvis Road will ruin West Byfleet, with stress, congestion and more pollution. The M25 and A3 are already a major contributor to pollution. The infrastructure will not cope. Development will devalue properties and put strain on everyone. Objects to 21 Traveller pitches in a peaceful village with low crime levels, near an old people's home. Retain the little remaining green space and green belt, which is there for a reason. As high council tax payers, people should be listened to.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation has been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper. Please see Section 6 on the provision of infrastructure; and Sections 8 and 13 on potential impacts such as pollution and congestion. Section 3 sets out the need to allocate land to meet the accommodation needs of Travellers. Section 3.10 addresses potential impacts on the amenity of nearby residents, and Section 3.13 on affects on the community. Section 4 responds to the comments about a reduction in Green Belt land, and Section 5 specifically refers to the impact on residents of West Byfleet and Byfleet. An Independent Inspector will be appointed by the Secretary of State to assess the Site Allocations DPD against the tests of soundness and legislation. The Council will be expected to take account of his/her findings.
Response Reference: U0000917
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04475/1
Name: Mrs Linda Hall
Number of Signatories: 3
Comment Type: OBJ
Site Reference: GB07, GB08
Summary of Comment: Concerned over the loss of greenbelt between Mayford and Woking - particularly the woods and habitats on GB7 - which plays a critical part in preventing urban sprawl of Woking swallowing up the historic, rural village of Mayford. Further development will have a major impact for Mayford and the Egley Road.

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The representation regarding impact on woods and habitats, Mayford Green Belt, urban sprawl and visual gap have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 19, 20 and 21.
Response Reference: U0001778
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06213/1
Name: Mr And Mrs Alan And Catherine Hall
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Objects to releasing GB7 from the Green Belt to accommodate housing. With the addition of the school to Egley Rd the congestion of traffic is now critical at peak periods. Hook Heath Road and Hook Hill Lane have now become a Rat Run. GB7 is full of mature trees, some of which could be 200 years old, replacing these would be impossible. Wildlife is very prevalent to include Deer, Hedgehogs Owls and Foxes. We now have to wait 4 to 5 weeks for a Doctors appointment. Adding additional housing into an existing saturated area, lacking many essential services would be destructive to the residents of Mayford Village.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Objection noted. Section 6 of the Regulation 19 Issues and Matters Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures will satisfactorily address any adverse impacts from cumulative development in the Borough. The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed. Nevertheless a number of the proposed allocations, including GB7, will require a detailed ecological survey as a key requirement to assess any site specific ecological issues.
Response Reference: U0001169
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06855/1
Name: Mr Peter Hammond
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: The DPD is not sound, positively prepared, justified, effective or consistent with national policy. The DPD does not adequately address impact on local infrastructure such as such as the A245, schools and NHS facilities. The proposed A245 mitigations are weak and would not alleviate the increase in traffic in the area, merely move it to other routes- unlikely to be effective given that people will still need to travel between towns. The evidence to support the proposals relies too much on estimation and guess-work. Flood risk issues on the sites have not been appropriately addressed, especially considering WBC's response to similar issues at Martyrs Lane. The evidence does not demonstrate an exceptional circumstance requiring Traveller sites to be built in the Green Belt, as required by Government policy. Many alternative smaller sites, especially those closer to larger population areas, have not been appropriately considered.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on local infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on flood risk is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7. Flood risk issues were not one of the main reasons for the rejection of the Martyrs Lane site as a suitable site for Green Belt removal. The application of the sequential test and exceptional circumstances to the allocation of Gypsy and Traveller sites is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3.
Response Reference: U0001372
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06859/1
Name: Ms Alison Hammond
Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. My reasons for this assertion are detailed below:

This Site is currently allocated as Greenbelt land and also as a concrete aggregate safeguarded site.

This Site falls within the boundary of the West Byfleet Neighbourhood Development Plan (NDP2017) and forms part of their Greenbelt designation. One of the objectives of the NDP2017 is to maintain, enhance and protect the distinctive and special character of West Byfleet. Any future application for Planning Permission on the Site would be contrary to the NDP2017 and therefore not compliant with Planning Law as defined in the NPPF paragraph 47. The NDP2017 places great emphasis on the protection and enhancement of all existing green spaces which would be significantly undermined if the Site was released from the Greenbelt for housing.

The Site is covered by a minerals allocation which will still exist if the Site is released from the Greenbelt - the minerals plan runs from 2011 to 2026 and the site allocations DPD to 2027. As a result of the timings running in parallel the minerals allocation hanging over the Site would not make this site an attractive prospect for residential development.

Access to the Site is over 1km from the railway station and Parvis Road would require significant upgrading works and crossing facilities to be provided and even then would not be a sustainable location as the use of private vehicles would be heavily relied upon.

TRAFFIC ISSUES

Parvis Road is already very congested at peak times and its ability to cope with an additional increase in traffic to serve 550 private dwellings and 15 traveller pitches.

NOISE AND AIR POLLUTION

The NPPF (paragraph 170(e)) states that planning policies and decisions should contribute to and enhance the local environment by preventing new development from contributing to or being put at unacceptable risk by unacceptable high levels of soil, air, water or noise pollution. Given the site's proximity to the M25 and the A245, any future residential development is considered to be at risk from both noise and air pollution which would be very difficult to mitigate against resulting in an allocation which is not consistent with National Policy. There have been no proper consideration given to noise pollution.

INFRASTRUCTURE

The Infrastructure Report completely fails to address how and where adequate healthcare could be provided for an increase in population.

TRAVELLER PITCHES

WBC's policy on Gypsies, Travellers and Travelling Showpeople states that a sequential approach should be taken when identifying suitable sites with sites in the urban area being considered before those in the Greenbelt.

The proposed development of the site should not have unacceptable impact on the visual amenity and character of the area.

OTHER

The Site is an area subject to frequent and severe flooding. Adequate assessments regarding flooding from both river and surface water have not been carried out. This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment. WBC has not focussed on previously developed land in sustainable locations, which it is required to do. Inadequate

consideration has been given to alternative sites.
Inaccurate Statements regarding the greenbelt function of the Site are provided. The Site does in fact perform the greenbelt function of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment.
The outline planning permission granted to Sheer House and the development at Broadoaks only serves to exacerbate a number of the points detailed above, in particular the inadequacy of appropriate infrastructure, including health, schools, water, sewage and roads.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

In regards to the mineral allocation see Section 17 and for the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. The IDP included waster water and water provision, this can be found on the Council's website. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

The key requirements of the policy have been informed by the measures of mitigation developed in the Sustainability Appraisal Report. Together with the policies of the Development Plan, and the IDP, the Council is confident that adequate mitigation can be identified to address development impacts.

Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

The reasoning behind the allocation of Traveller pitches in the Green Belt, and at West Hall in particular, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3.

In regards to the lack of alternative sites see Section 11 of the Topic Paper.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The concentration of housing in Byfleet and West Byfleet is addressed in Section 5 of the Topic Paper. In regards to the concentration of housing on individual sites, the proposed anticipated densities are reasonable and are broadly in line with the Core Strategy, based on ranges provided in policy CS10. Actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage.

<p>Paragraph 1.7 above reiterates the need to allocate a range of sites to meet the variety of housing need across the Borough. Green Belt sites will contribute towards the provision of family homes, for example.</p> <p>It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes. It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development.</p>
Response Reference: U0001207
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06557/1
Name: Mr Tobias Hampshire
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
<p>Summary of Comment: Strongly objects to GB4, GB5 and GB10. Considers that the DPD does not pass the test of soundness required by the NPPF. In particular the DPD is not considered an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy. Reasons for this assertion are detailed below:</p> <ol style="list-style-type: none"> 1. No consideration on the impact to existing infrastructure: the volume of additional traffic on Parvis Road is unfeasible; the report does not consider how healthcare and school places will be addressed. Outline planning permission has already been granted to Sheer House and Broadoaks, and there is significant concern regarding the adequacy of infrastructure including roads, sewage, water, schools and health. 2. The number of dwellings constitutes over-development and is excessive. WBC has not considered alternative sites before proposing removal from the Green Belt. The proposed quantum of development in Byfleet and West Byfleet is 930 dwellings and 21 Traveller pitches. It is not considered appropriate to have so much development in such a small area. 3. Release of Green Belt land would not check the unrestricted sprawl of Woking, and allows West Byfleet to merge with Pyrford and Byfleet. 4. Development will exacerbate noise and air pollution that already impacts residents due to the M25 and Parvis Road. The DPD does not give this adequate consideration. 5. The proposal fails to protect the biodiversity of the area, including access to, and the rural setting of, the Wey Navigation, and the loss of ancient woodlands and hedgerows. 6. WBC has not followed the sequential approach to allocation of Traveller sites, first considering sites in the urban area and then allocating sites in the Green Belt. In allocating a Traveller site, there should not be an unacceptable impact on visual amenity or character of the area. There should also be adequate infrastructure to service the pitches, access to schools and healthcare and space for business activities. It is not considered that these have been addressed.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Many of the issues raised in this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper.

Section 6 addresses the infrastructure provision required to support the Site Allocations DPD. In particular Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 addresses this issue in greater detail, and Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

Paragraph 6.12 addresses GP provision.

Paragraph 6.9 addresses education provision.

Paragraph 6.11 addresses wastewater and sewerage.

Paragraph 6.10 addresses water supply.

Paragraph 5.1 recognises that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.

Section 11 sets out the thorough assessment of reasonable alternatives that has informed the Site Allocations DPD, and Section 1 sets out the justification for the release of Green Belt land to meet future development requirements in the Borough. In particular, Paragraph 1.6 notes that the capacity of the urban area has been assessed through the SHLAA, and the evidence continues to justify the principle established in the Core Strategy that land will be required to be released from the Green Belt to meet housing delivery between 2022 and 2027. It is further noted that as per Paragraph 1.7, the Site Allocations DPD identifies a quantum of land which may be sufficient to meet development needs over the plan period and that in this regard there is no need to release Green Belt land for development. However, given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

Checking the unrestricted sprawl of urban areas and preventing neighbouring towns from merging into one another are two of the five purposes of the Green Belt as defined by the National Planning Policy Framework. As set out in Paragraph 4.1, the Council has ensured through a number of studies that any land released from the Green Belt will not undermine its overall purpose and integrity. In particular, as outlined in Paragraph 21.1, the Green Belt Boundary Review assessed the parcels of Green Belt land against the purposes of the Green Belt, one of which is to check the unrestricted sprawl of large built up areas. None of the proposed allocations will lead to unacceptable urban sprawl.

Section 8 addresses air and noise pollution.

Section 19 confirms that due consideration has been given to biodiversity. In particular, Paragraph 19.1 confirms that during the preparation of the Site Allocations DPD, the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed. It is further noted that Core Strategy Policy CS7 sets out the Council's commitment to conserving and protecting existing biodiversity assets within the Borough. Regarding the specific allocations, GB10 includes inter alia the following key requirements: "Additional Green Infrastructure could also be provided on

land to the east which is also within the same ownership but which would remain within the Green Belt (GBBR, Table 4.3, footnote 5) - 'this land could provide Green Infrastructure for the development within the Green Belt which could act as a buffer to the Wey navigation corridor with its distinctive character and wildlife corridor function.'"; and "retain large areas of woodland and parkland setting and strengthen where possible" Section 3 sets out the sequential approach which the Council has taken to the allocation of Traveller sites. Site-specific amenity and infrastructure considerations will be taken into account as part of the Development Management process.
Response Reference: U0001311
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06658/1
Name: Ms Lucy Hampshire
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB18
Summary of Comment: Strongly objects to the removal of Green Belt from Byfleet and West Byfleet, and allocations GB4, GB5 and GB10. Does not consider that the DPD passes the test of soundness; in particular it is not considered an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. Reasons for this assertion are detailed below: The proposal is detrimental to the area, resulting in the loss of ancient woodland, increased risk of flooding, increased noise impact to the local area, which is already impacted by the planned development of Broadoaks, Parvis Road and the M25. The proposals fail to protect the biodiversity of the area. GB10 for example is of key importance to the local community, providing access to the countryside. Removal of the site from the Green Belt fails to consider the adjacent Wey navigation and will be significantly detrimental to the landscape. Removal of the proposed sites from the Green Belt would be detrimental to the aim of checking the unrestricted sprawl of Woking, and West Byfleet to merge in either direction to both Pyrford and Byfleet. The proposed number of dwellings, including Broadoaks, reaches 930 dwellings with 21 new traveller pitches. This constitutes unnecessary overdevelopment. WBC has not adequately considered alternative sites before amending the Green Belt. No consideration has been given to the impact on existing infrastructure; the Parvis Road's ability to cope with additional pressures is questionable. There is no provision for addressing the increased need for healthcare and school places. The impact on residents of noise and air pollution has failed to be considered. The proposal is not consistent with national policy or WHO guidance on air pollution. Opposes the DPD.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Many of the issues raised in this representation are addressed in the Regulation 19 Issues and Matters Topic Paper. It is firstly noted that Core Strategy Policy CS7 identifies Ancient Woodland as a locally important habitat and provides that "within locally designated sites development will not be permitted unless it is necessary for appropriate on-site management measures and can demonstrate no adverse impacts to the integrity of the nature conservation interest." Flood risk is addressed by Section 7 of the Regulation 19 Issues and Matters Topic Paper. Furthermore, it is noted that the key requirements for GB10 include inter alia that "the site is within Flood Zone 1 but features a number of existing drainage channels meaning there

is a risk of flooding. The site is also adjacent to Flood Zones 2 and 3 whilst a principle aquifer is located within the site. Consideration of sustainable drainage and flood attenuation within the landscape are potential options. Early engagement with the Environment Agency is required. Flood Risk from onsite and adjacent ordinary watercourses will need to be assessed and details submitted as part of a Flood Risk Assessment with any planning application."

Section 19 of the Regulation 19 Issues and Matters Topic Paper addresses the due consideration which has been given to biodiversity. In particular, Paragraph 19.1 provides that during the preparation of the Site Allocations DPD, the Council consulted with Surrey Wildlife Trust and Natural England for advice on the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed. It is further noted that Core Strategy Policy CS7 sets out the Council's commitment to conserving and protecting existing biodiversity assets within the Borough. Regarding the specific allocations, it is noted that GB10 includes the following key requirements: additional Green Infrastructure could also potentially be provided on land to the east which is also within the same ownership but which would remain within the Green Belt (GBBR, Table 4.3, footnote 5) - this land could provide Green Infrastructure for the development within the Green Belt which could act as a buffer to the Wey navigation corridor with its distinctive character and wildlife corridor function; and another key requirement to retain large areas of woodland and parkland setting and strengthen where possible.

Checking the unrestricted sprawl of urban areas and preventing neighbouring towns from merging into one another are two of the five purposes of the Green Belt as defined by the National Planning Policy Framework. As set out in Paragraph 4.1, the Council has ensured through a number of studies that any land released from the Green Belt will not undermine its overall purpose and integrity. This includes GB4, GB5 and GB10.

The Council does not consider that the proposals outlined in the Site Allocations DPD would lead to overdevelopment. Section 1.3 provides that the Core Strategy makes provision for 4,964 net additional dwellings. This equates to a housing requirement of 292 dwellings per annum, and the key purpose of the Site Allocations DPD is to identify a quantum of land capable of delivering this requirement. The Core Strategy was adopted in October 2012 and in accordance with Paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. Therefore it provides an up to date strategic context for the preparation of the Site Allocations DPD.

All sites identified in the Site Allocations DPD for residential development make a valuable contribution towards meeting the housing requirement. As per paragraph 1.7, it is noted that the Council has allocated a quantum of land within the urban area which may be sufficient to meet the housing requirement. However, it is noted that given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation, It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

Section 11 sets out that there has been a thorough assessment of reasonable alternative sites to inform the selection of preferred sites.

Section 6 sets out that consideration has been given to the infrastructure provision required to support the Site Allocations DPD. More specifically Section 13 addresses transport and congestion considerations, and Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development

impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed. GP provision is addressed in Paragraph 6.12, and education provision is addressed in Paragraph 6.9. Section 8 addresses noise and air pollution.
Response Reference: U0001321
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06616/1
Name: Ms Susan Hanrahan
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Concerns regarding increased traffic congestion and safety issues on Parvis Road. The route cannot support new development of GB10 and GB11. New traffic lights and toucan crossing would be unsuitable. Has provided data from Transport For Surrey : CUMULATIVE ASSESSMENT OF FUTURE DEVELOPMENT IMPACTS ON THE HIGHWAY NETWORK . 6 SEPTEMBER 2011.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses the adequacy of infrastructure. Section 13 specifically addresses road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. The Council is satisfied that the transport evidence used in supporting the DPD is robust. The evidence accepts that development will have transport impacts in the local area, including the A245. However, the County council is also clear that those impacts can be mitigated. Since the County Councils transport assessment, further work had been undertaken to identify the measures of mitigation that might be necessary to address transport impacts along the A245 corridor. The Council is confident that when implemented those impacts will be minimised to an acceptable level. Within the GB10 Policy there are key requirements for developer contributions to address potential transport issues, which include infrastructure to provide access to the A245. Transport assessments have covered the impacts of cumulative development and have identified appropriate mitigation measures for potential traffic hotspots.
Response Reference: U0001545
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06844/1
Name: Glenyss Hansell
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07, GB08
Summary of Comment: Objects to further development on Green Belt land along Egley Road and in Mayford. Land has already been lost to the Moor Lane housing development

and have noticed there are far fewer species of birds in the area. Further building will mean further loss of habitat, more traffic and therefore more pollution. Green spaces are needed not just for the wildlife but for our well being. Strongly object to this encroachment on to the greenbelt.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Objection noted. The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. The representation regarding wildlife, pollution, traffic and wellbeing are addressed in the Regulation 19 Issues and Matters Topic Paper see Section 19, 8, 13 and 4.
Response Reference: U0001108
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04937/1
Name: Mrs S Hardesty
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Considers that the DPD is neither legally compliant nor sound. The DPD is not legally compliant as it does not fully consider low density and infill plots for development, which can provide high quality characterful homes in keeping with the area and contribute to local need. This is contrary to national policy (paragraph: 010 Reference ID3-010-20140306) which states that all sites should be considered for assessment. Small sites are overlooked in favour of larger sites. The DPD is unsound as self builders are not considered, although Woking Core Strategy acknowledges that there is a need for a mix of housing. Wishes to participate at the public examination in order to have a detailed conversation about the re-evaluation of small sites in Green Belt and current/future possibilities and sites for self builders. Wishes to be informed when the DPD progresses to the next stages.
Contributor Proposed Modification: The DPD should identify a greater diversity of sites, by reevaluating the below small sites which would be suitable for self builders, with limited impact on the local area: The land on the junction of Blackhorse Road and Heath House Road, GU22 0QT The land on the corner of Heath House Road and Rough Road, GU22 0RB The land Blackhorse Road/Heath House, South West, GU22 0QU
Modification Reference: U0000247
Officer Response: The decision not to allocate sites that will yield fewer than 10 dwellings is addressed in Paragraph 11.4 of the Regulation 19 Issues and Matters Topic Paper, and is justified on the grounds of ensuring that the appraisal process was manageable. The NPPF specifies that "under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permission to meet the identified demand." While the Council maintains a self build housing register, it has not identified any serviced plots. However, the Council has published a SHLAA which provides a comprehensive evaluation of all

sites in the Borough that are considered deliverable or developable. This provides sufficient information for those wishing to carry out a self-build or custom housebuilding project. Indeed, through the CIL monitoring process, it is clear that a significant number of self-build schemes continue to come forwards in the Borough. Furthermore Policy DM12 of the Development Management Policies DPD provides in principle support for "the development of self and custom-build homes and custom-build projects in suitable locations, where they support the delivery of the Core Strategy and meet all other requirements of the Development Plan for the area." In this regard, the Council is not acting contrary to its obligations as it is addressing self-build and custom house building through a process independent of the Site Allocations DPD.
Response Reference: U0001303
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06790/1
Name: Mr Tim Hardyman
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Objects to GB10; recognises the need for housing, but concerned that the environmental impact is too great. It would be better to redevelop brownfield sites instead of releasing more Green Belt. Also concerned about the impact of development on local infrastructure, roads, transport, healthcare, education and other public services.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation is addressed by the Regulation 19 Issues and Matters Topic Paper. The environmental impact of proposed allocations has been addressed through the Sustainability Appraisal, further details of which are provided in Paragraph 11.2. Section 1 sets out the justification for the allocation of Green Belt land for development. Section 6 addresses infrastructure provision. In particular Paragraph 6.9 addresses education provision and paragraph 6.12 addresses GP services provision. Furthermore, Paragraph 6.7 addresses transport infrastructure as does Section 13.
Response Reference: U0001004
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06485/1
Name: Mrs Alina Hargrave
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
Summary of Comment: Objects to UA44 allocation. DPD is unsound and does not comply with Duty to Cooperate. UA44 has not been consulted on. This does not comply with WBC guidelines on consultation. Concerns regarding the overdevelopment of Westfield and associated strain on parking, as well as road, educational and health infrastructure.

Wishes to be informed of next stages.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Regulation 19 is the second stage of the consultation for the preparation of the Site Allocations DPD. New sites that were not present in Regulation 18, such as UA44, come forward to be consulted on at the Regulation 19 stage based on evidence at the time, including representations received during the Regulation 18 Consultation. Representations made during the Regulation 19 Consultation are given the same consideration as those made in the previous Regulation 18 Consultation and still have potential to modify the plan subject to being justified. The Core Strategy has already determined the number of dwellings proposed for the Borough over the plan period. The overall quantum of development and its associated impacts have also been assessed. Measures of mitigation have been identified where feasible and the Site Allocations DPD includes specific requirements for detailed site specific impacts and mitigation measures to be identified. Infrastructure requirements have been addressed and are covered in greater detail in section 6 of the Regulation 19 Issues and Matters Topic Paper.
Response Reference: U0001091
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06738/1
Name: Mr Grant Harrison
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is not sound. It is not an appropriate strategy taking into account the reasonable alternatives and based on the evidence, nor is it consistent with national policy, due to: <ul style="list-style-type: none"> - Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces. - Inadequate reasons given for excluding Martyrs Lane Green Belt, which would be better suited for development. - Inadequate consideration of alternative sites, in particular PDL in sustainable locations. - This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment. - The site performs the Green Belt functions of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment. - Residents would be car reliant: the site is over 1km from West Byfleet railway station with significant upgrading needed to the route. Questions the ability of the heavily congested Parvis Road to cope with additional traffic, including that of Broadoaks. There would need to be vehicular access at all times, which will be difficult to achieve. - The Infrastructure Report does not address provision of healthcare and or education for the increased population. - The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk. - Extremely close to the A245 and M25, so at risk of air and noise pollution, very difficult to mitigate against- contrary to NPPF para 170(e). No proper consideration of noise pollution.

- Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.

- The Broadoaks and Sheer House developments will exacerbate a number of these issues.

Contributor Proposed Modification: Other sites in the Green Belt, and on previously developed land, should be given due consideration for development.
A sequential approach should be adopted when identifying Traveller sites.

Modification Reference: U0000308

Officer Response: The issues raised are comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper. Section 1 and 2 gives the Council's justification for releasing and safeguarding Green Belt land to meet future development needs. Section 16 responds to concerns about conflicts with the West Byfleet Neighbourhood Development Plan. Section 17 addresses concerns about the safeguarding of site GB10 as an aggregate and minerals site. The Green Belt Boundary Review assessed all of the Green Belt land in the borough for future development needs. Many areas of Green Belt were dismissed due to absolute environmental constraints (for example, being in Flood Zone 2 or 3, or within a Site of Special Scientific Interest); due to landscape sensitivity; due to lack of access to services and facilities and low potential to achieve sustainable development; and due to the degree the land contributed to the functions of the Green Belt. It is argued that the Green Belt sites perform several Green Belt functions. It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl. Section 11 of the Topic Paper describes how the Council has comprehensively assessed alternative sites, prioritising those previously development sites in the urban area. The representation regarding excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. The cumulative impacts of development - including that at Sheer House and Broadoaks - have been taken into account in the infrastructure planning. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

Concerns raised regarding noise and air pollution are addressed in Section 8 of the Topic Paper.

Section 3 of the Topic Paper provides a response to the concerns raised about Traveller pitches.

Response Reference: U0001416

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):**Contributor Reference:** 06585/1**Name:** The Harrison Family**Number of Signatories:** 1**Comment Type:** OBJ**Site Reference:****Summary of Comment:** 1. Introduction

Prepared by Turley on behalf of the Harrison family who own the Former Jackman's Nursery site at Smarts Heath Road, Woking, GU22 0NP.

Considers that the DPD is legally compliant, but that it is not sound and does not comply with the Duty to Cooperate.

Wishes to participate in the examination and wishes to be informed when the DPD progresses to the next stages.

2. The Site

The Former Jackman's Nursery site has an area of 4.2ha and is located immediately to the west of the village of Mayford. It is not PDL, however there are a number of retained buildings, including two concrete buildings of approximately 790sqm and 210 sqm, a timber building of approximately 88sqm and a separate building of approximately 90sqm. There is also a large area of compacted hardcore which is largely clear of vegetation and forms the access to Smart's Heath Road. It is one of two existing vehicular accesses to the site under client's control.

The Smarts Heath Road frontage of the site is heavily wooded as are the remaining boundaries. This strong boundary treatment means that the site benefits from a high level of visual containment. To the east of the site is the main Guildford - Portsmouth railway line. To the north of the site is an area of residential development. To the south and west of the site is 10 Acre Farm. In the Regulation 18 Site Allocations DPD, this was proposed for development of Gypsy and Traveller pitches. A planning application for a Gymnastics Club was approved in summer 2018 which, it is considered, will change the character and use of the 10 Acre Farm site. The site falls within the Green Belt. It does not fall within the "Mayford Settlement Area" as defined by the Proposals Map.

Guidelines issued by the Chartered Institute of Highways and Transportation (CIHT) set out suitable walking and cycling distances for access to local services which have been tested at both examination and appeal. An audit of facilities and services within 800m (easy walking distance) and an extended preferred maximum walking distance of 2km confirms that the site benefits from access to a good range of facilities including a convenience shop and post office, a public house, a secondary school, and bus stops providing access by public transport to Woking town centre and Guildford. The nearest school is Barnsbury Primary School.

3. Comments on strategic matters relating to the Site Allocations DPD

Policy CS1 states that "a review of the Green Belt Boundary will be carried out before 2016 to ensure that the release of Green Belt land for development does not undermine its purpose and integrity. The review will be carried out as an integral part of the Site Allocations DPD." Although the review was undertaken and published in 2014, timescales for the preparation of the Site Allocations DPD slipped with a first draft published in 2015 and the second version published in late 2018, more than six years after the adoption of the Core Strategy. The delay in preparing the Site Allocations DPD means that there have been a number of important changes in the strategic planning context with which the DPD must be considered, including:

- Publication of the revised NPPF in July 2018

- Publication of numerous population and household projection updates

- Worsening of housing affordability across the Borough

-Progress on the local plans for the local authority areas which share the Western Surrey HMA (i.e. Guildford and Waverley)

As a consequence, the strategic planning context is different to that which pertained at the adoption of the Core Strategy. The annual housing requirement of 292 can be regarded as out-of-date. It is recognised that the Council approved its Core Strategy review at the Council meeting on 18th October 2018. However, Turley considers that the Core Strategy Review did not take into account all relevant material factors in reaching its conclusion on housing need and housing trajectory.

Woking's housing requirement of 292 required and envisaged contribution towards addressing unmet need from Waverley and Guildford to ensure the HMA's need was met in full. Across both authorities, but most recently through the examination of the Guildford Plan, there has been a reluctance to accommodate this unmet need. A recent appeal decision in Waverley Borough (APP/R3650/W/3171409 - Land west of Folly Hill, Farnham: decision date 12 December 2019), indicated that Waverley is encountering difficulties in meeting its own housing needs and is therefore less capable of contributing to Woking's unmet need. It is not appropriate for Woking to seek to rely on its HMA neighbours to address unmet need, rather than updating its own evidence base to substantiate its assertion that it would not be possible to deliver more than 292 dwellings per year. In reality, the previously evidenced scale of need across the housing market area has recently been demonstrated to be a minimum when consideration is given to the Government's consultation on changes to the standard method, which indicates a need 431 homes per year in Woking.

The Site Allocations DPD is being prepared in this context, which is notably different from that in which the Core Strategy was developed, examined and adopted. It therefore needs to take a more proactive approach by identifying land which provides for needs beyond the level suggested in the Core Strategy.

The Former Jackman's Nursery site is an appropriate location to provide family and affordable housing to ensure that the identified housing need is met in full.

The need for larger, family housing has been consistently evidenced in Woking. The 2015 SHMA estimated some 61% of households in need of market housing in Woking require at least three bedrooms, while 23% require at least four. However since the adoption of the Core Strategy the need has not been met, in absolute or indeed proportionate terms. The client is concerned that the failure to address this issue will adversely impact the local housing market and fail to address the requirement of local plan making to assess and reflect in policies the housing needs of different groups as set out in the NPPF. As the DPD is unlikely to achieve a more appropriate housing delivery profile, it is considered to be not positively prepared, not justified and inconsistent with national policy.

There was a need equating to approximately 375 affordable homes per year at the time of the 2015 SHMA, which is likely to have increased. Where permissions have been granted for large brownfield redevelopments in Woking Town Centre, there has been limited delivery of affordability due to viability constraints. The development of greenfield sites is therefore critical to the delivery of affordable, as well as family, housing. If the DPD remains unchanged, the delivery of affordable and family housing will fall significantly short of current and future needs. Development of the client's site could make an important contribution to this need.

4. Comments on Green Belt matters related to the Site Allocations DPD

The majority of sites originally proposed for safeguarding in the Regulation 18 Site Allocations DPD were removed from the DPD, and Martyrs Lane was considered neither suitable nor available, leaving only three sites for safeguarding in the Regulation 19 DPD (with a potential cumulative yield of 270 dwellings). The client is concerned that insufficient land has been identified to meet the Borough's future housing needs. The DPD therefore fails to achieve the Borough's stated objectives of providing sufficient land to meet housing need and of identifying permanent and defensible boundaries to the Green Belt. The client concludes that the Council's approach to identifying sites for safeguarding is not justified in relation to the tests of soundness.

The Former Jackman's Nursery site (in whole or part) has been submitted to the 2013 and 2017 SHLAA. The 2017 SHLAA concludes that, while available for development and likely economically viable at a low density, the site is not suitable as it is located in the Green Belt and cannot be considered sustainable unless removed from the Green Belt, and is identified as forming part of parcel 17 identified in the Green Belt Review as having a strong rural character.

It is considered that the Council has misdirected itself in reaching these conclusions for the below reasons:

(a) The purpose of the Green Belt Review is ensuring that land released from the Green Belt will not undermine the purposes of the Green Belt. As Green Belt is a policy designation, not an environmental constraint, this factor is not engaged by any of the criteria within the SEA regulations. The Council's approach is unsound as the Green Belt designation has conferred a negative assessment score on Jackman's Nursery site, notwithstanding that it is considered to have good accessibility to key local services. EiP have confirmed elsewhere that evaluations in Sustainability Appraisals made on the basis of Green Belt designations can present an inaccurate position. This can in turn lead to sites which could score better in relation to sustainability objectives not being properly considered.

(b) The client considers that the approach taken to the Green Belt Boundary Review was not sufficiently robust or fine-grained. The approach taken was to conduct an initial sieving exercise to remove areas of "absolute constraint" from consideration, after which a total of 31 land parcels were identified for further consideration.

Given the importance subsequently attached to the characteristics of each parcel, ensuring parcels are credibly and appropriately defined was clearly of paramount importance. However while it is confirmed that consideration was given to "broad landscape characteristics", the acknowledgement of "anomaly areas" and "poorly defined unrecognisable boundaries to parcels" does not give confidence. It is clear that there are areas within wider strategic parcels that differ in landscape or sustainability characteristics from the parcel they form part of. The consequence was that smaller parcels of land were removed from further consideration, although their removal would not compromise Green Belt purposes or objectives.

The client contends that those areas of parcel 17 which are physically closest to the settlement of Mayford, including the Jackman's Nursery site and Ten Acre Farm, can be differentiated from the wider area of parcel 17 in terms of their landscape, visual and environmental character, their sustainability credentials and their contribution to meeting the purposes of Green Belt designation.

The client contends that with regard to land south of the defined Mayford Settlement Area, the Freemantle School site, Jackman's Nursery Site and 10 Acre Farm site could be removed from the Green Belt without compromising the integrity or purposes of the Green Belt.

The Green Belt Boundary Review concluded that Parcel 17 had Very Low potential for release from the Green Belt. It found that "development would relate poorly to settlement pattern (except at the southern edge of Mayford which has specific policy protection) and be unrelated to town." However, implicit in this is a recognition that land at the southern edge of Mayford would relate better to the settlement pattern. The review also concluded "while development would not lead to merger it is likely to reduce separation within an area where there are small developments/settlements," recognising that development of the parcel, and by implication individual parcels within the Parcel, would not lead to the merging of Woking and Guildford.

With regard to the five purposes of the Green Belt, the release of the Jackman's Nursery site, and adjacent land including 10 Acre Farm, the built area of the Mayford Centre and Freemantle School would not conflict with the five purposes of the Green Belt:

a) A positive decision to remove land from the Green Belt to meet the future development needs of the Borough does not constitute "unrestricted sprawl." Removing the above sites from the Green Belt would define a defensible long-term boundary, bound on the south by

the Hoe Stream which is permanent and defensible. Not all land within this area would accommodate development; as elsewhere in the DPD, land adjacent to the river would be retained as a landscape and ecological buffer. To the west the boundary could be defined by the western boundary of the 10 Acre Farm site which adjoins the boundary of the SSSI. Neither 10 Acre Farm nor Jackman's Nursery falls within the SSSI.

b) If the above sites were released from the Green Belt, a substantial buffer would continue to exist between Woking and Guildford and development would not result in towns merging or the appearance of coalescence. Significant built development already exists to the south of Mayford Green and the construction of Woking Gymnastics Centre will create a substantial building. In this context, the allocation of Jackman's Nursery for residential and potentially recreational development would be justified and would not reduce the gap.

c) The area to the south of Mayford is already developed; the Fremantle School, the Mayford Centre and 10 Acre Farm site cannot be considered as countryside. The identification of Jackman's Nursery as a location to provide for future housing needs would result in the loss of a small area of 'countryside' however this would be part of a planned release of sites from the Green Belt. The site is visually contained and the retention of the boundary tree belts would ensure that this containment persists. A robust new edge to the Green Belt could be created.

d) Neither Woking nor Guildford are defined as historic and the development would therefore have no impact on this purpose. Mayford is a village, not a town, so does not fall within the remit of this purpose.

e) Woking Borough Council has clearly sought to accommodate development in urban locations wherever possible. It has been demonstrated that insufficient capacity exists within the urban area for all the Borough's needs to be here. Accordingly the development would not result in a detrimental impact on this purpose.

5. Site Potential

A small area of land in the southern part of the site (less than 10%) falls in Flood Zone 2 and is therefore not suitable for residential development; this could be used to create further habitat or contribute to flood alleviation as part of the Hoe Stream enhancement. The trees provide containment.

Other than existing tree cover there are no other landscape constraints to the delivery of the site.

The site is well-related to existing development in Mayford, as acknowledged in the Green Belt Boundary Review and the SHLAA. It benefits from good access to a wide range of services and facilities.

Allowing for areas which are not developable due to flood risk and boundary landscaping, the site has a developable area of approximately 3 hectares.

The client considers that the site could accommodate family housing, including affordable housing, with a potential yield of 80 residential units. It is anticipated that residential development would be located towards the north of the site. To achieve a softer southern edge of the site, an element of recreational open space would be incorporated within a future development framework. This could further the objective of the Hoe Stream Restoration Project.

Contributor Proposed Modification: Additional sites should be allocated to ensure the needs for family housing and affordable housing in the Borough are met.

Achieving a modification of the DPD will require additional evidence. This will include an update of the Green Belt Boundary Review (2014); such a review should not be constrained to the identification of sites to meet a specific preordained level of housing delivery.

The Green Belt designation should be removed from consideration of the sustainability of specific sites in order for the DPD to be sound and justified.

Land to the south of the defined Mayford Settlement Area, the Freemantle School site, Mayford centre site, Jackman's Nursery Site and 10 Acre Farm site could be removed from the Green Belt without compromising the integrity or purposes of the Green Belt. The Jackman's Nursery Site should be allocated for residential and recreational development.

Modification Reference: U0000230

Officer Response: The Council has an up to date Core Strategy to set the strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. In accordance with Section 6 of the Core Strategy, the Council is committed to the comprehensive delivery of the requirements of the Core Strategy and the preparation of the Site Allocations DPD is a key means to achieving this objective. The review concluded that the Core Strategy is in general conformity with the 2018 NPPF and takes into account the latest population and household projections.

The Site Allocations DPD has a clear purpose set out in the Core Strategy to identify specific sites to enable the delivery of the Core Strategy. Policies CS1 (A spatial strategy for Woking Borough), CS2 (Woking Town Centre), Policy CS6 (Green Belt), Policy CS10 (Housing provision and distribution) and Section 6 (Monitoring and implementation) of the Core Strategy all highlights the role of the Site Allocations DPD to identify sites to enable the delivery of the Core Strategy. Previous Local Development Schemes also highlights the distinct purpose of the Site Allocations DPD. The Site Allocations DPD has been prepared to meet this objective by identifying sufficient land to enable the delivery of the Core Strategy. In accordance with paragraph 139 of the NPPF, the DPD goes further and safeguards land to meet future development needs beyond this plan period to ensure the enduring permanence of the Green Belt boundary.

The Core Strategy sets out the spatial strategy for the borough, including the broad spatial distribution of development and the timing for the release of Green Belt land. Policy CS1 directs most new development to previously developed land in the town, district and local centres which offers the best access to a range of services and facilities. Land in the Green Belt will only be released to enable housing provision between 2022 and 2027. Policy CS10 specifies the overall quantum of housing units to be accommodated in the Green Belt during the plan period. This is specified as 550 dwellings. The brownfield first approach adopted by the Core Strategy is necessary to ensure sustainable development across the Borough. The Inspector who conducted the Core Strategy Examination had this to say about the spatial strategy of the Core Strategy: 'with due regard to its means of production, the Core Strategy provides the most appropriate spatial strategy for sustainable development within the context of the Borough with clear objectives for the plan period in accord with the aims of national planning policy'. The Core Strategy recognises that Green Belt land will be needed to meet development needs between 2022 and 2027. The Green Belt and the Town Centre are therefore identified as future direction of growth.

Policies CS1 and CS6 prescribes the means for selecting Green Belt land for future development. These policies require the Council to carry out a Green Belt boundary review to ensure that the land that is released from the Green Belt will not undermine its purposes and integrity. Against this backdrop, any land that is being promoted that is not supported by evidence in the Green Belt boundary review will be resisted. Very special circumstances justification would not exist to allocate or safeguard such land. The Former Jackman's Nursery site falls within GBBR assessment land Parcel 17 which was not recommended for release from the Green Belt.

Regarding the need for three and four bedroom homes, it is noted that in accordance with Policy CS11 "all residential proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs as evidenced in the latest Strategic Housing Market Assessment in order to create sustainable and balanced communities." This is monitored through the Annual Monitoring Report. As set out in Paragraph 1.8 of

<p>the Regulation 19 Issues and Matters Topic Paper, the proposed housing development in the Green Belt will also help to provide the nature and type of family homes that the community needs. Most of the housing that will be delivered in the urban area is likely to be high density flatted accommodation. The SHMA demonstrates a clear need for family homes, which the proposed Green Belt sites will help meet.</p> <p>Policy CS12 of the Core Strategy provides that "between 2010 and 2027 the overall target for affordable housing is 35% of all new homes, equivalent to 1,737 new affordable homes." The purpose of the Site Allocations is to deliver the requirements of the Core Strategy, and as such it has been drafted in accordance with the Core Strategy. This includes appropriate affordable housing percentages within the key requirements for individual policies.</p> <p>Through the Site Allocations DPD, the Council has identified a sufficient quantum of land to deliver the housing requirement set out in the Core Strategy. Indeed, as set out in Paragraph 1.7 of the Regulation 19 Issues and Matters Topic Paper, the Council has also sought to build into this supply a sufficient cushion to cater for non-implementation. It is noted that the sustainability of the site, notwithstanding its Green Belt status, has been given due consideration as part of the Green Belt Boundary Review. The factors considered include strategic accessibility, environmental constraints, and local communities (which encompasses access to local facilities such as schools, health centres, and community centres.) Each assessment was then ranked in order of overall sustainability, and parcel 17 ranked 30th out of the 31 parcels.</p> <p>Section 12 of the Regulation 19 Issues and Matters Topic Paper addresses the credibility of the Green Belt Boundary Review. In particular, Paragraph 12.3 confirms that the review did not only consider large land parcels against the purposes of the Green Belt, but also considered specific sites within land parcels where relevant. As set out in Paragraph 12.2, the Council believes that the Green Belt boundary review report is sufficiently robust to inform the DPD and to make sure that any land that is released from the Green Belt does not undermine its purposes.</p>
Response Reference: U0001426
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 03019/3
Name: Tim Harrold
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Guildford and Woking Councils need to demonstrate a duty to cooperate in the preparation of their separate plans.</p> <p>Green Belt land should be protected and maintained, as stressed by Government. Not only is it of enormous benefit to the community, but it serves the purposes of the Green Belt in accordance with national policy i.e. checking unrestricted sprawl; preventing Woking and Guildford merging into one another; and protecting the openness of the countryside from encroachment. It also serves to regenerate urban land: further loss of Green Belt in Woking is unnecessary as there are sufficient brownfield sites in the Borough to meet its housing needs. Points to correspondence to Cllr Kingsbury which proposes around a dozen brownfield sites that could be reviewed for further housing development, including on industrial sites such as at Poole Road and Day Aggregates. The permanence of the boundaries of Green Belt land is a fundamental principle of national planning policy. New Green Belt boundaries should only be established in exceptional circumstances at the time of a local plan review - this term is clearly much more stringent and robust in policy terms than 'very special circumstances'. It should be a</p>

unique, rare, unusual and one-off event. Woking's proposed Green Belt sites should be reassessed to determine whether 'exceptional circumstances' genuinely apply in their consideration for housing use. The loss of Green Belt land as 'safeguarded' for possible housing use is concerning. Housing shortage is not to be considered as an 'exceptional circumstance' - relevant in Surrey where pressure to build on the Green Belt is a constant threat to the openness of the rural countryside because of its proximity to London. Particularly concerned about loss of Green Belt land and problems of sustainability as a result of the Hoe Valley School development - to which CPRE Guildford objected. National policy also emphasises that high priority should be given to local decision-making. Local parish councils and residents associations seek to ensure the Green Belt remains untouched by encroachment. Priority should be given to brownfield sites and higher density urban, affordable housing, as reiterated in national policy.

Contributor Proposed Modification: Reassess the need to alter Green Belt boundaries. Reassess Green Belt sites to determine whether exceptional circumstances are met in their consideration for housing use. Give priority to additional brownfield sites which are available for housing use, such as industrial sites including Poole Road and Day Aggregates.

Modification Reference: U0000312

Officer Response: The Council acknowledges the critical role that Green Belt land plays as raised in the representation. However, the Council believes that exceptional circumstances justification exists for the release of Green Belt land for the delivery of housing, and to safeguard land to ensure the enduring permanence of the Green Belt boundary. This is set out in detail in Sections 1 and 2 of the Council's Regulation 19 Issues and Matters Topic Paper.

The Core Strategy seeks to concentrate most new development on previously developed land in the town, district and local centres. Section 11 of the Topic Paper sets out how the Council conducted a thorough assessment of alternative, brownfield sites to accommodate projected growth, before considering Green Belt land. This sets out how the need for land to be released from the Green Belt continues to be justified, as well as paragraphs 1.6 to 1.14 of the Topic Paper.

The Council takes the view that the proposed anticipated housing yields and densities for sites in the DPD, including Poole Road and Day Aggregates sites, are reasonable and broadly in line with the Core Strategy. Yields could go up or down depending on the nature of the scheme, and this will be managed at pre-application and application stage. This is described in detail in Section 18 of the Topic Paper. It should also be emphasised that housing delivery will be closely monitored, and should there be more housing delivered in the urban area that the housing requirement, that may result in a delay of the release of safeguarded sites until they are needed. The draft Site Allocations DPD makes this point very clear in all the specific allocations by emphasising that the exact timing for the release of land for development will be informed by a full assessment of the overall housing delivery since 2010 against the Core Strategy housing requirement. Land will only be released for development if there is evidence of significant under provision against the housing requirement, and there is no indication that the shortfall could be met by development on previously developed land within the urban area. In order to be considered sound, the Council has to be clear by evidence that it has identified sufficient land to meet its requirements within the specified timeframes having taken into account risks, and that it has put in place a defensible Green Belt boundary that will stretch beyond the plan period. Paragraphs 1.7 and 1.8 of the Topic Paper also explain how proposed housing development in the Green Belt will also help to provide the nature and type of family homes that the community also needs, which will not be delivered solely through higher density, affordable urban housing.

The Council is confident that the sites that are allocated or safeguarded in the DPD meet the exceptional circumstances test as required by paragraphs 136 and 137 of the NPPF,

<p>and that the policy approach remains valid and sound. This is set out in detail in paragraphs 1.9 to 1.14 of the Topic Paper.</p> <p>Regarding the Hoe Valley School development, the Secretary of State supported the Council's decision that very special circumstances had been met in order to approve this critical piece of infrastructure. It is acknowledged that aspects of the development caused a degree of harm to the Green Belt, and to the semi-rural character and appearance of the site. However, there were found to be no adverse impacts which would significantly and demonstrably outweigh the substantial socio-economic benefits when assessed against local and national planning policies. Any significant adverse impacts identified have been, and continue to be, mitigated by planning conditions which the Council continues to monitor.</p>
<p>Response Reference: U0001349</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06892/1</p>
<p>Name: Mr Matt Hart</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB07, GB08, SA1</p>
<p>Summary of Comment: Objects to the proposed building work at Mayford. The existing Green Belt was put in place to preserve the character of the area, retain the village status of Mayford and prevent urban sprawl from Woking.</p> <p>The new school has covered most of the area of the Green Belt land between Woking and Mayford. Aware of the local requirement for more school places, questions the need for a huge sports facility.</p> <p>The remaining Green Belt should be protected for the reasons listed above.</p> <p>In an age of poor air quality and global warming, removing more trees is a reckless decision.</p> <p>The plan to build a football stadium with four times current capacity [UA44] will displace a private leisure club which the Council propose to put on Green Belt land. This is wrong on so many levels.</p> <p>The Council's explanatory document that states protected trees will be left in place to protect residents from further encroachment needs much more detail. Mayford residents deserve a more explicit plan that proves the existing woodland between Hook Hill Lane and the school will not be removed for buildings.</p> <p>The Council have said they are willing to entirely change the character of the town by 'going upward rather than outwards'. the town is now full of tower blocks and they have now turned to the Green Belt. The needs and desires of local residents are not being considered.</p> <p>Please reconsider the proposals and prevent the village of Mayford being ruined forever.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: This representation has been comprehensively addressed in Council's Regulation 19 Issues and Matters Topic Paper, sections 1, 8 20, 21. The allocation for GB7 states that 'the northern part of the site which is hatched on the location plan is designated as an area of local separation to provide a visual gap between Mayford and the rest of the urban area. This part of the site is not for built development.' A key requirement is also included in the policy, to retain protected trees and tree belts and strengthen planting to enhance the sense of separation between the two developments. The level of housing need, and types of need that need to be catered for, including family</p>

housing (detailed in the latest Strategic Housing Market Assessment) mean that there is a need to develop high density town centre schemes as well as sites in the Green Belt. Development of a private leisure club as a result of the Football Stadium development at site UA44 will be determined as part of the Development Management process, in accordance with the Development Plan, which includes the Site Allocations DPD. The planning merits of the scheme will be determined by the Council's Planning Committee, and there will be extensive public consultation as part of the planning process. This is a separate matter to the preparation of the Site Allocations DPD.
Response Reference: U0001587
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06458/1
Name: Ms Jane Harvey
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Objects to building on the Byfleet Green Belt. Concerns regarding the following: - Traveller pitches; - Inadequate road, health and educational infrastructure; There are alternative brownfield sites that can be allocated in order to distribute housing and traveller pitches throughout the borough.
Contributor Proposed Modification: There are alternative brownfield sites that can be allocated in order to distribute housing and traveller pitches throughout the borough.
Modification Reference: U0000382
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development, and also the aspect regarding brownfield land. Section 4 addresses the impact of loss of Green Belt land on the amenity and wellbeing of residents. Section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet. Section 3 addresses the issue regarding traveller pitches. Section 6 addresses the issue regarding the adequacy of infrastructure. Section 13 specifically addresses road infrastructure.
Response Reference: U0001431
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06511/1
Name: Ms Carly Harwood
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Object to release of Green Belt in Byfleet / West Byfleet. The proposed sites are prone to flooding. The dramatic drop in Government housing figures, and large developments in the town centre, should be taken into account. Need to upgrade the local school, medical and transport infrastructure before building more houses; they don't even function for the existing population.

Surprised that other parts of the Borough are not subject to the same proposal.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The issue of flood risk in relation to the allocations is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7. The impact on the SADPD of recent changes to the calculation of housing need is addressed by the Regulation 19 Issues and Matters Topic Paper, see Paragraph 1.5. The relationship between large developments in the Town Centre and Green Belt release is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 (especially paragraph 1.7), 11, and 18. The impact of the proposal on infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact on traffic congestion in particular is addressed by Section 13. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5.
Response Reference: U0001637
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06576/1
Name: Haskins Garden Centres Ltd
Number of Signatories: 1
Comment Type: COMM
Site Reference:
Summary of Comment: DPD is legally compliant and complies with Duty to Cooperate. DPD is unsound. Wishes to be informed of next stages. Wishes to participate at the oral examination for the following reason; The issues associated with retail provision within the Borough are complex and require verbal representation and discussion. Furthermore, matters associated with the provision of garden centre accommodation are very bespoke and would also benefit from representation in person. Haskins Garden Centres (client) wish to highlight availability and appropriateness of an alternative site to the south of the Borough as suitable for enhanced retail and employment use (Garden Centre), during the Plan period. Site description: Sutton Green Garden Centre covers some 6.66 hectares of land within the Green Belt, situated on the eastern side of the A320 Guildford Road between Jacobs Well and Mayford, to the north of Guildford and south of Woking. The Site, which has operated as a nursery/garden centre and horticultural/agricultural use for the last 40 years or so, has a varied planning history and now benefits from an existing planning permission for a garden centre (Class A1) with associated agricultural (pick your own) land and leisure activities. Justification: The proposal would regenerate an existing garden centre, and would therefore be developing brownfield land in the Green Belt. Garden centres are often situated in Green Belt areas, so the proposal would be in keeping with the surrounding character. There are opportunities for ecological enhancements, additional boundary landscaping, a drainage retention pond, and wildlife habitat landscaping to the north-eastern part of the site.

<p>The proposal would benefit the rural economy and provide employment. There is significant demand for a modern Garden Centre in the area, especially given the allocation of Wyevale, which is reducing its portfolio of garden centres. Allocations have been primarily focused on residential development, therefore the DPD will benefit from addressing an increase in retail space. Traditional forms of retail are directed towards the town, district, local and neighbourhood centre. However, the Core Strategy does not specifically pick up on those non-traditional forms of retail, such as garden centres, that are not suited to town centre locations. This issue should therefore be specifically examined in the emerging DPD. The redevelopment would be acceptable in terms of transport sustainability, site access and traffic impacts.</p>
<p>Contributor Proposed Modification: Proposed modification: Policy SA1A: Policy Framework for land released for development but retained in the Green Belt: Land at Sutton Green Garden Centre, Whitmoor Lane/Guildford Road (Proposal Site GB XX) is allocated for a garden centre, leisure related retail and ancillary uses to meet the future needs of the area. Until the land is redeveloped for the proposed uses, development will only be acceptable in principle where:</p> <ul style="list-style-type: none"> - It would not prejudice the future development of the Site for the proposed uses; - The development is an acceptable development in the Green Belt in accordance with Policy CS6: Green Belt of the Core Strategy. <p>In the context of the above amendment it is further requested that the supporting justification contained within the DPD be amended to reflect this proposed alteration and the function of garden centres and their role in the rural economy recognised.</p>
<p>Modification Reference: U0000372</p>
<p>Officer Response: Policy CS1 of the Core Strategy sets out the overall quantum of employment floorspace to meet the borough's needs up to 2027, recognising that individual companies might have unique and special needs that need to be determined and addressed on a case by case basis. The Core Strategy has also established the overall spatial distribution of development across the borough and has required that the employment needs of the borough could be met within the urban area and other industrial estates without the need to allocate Green Belt land. This approach has been comprehensively discussed at the Core Strategy Examination. Policy CS15: Sustainable economic development of the Core Strategy provides the policy framework for meeting the economic needs of the area. The policy clearly emphasises that the need for further economic development floorspace will not necessitate the allocation of greenfield land for employment use. The existing employment areas are protected to meet projected need and are capable of accommodating future requirements. Policy CS15 reinforces the overall spatial strategy not to allocate Green Belt land for employment uses. There is therefore no ambiguity that the Site Allocations DPD is not intending to allocate employment uses in the Green Belt. To do otherwise would risk the soundness of the DPD for preparing a Site Allocations DPD that is not in general conformity with the Core Strategy. This in principle approach for the allocation of Green Belt land for employment use does not entirely rule out any development on the site. Each proposal would have to be justified by very special circumstances, based on the individual merits of the proposal. At this</p>

stage, the Council believes that very special circumstances justification based on evidence does not exist to allocate this employment use within the Green Belt.
Response Reference: U0001744
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 05083/1
Name: Mr David Hastie
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Objects to the release of Green Belt land for development under site allocation GB10. There are no 'exceptional reasons' to justify this proposal.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses issues regarding the release of Green Belt land for development. Section 3 addresses the issue regarding the release of Green Belt land for traveller accommodation.
Response Reference: U0001607
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06552/1
Name: Ms Mary Hastie
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Objects to the release of Green Belt at West Hall and the proposal to build 555 residential units and travellers' pitches. Does not believe there are any exceptional reasons for release and development of this Green Belt land.
Contributor Proposed Modification:
Modification Reference:
Officer Response: The reasons and justification for residential development and travellers pitches at this site is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1, 3 and 5.
Response Reference: U0001432
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06802/1
Name: Mr A Hastie
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10

<p>Summary of Comment: The DPD does not pass the tests set out in paragraph 35 of the NPPF. It is not an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence, nor consistent with national policy.</p> <p>Site GB10 is designated Greenbelt, and within the West Byfleet Neighbourhood Development Plan (WBNP) area. The WBNP aims to maintain, enhance and protect the distinctive and special character of West Byfleet. The site is therefore protected in planning law. Society benefits from Greenbelt as it is a haven for wildlife and prevents urban sprawl; and the noise, air and light pollution that this brings.</p> <p>Objects to impact on infrastructure: West Byfleet has congested roads, over-subscribed health and welfare services, high demand on schools (increasing pupils per class leading to playgrounds being converted into classrooms). Rail services are at capacity.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The Council recognises that site GB10 falls within the West Byfleet Neighbourhood Plan area. A detailed response to this issue is given in section 16 of the Regulation 19 Issues and Matters Topic Paper. The Neighbourhood Plan does not designate the area as Green Belt, but rather recognises the national designation and seeks to reinforce its importance for the local area. Any scheme that comes forward to develop this site will need to take account of the objectives and policies in the Neighbourhood Plan, particularly those around the retention and/or provision of sufficient green infrastructure and wildlife corridors.</p> <p>Section 19 of the Topic Paper responds to concerns around the impact on wildlife; Section 21 of the Topic Paper addresses concerns about urban sprawl; and Section 8 sets out the Council's response around air pollution concerns.</p> <p>Section 6 sets out a detailed response regarding impacts on infrastructure, including health, education, and public transport services. Section 13 addresses concerns about congestion. In terms of rail capacity, South Western Railway indicate that there are seats available on all trains operating before 10am on the West Byfleet to London Waterloo line. Forthcoming timetable changes also seek to provide extra capacity and faster journeys where required, and will be coming into force this year.</p> <p>In terms of noise and light pollution: The Sustainability Appraisal considered noise and light pollution; and identified noise pollution as an issue affecting sites including GB1, GB4, GB5, GB7, GB10 and GB11. It recommended various mitigation measures, including requirements for Noise Impact Assessments, and these have been incorporated into the policies for GB1, GB7, GB10 and GB11. The Council would anticipate proposals to address noise pollution impacts through retention of natural features, increased provision of landscaping and green infrastructure, and particularly in the case of GB10, providing additional green infrastructure on land to the east to buffer occupants from noise generated by the M25. In addition, policy in the Development Management Policies DPD (such as DM5: Environmental Pollution and DM6: Air and Water Quality) would seek appropriate schemes of mitigation to minimise any adverse impacts on the environment from individual and cumulative development.</p>
<p>Response Reference: U0001065</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06730/1</p>
<p>Name: Barry And Maureen And Joanne Hatcher</p>
<p>Number of Signatories: 3</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11</p>

Summary of Comment: Supports the 13 comments submitted by the Chairman of the Byfleet Neighbourhood Forum and believes WBC are not listening to the views of residents in Byfleet and West Byfleet. The Council is causing distress to the residents. Hopes there are those in departments at WBC who believe in democracy, but based on past results believes this is very unlikely.
Contributor Proposed Modification:
Modification Reference:
Officer Response: Please refer to the response to the Chairman of the Byfleet Residents Neighbourhood Forum (Contributor Ref 06903/1). The Council are listening and will take account of all representations made as part of consultation on the DPD. The justification for the release of sites from the Green Belt is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, particularly sections 1-5.
Response Reference: U0001578
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04141/1
Name: Mr David And Monica Haward
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Very concerned that any further development of the Egley Road will eliminate the green gap between Woking and Mayford. There are many woods and habitats which are important in this gap and would urge the Woking Council to prevent urban sprawl from swallow up Mayford Village.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The representation regarding Mayford Green Belt and urban sprawl have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21. The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development. In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess any site specific ecological issues. The Council is proposing a modification to GB7 to provide a visual gap between Mayford and the rest of the urban area.

Response Reference: U0001160
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06836/1
Name: Mrs Camilla Hawkins
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB18
Summary of Comment: Strongly objects to release of majority of West Byfleet and Byfleet's Green Belt land for housing. Detrimental to current and future generations. Reducing Green Belt land will reduce air quality and extra traffic will cause pollution - detrimental to health (e.g. asthmatic daughter). Enjoying open space, views and walks helps mental wellbeing. Infrastructure cannot cope - doctor surgeries and schools are at bursting point. Roads will grind to a halt - intolerable for locals. This year's Christmas Iceland foods advert demonstrates how deforestation has alarming consequences for the environment and causes climate change. Concreting over these small, confined areas and filling them with polluting cars will have similar damaging impact on environment - future generations will hold us to account for harming their quality of life.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: A comprehensive response to the issues raised in the representation is provided in the Council's Regulation 19 Issues and Matters Topic Paper. The Council accepts that any land taken out of the Green Belt will lead to a reduction of the total amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. However, the Council must weigh up other social and economic needs. The exception circumstances for releasing land from the Green Belt are described in detail in Sections 1 and 2 of the Topic Paper; Sections 4 and 5 respond to concerns about the effects on wellbeing and amenity of residents; and disproportionate effects on West Byfleet and Byfleet respectively. Section 8 responds to concerns about air and noise pollution; Section 6 responds to concerns about infrastructure provision; and Section 13 responds to concerns about congestion, particularly along Parvis Road. Key requirements introduced to the site allocation policies will ensure the effective avoidance or mitigation of any adverse effects that development proposals may cause - including on sensitive landscapes. Surveys, assessments and the design and access statements at planning application stage are expected to ensure that trees and other features of environmental, ecological and amenity significance are fully assessed and conserved where necessary. See Section 19 of the Topic Paper for more details.
Response Reference: U0001644
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06787/1
Name: Ms Yvonne Heard
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB05

Summary of Comment: Having been notified about the Council's lack of adequate research into land ownership, concerned about the threats to the area known locally as the 3 Acre Field. This should be retained as a bequeathed burial area to enable St Mary's Church to continue with burials, in line with the adopted concept of 'Living Churchyards' (welcoming both people and wildlife, flora and fauna). It would be disgraceful for the Council to take away this bequeathed land.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council has responded to this issue in Section 15 of its Regulation 19 Issues and Matters Response Topic Paper.
Response Reference: U0001510
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02982/2
Name: Mr Andrew Heaton
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports decision to remove Regulation 18 sites GB12 and GB13 from DPD. Pleased Council recognises comments made. Original objections still stand: - process for identifying parcels of land for exclusion from Green Belt was flawed and scoring criteria inconsistently applied; - the land contributes significantly to semi-rural setting and character of Pyrford, and development would significant impact on local heritage assets; - amount of land safeguarded for development beyond 2027 is excessive and inclusion of this land is unnecessary; - local roads, healthcare facilities, water infrastructure, local primary school nor public transport could not support a further 500 houses. Some local children are unable to get their children into school as a result of many special needs children attending from outside the catchment area. Traffic and parking along roads is already terrible, especially at school drop off and pick up times.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support is noted. Paragraph 14.2 of the Council's Regulation 19 Issues and Matters Topic Paper details the reasons why the sites were removed from the DPD.
Response Reference: U0001216
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02983/2
Name: Lynn Heaton
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports decision to remove Regulation 18 sites GB12 and GB13 from DPD. Pleased Council recognises comments made.

Original objections still stand: - process for identifying parcels of land for exclusion from Green Belt was flawed and scoring criteria inconsistently applied; - the land contributes significantly to semi-rural setting and character of Pyrford, and development would significant impact on local heritage assets; - amount of land safeguarded for development beyond 2027 is excessive and inclusion of this land is unnecessary; - local roads, healthcare facilities, water infrastructure, local primary school nor public transport could not support a further 500 houses. Some local children are unable to get their children into school as a result of many special needs children attending from outside the catchment area. Traffic and parking along roads is already terrible, especially at school drop off and pick up times.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support is noted. Paragraph 14.2 of the Council's Regulation 19 Issues and Matters Topic Paper details the reasons why the sites were removed from the DPD.
Response Reference: U0001214
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02984/2
Name: Mr Harry Heaton
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports decision to remove Regulation 18 sites GB12 and GB13 from DPD. Pleased Council recognises comments made. Original objections still stand: - process for identifying parcels of land for exclusion from Green Belt was flawed and scoring criteria inconsistently applied; - the land contributes significantly to semi-rural setting and character of Pyrford, and development would significant impact on local heritage assets; - amount of land safeguarded for development beyond 2027 is excessive and inclusion of this land is unnecessary; - local roads, healthcare facilities, water infrastructure, local primary school nor public transport could not support a further 500 houses. Some local children are unable to get their children into school as a result of many special needs children attending from outside the catchment area. Traffic and parking along roads is already terrible, especially at school drop off and pick up times.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support is noted. Paragraph 14.2 of the Council's Regulation 19 Issues and Matters Topic Paper details the reasons why the sites were removed from the DPD.
Response Reference: U0001215
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06541/2
Name: Mr Liam Hebb
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Does not consider that the DPD passes the required test of soundness set out in the NPPF. In particular the DPD is not considered an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence. Nor is it consistent with national policy. Reasons for this assertion are detailed below:</p> <ol style="list-style-type: none"> 1. The A245 is already heavily congested and used as a diverted route for maintenance/issues on the M25 between Junctions 11 and 12. The suggested mitigation measures are minimal and insufficient to deal with the quantum of development. 2. The A245 has the highest pollution levels in Woking. Increases in traffic will increase pollution for local residents, contrary to the NPPF. Destruction of the woodland will also remove a natural form of pollution mitigation and adversely impact biodiversity. There is nothing in the proposal to address noise pollution which is already excessive. 3. Impact assessments have failed to demonstrate how healthcare, education and public transport will accommodate the increase in population. 4. The site is contrary to the West Byfleet Neighbourhood Plan (2007) which seeks to protect and enhance Green Belt sites. 5. 15 traveller pitches are considered out of character with the area, and it is considered that it has not been adequately demonstrated that alternative urban sites are unavailable. 6. The site is subject to frequent flooding and adequate mitigation has not been demonstrated. 7. The site should not be taken out of the Green Belt as it performs the primary function of Green Belt land to prevent urban sprawl. Alongside GB4 and GB5, Byfleet and West Byfleet will effectively be merged into one village. 8. The provision of 555 dwellings is unnecessary given the expected reduction in housing requirements from central government and constitutes overdevelopment. 9. The above objections should be seen in the context of the 252 new dwellings being constructed at the adjacent Broadoaks site and the proposed 220 dwellings at High Road and Murray's Lane. All these developments place additional demands on the local infrastructure. 10. The proposed redevelopment of West Byfleet centre has not featured in the proposals. Although at the time of writing, the developer has withdrawn, the prospect of increased retail and residential provision has not be taken into account with regards to traffic congestion, air and noise pollution and already overstretched local medical and school services.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.</p> <p>Paragraphs 8.1 to 8.5 address the due consideration that has been given to air quality.</p> <p>Section 19 addresses the consideration which has been given to biodiversity. In particular, Paragraph 9.1 confirms that during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed.</p>

Paragraphs 8.6 to 8.10 address the consideration which has been given to noise pollution. Section 6 addresses infrastructure provision. In particular, Paragraphs 6.9 and 6.12 address the consideration that has been given to education and GP provision respectively. Regarding public transport, Paragraph 6.4 notes that the Council is working with Network Rail to deliver significant improvements to the rail network and other transport improvements in the vicinity of the station. Furthermore, the Draft Infrastructure Delivery Plan Paragraph 6.68 sets out the local bus network improvement measures that SCC will seek to implement as and when funding becomes available.

Section 16 outlines the compatibility of the Site Allocations DPD with the West Byfleet Neighbourhood Plan.

Section 3 sets out the sequential approach that the Council has taken to the allocation of Traveller sites. In particular Paragraph 3.6 confirms that there is a demonstrated lack of deliverable sites in the urban area to meet the identified need to provide a robust case on special circumstances grounds to justify the use of Green Belt land to deliver Traveller pitches. Paragraph 3.10 confirms that the proposed allocations include a list of key requirements to be met to make the development of the site acceptable. The requirements will ensure that the siting, layout and design of the site minimises any adverse impacts on the landscape setting of the area.

Section 7 confirms that proper assessment of the flood risk implications of the Site Allocations DPD has been carried out. Furthermore, it is noted that the key requirements for GB10 include inter alia that "the site is within Flood Zone 1 but features a number of existing drainage channels meaning there is a risk of flooding. The site is also adjacent to Flood Zones 2 and 3 whilst a principle aquifer is located within the site. Consideration of sustainable drainage and flood attenuation within the landscape are potential options. Early engagement with the Environment Agency is required. Flood Risk from onsite and adjacent ordinary watercourses will need to be assessed and details submitted as part of a Flood Risk Assessment with any planning application."

Regarding the release of GB10 from the Green Belt, it is noted that in accordance with Paragraph 4.1 the Council has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. In particular, as outlined in Paragraph 21.1, the Green Belt Boundary Review assessed the parcels of Green Belt land against the purposes of the Green Belt, one of which is to check the unrestricted sprawl of large built up areas. None of the proposed allocations will lead to unacceptable urban sprawl.

The Council does not consider that the provision of 555 dwellings at GB10 would constitute overdevelopment. Section 1.3 provides that the Core Strategy makes provision for 4,964 net additional dwellings. This equates to a housing requirement of 292 dwellings per annum, and one of the purposes of the Site Allocations DPD is to identify a quantum of land capable of delivering this requirement. The Core Strategy was adopted in October 2012 and in accordance with Paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. Therefore it provides an up to date strategic context for the preparation of the Site Allocations DPD. All sites identified in the Site Allocations DPD for residential development make a valuable contribution towards meeting the housing requirement. As per paragraph 1.7, it is noted that the Council has allocated a quantum of land within the urban area which may be sufficient to meet the housing requirement. However, it is noted that given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

<p>The Council has taken a comprehensive approach to assessing infrastructure requirements and as per Paragraph 6.2 has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD.</p> <p>Regarding redevelopment in West Byfleet Centre, it is noted that the Site Allocations DPD includes UA42 for the mixed-use redevelopment of Land at Station Approach West Byfleet. This allocation has been included in the infrastructure assessments outlined in Section 6. It is also noted that the key requirements of UA42 include inter alia a "detailed transport assessment to determine site specific transport mitigation measures. The transport assessment should take account of proposed developments in the vicinity of the site," and "a Travel Plan to minimise car use of prospective occupants of the development." Air quality and noise pollution are addressed in Section 8 of the Regulation 19 Issues and Matters Topic Paper.</p>
<p>Response Reference: U0001318</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06602/1</p>
<p>Name: Ms Lucy Hebb</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: DPD does not pass test of soundness required by paragraph 35 of the National Planning Policy Framework (NPPF) 2018. DPD is not an appropriate strategy taking into account reasonable alternatives. DPD is not consistent with national policy. Objects to GB10 allocation. The development of the site would be contrary to policies set out in the West Byfleet Neighbourhood Plan which protect and enhance Green Belt sites. The Green Belt prevents urban sprawl and acts as a buffer between Byfleet and West Byfleet. With the addition of GB4 and GB5, the two areas will merge. Concerns regarding the following: - Inadequate road infrastructure and increased congestion, particularly on Parvis Road, especially when diversions occur on junctions 10-11 on the M25; - Increased air pollution from increased traffic and destruction of woodland, which is contrary to the NPPF Parvis Road has the highest level of pollution in Woking; - Increased noise pollution from traffic; - Inadequate health, educational and rail infrastructure; - Flooding and lack of impact assessment and mitigation measures for this issue; - Overdevelopment. 555 additional dwellings do not take into account expected housing reduction requirements from central government. There is already development taking place at Broadoaks. Redevelopment of West Byfleet centre. Resultant demand on infrastructure needs to be considered; - 15 traveller pitches. Out of keeping with local character. It has not been shown sufficiently that other urban sites are not available. Additional strain on infrastructure.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper.</p>

As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

Section 6 addresses infrastructure provision. In particular, Paragraphs 6.9 and 6.12 address the consideration that has been given to education and GP provision respectively. Regarding public transport, Paragraph 6.4 notes that the Council is working with Network Rail to deliver significant improvements to the rail network and other transport improvements in the vicinity of the station. Furthermore, the Draft Infrastructure Delivery Plan Paragraph 6.68 sets out the local bus network improvement measures that SCC will seek to implement as and when funding becomes available.

Section 16 outlines the compatibility of the Site Allocations DPD with the West Byfleet Neighbourhood Plan.

Section 3 sets out the sequential approach that the Council has taken to the allocation of Traveller sites. In particular Paragraph 3.6 confirms that there is a demonstrated lack of deliverable sites in the urban area to meet the identified need to provide a robust case on special circumstances grounds to justify the use of Green Belt land to deliver Traveller pitches. Paragraph 3.10 confirms that the proposed allocations include a list of key requirements to be met to make the development of the site acceptable. The requirements will ensure that the siting, layout and design of the site minimises any adverse impacts on the landscape setting of the area.

Section 7 confirms that proper assessment of the flood risk implications of the Site Allocations DPD has been carried out. Furthermore, it is noted that the key requirements for GB10 include inter alia that "the site is within Flood Zone 1 but features a number of existing drainage channels meaning there is a risk of flooding. The site is also adjacent to Flood Zones 2 and 3 whilst a principle aquifer is located within the site. Consideration of sustainable drainage and flood attenuation within the landscape are potential options. Early engagement with the Environment Agency is required. Flood Risk from onsite and adjacent ordinary watercourses will need to be assessed and details submitted as part of a Flood Risk Assessment with any planning application."

Section 8 of the Topic Paper addresses concerns about noise and air pollution. Regarding the release of GB10 from the Green Belt, it is noted that in accordance with Paragraph 4.1 the Council has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. The Council does not consider that the provision of 555 dwellings at GB10 would constitute overdevelopment. Section 1.3 provides that the Core Strategy makes provision for 4,964 net additional dwellings. This equates to a housing requirement of 292 dwellings per annum, and one of the purposes of the Site Allocations DPD is to identify a quantum of land capable of delivering this requirement. The Core Strategy was adopted in October 2012 and in accordance with Paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. Therefore it provides an up to date strategic context for the preparation of the Site Allocations DPD. All sites identified in the Site Allocations DPD for residential development make a valuable contribution towards meeting the housing requirement. As per paragraph 1.7, it is noted that the Council has allocated a quantum of land within the urban area which may be sufficient to meet the housing requirement. However, it is noted that given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation, It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

The Council has taken a comprehensive approach to assessing infrastructure requirements and as per Paragraph 6.2 has undertaken a number of studies including the

Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD.
Response Reference: U0001356
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06727/1
Name: Ms Rosie Hebb
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
<p>Summary of Comment: The DPD is unsound. In particular it is not an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence. It is also not consistent with national policy. Objections are to West Hall but should be seen in the context of the proposed developments at Broadoaks, Byfleet High Road and Murray's Lane, with their infrastructure impact.</p> <p>Parvis Road is already heavily congested, the proposed measures to mitigate the impact of extra traffic are minimal and insufficient.</p> <p>Studies have shown the A245 has the highest air pollution levels in Woking. Increase in traffic levels will worsen this, contrary to the NPPF.</p> <p>Destruction of woodland will remove a natural means of fighting pollution, as well as natural habitat, harming biodiversity.</p> <p>Impact assessments have failed to demonstrate how healthcare, education, and public transport will be able to accommodate the increase in local residents.</p> <p>Development of the site will be contrary to aims of West Byfleet Neighbourhood Plan, and national policy - the land performs the green belt function of preventing urban sprawl. The scale of development is unnecessary given the Government's reduced housing figures. It has not been adequately demonstrated that alternative urban sites are unavailable for traveller pitches, which will be out of keeping with the area.</p> <p>The site is vulnerable to flooding, and it has not been demonstrated how this will be adequately mitigated.</p>
Contributor Proposed Modification: Land at GB10 should be retained in the Green Belt. Alternative urban areas should be prioritised for development, including traveller pitches.
Modification Reference: U0000314
<p>Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.</p> <p>Section 6 addresses infrastructure provision. In particular, Paragraphs 6.9 and 6.12 address the consideration that has been given to education and GP provision respectively. Regarding public transport, Paragraph 6.4 notes that the Council is working with Network Rail to deliver significant improvements to the rail network and other transport improvements in the vicinity of the station. Furthermore, the Draft Infrastructure Delivery Plan Paragraph 6.68 sets out the local bus network improvement measures that SCC will seek to implement as and when funding becomes available.</p> <p>Section 16 outlines the compatibility of the Site Allocations DPD with the West Byfleet Neighbourhood Plan.</p>

Section 3 sets out the sequential approach that the Council has taken to the allocation of Traveller sites. In particular Paragraph 3.6 confirms that there is a demonstrated lack of deliverable sites in the urban area to meet the identified need to provide a robust case on special circumstances grounds to justify the use of Green Belt land to deliver Traveller pitches. Paragraph 3.10 confirms that the proposed allocations include a list of key requirements to be met to make the development of the site acceptable. The requirements will ensure that the siting, layout and design of the site minimises any adverse impacts on the landscape setting of the area.

Section 7 confirms that proper assessment of the flood risk implications of the Site Allocations DPD has been carried out. Furthermore, it is noted that the key requirements for GB10 include inter alia that "the site is within Flood Zone 1 but features a number of existing drainage channels meaning there is a risk of flooding. The site is also adjacent to Flood Zones 2 and 3 whilst a principle aquifer is located within the site. Consideration of sustainable drainage and flood attenuation within the landscape are potential options. Early engagement with the Environment Agency is required. Flood Risk from onsite and adjacent ordinary watercourses will need to be assessed and details submitted as part of a Flood Risk Assessment with any planning application."

Regarding the release of GB10 from the Green Belt, it is noted that in accordance with Paragraph 4.1 the Council has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity.

The Council does not consider that the provision of 555 dwellings at GB10 would constitute overdevelopment. Section 1.3 provides that the Core Strategy makes provision for 4,964 net additional dwellings. This equates to a housing requirement of 292 dwellings per annum, and one of the purposes of the Site Allocations DPD is to identify a quantum of land capable of delivering this requirement. The Core Strategy was adopted in October 2012 and in accordance with Paragraph 33 of the NPPF was reviewed in October 2018.

The review followed guidance provided in the Planning Practice Guidance. Therefore it provides an up to date strategic context for the preparation of the Site Allocations DPD. All sites identified in the Site Allocations DPD for residential development make a valuable contribution towards meeting the housing requirement. As per paragraph 1.7, it is noted that the Council has allocated a quantum of land within the urban area which may be sufficient to meet the housing requirement. However, it is noted that given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

The Council has taken a comprehensive approach to assessing infrastructure requirements and as per Paragraph 6.2 has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD.

Response Reference: U0001355

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06829/1

Name: Mr Ian Hebb
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: The DPD is unsound. In particular it is not an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence. It is also not consistent with national policy. Objections are to West Hall but should be seen in the context of the proposed developments at Broadoaks, Byfleet High Road and Murray's Lane, with their infrastructure impact.</p> <p>Parvis Road is already heavily congested, the proposed measures to mitigate the impact of extra traffic are minimal and insufficient.</p> <p>Studies have shown the A245 has the highest air pollution levels in Woking. Increase in traffic levels will worsen this, contrary to the NPPF.</p> <p>Destruction of woodland will remove a natural means of fighting pollution, as well as natural habitat, harming biodiversity.</p> <p>Impact assessments have failed to demonstrate how healthcare, education, and public transport will be able to accommodate the increase in local residents.</p> <p>Development of West Hall is not consistent with the objectives of the West Byfleet Neighbourhood Plan which seeks to protect and enhance greenbelt sites.</p> <p>The proposed 15 travellers' pitches are totally out of keeping with the character of the area and it has not been adequately demonstrated that alternative urban sites are unavailable.</p> <p>The site is subject to frequent flooding and it has not been demonstrated how this will be adequately mitigated.</p> <p>The site should not be taken out of greenbelt as it performs the primary function of greenbelt land to prevent urban sprawl. Along with the development of GB4 and GB5, Byfleet and West Byfleet will effectively be merged into one village.</p> <p>The provision of 555 dwellings is unnecessary given the expected reduction in housing requirements from central government and constitutes overdevelopment.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 8 addresses concerns regarding air and noise pollution.</p> <p>Section 6 addresses infrastructure provision. In particular, Paragraphs 6.9 and 6.12 address the consideration that has been given to education and GP provision respectively. Regarding public transport, Paragraph 6.4 notes that the Council is working with Network Rail to deliver significant improvements to the rail network and other transport improvements in the vicinity of the station. Furthermore, the Draft Infrastructure Delivery Plan Paragraph 6.68 sets out the local bus network improvement measures that SCC will seek to implement as and when funding becomes available.</p> <p>Section 16 outlines the compatibility of the Site Allocations DPD with the West Byfleet Neighbourhood Plan.</p> <p>Section 3 sets out the sequential approach that the Council has taken to the allocation of Traveller sites. In particular Paragraph 3.6 confirms that there is a demonstrated lack of deliverable sites in the urban area to meet the identified need to provide a robust case on special circumstances grounds to justify the use of Green Belt land to deliver Traveller pitches. Paragraph 3.10 confirms that the proposed allocations include a list of key requirements to be met to make the development of the site acceptable. The requirements</p>

will ensure that the siting, layout and design of the site minimises any adverse impacts on the landscape setting of the area.

Section 7 confirms that proper assessment of the flood risk implications of the Site Allocations DPD has been carried out. Furthermore, it is noted that the key requirements for GB10 include inter alia that "the site is within Flood Zone 1 but features a number of existing drainage channels meaning there is a risk of flooding. The site is also adjacent to Flood Zones 2 and 3 whilst a principle aquifer is located within the site. Consideration of sustainable drainage and flood attenuation within the landscape are potential options. Early engagement with the Environment Agency is required. Flood Risk from onsite and adjacent ordinary watercourses will need to be assessed and details submitted as part of a Flood Risk Assessment with any planning application."

Regarding the release of GB10 from the Green Belt, it is noted that in accordance with Paragraph 4.1 the Council has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity.

The Council does not consider that the provision of 555 dwellings at GB10 would constitute overdevelopment. Section 1.3 provides that the Core Strategy makes provision for 4,964 net additional dwellings. This equates to a housing requirement of 292 dwellings per annum, and one of the purposes of the Site Allocations DPD is to identify a quantum of land capable of delivering this requirement. The Core Strategy was adopted in October 2012 and in accordance with Paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. Therefore it provides an up to date strategic context for the preparation of the Site Allocations DPD. All sites identified in the Site Allocations DPD for residential development make a valuable contribution towards meeting the housing requirement. As per paragraph 1.7, it is noted that the Council has allocated a quantum of land within the urban area which may be sufficient to meet the housing requirement. However, it is noted that given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

The Council has taken a comprehensive approach to assessing infrastructure requirements and as per Paragraph 6.2 has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD.

Response Reference: U0001357

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06818/1

Name: Mr Neil Henderson

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB05, GB12, GB17

Summary of Comment: DPD is not justified and not sound: the removal of Green Belt (in particular sites GB5, GB12 and GB17) is unjustified.

These sites are used by people for the enjoyment of the countryside. In particular development of GB12 would spoil the enjoyment of the Wey Navigation path (National Trust property).
Development of GB12 South of Parvis Road would be subject to high flood risk.
Development of all three sites would be detrimental to traffic and local services in the area.

Contributor Proposed Modification: Remove from the DPD proposals to remove from GreenBelt GB12 (South of Parvis Road), GB5 (south of Rectory Lane) and GB17 (Woking Palace).

Modification Reference: U0000187

Officer Response: Assume that references to GB12: Land South of Parvis Road actually relate to site GB10: Land surrounding West Hall (referred to as Land to the south of Parvis Road in the Sustainability Appraisal).

The necessity of removing sites from the Green Belt for housing development and for safeguarding for future housing development is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2. Site GB17 is not proposed for removal from the Green Belt.

Site GB17 is proposed for development into a Country Park, with criteria to guide its development. This development would substantially increase public enjoyment of the countryside, and potentially increase enjoyment of the Wey Navigation. As a site safeguarded for housing development in the Green Belt, sites GB5 and GB10 have been identified by the Sustainability Appraisal as having a potential negative impact on natural, historic and cultural assets and landscapes. The SA found that the use of green infrastructure, layout and landscaping could mitigate the general landscape impacts of developing these sites, with a neutral impact (at least on site GB5) in the long term once green infrastructure assets have matured. Policy GB10 includes various requirements to secure this mitigation, and specific requirements on such issues could be included in a policy for site GB5 if and when the site is allocated for development.

Sites GB10 and GB5 are not subject to high flood risk; this is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.

The impact of the proposals on local infrastructure and traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see sections 6 and 13.

Response Reference: U0000911

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 05304/1

Name: Ms Amanda Hensby

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11

Summary of Comment: Objects to building on Green Belt land in Byfleet and West Byfleet. Alternative land including brownfield is available.

Concerns regarding inadequate road infrastructure.

Roads into the village are narrow and cars are parked along roads in Byfleet Village.

New estates are also overcrowded with cars.

Parvis Road is already congested, especially when incidents occur on the M25 or A3.

Roads need to be improved before any development takes place.

Concerns regarding inadequate educational infrastructure. Byfleet does not have a secondary school, meaning children have to rely on bus and car use or walk along dangerous roads. If existing schools in the area expand, play areas will be impacted.
Concerns regarding flooding.
Village has suffered from flooding in recent years.
River Wey is poorly maintained - needs dredging.
Drains beneath roads require upgrading.
Development in West Byfleet must be considered carefully. Frequent road accidents occur, and Parvis Road cannot accommodate entrances to new developments.

Contributor Proposed Modification: Alternative land including brownfield is available. Roads need to be improved before any development takes place.

Modification Reference: U0000398

Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development, and also covers the brownfield aspect. Section 5 specifically addresses Green Belt land in Byfleet and West Byfleet.

Section 6 addresses the issue regarding adequacy of infrastructure. Section 13 specifically addresses road infrastructure. As stated in paragraph 13.3, the Council has also worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

Transport and parking issues for proposed development will be considered in detail, should a scheme come forward. The Council sets specific requirements within its Parking Supplementary Planning Guidance and has a policy framework for car parking in Core Strategy policy CS18 on Transport. The policy aims to ensure development proposals provide appropriate infrastructure measures to mitigate any adverse effects of development traffic and other environmental and safety impacts. Transport Assessments will be required for development proposals to fully assess the impacts and identify appropriate mitigation measures.

Section 7 addresses the issue regarding flooding.

At the development management stage, planning applications will be subject to thorough analysis to ensure that schemes contribute positively to the setting in which they are situated.

Response Reference: U0001377

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06820/1

Name: Mr Clive Hensby

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB12

Summary of Comment: Objects to release of Green Belt in Byfleet for housing development.

There will be negative impacts on the wildlife e.g. woodpeckers, squirrels, foxes, badgers, deer, pheasants, barn owls, herons, buzzards, kites. Future generations will be deprived of experiencing this wildlife if green spaces are built on.

The area suffers frequent and severe flooding; which will be exacerbated by development.

The waterways haven't been kept clear.

Questions the ability of the heavily congested Parvis Road to cope with additional traffic.

Public transport is inadequate. There is already gridlock on the small roads of Byfleet during rush hour.

The two existing primary schools are already at capacity; journeys to secondary schools will generate more traffic; lack of doctor surgeries in Byfleet will put even more pressure on health centre in West Byfleet. The infrastructure cannot cope.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The concerns raised in the representation are addressed in the Regulation 19 Issues and Matters Topic Paper. Section 4 of the Topic Paper responds to concerns about releasing Green Belt land to the detriment of wellbeing and amenity of residents; Section 19 responds to concerns about the impact on wildlife; Section 7 gives details about flooding concerns; Section 10 describes the evidence base - including transport assessments; and Section 13 responds to concerns about traffic and congestion. Section 6 provides details about infrastructure assessments, including schools and healthcare facilities. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD.
Response Reference: U0001477
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 01926/2
Name: Mr Steve Henshall
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Pleased that Regulation 18 sites GB12 and GB13 are to remain in the Green Belt for the long term benefit of the community.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support for the removal of Regulation 18 sites GB12 and GB13 is noted.
Response Reference: U0001009
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02802/2
Name: Ms Samantha Herbert
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Objects to GB10. Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy.

Access to the Site is not far from the railway station and Parvis Road would require significant upgrading works and crossing facilities to be provided and even then would not be a sustainable location as the use of private vehicles would be heavily relied upon. Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces.

Parvis Road is highly congested at peak times and its ability to cope with an additional increase in vehicular movements to serve 15 traveller pitches and loads more cars, lorry's plus 550 private dwellings is questioned. No consideration has been given to noise pollution

The Infrastructure Report does not address provision of healthcare and or education for the increased population.

Extremely close to the A245 and M25, so at risk of air and noise pollution, very difficult to mitigate against- contrary to NPPF para 170(e). No proper consideration of noise pollution.

These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities for Travellers and Gypsy.

The Site is an area subject to frequent and severe flooding. Adequate assessments regarding flooding from both river and surface water have not been carried out.

Inadequate reasons provided for excluding Martyrs Lane greenbelt from the allocation.

This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment.

WBC has not focussed on previously developed land in sustainable locations, which it is required to do. Inadequate consideration has been given to alternative sites.

Inaccurate Statements regarding the greenbelt function of the Site are provided. The Site does in fact perform the greenbelt function of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment.

The outline planning permission granted to Sheer House and the development at Broadoaks only serves to exacerbate a number of the points detailed above, in particular the inadequacy of appropriate infrastructure, including health, schools, water, sewage and roads.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: In terms of upgrading the crossing and services, the Council is aware the sites proposed will need site specific requirements. The exact nature of these sites specific requirements will be identified through the development management process and informed by a transport assessment. For example key requirements of GB10 and GB11 to be addressed include bus stop provision and direct access to this and also infrastructure improvements to connect pedestrian and cycle networks.

The concern regarding vulnerability of the sites to flooding is addressed in section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure

planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development along this corridor.

The Core Strategy clearly specifies that Green Belt will need to be released to deliver the development aspirations and requirements of the Council. West Hall has been identified in the context of this broad strategic framework, taking account of a breadth of evidence that is robust and comprehensive. This evidence justifies the allocation of this site, and others put forward in the DPD. As stated in the NPPF, Neighbourhood Plans should support and be in conformity with the delivery of strategic policies contained in local plans or other spatial development strategies.

Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.

The reasons for not safeguarding the Martyrs Lane is addressed in the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11.

In regards to the housing quantities, the Council takes the view that the proposed anticipated densities are reasonable and are broadly in line with the Core Strategy. It is always emphasised that the proposed densities are indicative, based on ranges provided in policy CS10 of the Core Strategy (which are in turn based on the character of the area and on exemplar sites) and actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. Densities could go up or down depending on the nature of the scheme, and this will be managed at pre-application / planning application stage. Paragraph 1.7 above reiterates the need to allocate a range of sites to meet the variety of housing need across the Borough. Green Belt sites will contribute towards the provision of family homes, for example.

The representation regarding unnecessary, excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper. The comment about consideration of alternative sites is addressed in Section 11 of the topic paper.

It is argued that the Green Belt sites perform several Green Belt functions. It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review (GBBR) comprehensively assessed the performance of land in respect of relevant Green Belt purposes and recommended sites to be removed. It is acknowledged that land at GB10 makes some contribution to the purposes of the Green Belt, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. The Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12.

The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.

Response Reference: U0001150

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06604/1

Name: Mr Stephen Hickford
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: No comment on legal compliance or duty to cooperate. The DPD is not positively prepared nor is it justified or effective. No comment is made with regard to consistency with national policy. The DPD is unsound.</p> <p>New houses are needed in Woking Borough and to a limited extent in West Byfleet. However the scale of GB10 would be overwhelming on the village of West Byfleet, especially when combined with the recently approved Broadoaks development of 254 dwellings and a care home. West Hall will add a further 555 dwellings and the redevelopment of Sheer House in the centre will further increase the number of dwellings. It is reasonable to assume that 555 dwellings on West Hall could result in an additional 1000 cars using Parvis Road. At peak times, traffic on Parvis Road is congested, backing up towards Woking or Cobham depending on the time of day. The additional traffic generated by the West Hall development would compound this problem and require significant mitigation. Also the air quality around Parvis Road will deteriorate. Local schools and health centres are already at capacity and new development would require additional investment in facilities. There appears to be no coordination across Government departments to ensure that social infrastructure is appropriate for currently approved developments, let alone the additional requirements generated by West Hall. In conclusion, GB10 does not meet the tests of soundness. It has not been positively prepared as it does not meet West Byfleet's assessed needs; it is not justified when compared to other alternatives in the Woking area; and it is not effective as there is no evidence of cross boundary strategic joint working concerning social infrastructure. Does not wish to participate in the public examination Wishes to be informed when the Site Allocations DPD progresses to the next stages.</p>
Contributor Proposed Modification: None stated
Modification Reference: U0000164
<p>Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>Paragraph 5.1 recognises that development is not spread evenly across the borough, but that development has been directed to the most sustainable locations in accordance with the spatial strategy of the Core Strategy. The Council also has to ensure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.</p> <p>Transport infrastructure is addressed by Paragraph 6.7, and Section 13. In particular, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Paragraphs 8.1 to 8.5 address air quality.</p> <p>Infrastructure is also addressed by Section 6. In particular Paragraph 6.9 addresses education provision and Paragraph 6.12 addresses GP provision. As noted in Paragraph 6.1, it is also advised that the Council has collaborated with a number of stakeholders in preparing the Site Allocations DPD. In particular, as noted in Paragraph 6.2, the Site Allocations DPD is supported by the Draft Infrastructure Delivery Plan, which was informed by extensive stakeholder engagement.</p> <p>The Council considers that the Site Allocations DPD is positively prepared. Paragraph 1.4 provides that the document should be judged on whether it has identified a sufficient deliverable range of sites in sustainable locations in the context of the spatial strategy of the Core Strategy to meet the development needs of the Borough. GB10 makes a</p>

significant contribution to this objective. Moreover, as set out in Paragraph 1.12, the Council considers that all allocated and/or safeguarded sites, including GB10, are the most sustainable when compared against reasonable alternatives.
Response Reference: U0000975
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06712/1
Name: Highways England
Number of Signatories: 1
Comment Type: SUPP
Site Reference:
Summary of Comment: Highways England considers any proposals that have the potential to impact the safe and efficient operation of the strategic road network (SRN), in this case the A3, M3 and M25. Would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth within the District - together with cumulative impact from development already proposed - without careful consideration of mitigation measures, and without the appropriate infrastructure in place. Supports sustainable measures which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should be a last resort. Welcomes support in policy CS16 to ensure delivery of infrastructure to support planned growth. Notes that the Council is investing significant capital on transport improvements in Town Centre to promote sustainable transport measures e.g. transport interchange hub at railway station. Is in support of such solutions, which contribute towards minimising car use of prospective occupants of new developments. Understands that transport studies have already been carried out to identify measures of mitigation along the A320 and A245 corridors (replacement of Victoria Arch and improvement to the road network). Highways England participated in the project working group in December 2017 when feasibility study was in its early stages and we were pleased that mitigation for the M25 J11 was being considered at that stage. Aims to work with the partners to progress this further as project develops. Generally supportive of approach in consultation documents, noting that Transport Statements and Travel Plans are being stipulated for the individual sites in order to assess likely transport impacts and minimise car use of prospective occupants. Looks forward to working with the Council to identify and produce a robust transport strategy which would inform the size and scale of development deliverable within the Borough: this will form a key piece of evidence to demonstrate the Local Plan is sound. It is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the growth is planned.
Contributor Proposed Modification: Identify and produce a robust transport strategy which would inform the size and scale of development deliverable within the Borough. It is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the growth is planned.
Modification Reference: U0000429
Officer Response: Representation comments and support are noted.
Response Reference: U0001279
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06492/1

Name: Mrs Jillian Hills
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
<p>Summary of Comment: Object to loss of Green Belt in West Byfleet and Byfleet, when there are plenty of brownfield and windfall sites that could be used. Housing should be shared across all wards of the Borough rather than nearly all going in Byfleet and West Byfleet.</p> <p>The impact on our local infrastructure - Roads, Doctors, Schools and Sewage will be devastating. Parvis Road is already at maximum capacity and the added congestion will bring chaos.</p> <p>Much of the land earmarked for development is known to be prone to flooding. It is morally wrong to approve housing to be built on this land with full knowledge that it could flood.</p> <p>It is also morally wrong to build housing at such close proximity to the M25 in full knowledge of the high levels of pollution.</p> <p>Very sad to lose the last local pockets of green space, which are wildlife habitats- the local ecosystem will be devastated.</p> <p>Large traveller sites don't work and should not be considered.</p>
Contributor Proposed Modification: I strongly recommend that you reconsider these proposals and take into account my views.
Modification Reference: U0000173
<p>Officer Response: The consideration of brownfield and other alternative sites in the urban area is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 11.</p> <p>The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. If all types of housing site in the DPD are considered, the amount of housing proposed for the Town Centre is much greater.</p> <p>The impact of the proposals on infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of the proposals specifically on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The impact of the proposals on the wellbeing and amenity of local people is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4.</p> <p>The impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19.</p> <p>Issues relating to the allocation of traveller sites are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p>
Response Reference: U0001573
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06493/2
Name: Mr Keith Hills
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11

<p>Summary of Comment: Objects to all the proposals to remove land from the Green Belt in Byfleet and West Byfleet. Wrong to use Green Belt when there are plenty of brownfield and windfall sites.</p> <p>It is unjust that Byfleet and West Byfleet are taking nearly the full allocation of housing, and furious that the burden is not shared across the 10 wards of the Borough. One small area is taking the effect of hundreds of new dwellings.</p> <p>The impact on local infrastructure - roads, doctors, schools and sewage - will be devastating. Parvis Road is already at maximum capacity and added congestion will bring chaos.</p> <p>There are flooding issues on the earmarked land, and it is morally wrong to approve housing on land that could flood. It is also wrong to build housing in such close proximity to the M25 with knowledge of high pollution levels.</p> <p>It is a tragedy that these final pockets of green space in our area will be lost forever. The loss of habitats for diminishing wildlife will have a devastating effect on the area's ecosystem.</p> <p>Large traveller sites do not work and it is unacceptable that it is being considered.</p>
<p>Contributor Proposed Modification:</p>
<p>Modification Reference:</p>
<p>Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1-7, 10-11 and 19. On the point on the loss of green space and habitats for wildlife, background to Policy GB10, contained in the Green Belt Boundary Review, is the presumption that large parts of the site should not be built on and left green to help maintain a good transition between the urban area and Green Belt. It is proposed that the site should contain substantial areas of public open space and green infrastructure, including large areas of woodland and parkland setting which should be preserved and strengthened where possible. This will serve residents of the development, and also help conserve the distinctive function of green infrastructure and links to the Wey Navigation corridor, which contribute to the character of the area and also play a key role as a wildlife corridor. These points are included as key requirements in the policy for GB10 and will help to ensure that local wildlife and the ecosystem are minimally impacted by the development.</p> <p>Regarding the point on large traveller sites not working, the Government's Good Practice Guidance on Designing Gypsy and Traveller Sites states in para 4.7 states that 'experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage' and on the back of this suggests that sites should consist of up to 15 pitches unless there is clear evidence to suggest that larger sites are preferred by the Gypsy or Traveller community. However the guidance also notes that smaller sites, of 3-4 pitches, can also be successful, particularly where designed for one extended family. This guidance, together with conversations with Gypsy and Traveller groups in the Borough and the need identified in the Borough, sits behind the size of sites put forward in the DPD.</p>
<p>Response Reference: U0001717</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 04714/1</p>
<p>Name: Mr Michael Hipkins</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: COMM</p>
<p>Site Reference: UA04, UA05, UA06, UA08, UA09, UA10, UA11, UA12, UA13, UA14, UA15, UA16, UA17, UA18, UA19, UA26, UA29, UA30, UA31, UA32, UA33, UA34, UA35, UA36, UA37, UA38, UA42, UA44</p>

<p>Summary of Comment: DPD is legally compliant and complies with Duty to Cooperate. DPD is not sound. Proposes that development of the sites identified (mainly in and around the Town Centre) should not surpass a height of 16 storeys in order to be sympathetic to the nature of the town in terms of the centre, views from surrounding areas and interaction of citizens in work, leisure and living. This will improve the soundness of the DPD. Supports the omission of Martyr's Lane site. Does not wish to participate in oral examination. Wishes to be informed of next stages.</p>
<p>Contributor Proposed Modification: Proposes that development of the sites identified (in and around the Town Centre) should not surpass a height of 16 storeys in order to be sympathetic to the nature of the town in terms of the centre, views from surrounding areas and interaction of citizens in work, leisure and living. This will improve the soundness of the DPD. A sentence should be added to the policies stating: 'No building in or close to the town centre should exceed 16 storeys in height'. That would allow the DPD better to reflect the nature of the town centre, the view of the town centre from outside, and the interactions of citizens with the town centre in terms of work, leisure and living. This should be the policy objective of the local authority so that it preserves the nature of the town centre which otherwise will look out of keeping with the nature of the town.</p>
<p>Modification Reference: U0000421</p>
<p>Officer Response: It will be unreasonable to prescribe the height of buildings on sites that are allocated in the DPD. It is important that each application is determined on its merits, taking into account the site-specific merits of the proposal and its context. The Council has robust policies and an SPD to ensure that development does not detract from the character of the area and the policy objectives for the site. The Council has also set up a Design Review Panel to scrutinise development proposals to ensure that they are of high quality design. Policy CS21 of the Woking Core Strategy (2012) states that tall buildings could be supported in the Town Centre, if they are well designed and can be justified in context. The Woking Design SPD (2015) provides guidance for such developments and sets out the strategy for tall buildings in the borough, and does not state any restrictions on building heights. The appropriateness of building heights will be assessed at development management stage against Policy CS21 and the criteria set out in the Design SPD.</p>
<p>Response Reference: U0000977</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 05210/1</p>
<p>Name: Ms Lynda Hirst</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB07</p>
<p>Summary of Comment: Objects to the removal of GB7 from the Green Belt. Concerns regarding; -Urban sprawl encroaching on Mayford Village -Inadequate road infrastructure (A320, Saunders Lane and Smarts Heath Road), resulting in increased traffic congestion, reduced safety and pollution (light and air) -Destruction of wildlife habitats</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>

<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 8 addresses the issue regarding pollution. Section 13 addresses the issue regarding adequacy of road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A320 Corridor Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 19 addresses the issue regarding detriment to wildlife and habitats. Section 21 addresses the issue regarding urban sprawl.</p>
<p>Response Reference: U0001328</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06006/1</p>
<p>Name: Historic England</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: SUPP</p>
<p>Site Reference: GB03, GB17</p>
<p>Summary of Comment: Historic England supports Policy GB3: Brookwood Cemetery. However, the policy should be amended to acknowledge the Conservation Framework that was part funded and supported by Historic England with the Council which establishes an agreed action plan and a set of objectives for the site. The following wording is proposed 'to achieve this, the management of the site should be in accordance with the agreed Conservation Frameworks and must address the following key requirements...'. Reference to English Heritage should change to Historic England. Support Policy GB17: Woking Palace. Please note, that any works impacting directly on the scheduled area will require Scheduled Monument Consent; a note to this effect could be included in the policy or the reasoned justification.</p>
<p>Contributor Proposed Modification: Historic England supports Policy GB3: Brookwood Cemetery. However, the policy should be amended to acknowledge the Conservation Framework that was part funded and supported by Historic England with the Council which establishes an agreed action plan and a set of objectives for the site. The following wording is proposed 'to achieve this, the management of the site should be in accordance with the agreed Conservation Frameworks and must address the following key requirements...'. Reference to English Heritage should change to Historic England. Support Policy GB17: Woking Palace. Please note, that any works impacting directly on the scheduled area will require Scheduled Monument Consent; a note to this effect could be included in the policy or the reasoned justification.</p>
<p>Modification Reference: U0000425</p>
<p>Officer Response: The key requirements are requirements that are necessary to be met for development to be acceptable. The suggested wording is reasonable but should be best added as one of the key requirements rather than as a preamble to all of them. It is therefore proposed that an additional key requirement be added to Proposal GB3 to read as follows: development should take full account of the agreed Conservation Frameworks prepared for the site by Historic England in partnership with Woking Borough Council. Reference to English Heritage (bullet point 8 of GB3) is an editorial error and should be changed to Historic England. Support for GB17 Woking Palace is noted.</p>
<p>Response Reference: U0001232</p>

<p>Officer Proposed Modification: Add a key requirement to policy GB3 to read as follows: development should take full account of the agreed Conservation Frameworks prepared for the site by Historic England in partnership with Woking Borough Council. Reference to English Heritage (bullet point 8 of GB3) should be changed to Historic England.</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06931/1</p>
<p>Name: Hoe Valley Residents Forum</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: UA44</p>
<p>Summary of Comment: Writes on behalf of Hoe Valley Residents Forum, representing residents of the ward. Objects to UA44 allocation. Concerns include the following:</p> <ul style="list-style-type: none"> - Site was not in previous Site Allocations DPD, not enough detail on the plans for this site. - Density, 1,000 dwellings is too excessive for the site. - The site is not within easy reach of supermarkets to get supplies of food, or hospitals in case of need. - Inadequate parking provision and associated safety issues. The area already experiences issues with parking, particularly with spectators on match days. - Development being out of character for the area, mainly regarding height. - As this proposed site has never been included in any previous site allocation paper there has been no ecological survey for trees and wildlife carried out. - Increased strain on road, health and educational infrastructure.
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The Council accept that Policy UA44 was not in the Regulation 18 version of the plan. It was included in the Regulation 19 version based on up to date information at the time. The Regulation 19 Consultation provides an opportunity for residents of the Borough to comment on proposals and their comments will be taken into account before the DPD is submitted for examination. The Council is satisfied that it has done what it can within the available resources but has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. This is set out in detail in Section 9 of the Regulation 19 Issues and Matters Topic Paper. The main aim of preparing the Site Allocations DPD is to identify land and allocate specific sites to enable the delivery of the Core Strategy, and to meet future development needs beyond the Core Strategy period. The vision of the Core Strategy includes providing well-designed homes to meet the needs of all sections of the existing and future community; the creation of jobs for a sustainable economy; and the provision of shops and facilities to meet the day-to-day needs of the community. The Council recognises the outcomes of plan-making may not satisfy everyone, but that a good balance is struck between all the conflicting needs and aspirations for the Borough. The Site Allocations DPD provides a framework for clear and consistent decision making, giving greater certainty to both the local community and developers. During the preparation of the Site Allocations DPD, the Council has sought to involve the public at each stage and consider the variety of views submitted. The consultation process for plan-making - led by the planning authority - is a different process to that of consulting on development proposals and projects at the planning application stage, which are managed by different teams within the Council. Policy UA44 does not identify the site for the delivery of 1,000 dwellings. The scale of development will be determined at pre-application and/or planning application stage, as</p>

and when a scheme comes forward. In parallel to the Site Allocations DPD preparation process, planning applications can be submitted at any time for consideration through the development management process, and often considered by the Planning Committee. Land does not have to be allocated for certain uses in order to be subject to a speculative planning application. Any development organisation, including those working with Woking Borough Council and those established by the Council, can submit a planning application to be determined on its own merits outside of the DPD preparation process. The full Council considered the plans for Woking Football Stadium at a meeting in July 2018, and all documentation is in the public domain on the Council's website, under 'Council Meetings'. The reports include all aims and objectives of the redevelopment, and reasons behind the proposals. GolDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this year. There will be extensive public consultation as part of the planning application process. The planning merits of the scheme will be determined by the Council's Planning Committee in accordance with the Development Plan, which (if not adopted yet) will take into account the draft Site Allocations DPD.

The football stadium site, UA44, was appraised accordingly for sustainability, and included in the latest draft DPD for Regulation 19 public consultation. The sustainability appraisal matrix for the site is included in Appendix 11 of the Sustainability Appraisal report. The site was also assessed as part of the updated (2017) Strategic Housing Land Availability Assessment (SHLAA), available on the Research and Evidence Base section of the Woking2027 website. The SHLAA identifies deliverable and developable sites to help inform the preparation of the Site Allocations DPD. The yields in the Site Allocations DPD are indicative - actual yields delivered may go up or down. Indicative yields are based on the ranges provided in policy CS10 of the Core Strategy, which are in turn based on the character of the area and on exemplar sites. Should a planning proposal come forward for a site with an increased yield, this will be considered on a case by case basis depending on the merits and impacts of the proposal at the planning application stage. The community will also be consulted on the planning proposals, whose responses would be considered in making a decision to approve or reject the scheme.

The accessibility of the site was assessed as part of both the SHLAA and the Sustainability Appraisal. Walking and cycling distances to key services and facilities were measured using the Council's Geographical Information System software. The site is considered to be in reasonable walking distance to key services and facilities and there is scope to reduce the need to travel by car. It is considered to have excellent accessibility to schools and GP facilities. Reasonable walking distances are defined as within 800m walking distance, or a 600m straight-line distance, or within a 10minutes' walking distance. Reasonable cycling distance is considered to be up to 3km (guidance by Sport England). If commercial and/or retail uses are delivered as part of any scheme coming forward, accessibility by occupiers and the local community to facilities will be further enhanced. With regard to parking, the Council sets specific requirements within its Parking Supplementary Planning Guidance and has a policy framework for car parking in Core Strategy policy CS18 on Transport. To address the issue concerning road safety, a number of key requirements are included in the DPD to ensure that there are effective and well designed access arrangements to sites to minimise conflict between vehicles and pedestrians. In addition, policy CS18 and a number of the key requirements all seek to minimise the use of car travel, which will have a bearing on safety. It should be acknowledged that there are other safety matters such as speeding and reckless driving which are beyond the remit of the Site Allocations. Section 13 of the Regulation 19 Issues and Matters Topic Paper covers the adequacy of road infrastructure in further detail.

The Council has robust planning policies such as policy CS21 on Design, supported by extensive guidance such as the Design SPD and Outlook, Amenity, Privacy and Daylight SPD, to ensure that development coming forward is of high quality design. Development should respect and make a positive contribution to the street scene and the character of

<p>the area in which they are situated, paying due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land. During the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological and/or tree survey as a key requirement to assess any site specific ecological issues. The surveys will make sure that trees and other features of environmental, ecological and amenity significance are fully assessed and protected from development, where necessary. Section 19 of the Regulation 19 Issues and Matters Topic Paper covers impact of development on woodland and wildlife in greater detail. The issue regarding the adequacy of health and educational infrastructure is covered in Section 6 of the Regulation 19 Issues and Matters Topic Paper.</p>
<p>Response Reference: U0001231</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06851/1</p>
<p>Name: Jill And Kevin Holland</p>
<p>Number of Signatories: 2</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10, GB11</p>
<p>Summary of Comment: Concerned over Green Belt removals for housing, as West Byfleet residents: The proposals would contravene the Green Belt purposes of stopping urban sprawl, protecting the countryside and wildlife, and protecting the individual character of villages. Green Belt review should only be used in exceptional circumstances when other urban/brownfield sites are not available. Not sure WBC has explored all other areas in the borough; for example, there is no mention of developing Hook Heath, Knaphill or Horsell. Adding over 1000 houses to a village of 2300 is over-development. Existing plans for Sheer House and Broadoaks seem proportionate but an additional 555 dwellings is not proportionate or necessary. The proposals will add considerably to existing congestion on the A245 and Sheerwater Road- the latter will also be subject to traffic from the Sheerwater redevelopment. Increased traffic will cause increased pollution, including at the school on the A245/ Sheerwater road, harming health, especially of children. Question when the last air quality check happened, and this would not have taken into account the increase in traffic. There is a lack of places at the schools, health centre and dental practices. Traveller sites are too concentrated in the West Byfleet area; should be distributed more evenly around the borough.</p>
<p>Contributor Proposed Modification: It would be appreciated if the council could have a rethink.</p>
<p>Modification Reference: U0000231</p>
<p>Officer Response: It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release</p>

<p>from the Green Belt, based on its high potential to deliver sustainable development. Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl. The exceptional circumstances justification for why WBC is proposing Green Belt review is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 9. The assessment of alternative sites for development is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 11.</p> <p>The concentration of Green Belt loss in the Byfleet and West Byfleet area is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 5.</p> <p>The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13.</p> <p>The impact of the proposals on air pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8. Passive monitoring of NO2 is currently carried out at locations on Dartnell Avenue and the A245 bridge across the M25.</p> <p>The impact of the proposals on local infrastructure, including medical and education facilities, is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6.</p> <p>The reasoning behind the selection of traveller sites is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 3.</p>
Response Reference: U0001393
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06815/1
Name: Mrs Julie Holloway
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Strongly objects to Green Belt development in Byfleet, as a long term resident. Roads are already severely congested; unless they can be doubled in width and proper traffic management systems installed, further development would have unmanageable impacts. Planners don't know how bad it is.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The reasoning for the proposed release of Green Belt in Byfleet to meet future development needs is addressed by the Regulation 19 Issues and Matters Topic Paper, see sections 1, 2 and 3. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see section 13.
Response Reference: U0001555
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06765/1
Name: Ms Louise Holman
Number of Signatories: 1
Comment Type: OBJ

Site Reference: GB10, GB11
Summary of Comment: Objects to development on Green Belt land in West Byfleet, namely GB10. Roads around Byfleet are gridlocked, and pollution from M25 is now at its worst. Residential development and loss of green space would further pollute the area, and the roads would not withstand the extra cars. There are other sites to develop, for instance the vacant school.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation is addressed by the Regulation 19 Issues and Matters Topic Paper. Paragraph 6.7 confirms that the County Council as Highway Authority is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 addresses transport infrastructure in greater detail, and Paragraph 13.3 in particular confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Air quality is comprehensively addressed by Paragraphs 8.1 to 8.5. Section 11 confirms that there has been a thorough assessment of reasonable alternative sites to inform the selection of preferred sites. The Manor School, Magdalen Crescent, Byfleet was assessed as part of the SHLAA (2017) (reference: SHLAABWB001) and was not considered to be deliverable or developable during the plan period.
Response Reference: U0001039
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06633/1
Name: Mr Denis Holmes
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Object to proposals for GB10: The DPD is not sound; in particular, the removal of GB10 from the Green Belt is not justified, and the proposals for GB10 are not consistent with national policy. GB10 should be kept in the Green Belt, not allocated as proposed. The site is Green Belt and, contrary to statements provided, performs the Green Belt functions of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment. The site is a concrete aggregate safeguarded site. Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces, this would be significantly undermined by the proposals. If GB10 is allocated (in combination with the Broadoaks development), the area of open space provided by the Green Belt in West Byfleet will be 13%, compared to 63% in the Borough as a whole- extremely unlikely that a more appropriate alternative is not available elsewhere in the Borough. The loss of Green Belt will inevitably cause a net loss of biodiversity in West Byfleet, contrary to the NPPF. The site is covered by a minerals allocation, in a minerals plan running to 2026. This will make the site unattractive to developers, so its deliverability is questioned.

Parvis Road is already congested with 507 additional dwellings approved, 252 of which only accessible by Parvis Road. Question the road's ability to cope with vehicles from GB10. Effective mitigations for this are not proposed in detail and are likely to be complex, expensive and take time to implement. Without such mitigations the proposal fails NPPF sustainable development guidelines.

Any future development will be at risk from noise and air pollution from the M25 and A245, which would be very difficult to mitigate, contravening NPPF para 170(e). SA objective II is to minimise adverse impacts of emissions from transport, but there is no baseline data on air quality across the Borough. The existing Green Belt provides a noise and pollution buffer between West Byfleet (including schools) and the M25; its removal would increase noise and pollution. No proper consideration of noise pollution.

The proposal (especially in combination with other proposals in the area) will place a significant strain on local infrastructure. Roads are already congested, on-street parking is a problem, schools and GPs are operating above capacity, water supply is stressed. These issues will require significant, complex, costly and time consuming mitigation measures; these have not been identified, e.g. the Infrastructure Report does not address provision of healthcare and or education for the increased population. Proposals would therefore not be sustainable development.

Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision (Parvis Road does not provide safe or easy access from existing roads); adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.

The SA has not been carried out with due regard to the objectives for sustainable development in NPPF para 9, in particular with regard to the inevitable net loss of biodiversity, and lack of proposals for mitigating pressure on infrastructure mentioned above; and the fact that residents would be car reliant: the site is over 1km from West Byfleet railway station with significant upgrading needed to the route. Contrary to SA table 1, the site fails the NPPF sustainable development guidelines, and no mitigation measures are proposed.

It is not possible to fully evaluate the validity of the SA and related documents, owing to malfunctioning links and website searches not bringing up the relevant documents.

The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk.

Inadequate reasons given for excluding Martyrs Lane Green Belt.

Inadequate consideration of alternative sites, in particular PDL in sustainable locations, and small sites identified in the SA or other 'windfall' sites.

This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment. The Broadoaks and Sheer House developments will exacerbate a number of these issues.

Contributor Proposed Modification: the Draft Site Allocations DPD should be changed to keep site GB10 in the Greenbelt and that the proposed allocation of this site for the development of 555 dwellings and 15 traveller pitches should not be permitted.

Modification Reference: U0000299

Officer Response: The necessity of removing site GB10 from the Green Belt is addressed in the Regulation 19 Issues and Matters Topic Paper.
The site has been assessed through the Green Belt Boundary Review (2015) and found to be suitable for removal from the Green Belt. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12.
The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5.
The effect of the proposals on biodiversity are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 19.

The impact of the minerals allocation on site GB10 is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 17.

The effect of the proposals on traffic are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.

The impact of the proposed development on noise and air pollution (and vice versa) is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 19.

The impact of the proposed development on local infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.

The reasoning behind the allocation of Traveller pitches in the Green Belt, and at West Hall in particular, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 19.

The Council considers the Sustainability Appraisal to have been carried out correctly, and that, for the sites which are being taken forward to allocation, it proposes adequate mitigation measures for all potential adverse effects identified.

It is true that only part of site GB10 is within standard walking distance of West Byfleet District Centre and the station. However this level of proximity to services is still better than that for most other sites considered through the Green Belt Boundary Review. In addition, only slightly over half the total area of the site will be developed, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is likely to limit development on the areas of the site furthest from the District Centre. The key requirements in policy GB10 include to 'improve sustainable transport infrastructure including pedestrian and cycle links and bus services to West Byfleet District Centre'. It is therefore not considered that the residents would be car reliant.

The Council apologises if links were malfunctioning at the time the respondent tried to access the website. We tested all links at the beginning of the consultation, and we are confident that any malfunctions would not have lasted long since we ensure that all errors of this nature are corrected quickly once we become aware of them.

Issues of flood risk are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.

The reasons for not removing the Martyrs Lane site from the Green Belt are addressed in the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11.

The consideration of PDL and windfall sites is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 11.

The quantity and density of housing proposed is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 18. The proposed indicative density for site GB10 of 40 dwellings per hectare (dph) is consistent with the Core Strategy, which recommends a density of 30-50 dph for 'Green Belt sites to be released after 2021/22'. This is a medium density of suburban development. The figure only relates to the developable area of the site (approximately 14.8 ha), and does not include the areas of existing woodland and new green infrastructure which are proposed to take up nearly half the site's total 29.33ha area.

The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.

Response Reference: U0000983

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 02141/2

Name: Hook Heath Residents Association
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: The Woking DPD Allocations Consultation (DPD) as drafted is unsound. It seems to adopt a similar approach to proposed allocations in the urban area and in the Green Belt. There is no adequate justification for the Green Belt changes, as required by NPPF.</p> <p>The DPD is in direct conflict with the NPPF, in particular the requirement for Green Belt removals to be 'fully evidenced and justified' and for plans to offset Green Belt loss through compensatory environmental and access improvements to remaining Green Belt land. No mention is made of the latter requirement, or evidence presented as to how each Green Belt loss will be offset, or what compensatory improvements might be carried out. It is not known whether sites disregarded for Green Belt release might have been treated differently if their ability to deliver significant compensatory benefits was taken into account.</p> <p>The DPD relies upon the Green Belt Boundary Review (GBR), which is not a robust piece of evidence base. Concerned that the evidence behind the GBR has not been reviewed in response to flaws raised in previous consultations.</p> <p>The DPD is reliant on the GBR yet has entirely different conclusions and recommendations- it picks and chooses various sites from the GBR. This demonstrates that the DPD is not positively prepared, justified, effective or consistent with national policy.</p> <p>The Sustainability Appraisal is flawed, vague, subjective and seems to have been produced retrospectively to justify a choice of Green Belt release sites that has already been made. The justifications given in the SA for choosing Green Belt release sites amount largely to potential for housing delivery, avoiding the highest flood risk areas, and choosing sites near centres and which might reduce the need for car travel. These would apply to just about any parcel of land adjacent to the urban area and outside the flood zone.</p> <p>The Sustainability Appraisal and the GBR contradict one another (contrary to SA para 19.8), with regard to the removal of land north-east and north-west of Saunders Lane, which is supported by the GBR but not by the SA. The DPD seems to 'pick and choose' parts of the evidence base on an ad hoc basis.</p> <p>The DPD seeks to make significant changes to the Woking Green Belt without pre-requisite substantive evidence or justification. Table 13 of the DPD, 'Summary of the proposed changes to the Proposals Map by ward', does not refer to all of the proposed significant changes to the green belt. E.g. Green Belt land east of Hook Heath Road and south of Allen House Park, which meets Green Belt purposes, is shown on the Proposals Map as being removed from the Green Belt (effectively imposing a general presumption in favour of development), with no justification given beyond a statement in the supporting text that it will become part of the urban area, and without being the subject of any policy or allocation. The proposal is clearly of major significance in terms of scale and impact. Need to ensure that every Green Belt change proposed is clearly identified, enabling consultees to consider the extent to which significant changes are being proposed without being fully evidenced or justified.</p> <p>The DPD contains information that is unclear, contradictory and incorrect:</p> <p>Sites in the DPD have different size, shape and numbering to sites in the evidence base, making it impossible to conclude that the precise sites in the DPD have been assessed in a holistic and consistent manner.</p> <p>The title of Section B (p232) is confusing- why include policies for land that will stay in the Green Belt under the title '... sites to be taken out of the Green Belt'? Why include a policy</p>

for land in the Green Belt, supporting the use of that land for development not inappropriate in the Green Belt? This could apply for the whole of the Green Belt. The DPD proposes to release land from the Green Belt in order to provide uses (i.e. green infrastructure) that are not inappropriate to and which are compatible with Green Belt purposes. This approach is harmful to the Green Belt and is unnecessary. Retaining the land in the Green Belt would provide for green infrastructure enhancement, and there is a statutory duty for such enhancement as part of Green Belt Review. Removing land from the Green Belt will not 'assist in ensuring a strong Green Belt boundary', it will just reduce the size of the Green Belt.

Land north of Saunders Lane (previously identified as 'Parcel 20') was formerly proposed for Green Belt release but now proposed for retention. HHRA objected to the previous proposals and now supports the retention of this land in the Green Belt. It is an important area of Green Belt which meets all the Green Belt purposes. It forms part of an essential area of Green Belt on the southern boundary of Woking in the Hook Heath area, extending along the Hoe Stream to Woking Football Stadium. This area prevents Hook Heath and Mayford from merging; its development would harm the character of the south west part of Woking, with spacious areas of Green Belt separating residential areas. Site GB7's removal from the Green Belt would turn Mayford into part of the urban area, in contrast to the recognised need to keep it separate.

The removal of the northern strip of GB7 from the Green Belt makes no sense given that it currently meets essential Green Belt purposes and is meant to provide a use compatible with the Green Belt, and retaining it in the Green Belt would allow compensatory improvements there.

The criterion preventing 'any form of built development' on the northern strip of GB7 would go beyond any national or local planning policy, preventing any form of infrastructure e.g. essential flood works or footpaths. It would be contrary to planning policy and statute and would not pass examination. The northern strip of GB7 would be subject to severe and constant threat of development with little if any policy protection.

The creation of a 'visual gap' in the northern strip of GB7 will fail as it will simply provide for a greater sense of the urban area that would surround it.

The allocation GB7 should be reduced to include only the area north of Mayford proposed for residential development; the land south of Hillside should stay in the Green Belt.

9 It is proposed to remove Parcel GB9 from the Green Belt in order to provide uses (green infrastructure) that are not inappropriate to and which are compatible with, Green Belt purposes. If retained in the Green Belt this site would provide an opportunity for enhancement to compensate for Green Belt loss elsewhere. This approach is harmful to the Green Belt and is unnecessary. Policy GB9 should be removed.

There is no evidence to demonstrate why GB9 is needed for green infrastructure, why it needs to have this size and location, what kind of green infrastructure would be provided, by whom, how and on what basis it would be paid for.

The justification given for removing this land from the Green Belt (isolation from the rest of the Green Belt) is a hangover from the previous proposals for safeguarding land north of Saunders Lane for development. If land north of Saunders Lane remains in the Green Belt, site GB9 is no longer an isolated area of Green Belt, so there is no justification for its removal.

Site GB9 forms part of an important area of Green Belt to the south west of Woking- part of the Green Belt between Saunders Lane and the town. It protects the visually important Hook Heath escarpment. Releasing this site would not strengthen the permanence of the Green Belt, but erode the Green Belt in an edge of town location where it performs an essential role.

The suggestion in supporting text that green infrastructure on GB9 would relate to site GB7 is unrealistic, as the two sites are separated by a railway line and have no physical connection.

Confused by the statement in GB9 that land would be 'released for development'.

Land immediately to the north of GB9 (a very large area of Green Belt, formerly referred to as site 20g) is proposed for removal from the Green Belt without being fully evidenced or justified, in accordance with national policy; and without its removal being referred to in Table 13, which is meant to name each site proposed for removal.

'Site 20g' performs an important Green Belt function; it is part of the area of Green Belt that wraps around the south western part of Woking

10 The DPD proposes to change the designation of land to the east of Hook Heath Road from Green Belt (immediately to the north of GB9; a very large area of Green Belt, formerly referred to as site 20g) to white land within the urban area without substantive evidence or justification, and without its removal being referred to in Table 13, which is meant to name each site proposed for removal.

'Site 20g' performs an important Green Belt function; it is part of the area of Green Belt that wraps around the south western part of Woking, an area of significant development pressures, and is adjacent to the part of site GB7 proposed as a 'visual gap'.

The proposed removal of 'Site 20g' from the Green Belt is reliant upon other proposals in the DPD which are not fully evidenced or justified (i.e. the removal of Site GB9 from the Green Belt).

Together, sites '20g', GB7 and GB9 provide a major opportunity for the Council to meet its obligations in respect of Paragraph 138 of the Framework. They should therefore be retained in the Green Belt and enhanced to best effect.

11 Individually and in combination, the above factors result in a draft DPD that, as set out, is not sound. The Conclusion to this Representation (page 24) sets out changes that would, in part, address the above.

Contributor Proposed Modification: It is considered that, in order to be found sound, the DPD should respond to the findings set out in this Representation, including, in particular:

- (1) Change Parcel GB7 so that land to the south of Hillside is appropriately protected as Green Belt, as a continued part of the area of land to the south west of the main urban area;
- (2) Remove Parcel GB9 from the DPD and retain the appropriate protection of this area as Green Belt, as a continued part of the area of land to the south west of the main urban area;
- (3) Remove the proposal to remove land to the east of Hook Heath Road from the DPD. Need to ensure that every Green Belt change proposed is clearly identified, enabling consultees to consider the extent to which significant changes are being proposed without being fully evidenced or justified.

Together, sites 20g, GB7 and GB9 provide a major opportunity for the Council to meet its statutory obligations in respect of Paragraph 138 of the Framework. To date, the Council has not met this statutory duty. It is respectfully advised that the Council looks again at these areas of land and takes the opportunity to enhance the Green Belt to best effect, rather than propose its unnecessary erosion.

Modification Reference: U0000219

Officer Response: The removal of land from the Green Belt is fully evidenced and justified in accordance with the NPPF. This matter is addressed by the Regulation 19 Issues and Matters Topic Paper, see in particular sections 1-3. The DPD proposes significant environmental and access improvements to remaining areas of the Green Belt through site allocations GB12-GB17, including five new SANG sites and a new country park, plus site allocation GB3: Brookwood Cemetery, and environmental improvements included in the key requirements to several of the policies for development on current Green Belt land.

The Green Belt Boundary Review (GBBR) is a robust piece of evidence base. The methodology of the GBBR is addressed by the Regulation 19 Issues and Matters Topic Paper, section 12. There is no doubt that the Green Belt Boundary Review has been used

to inform the Site Allocations DPD. Clear reasons have been given where the Council has taken a different course from the recommendations of the GBBR. In all cases, the Council has used the evidence to make planning judgements based on the weight they have attached to the different conclusions of the evidence. For example, by not carrying forward the proposals to remove and safeguard sites in Pyrford and north of Saunder's Lane, Mayford. The reasons for excluding these sites are set out in the Regulation 19 Issues and Matters Topic Paper, paragraph 14.11-14.13. These reasons are sound and consistent with national policy in themselves but in no way invalidate the broader conclusions of the GBBR.

The respondent's characterisation of the Sustainability Appraisal (SA) is rejected. The description of justifications given regarding Green Belt release sites seems to be based on a partial reading of Table 7 of the SA: List of Green Belt sites recommended for allocation/safeguarding and reasons. The SA should be considered as a whole, in particular Chapter 12: Relationship between the SA of the Site Allocations DPD and Green Belt Boundary Review Reports, Chapter 13: Factors that have informed the determination of reasonable alternatives, and Table 8, List of Green Belt Sites Recommended for Rejection and Reasons, as well as a fuller reading of Table 7. This would give some indication of the breadth of factors used by the SA to assess Green Belt release sites. The full range of factors considered is set out in Appendix 12 of the SA. In relation to sites north of Saunders Lane, there is no contradiction between the SA and GBBR. The SA clearly sets out the issues relating to these sites, in particular in Table 7 and paragraph 15.19.

Agree that an area of land north of site GB9 and south of Allen House Park (known as 'Parcel 20g') needs more detailed treatment in the DPD. Officers are proposing a modification to provide further protection from development to Parcel 20g within the plan period. This modification will extend site GB9 northwards to include this parcel, to make it part of the safeguarded land. This means that while it will be released from the Green Belt upon adoption of the plan, it will not be released for development until 2027, through a review of the Core Strategy and/or Site Allocations DPD. This parcel includes residential properties and for this reason a distinction will be made, using a hatched area on the site plan, to show that this area is not intended for Green Infrastructure. Until 2027, development at any part of the site will have to comply with the Green Belt policies in the development plan. A specific policy and key requirements to guide development at the site, noting the distinction in the amended proposed hatched area (parcel 20g) will be developed and determined as part of the review of the Core Strategy and/or the Site Allocations DPD. There is, therefore, no need to change Table 13 of the SADPD.

It is inescapable that, over the course of a four year production process for a Site Allocations document requiring a large volume of evidence, there will be changes to site reference numbers and minor changes to site boundaries. None of these changes were considered significant enough to merit re-assessment in the Sustainability Appraisal.

Agree that the title of Section B is confusing; this will be changed to better reflect the contents of the section.

The principle of removing current or future Green Infrastructure land from the Green Belt is well established, where there are sound reasons for doing so (in this case, establishing a strong defensible Green Belt boundary when adjacent land is being allocated for housing development). The enhancement of green infrastructure can take place whether or not the land is in the Green Belt.

Site GB9 is excluded from the Green Belt to ensure a strong, defensible Green Belt boundary that will endure beyond the plan period. This approach is consistent with national policy. The new boundary on Hook Heath Lane is considered to provide a much more defensible boundary than the existing one, some of which appears not to follow any features on the ground; in addition, the removal of site GB7 from the Green Belt would otherwise leave site GB9 surrounded by the urban area on three sides. It is acknowledged that Green Infrastructure is a use compatible with the Green Belt, and the Policy for the site makes clear that it is situated at a high point of the Escarpment or rising ground of

landscape importance, and is unsuitable for built development. Trees are safeguarded by a Tree Preservation Order. This is considered to provide sufficiently strong protection for the site to remain green while meeting long term Green Infrastructure needs. Given that the site is proposed for safeguarding rather than allocation, it is to be expected that there is no current evidence for precise Green Infrastructure needs to support the site's delivery; proposals for Green Infrastructure on the site will be set out as part of the plan review for after 2027, to be informed by up to date evidence at the time. Further justification for safeguarding can be found in section 2 of the Council's Regulation 19 Issues and Matters Topic Paper.

Support welcomed on retaining sites north of Saunders Lane within the Green Belt. The existing village of Mayford is not proposed to become part of the urban area, but to remain within the Green Belt, protecting its special and open character. The protection of open space at the north end of site GB7 will maintain a visual gap between Mayford and the rest of the urban area. Since the construction of the Hoe Valley School this has been the only substantial open space on the Egley Road frontage between Mayford and Woking. No additional built development is proposed for the immediate vicinity of this protected open space- the school and its playing fields will buffer the space from new development to the south- so it cannot be said to 'fail'. Given that Mayford village remains in the Green Belt, however, to avoid the creation of an isolated fragment of urban area, the formal urban area boundary will be extended down across this protected gap to cover the whole of site GB7.

The reference to the northern part of site GB7 being 'protected against any form of built development' is part of the supporting text rather than the policy itself, and is not considered inappropriate. The policy simply states 'This part of the site is not for built development'.

Site GB9 is not claimed to be an isolated area of Green Belt, however, it does currently have some weak boundaries and after the development of site GB7 it will be surrounded on three sides by built up areas. The Green Belt boundary will be strengthened and made more defensible by removing this site.

The importance of the landscape is not one of the purposes of the Green Belt used in assessing the permanence or defensibility of Green Belt boundaries. However, it is given due consideration in the Green Belt Boundary Review and there are robust policies in the Core Strategy to protect landscape quality.

There is no reference in the GB9 supporting text to a connection with GB7.

'Released for development' relates to the change of use of the land to a Green Infrastructure use, the nature of which is to be determined closer to the time in accordance with need, but is unlikely to be agriculture (the current permitted use).

Response Reference: U0001761

Officer Proposed Modification: Re-title Section B to 'Development and infrastructure sites to be taken out of the Green Belt or washed over by the Green Belt'.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06462/1

Name: Mr Michael Hopgood

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11

<p>Summary of Comment: The Byfleet/West Byfleet area seems to be unfairly targeted for development, with virtually 75% of the 1,241 dwellings proposed for Woking, and a similar percentage of the Traveller pitches.</p> <p>The proposals will effectively merge Byfleet and West Byfleet, ruining their separate identity, by developing virtually all the green belt along the Parvis Road. Brownfield sites could be developed first, and there are other green belt areas.</p> <p>Concentrating development in this area will magnify the effect on infrastructure, which is not currently sufficient for this increase. Parvis Road cannot cope with current peak period traffic and any new access onto the road will make this congestion worse. Scope to widen the road must be limited by the M25 bridge.</p>
<p>Contributor Proposed Modification: The ideal solution, from my perception of the problem, is to either spread the new development far more evenly across the borough or to focus it entirely on a new site, which would incorporate infrastructure improvements such as educational and medical requirements and be sited near major roads which can cope with the additional flow. I do not propose to suggest which other villages could take some of this development but there is an obvious area for total new development in the Martyrs Lane / New Zealand Golf Club area. A New Town here would have access to the A320, which leads to the M25.</p>
<p>Modification Reference: U0000168</p>
<p>Officer Response: The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 5.</p> <p>The Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes, including the prevention of towns from merging. It concluded that the parcel including sites GB4 and GB5 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It also concluded that sufficient exceptional circumstances justification exists for the release of site GB10 from the Green Belt, based on its high potential to deliver sustainable development. A significant green gap will be retained between site GB10 and the motorway, with public access to this area enhanced by the creation of the Byfleet SANG and possibly off-site green infrastructure provided as part of the development of GB10 (as set out in the policy's key requirements), and the majority of the Green Belt on the east side of Byfleet will also be retained.</p> <p>The assessment of alternative brownfield sites is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 11.</p> <p>The methodology of the Green Belt Boundary Review, which identified the sites in question as suitable for removal, is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 12.</p> <p>The impact of the proposals on infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6.</p> <p>The impact of the proposals on highway capacity is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13.</p> <p>The reasons for rejecting the Martyrs Lane site for Green Belt removal are addressed in the Regulation 19 Issues and Matters Topic Paper, paragraph 3.11.</p>
<p>Response Reference: U0001705</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06491/1</p>
<p>Name: James Hopkins</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>

Site Reference: GB05
Summary of Comment: Please do not allow development on this site, it should stay as green belt land. The site should not be developed due to: Pollution. Additional pressure on schools and doctors. Traffic congestion. A designated future burial ground for St Mary's The possiblity it could devalue local homes.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The necessity of releasing land from the Green Belt for safeguarding for future development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 2. The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The impact of the proposals on local infrastructure, including schools and doctors, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The presence of burial land on site GB5 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 15. The potential for a drop in the value of nearby houses as a result of new development is not in itself a material planning consideration.
Response Reference: U0001688
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06699/1
Name: Lesley Hopkins
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Concerned about the loss of the green belt in Mayford especially relating to GB7. This is a buffer against the urban sprawl of Woking. Mayford has lost a large area of Green Belt to the new Hoe School and sports centre. The A320 is the main arterial road between Guildford and Woking. It's an extremely busy road and cannot take the extra volume of traffic. This has had a detrimental effect on the infrastructure noticeably the school children knocked down at the traffic lights. Mayford doesn't have the capacity for further housing. It would cause a drain on all the other services.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The representation regarding Mayford Green Belt, Mayford character and visual gap have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21. The application for the Hoe Valley school and associated sports facilities at Egley Road were considered as part of the Development Management process, with regard to the Borough's statutory development plan at the time of the application (in 2015). This part of the site has been implemented and the school opened in September 2018. On balance, the merits of the proposal and need for a school were among a number of considerations that demonstrated very special circumstances for development in this Green Belt location.

<p>Following approval by the Council, the application was referred to the Secretary of State for consideration, but was not called in, meaning the Secretary of State did not consider it necessary to determine the application for the Council. The Council went through the correct planning procedure and consultation with regard to this application.</p> <p>In regards to traffic congestion see Section 13 in the Regulation 19 Issues and Matters Topic Paper.</p> <p>The matter of lack of adequate infrastructure provision has been addressed in Section 6 of the Regulation 19 Issues and Matters Topic Paper.</p>
<p>Response Reference: U0001078</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06909/1</p>
<p>Name: Horsell Common Preservation Society</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: COMM</p>
<p>Site Reference: GB06, GB12, GB13, GB14, GB15, GB16</p>
<p>Summary of Comment: HCPS agrees with intention to locate the largest share of the proposed development within sites in / around the Town Centre and other urban sites; and to release Green Belt land a good distance from Horsell Common - which will have a lower direct impact on sensitive parts of the Common compared to the former 'land to the east of Martyrs Lane' site. However, parts of the Common closest to the Town Centre are likely to experience effects of additional informal recreation by residents. HCPS welcomes timely and appropriate investment in the improvement and management of these areas to help mitigate this impact. Notes the proposed use of the normal SANG mitigation strategy. Sites GB13 (Brookwood Farm) and GB14 (Westfield Common) are already available to the public - supports appropriate investment into converting these into SANGs to deliver effective mitigation and reduce effects on Horsell Common SPA. Notes that a minor adverse air quality impact is forecast on some roadside fringes of the SPA. HCPS welcome proposals to limit these effects.</p> <p>GB6 abuts Horsell Common and its SPA. Recognise the need for reducing traffic congestion pressure and is not against the principle of improvement at the roundabout, however:</p> <ul style="list-style-type: none"> - the red line extent of GB6 is too small to accommodate the large-scale improvement identified in the A320 Corridor Study; - the traffic input information into the Study may now need updating as neither the land to the east of Martyrs Lane, nor the Fair Oaks proposals, are included in Borough Council's current or emerging plans. Data may now be irrelevant. <p>These anomalies should be addressed to sufficiently inform extent and nature of proposals at GB6, and how they will affect the Common.</p>
<p>Contributor Proposed Modification: Address anomalies in A320 Corridor Study to better inform infrastructure improvement requirements at site GB6.</p>
<p>Modification Reference: U0000253</p>
<p>Officer Response: Support for the overall spatial strategy of the DPD is noted, in preference to the land east of Martyr's Lane.</p> <p>The Council recognises the proximity of Horsell Common to allocated sites in the Town Centre. Policies CS7: Biodiversity and Nature Conservation and CS8: Thames Basin Heaths Special Protection Areas, reiterate the importance of protecting environmentally sensitive designations and seek to protect and enhance biodiversity assets of the Borough. The Council is satisfied that the Town Centre sites can be developed for the proposed uses without significant damage to surrounding environmentally sensitive</p>

designations due to the strong protection these areas are afforded by policies in the Core Strategy, Development Management Policies DPD, and key requirements in the policies of the Site Allocations DPD. This conclusion is supported by the available evidence such as the Habitats Regulations Assessment, Sustainability Appraisal and the Landscape Assessment.

As per policies CS7 and CS8, where development is proposed that would affect sites or features of nature conservation importance, such as Horsell Common, appropriate mitigation measures and management measures will be taken to ensure that this is prevented or minimised. At detailed planning application stage, the Council will consult with all relevant biodiversity organisations as well as require applicants to carry out environmental impact assessments to ensure the effective avoidance and/or mitigation of any adverse effects prior to the approval of development.

The Site Allocations DPD has also identified sufficient SANG land to avoid negative impacts of development proposals (including Town Centre proposals) on the Thames Basin Heaths SPA, which includes parts of Horsell Common. In addition to existing SANG, sufficient SANG capacity will be available over and above what is required in the SPA Avoidance Strategy.

Section 8 of the Council's Regulation 19 Issues and Matters Topic Paper responds to concerns about the impacts of development on air quality.

The comments regarding site GB6 for infrastructure improvements at Six Crossroads Roundabout are noted. The A320 Corridor Study concludes that the existing Six Crossroads roundabout is currently operating significantly over theoretical capacity in both the AM and PM peak hours. This is concluded even without taking into account impacts on capacity from future development. Although the land east of Martyrs Lane is not included in the latest Site Allocations DPD, the scale of future development remains the same and the proposed mitigation measures continue to be relevant to address development impacts on the A320. The Study only puts forward a feasibility design aiming to bring the performance of the junction to around practical capacity. The Council will continue to work with Surrey County Council to further refine the design of the scheme, taking into account both the latest development proposals and potential impacts on the surrounding environment. This may occur before the time for that to be taken into account prior to the examination of the DPD, but until a conclusive design is established, the existing site boundary as supplied by Surrey County Council is considered to be reasonable. The reasoned justification of policy GB6 indicates that some third party land may be required to achieve the proposed infrastructure development, but the extent of third party land cannot yet be fully identified until further refinement of the design of the scheme is undertaken. Should this become available before adoption of the DPD, the location plan will be updated accordingly. Minimising impacts on environmentally sensitive areas and conserving the integrity of the SPA will be key requirements for any proposal.

The Council continues to welcome ongoing engagement with the Society to inform the preparation of planning policies and proposals.

Response Reference: U0001527

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 05729/1

Name: Mr Peter Hoskyn

Number of Signatories: 1

Comment Type: OBJ

Site Reference: RG18GB12, RG18GB13, GB10

Summary of Comment: Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not, an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy.

The DPD is not justified. The release of the GB10 land (a.k.a. West Hall, Tins Wood) is stated to provide up to 555 additional homes in the period to 2026 plus 15 traveller pitches. There seems to be little recognition that the proposals on the adjoining Broadoaks site will shortly provide 332 homes (including an 80 bed care home) and the nearby town centre Shere House a further 255. There are also other smaller infill, renewal or change of use schemes for residential use in West Byfleet. In addition there are large residential proposals at Sheerwater (less than a mile away), continuing development in Woking Town Centre (3 miles away and 5 minutes by train) of a number of tower blocks of residential apartments providing hundreds of homes and with more sites proposed. The demand anticipated by the draft SADPD seems to be overstated and therefore the resulting proposal to remove GB10 from Green belt is Not Justified.

Proportionally, taking into account the more imminent schemes and the now proposed GB10 site, an increase in homes in West Byfleet of 45% seems to be suggested - massively higher than anywhere else in the Borough. This overweight increase in the allocation for West Byfleet is also Not Justified.

Not consistent with National Policy

The land comprising the GB10 site does comply with the Government's attachment of importance to the value of Green Belt land as it checks the unrestricted spiral of urban areas, assists in safeguarding the countryside from encroachments and helps urban regeneration by encouraging new use of derelict and other urban land. The removal of GB10 from Greenbelt allocation is therefore clearly Not consistent with National Policy.

The land comprising the GB10 site falls within the West Byfleet Neighbourhood Development Plan Forum area and forms part of their Green Belt designations with an objective to maintain, enhance and protect the distinctive and special character of West Byfleet. To ignore this objective is Not consistent with National Policy in respect of the planning purpose of Neighbourhood Plans.

Development of the land comprising the GB10 site is not a sustainable development as it has a history of flooding. Also it is more than 800m walking distance from any rail station with no adequate regular bus service. On these points therefore Development of the GB10 site is Not consistent with National Policy.

A Traffic Mitigation Report relating to the A245 has been prepared by Surrey County Council. It suggests that the increased traffic flows, the introduction of new access roads, the additional need for pedestrian crossings can all be managed by making some alterations to the traffic management software controlling traffic lights in West Byfleet. There is no proposal to increase the actual capacity of the A245 by any significant increase in the width or "laning" of carriageways. The report admits that the capacity of the roundabouts, traffic lights etc. is currently at capacity or just below. This is before any of the developments referred to in 1a above have come on stream. It is not plausible that the extra traffic generated by natural growth and these developments (let alone those that may be brought forward further east at Byfleet and Brooklands and to the west in Woking) can possibly be managed by the tweaking of some traffic light software and minor road furniture/ road painting changes. The resulting congestion, stationary traffic etc. will worsen the already high levels of danger, noise and air pollution along the A245 particularly the stretch adjacent to the GB10 site and is Not consistent with National Policy.

In addition to the above the Government Road Traffic Forecasts published in September 2018 suggest, for the period 2015 to 2050, traffic level growth in the South East of 21% to 53%. Car ownership nationally will increase by 45% (perhaps a greater percentage in the South East) and white van growth (fuelled probably by internet shopping) by up to 108%. The Traffic Mitigation report solutions, which is considered inadequate for the levels of

traffic without any extra development, could not have taken into account these 2018 Government figures and therefore the Mitigation Proposals certainly do not support the draft SADPD which is therefore, on this ground, Not consistent with National Policy and also is not Not positively prepared.

Not positively prepared - On the borders of the Borough there are proposals for large residential schemes at Fairoaks Airport Chobham, Longcross, Guildford and Wisley Airport to provide thousands of homes. There is little evidence that these proposals have been taken into account in the draft SADPD or of any detail discussions with adjoining planning authorities (Guildford, Elmbridge, Surrey Heath, Runnymede) to ensure that there is sustainable development across the immediate wider area. As such the Duty to co-operate has therefore not been satisfied and the reasons for taking GB10 out of Green belt are undermined and again on these grounds the draft SADPD is Not Positively Prepared.

There appear to be no reasons presented for the exclusion of other potentially available green belt sites such as the two fields in Pyrford (off Upshot Lane and Pyrford Common Road/Church Hill) which offer more flexibility for access roads and no risk of flooding - compared with GB10 which suffers problems in both these areas of concern. The exclusion of the possible site in Martyrs Lane is also not properly explained. In these regards therefore it can be said that the draft SADPD is Not Positively Prepared .

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

In regards to the disproportionate allocation in West Byfleet see Section 5 of the Topic Paper.

It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes. It is acknowledged that land at GB10 made some contribution to the purposes, but based on the evidence the Council believes that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. The Green Belt boundary review assessed the parcels of Green Belt land against the purposes of the Green Belt, one of which is to check the unrestricted sprawl of large built up areas. None of the proposed allocations will lead to unacceptable urban sprawl.

In regards to the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The Council are aware that bus provision and direct access to this will be required for the site as well as pedestrian and cycle infrastructure and crossing to link to the surrounding area. There are key requirements for development to address to be acceptable. The exact nature of these sites specific requirements will be identified through the development management process and informed by a transport assessment.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Overall, the Council is confident that the infrastructure delivery plan

provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Reg 19 Consultation. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. For example, the Council has worked with Surrey Heath, Runnymede Borough Council and the County Council to carry out the A320 Corridor Study to identify mitigation measures to address cumulative development impacts. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to site GB10.
Response Reference: U0001294
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06642/1
Name: Mrs Penelope A Hoskyn
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
<p>Summary of Comment: Supports removal of GB11 (Broadoaks) from Greenbelt as redevelopment is needed to meet housing needs (particularly through providing a care home) and provide employment.</p> <p>Supports provision of Traveller pitches at Murray's Lane.</p> <p>However, the DPD is unsound due to inconsistencies between Regulation 18 and Regulation 19 drafts (e.g. West Hall is in Flood Zone 2 in Reg 18 but Flood Zone 1 in Reg 19); renumbering of sites making it difficult to understand.</p> <ul style="list-style-type: none"> - Traveller sites: GB10 suddenly included Traveller pitches at Reg19 stage - lack of public consultation. Should be a reduced number of pitches on GB10 and spread others around the Borough e.g. Sheerwater redevelopment. - Overdevelopment: cumulative development at West Hall, Broadoaks and Sheer House - around 1000 new homes - will strain infrastructure and local amenities. Lack of consideration for total number of proposed homes in the community of West Byfleet. - GB10 covered by West Byfleet Neighbourhood Plan, which aims to maintain, enhance and protect the distinctive character of West Byfleet. Would support some increase in homes, but must enhance the area for existing and future residents. - No consideration been given to noise, fumes and pollution that will be caused by increased traffic. Minor traffic light tweaks will not address already highly congested roads e.g. Parvis Road. - Lack the infrastructure to serve over 1000 new homes e.g. GP surgeries and primary schools are at capacity; lack community facilities such as village halls; inadequate bus services; inadequate drainage to address history of flooding. Questions what studies have been carried out on this. - Other sites: inadequate consideration given to other brownfield sites before making use of Greenbelt. Questions whether Greenbelt land is needed to meet housing needs. Proposals should be better spread around the Borough, thereby spreading the load and reducing unacceptable pressure on residents of West Byfleet.
Contributor Proposed Modification: Spread sites more evenly across the Borough, including Traveller pitches.
Modification Reference: U0000250
<p>Officer Response: Support for Broadoaks site GB11 and Murrays Lane Traveller site is noted.</p> <p>Since the DPD was published for Regulation 18 consultation, a number of changes were made to the document, reflecting changes in the evidence base (such as new sites identified by the updated Strategic Housing Land Availability Assessment) and to take into account issues raised during the consultation. This would account for the change in</p>

references, content and structure of the Regulation 19 version of the DPD. The Council did not intend for the changing draft to cause confusion. Appendix 6 of the DPD details all of the updates since the publication of the DPD for Regulation 18 consultation.

The Regulation 18 DPD refers to the entire, wider 50ha site when making reference to Flood Zone 2. The latest draft rectifies this by identifying the developable 29.33ha site as being located wholly within Flood Zone 1. The Sequential Test assessment which makes up the evidence base confirms that the site is adjacent to land classified as Flood Zone 2 and 3 (across the River Wey Navigation). This is not allocated for development.

The position on Traveller sites has also changed since the Regulation 18 draft. Section 3 of the Regulation 19 Issues and Matters Topic Paper sets out in detail why the sites in the Regulation 19 draft have been identified.

The Council is aware of the planning history associated with the Broadoaks and Sheer House sites, and recognises that the cumulative development may have impacts on the area. This comment is addressed in Section 5 of the Topic Paper, which also explains why the allocation of sites cannot be more evenly spread across the Borough. Section 10 describes the evidence base that has underpinned the identification of sites for development. In assessing the impacts of development, and identifying any mitigation measures necessary to make development acceptable, the cumulative nature of development has been taken into account.

Section 16 of the Topic Paper responds to the comment regarding the West Byfleet Neighbourhood Plan.

The Council has considered the impact of future development on transport infrastructure. This is set out in detail in Section 13 of the Topic Paper, and paragraph 6.4. Section 6 of the Topic Paper addresses concerns raised about infrastructure capacity. Section 7 describes how sufficient flood risk assessment has taken place.

Section 11 sets out how all brownfield alternatives have been assessed before making use of Green Belt land. The Council has conducted its brownfield site assessment predominantly through the Strategic Housing Land Availability Assessment, available on the Council's website.

Section 1 of the Topic Paper provides a detailed justification for the release of Green Belt land to meet future development requirements.

Response Reference: U0000930

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06478/1

Name: Dr David Howbrook

Number of Signatories: 1

Comment Type: COMM

Site Reference: UA07

Summary of Comment: The DPD is unsound, as UA7 allocation lacks detail on integrating car with train.
Wishes to be informed of next stages.

Contributor Proposed Modification: There should be a multi story car park on a main road with a lift to the station concourse and space to safely pick up and drop off by car. The current arrangement is unsafe with cars, taxis and cyclists sharing the same space.

Modification Reference: U0000422

Officer Response: Network Rail, in partnership with the Council, is seeking to make improvements to the rail network and manage traffic at the Victoria Arch. UA7 safeguards land to enable these proposals to be delivered. It is not expected that these proposals would adversely affect parking provision to service the station. Indeed, Network Rail is

exploring options of expanding car park capacity to serve the increasing use of the station, but this is a separate matter which has not been addressed through the Site Allocations DPD. To add, the DPD states that the allocation sets out to improve the taxi rank to the south of the station and that the development should seek to enhance connectivity and improve access across the railway track, particularly for pedestrians and cyclists. Overall, it is expected that interchange facilities at this part of the station will be enhanced by the proposed bus/rail interchange.
Response Reference: U0000995
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06888/1
Name: Ms Dawn Howells
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: DPD is not sound, in particular, not an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence, nor consistent with national policy:</p> <p>The site is currently Green Belt; the proposals would irreversibly change the village character of the community which attracted its current residents.</p> <p>Parvis Road already suffers from congestion; the proposals would cause unacceptable levels of traffic.</p> <p>The proposals would result in unacceptable levels of noise and air pollution with associated dangers to the health of local residents (and no provision is made for extra healthcare).</p> <p>The proposals ignore the need for extra school places.</p> <p>Concern over the location of Traveller pitches and other housing.</p> <p>More suitable areas should have been investigated further as this site is in danger of flooding.</p> <p>Building work for a major development like this would involve considerable disruption and traffic congestion for a considerable length of time.</p> <p>The West Byfleet community does not want this development.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The justification in principle for the existence of very special circumstances requiring the release of Green Belt land for housing is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 1.</p> <p>With regard to local character, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the site will increase the population of West Byfleet. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.</p>

<p>The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 13.</p> <p>The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 8.</p> <p>The impact of the proposals on infrastructure, including healthcare and schools, is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 6.</p> <p>The justification for the location of Traveller pitch allocations is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 9.</p> <p>Issues of flood risk in relation to the Site Allocations are addressed by the Regulation 19 Issues and Matters Topic Paper, Section 9.</p>
Response Reference: U0001465
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06890/1
Name: Mr Martin Howells
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: DPD is not sound, in particular, not an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence, nor consistent with national policy:</p> <p>The site is currently Green Belt; the proposals would substantially change the village characteristics of the community.</p> <p>Parvis Road already suffers from congestion at peak times; the proposals would cause unacceptable traffic issues including delay and traffic overcrowding at West Byfleet's approaches and exit points.</p> <p>The proposals would result in unacceptable levels of noise and air pollution with associated dangers to the health of local residents.</p> <p>No allowance is made for the need for healthcare and school places of an increased population.</p> <p>Concern over the location of Traveller pitches and other housing.</p> <p>The site is liable to flood; inadequate consideration has been given to alternative sites.</p> <p>The above problems (especially traffic congestion during the construction phase) would be worsened by other local planning proposals.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1.</p> <p>With regard to local character, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of West Byfleet. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the</p>

<p>Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.</p> <p>The traffic implications of the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. Other sites proposed for development in the area were included in the traffic mitigation evidence base, and also provided to inform the planning of infrastructure providers.</p> <p>The pollution implications of the proposal are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The implications of proposed Traveller pitches are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p> <p>The flood risk implications of the proposal are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The assessment of alternative sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 11.</p>
Response Reference: U0000928
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06755/1
Name: Councillor Deborah Hughes
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
<p>Summary of Comment: Considers that the DPD is neither legally compliant nor sound, and does not comply with the Duty to Cooperate.</p> <p>The DPD was submitted to Council in March with a new addition, UA44. Unlike the rest of the DPD, this had not gone through the consultation process so councillors had not received any feedback on the site from their residents. It is noted that Council has also been asked to agree to a feasibility study to consider a significant development on site. This was mentioned in the DPD as being for just under a thousand flats and the redevelopment of the football stadium to 10,000 seats and 10,000 sqm of commercial space.</p> <p>Residents in the area were and are largely unaware of this development, which is more akin to a town centre development. They have not had notification nor an opportunity to comment on this.</p> <p>The area is part of an historic village setting and would be out of keeping with other properties.</p> <p>The proposals for the site need to give full consideration to environmental factors, and sustainability appraisals.</p> <p>It seems that the proposals for this parcel of land provide significantly less than one parking space per flat, when in reality there are likely to be at least two vehicles per unit. There is no recreation or green space for residents.</p> <p>The flats will be small and overlooked.</p> <p>The area is already subject to traffic issues, including severe, unsafe congestion at the junction.</p> <p>No additional infrastructure has been considered.</p> <p>The area surrounding the site is already severely impacted by overflow parking, particularly on match days. The lack of provision for match parking, coaches, travelling fans and the public is inadequate.</p>

The site has previously been subject to a sustainability appraisal which indicated 40 residences on site would be feasible. This is drastically different to the numbers recently proposed by the Council.
Can it be demonstrated that there is need for this type of housing considering the number of flats being built in the town centre? Is this the housing that residents need?
Wishes to participate at the public examination as one of the local ward councillors representing the local residents. Also has a wider overview of the potential impact on the rest of the ward.

Contributor Proposed Modification: UA44 should be removed from the DPD.
There should be full consultation of residents in the locality, including the whole of the Hoe Valley ward.
A full sustainability appraisal is required to consider the infrastructure requirements and impact of significant development at this site.
Environmental studies need to be confirmed.

Modification Reference: U0000350

Officer Response: Although proposed allocation UA44 was not included in the Regulation 18 Site Allocations DPD, local residents have had an opportunity to comment on the allocation during the Regulation 19 consultation. Section 9 of the Regulation 19 Issues and Matters Topic Paper sets out the approach which the Council took to consultation. It is normal practice for subsequent stages of the plan making process to take into account new information and responses to previous consultations. Furthermore, anyone who is not satisfied with the proposal will have the opportunity to present their case to the Inspector of the Secretary of State at the examination.
It is noted that the DPD does not provide an indicative yield for UA44. This was agreed by Council prior to the publication of the document for the Regulation 19 consultation. The proposed improvement of the Football Club will determine the residential capacity of the residual land that would be available for houses. This will be determined at the planning application stage.
The character of the area surrounding UA44 has been considered in drafting the key requirement for the policy. These include inter alia:
1. "The scale of the development should not detract from the general character and appearance of surrounding streets"
2. "Strong boundary treatments should be designed into the development to respect and enhance local character"
3. "Design of the development to have regard to the adjacent locally listed building."
These are matters that will be addressed and agreed at the planning application stage and residents will have the opportunity to comment on the application when it is submitted. Paragraph 11.2 of the Regulation 19 Issues and Matters Topic Paper sets out that the DPD has been informed by the Sustainability Appraisal. This has provided a consistent basis for describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations. Environmental, alongside social and economic, factors have been considered as part of this appraisal.
One of the key requirements for UA44 is: "appropriate and adequate provision of car, coach and cycle parking in accordance with the adopted car and cycle parking standards but that take into account the site's sustainable location and will not compromise on highway safety." This is a detailed matter that will be agreed at the planning application stage.
Regarding recreation and green space, it is noted that any application will be determined in accordance with Core Strategy Policy CS21. One requirement of this policy is to "ensure schemes provide appropriate levels of private and public amenity space."
Furthermore, it is noted that Objective 2 of the Sustainability Appraisal Framework is to "facilitate the improved health and wellbeing of the population and reduce inequalities in health." One of the questions that has been asked in this regard is whether the

<p>development of a given site would "improve accessibility to leisure and open space for informal and/or formal recreation." In assessing site UA44 against this objective, it was confirmed that the scheme would result in "improved accessibility to leisure space." Indeed, the development is well-served in terms of recreation, with Woking Park and Loop Road Recreation Ground both nearby. In addition Policy CS17 of the Core Strategy will ensure that the development makes a contribution towards the provision of open space and green infrastructure to serve the development.</p> <p>Core Strategy Policy CS21 also provides that new development should "achieve a satisfactory relationship to adjoining properties avoiding significant harmful impact in terms of loss of privacy, daylight or sunlight, or an overbearing effect due to bulk, proximity or outlook." Any potential overlooking issues will be considered as part of the Development Management process. So too will the floorspace and space standards provided for residential accommodation.</p> <p>Paragraph 6.7 of the Regulation 19 Issues and Matters Topic Paper addresses transport provision and confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 of the Regulation 19 Issues and Matters Topic Paper addresses transport and congestion issues in greater detail. It is further noted that one of the key requirements of UA44 is that "Highway improvements may be required at the junction of the site with Knaphill Road and Westfield Avenue to ensure an effective access arrangement to ensure highway safety."</p> <p>Section 6 of the Regulation 19 Issues and Matters Topic Paper sets out the consideration which has been given to the infrastructure required to support the Site Allocations DPD. In particular, Paragraph 6.2 provides that the Council has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD.</p> <p>One of the key requirements of UA44 is that "a residential match day and non-match day events Travel Plan will be required." This will help manage the travel needs of occupiers of the site.</p> <p>Prior to the publication of the Regulation 19 Site Allocations DPD, it was agreed by Council to remove the indicative yield for UA44. This reflects that the stadium is the key driver of UA44 and will determine the level of residential units provided. This can only be determined when a specific proposal comes forward. In any case, it is noted that any yields provided by the Site Allocations DPD are only indicative. The actual density and quantum of development can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage.</p> <p>As set out in Paragraph 1.14 of the Regulation 19 Issues and Matters Topic Paper, all the proposed sites will make a significant and meaningful contribution towards meeting the housing requirement. Not allocating any or all of the sites (or not having new sites to replace any site that is rejected) could undermine the overall delivery of the Core Strategy.</p>
Response Reference: U0001480
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06481/1
Name: Greta Hughson
Number of Signatories: 1
Comment Type: COMM
Site Reference: UA15
Summary of Comment: Proposed modifications for site UA15 (Big Apple).

<p>A permanent venue for the Phoenix Cultural Centre and Fiery Bird is desired, and should be explicitly allocated within the plans for UA15. The Local Development Scheme takes cultural strategy into account, but is no longer on the council website. Does not wish to participate in examination or be informed of next stages.</p>
<p>Contributor Proposed Modification: A permanent venue for the Phoenix Cultural Centre and Fiery Bird is desired, and should be explicitly allocated within the plans for UA15.</p>
<p>Modification Reference: U0000418</p>
<p>Officer Response: The purpose of the Site Allocations DPD is to identify land and to enable the quantum of development in the Core Strategy to be delivered. It does not deal with individual companies or operations that could occupy allocated sites. The Council is aware of the need of a venue for the Phoenix Cultural Centre and the Fiery Bird and could work separately with the owners to find a space for their operations.</p>
<p>Response Reference: U0001734</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06561/1</p>
<p>Name: Derya Ibrahim</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05</p>
<p>Summary of Comment: Object to removing land from the Green Belt in Byfleet. Parvis Road is already heavily congested at rush hour. The part of GB5 behind Sanway Park has flooded many times, most significantly in 2013 when Sanway Close flooded. Byfleet has very little green land. Building on these sites will increase air pollution.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7. Historic flood events in the area are covered in the Strategic Flood Risk Assessment, especially in relation to 2013. However the information provided will be recorded. If and when site GB5 is allocated for development in future, any requirements on the site allocation policy will be informed by available information and policy at the time, including on flood risk. The impact of loss of green space on local wellbeing and amenity is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in Section 5. The impact of the proposals on air pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p>
<p>Response Reference: U0001577</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 02822/2</p>
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Name: Mr And Mrs Leo And Monica Iles
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Objects to development of GB7. Concerns regarding: Urban sprawl encroaching further into the countryside; Loss of open space; Traffic congestion; Air and noise pollution; Safety of children and elderly.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 4 addresses the issue regarding loss of open space. Section 21 addresses the associated issue regarding urban sprawl. Section 8 addresses the issue regarding pollution. Section 13 addresses the issue regarding road infrastructure and associated traffic congestion. The Site Allocations DPD includes a number of key requirements to ensure that there are effective and well designed access arrangements to sites to minimise conflict between vehicles and pedestrians. In addition, policy CS18 and a number of the key requirements all seek to minimise the use of car travel, which will have a bearing on safety. It should be acknowledged that there are other safety matters such as overspeeding and wreckless driving which are beyond the remit of the Site Allocations. Finally, the Core Strategy directs most of the allocations to sustainable locations in relative proximity to facilities to reduce the need to travel by car.
Response Reference: U0001703
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 03909/1
Name: Mr David James
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is legally compliant and complies with Duty to Cooperate. The DPD is not sound. Concerns regarding traveller pitches on GB10. A reduced number of traveller pitches per site would ensure a greater chance of acceptance and integration into the local community. Proposes that the number of traveller pitches be reduced to a maximum of 5. This will strengthen the soundness of the DPD. Does not wish to participate at the oral examination. Wishes to be informed of next stages.
Contributor Proposed Modification: Proposes that the number of traveller pitches be reduced to a maximum of 5. This will strengthen the soundness of the DPD. A reduced number of traveller pitches per site would ensure a greater chance of acceptance and integration into the local community.

Modification Reference: U0000378
Officer Response: Section 3 of the Regulation 19 Issues and Matters Topic Paper addresses concerns regarding traveller pitches in Byfleet and West Byfleet. The practice guide for designing gypsy and traveller sites (2008) has been withdrawn, however this stated that the ideal maximum figure for pitches on one site was 15, which none of the proposed sites in West Byfleet and Byfleet exceed.
Response Reference: U0001445
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): F

Contributor Reference: 05872/1
Name: Mr Stuart James
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: The development proposals for Green Belt sites in the Byfleets are totally inappropriate. The area is already full up, with no room and scope, this needs to be addressed by WBC. The infrastructure is full and cannot cope with the huge increase that will occur (including health centre and schools). Where is the brown belt assessment? Using up Byfleet's Green Belt when there is much more in the Borough is a total distortion. Roads cannot cope with the existing traffic; the proposed A245 mitigation measures will make no difference.
Contributor Proposed Modification: This document needs to be revised to reflect a balanced accross the borough approach, rather than targeting the Byfleet wards.
Modification Reference: U0000274
Officer Response: The impact of the proposed Green Belt developments on the amount of open space in the area of local residents is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. The impact of the proposed development on local infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The assessment of brownfield sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 11. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. The impact of the proposed development on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.
Response Reference: U0001237
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06152/1
Name: Mr Keiron James
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
Summary of Comment: Wishes to register strong objections to the proposals to remove the majority of remaining Green Belt in the Byfleets ward for housing development.

Reasons for objections set out below: Green Belt - during recent consultation, there was no justified response to why nearly all of the Byfleets very limited Green Belt has been targeted for removal, within the proposed 2% [overall in the Borough]. There must be workable solutions elsewhere in the Borough. Brownfield - Does not believe that Brownfield sites have been examined sufficiently for possible development. Flooding - Large areas of Byfleet are prone to flooding. Building on the proposed flood plain significantly increases flood risk to many homes, meaning they will not get home insurance cover. Many reports and photographic evidence of widespread flooding. Traffic - local roads are already at capacity and can not cope, let alone with another 1,500 cars. Proposals to stops motorists turning right out of Seven Hills Roads and putting cross hatching on roundabouts on Parvis Roads will not work. Intelligent traffic signals are already in place in West Byfleet, but do not work at peak times. No automated system will ease congestion. We are full up and there are no solutions to improve things. Byfleets ward already has the highest levels of pollution, the proposal will further impact our health. Infrastructure - a major issue. Local primary schools are at maximum capacity, and have been enlarged already to double intake. There is no room for additional children. West Byfleet health centre has 28,000 patients on its books, its a nightmare getting appointments and there is insufficient parking. They can not meet the Government's recommended times and there is no capacity for 2,000-4,000 additional residents. Overdevelopment - the Government has just released figures reducing the housing requirement by 20%, yet WBC still plans to build 5,000 houses over the next 10 years. This is a surplus of 2,000 to the requirement, and if need in the Borough is met or exceeded, there is no need to release Green Belt for additional development.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, particularly sections 4 to 8, 11, 13. The point about overdevelopment with regard to the latest housing need figures is addressed in paragraph 1.5 of this paper. The justification for releasing Green Belt land, and safeguarding it, for development needs can be found in sections 1-3 of this paper.
Response Reference: U0001580
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06805/1
Name: Stephanie James
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Strongly objects to release of Greenbelt in Byfleet. Disproportionate amount of Greenbeld in Byfleet compared to elsewhere in the Borough. Brownfield sites should be prioritised - these have not been sufficiently assessed. Infrastructure capacity is a significant issue: Roads e.g. Byfleet Road and A245 are currently congested and at capacity and cannot absorb upwards of 1500 extra cars. The proposals to stop motorists from turning right out of Seven Hills Road, forcing them instead to go around to the Painshill roundabout, or come in from Weybridge, will not make any difference, and will just move the problem, where there is already an issue on the Painshill roundabout and/or traffic coming in from Weybridge from the brooklands road. Roundabout hatchings won't work either as they will

be ignored. No amount of automated / intelligent traffic signals will work, including in peak times - the area is just overloaded with cars.
 Primary schools are at maximum capacity, having all recently been enlarged to take double intake classes.
 The West Byfleet Health Centre is full, with already limited parking. No capacity for a further 2000-4000 patients.
 Byfleet often floods. Building on proposed floodplain areas will increase the risk.
 A surplus of 2000 above the required housing number amounts to overdevelopment.
 There is no need to release Greenbelt land if needs are already being met, or indeed exceeded.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The issues raised in the representation have been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Sections 1 and 2 describe why the Council believe exceptional circumstances exist to justify the release or safeguarding of Green Belt land, including that in West Byfleet and Byfleet. Concerns about the disproportionate amount released in West Byfleet and Byfleet are addressed in Section 5. Section 11 describes how the Council has conducted a thorough assessment of brownfield sites across the Borough.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. This section also stresses that key requirements included in the policies expect detailed transport assessments to be submitted with planning applications, which may result in further site specific traffic mitigation measures being identified.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The representation regarding unnecessary, excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper. Section 2 sets out in detail why sites GB4 and GB5 need to be safeguarded for development beyond 2027. Sites GB4 and GB5 have not yet been allocated for

development, only safeguarded, in recognition of the fact that needs, and the planning policies reflecting them, may change beyond 2027.
Response Reference: U0001653
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 03300/1
Name: Mr N.R. Jarman
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
<p>Summary of Comment: The DPD is neither legally compliant nor sound, because: Whilst redevelopment of site UA44, or parts of UA44, are justified, UA44 is not sound as it has not been positively prepared nor justified, due to inadequate degree of consultation. Only consulting on site UA44 - which at 4.64ha is the fourth largest allocation and is for large-scale major development - at Regulation 19 stage fails to comply with paragraphs 2.10 and 2.20 of the SCI, which specify that the extent of consultation for DPDs should be proportionate to the scale of issues involved in the plan; and where early consultation is considered to be beneficial when producing work to inform LDDs (the Council should seek views of certain bodies and developers to help identify site-specific infrastructure requirements).</p> <p>Previous versions of the site allocation and papers presented at the 26 July meeting referred to GolDev redeveloping the site to provide a figure of 992 dwellings; 10,000sqft of retail space; a 10,000 all-seater stadium; a hospitality lounge for 200-500 people; and 671 parking spaces. The need for these dwellings, retail space and infrastructure have not been supported by any published evidence. 992 dwellings (which would be a gross overdevelopment of the site) was removed after the Council meeting on 18 October 2018 and no new figure was inserted. The figure of 992 would be unnecessary as other development sites will effectively contribute to meet Woking housing targets. There is no assessment to determine whether the retail space is needed, or what its impact would be on the local shopping centres at Kingfield, Blackbridge Road and Wych Hill (as per NPPF paragraph 89). Despite the Council meeting resolving to delete only the housing figure, all figures have now been deleted from the DPD and have not been replaced with new calculations. This makes the allocation difficult to scrutinise.</p> <p>With reference to highways improvements, there is no Knaphill Road in Woking - the supporting text to UA44 has not been given due consideration.</p> <p>Wishes to comment on any further amendment or responses made with respect to UA44. Whilst it is unlikely that would require participation at the oral part of the Examination, reserves the right to do so.</p>
<p>Contributor Proposed Modification: There needs to be further public consultation on the proposed development of site UA44, with research supporting proposals prepared and published for consultation in line with planning policy rather than aspirations for the football club.</p> <p>The site can clearly support some housing development. Sites UA19-UA23 cover proposed housing developments in the area of south Woking outside the town centre and immediate locality. The numbers of units proposed for those sites correspond to around between 33 and 86 dwellings per hectare. When proposals for the development of Westfield Tip (Application ref 2006/1237) were considered in March 2007 the officer's report recorded housing densities in the area including as follows: Westfield Avenue 14dph Hawthorne Close 56 dph</p>

Cheshnut Grove 20dph
Granville Road 41dph

The density for the Westfield Tip development itself was assessed to be 80 dph. Efficient use of land whilst having regard to the neighbouring area would suggest around that density figure for the area of the site outside the football ground, although still above the upper range for housing in urban areas as recommended in table 4 of the WBC Strategic Housing Land Availability Assessment.

It is clear that Woking Football club aspire to have a 10,000 all seated stadium on the site to replace the existing 6,000 capacity ground. Having reference to other modern football ground developments of around 10,000 seats (e.g. Mansfield, Shrewsbury, Colchester and Lincoln) such grounds (excluding parking) occupy typically around 1.5-2 ha.

Assuming the same at Woking, underground car parking of an appropriate number (and ignoring any retail taking further land), this would mean around 2.5-3 ha of housing land available giving a total of 200-240 residences on the site, assuming 80 dph. The 992 figure in the draft to council would equate to an enormous 331-397 dph, clearly too high for this location. As the July 2018 Goldev states 992 dwellings would be required to fund the stadium scheme, a development of 200-240 residences could not fund the complete 10,000 seat stadium the club seek. The case for such a large stadium however has yet to be made. The current ground rarely reaches capacity. Whilst the club has aspirations to achieve promotion to higher leagues there is clearly not the need for a 10,000 seat stadium now. EFL only require a capacity increasing after joining up to 5,000, with at least 2,000 seats. It may be that UA44 should be amended so that land capable of development to a larger stadium is safeguarded in the plan, whilst only some of the ground is redeveloped supported by the residential development. The remaining elements of the ground could then be built later when (if) there is clear demand such that money could be borrowed to support the development and which is then paid for by the fans buying tickets for matches.

Prior to putting figures into UA44 for such a scheme a traffic assessment must be completed to assess whether the local roads and the area generally can support such a development with respect to capacity and on road parking. Living in Turnoak Avenue we already at times suffer inconsiderate and irresponsible parking by visitors to the football ground.

Modification Reference: U0000205

Officer Response: The Council is satisfied that it has done what it can within the available resources but has gone beyond the statutory requirements to engage the community during the preparation of the DPD. This is set out in detail in section 9 of the Regulation 19 Issues and Matters Topic Paper. The Council could not consult on Woking Football Ground site in earlier rounds of DPD consultation as the site was only identified after the Regulation 18 consultation had concluded. It was identified as part of work to update the Council's Strategic Housing Land Availability Assessment, and was subsequently included in the DPD as the site was considered to be suitable, available and achievable at the scale identified in the SHLAA 2017. Officers then modified the site allocation policy to reflect early discussions with the stakeholders involved in the redevelopment of the site. However, as noted in the representation, the Council at its full meeting on 18 October 2018 agreed that reference to the anticipated development yield of 992 net additional dwellings at the site be removed.

The purpose of the DPD is to identify and allocate land for development to meet future development needs. Separate to but in parallel to the DPD preparation process, the stakeholders involved in the proposed redevelopment of the football ground will be engaging extensively with the local community to help put together detailed proposals that reflect the ambitions of both the Football Club and the local community, in line with SCI requirements. It is through this consultation process that the scale and detail of development will be formulated, including housing yields, the need for various uses such as commercial and retail development, the size of the new stadium, parking requirements etc. Further information about the project is on the Council website.

<p>Any planning application submitted for the football stadium will be considered by the Local Planning Authority on its own merits, taking into account views from the local community. Should a detailed proposal come forward, it would need to comply with local and national planning policies, including the key requirements in policy UA44. A number of impact assessments would be submitted with any planning application, such as a detailed transport assessment, identifying any additional mitigation measures required to make development acceptable. A transport assessment would assess whether, as mentioned in the representation, the local roads have the capacity to support development at the scale proposed in the planning application.</p> <p>There will be further opportunities for public consultation - both at the Examination stage of the Site Allocations DPD, and during planning application stage (and potentially at pre-application stage).</p> <p>The density figures provided in the representation are acknowledged. However, density figures will be determined during the design stage of preparing development proposals and then considered in detail at the development management phase.</p> <p>The reference to Knaphill Road was made in error and will be modified to read Kingfield Road.</p>
Response Reference: U0001077
Officer Proposed Modification: Amend key requirement 14 of UA44 to read: "Highway improvements may be required at the junction of the site with Kingfield Road and Westfield Avenue...".
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 04311/1
Name: Mr Graham Jarvis
Number of Signatories: 1
Comment Type: COMM
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Objects to any potential reintroduction of the Upshott Lane fields in the development scheme on the grounds that it would greatly damage the whole character and heritage of the village.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Comment noted.
Response Reference: U0001648
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06520/1
Name: Ms Louise Jelly
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Object to proposals for Byfleet and West Byfleet since: - The sites are Green Belt land. - The Council has not considered brownfield sites in the local area. - The location of parking for the new developments has not been considered, and addition of car traffic to an area which already suffers heavy congestion from 3pm. Worried that there has been an attempt to rush the proposal through without notifying the people concerned.

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The necessity of removing land from the Green Belt for allocation and safeguarding for development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. The consideration of brownfield sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 11. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. Parking for the new development will be in accordance with the Parking Standards SPD, or any successor document. The adequacy of the Regulation 19 consultation process is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 9.
Response Reference: U0001721
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06607/1
Name: Ms Andrea Jenner
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Objects to the proposed development on Green Belt land in Byfleet and West Byfleet. Plans to build 1000 houses all of which will have to use the already overcrowded road between Byfleet and West Byfleet should not be pursued for the following reasons relating to increased traffic: 1. Traffic mitigation is based on the Highways Agency improved M25 Junction 10 which may not go ahead. 2. Traffic leaving Seven Hills Road will be stopped turning right onto Byfleet Road, increasing traffic problems at Pains Hill junction and backing up traffic on Byfleet Road. 3. A cycle lane would not be built as increased traffic will put cyclists at risk 4. There is no provision for improving the road from Byfleet to Addlestone which is already congested due to traffic lights at the railway bridge These problems will not just be at rush hour as new home owners will drive to the shops. Companies at Brooklands that carry out deliveries will be impacted, and may consequently move to a different location with the loss of jobs. The local doctors' surgeries are full and increased numbers will result in longer waiting times. Local schools would not be able to cope with increased numbers, and roads would be congested by extra cars on the school run. There is insufficient fire service provision as the nearest station at Pains Hill is regularly closed. The next nearest station is Woking. The Green belt land in Byfleet is a buffer from M25 pollution.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation has been addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Transport infrastructure is addressed by Paragraph 6.7, and Section 13. In particular, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry

<p>out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. GP provision is addressed by Paragraph 6.12. Education provision is addressed by Paragraph 6.9. Air and noise pollution is addressed by Section 8. Regarding the fire service, Paragraph 12.73 of the Draft Infrastructure Delivery Plan notes that the service will continue to review crewing levels based on assessment of the level of community risk.</p>
Response Reference: U0000960
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05552/1
Name: Mr A Jennings
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
<p>Summary of Comment: The plans around not sound, cannot be justified and are not consistent with national policy, nor are they effective or sustainable. Infrastructure is currently inadequate and oversubscribed for the Byfleets, without an increase of 900 plus homes e.g. traffic (heavy congestion on A245), doctors (unacceptable waiting times), schools. The area is prone to flooding, which has worsened over 50 years of living in Byfleet. Increased development and lack of sewage and drainage infrastructure would have contributed to bad flooding in 2012. Further water displacement from increased development will make the situation worse. Inadequate awareness of land ownership e.g. church land in site GB5. High pollution levels along A245 in Woking will increase with further development and subsequent traffic; also compounded by increase in parcel delivery vehicles from Brooklands (excess of 650 small vans and 120 HGVs a day). The sites at Martyrs Lane (with better access to M25) and Pyrford should be revisited for suitability for development - this would ease traffic on the A245. Objects to overdevelopment of Traveller sites in Byfleet - sites at West Hall and Murrays Lane will be within 1 miles of each other. Removing Greenbelt will result in the merging of West Byfleet and Byfleet, which should be two separate towns. WBC should talk to neighbouring councils to ease road congestion and create relief road areas. Ignores opportunities to improve national infrastructure e.g. to widen M25 and accommodate HS4 Air. Byfleet is considered by council as a dumping ground for development.</p>
Contributor Proposed Modification: The Murrays Lane 3 year licence for traveller use should be upheld and the site should be closed down.
Modification Reference: U0000213
<p>Officer Response: Section 6 of the Council's Regulation 19 Issues and Matters Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the</p>

infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Topic Paper. Concerns raised regarding air pollution are addressed in section 8 of the Topic Paper.

It is acknowledged that land to the east of Martyrs Lane has good access to the M25. However, it would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.

- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;

- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.

- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.

- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.

- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites in Byfleet and West Byfleet.

The concern regarding traveller sites is addressed in detail in section 3 of the Topic Paper. Paragraph 3.8 addresses concern that all traveller sites are concentrated in the Byfleet and West Byfleet ward, and reiterates the benefits of allocating Murrays Lane.

Section 21 sets out how the Council is confident that none of the proposed allocations will lead to unacceptable urban sprawl.

Surrey County Council is the highway authority for the entire county, including the road network in Runnymede and Elmbridge. The Council is working both with its neighbouring boroughs and with the County Council on identifying suitable road infrastructure improvements to mitigate impacts of future development. Some of the proposed mitigation measures put forward in the transport studies are indeed in neighbouring boroughs.

The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network.

Response Reference: U0001117

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06663/2

Name: Mr Erik Jespersen

Number of Signatories: 1

Comment Type: COMM

Site Reference: UA04, UA31

Summary of Comment: No comment on legal compliance. No modification proposed. No comment on duty to cooperate, as the DPD has been positively prepared, on is it justified, on consistent with national policy and does not consider the DPD to be effective. Would not wish to participate examination and wishes to be informed of the next stages of the DPD.

Proposal for the development of the area with site reference UA4 does not take into consideration the current Community Benefit of the services provided by the organisation known as The Lighthouse, and the need therefore to provide alternative site location within the Town centre for this usage.

The Lighthouse contains 10,000sq ft of space dedicated to assisting the needy and vulnerable, addressing the poverties of resources, relationships, and identity. The variety of projects includes a food bank, workshops and cafe.

The 20+ projects are run primarily by volunteers. The Lighthouse works closely with a number of Woking Council departments, supporting the unemployed, refugees, homeless, vulnerable individuals and families, etc.

The Lighthouse has been in conversation with Woking's Chief Executive Ray Morgan, who has expressed personal commitment and intent to see The Lighthouse given a permanent home within the Town centre. Therefore, it makes sense that the Council articulates this intent with its Strategic Plan and DPD.

For comparison, it is noted that the DPD regarding development of area UA31 - Walton Road Youth Centre - acknowledges the current community work within that site, and makes future provision for it: Re-provision of the existing community facility suitable for use by a youth group in an improved form to ensure the development complies with Core

<p>Strategy policy (pg 169) and Re-provision of the existing community facility in an improved form would be required as part of any redevelopment.(pg 171). An amendment is therefore proposed to include a similar statement in the DPD strategy for area UA4.</p>
<p>Contributor Proposed Modification: It is noted that the DPD regarding development of area UA31 - Walton Road Youth Centre - acknowledges the current community work within that site, and makes future provision for it: Re-provision of the existing community facility suitable for use by a youth group in an improved form to ensure the development complies with Core Strategy policy (pg 169) and Re-provision of the existing community facility in an improved form would be required as part of any redevelopment.(pg 171). An amendment is therefore proposed to include a similar statement in the DPD strategy for area UA4.</p>
<p>Modification Reference: U0000427</p>
<p>Officer Response: The Site Allocations DPD does not deal with individual companies but rather with development uses. It is acknowledged that the Council has previously facilitated the occupation of the premises at this site, but this is separate to the allocation of the site in the DPD for future redevelopment. The Council is aware of the Lighthouse needs and may discuss their relocation as a separate matter. The Council considers the wording for the Policy is appropriate and reflects the requirements of the Core Strategy.</p>
<p>Response Reference: U0001147</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06849/1</p>
<p>Name: Mr Tom Jestico</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11, GB12, GB18</p>
<p>Summary of Comment: GB4 and GB5 are unsuitable for housing due to the additional traffic that would be generated. Parvis Road already has heavy traffic all day but especially peak hours, causing pollution. There has been a huge increase in traffic in the last five years, particularly heavy lorries and construction vehicles, at all hours of day and night, causing my house and others to vibrate. This has not been taken into account in the allocation of these sites. GB10 would only be suitable for very low density development due to proximity to the M25 and the traffic that would be created, further exacerbating congestion and pollution along Parvis Road. GB10 would be unsuitable for Traveller pitches due to noise and pollution from the M25. Travellers are entitled to the same environmental protection as the rest of us. GB11 would be suitable for employment use e.g. industrial and/or research, as proposed. GB12 and GB18 look suitable for the uses proposed.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The impact of the proposals on traffic levels in the area is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. WBC considers that, with the mitigation measures described in that section, GB10 would provide acceptable conditions for both standard housing and Gypsy and Traveller pitches.</p>

<p>The proposed indicative density for site GB10 of 40 dwellings per hectare (dph) is consistent with the Core Strategy, which recommends a density of 30-50 dph for 'Green Belt sites to be released after 2021/22'. The figure only relates to the developable area of the site (approximately 14.8 ha), and does not include the areas of woodland and green infrastructure which are proposed to take up nearly half the site's total 29.33ha area. Agree that GB11 would be suitable for employment use, although it now has permission for a housing led development with a relatively minor element of office floorspace. Welcome support for sites GB12 and GB18.</p> <p>It is true that only part of the site is within standard walking distance of West Byfleet District Centre and the station. However this level of proximity to services is still better than that for most other sites considered through the Green Belt Boundary Review. In addition, only slightly over half the total area of the site is proposed to be developed, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is likely to limit development on the areas of the site furthest from the District Centre. The key requirements in policy GB10 include to 'improve sustainable transport infrastructure including pedestrian and cycle links and bus services to West Byfleet District Centre'. It is therefore not considered that the residents would be entirely car reliant.</p>
Response Reference: U0001422
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06867/1
Name: Mr Tom Jestico
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: I and most of those making representations are not sufficiently qualified to know if the DPD is legally compliant or not. The DPD has not met the Duty to Cooperate, since the Council should have sent letters to all residents of Byfleet with details of the proposals; not everyone can take part online. The DPD is positively prepared, but not justified or effective. Most respondents, including me, are unqualified and insufficiently experienced to comment on the quality of the DPD.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The adequacy of communications in the Regulation 19 consultation is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 9.
Response Reference: U0001571
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06858/1
Name: Jean Jobson
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Please consider the point of view of local residents and imagine being in their shoes- don't just follow orders. The decision will affect future generations. Can the area (traffic, doctors and schools) really sustain this proposal
Contributor Proposed Modification: None Stated

Modification Reference: NOMODS
Officer Response: Three public consultation exercises have been carried out on the Site Allocations DPD (as well as the three rounds of consultation on the Core Strategy, which determined the proportion of development to be allocated in each broad area of the borough). At both previous stages the views of local residents expressed through those consultations have been taken into account, and amendments made to the documents accordingly as appropriate. The same will be true of the recently completed consultation. The impact of the proposals on local infrastructure, including medical and education facilities is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6. The impact of the proposals on traffic in particular is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13.
Response Reference: U0001406
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06687/1
Name: Ms Christine Johnson
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: GB10 - Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. Parvis Road is congested at the best of times and in gridlock during morning and evening rush hour and this is before the Broadoaks Development is completed with at least 155 more cars travelling on this section of road. Parvis Road cannot sustain any further traffic. There is already air and noise pollution from the proximity to the M25. Adding approximately another 555 cars would potentially affect the health of existing residents. Accepts that Woking Council needs to identify land to build more houses but another 555 homes at West Hall, in addition to the 155 already granted at Broadoaks is far too much for one area of the borough to bear. This would have an adverse and unacceptable impact on the size of the village (+50%) and remove the status of West Byfleet as a village. New housing should be spread around the borough not densely concentrated in one village. In addition to the impact on roads mentioned above, West Byfleet doctors' surgeries and schools are at capacity. No consideration appears to have been given to how families in 555 new homes will be catered for. Our greenbelt should be protected and not used for Travellers' pitches. In addition to the proposed heavy concentration of new homes at West Hall and Broadoaks, adding 15-21 pitches for travellers will only serve to exacerbate the issues above. The Martyrs Lane site should be reconsidered.
Contributor Proposed Modification: None Stated
Modification Reference: U0000381
Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4,

the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

The impact of the proposed development on noise and air pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.

The amount of development in Byfleet and West Byfleet is addressed in Section 5 in the Regulation 19 Issues and Matters Topic Paper.

The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper. The reasons for not removing the Martyrs Lane site from the Green Belt are addressed in the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11.

Response Reference: U0001102

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06891/1

Name: Mr Gary Johnson

Number of Signatories: 1

Comment Type: OBJ

Site Reference: SA1

Summary of Comment: The Site Allocations DPD is unsound because it does not meet the requirements of para 35 of the NPPF, in providing an appropriate strategy taking account of reasonable alternatives and based on proportionate evidence. Nor is it consistent with national policies. Reasons are detailed below:

The Council are seeking to remove site GB10 from the Green Belt. Green Belt was developed to prevent urban sprawl, the boundary of the above site abates the Broadoaks site which has had its Green Belt designation lifted and has planning approval for 156 properties, 67 affordable homes, a 60 bed care home and a small office development.

This development will provide accommodation for about 350 people will 300 cars (conservative estimate), all with no extra infrastructure to support it - schools, roads, healthcare etc.

If GB10 were to be allowed, there would be an uninterrupted continuation of West Byfleet, and this would reduce its separation with Byfleet, clearly continuing urban sprawl.

The loss of this Green Belt designation, in addition to Broadoaks development, is inappropriate. Other areas should share the loss of green space, as the sites concentrate Green Belt reduction in one area of the Borough.

Traffic - Parvis Road is already congested and the traffic from Broadoaks will add to the issue. Development of 550 dwellings at GB10 will result in an unacceptable level of congestion and pollution.

Infrastructure - existing provision of healthcare and schools are at or near capacity. Broadoaks will add to the problem. There is no provision to support additional housing in the area.

<p>Traveller site - allocation of traveller sites is always controversial and NIMBY policy will generally apply. As stated, GB10 should not have its Green Belt status removed, and based on this a travellers site should also not be considered.</p> <p>While appreciating the need for travellers sites, these should be restricted to 3 in any one location. It is inappropriate that the largest traveller site is concentrated in one area of the borough. The attempt to place travellers pitches at West Hall seems last minute and 'under the radar'. Residents were only made aware of this on 10 October 2018.</p>
<p>Contributor Proposed Modification: Suggests smaller traveller sites, max. 3 in any one location.</p>
<p>Modification Reference: U0000241</p>
<p>Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, particularly sections 1, 3-6, 8, 10, 11, 13, 21.</p> <p>The development application granted at Broadoaks (GB11) has been accounted for in the DPD, and the timing of substantial commencement of development at the site will inform future updates of the allocation.</p> <p>Regarding the inclusion of travellers pitches at West Hall between the Regulation 18 and Regulation 19 stages of consultation, these have been added to the DPD in accordance with the relevant planning guidance and latest information at the time. Consultation has been carried out at the Regulation 19 stage. The changes reflect the latest evidence including site availability, and go towards meeting the accommodation needs of travellers. For further detail please see section 3 of the Council's Regulation 19 Issues and Matters Topic Paper.</p> <p>On the point about restricting the size of travellers sites to 3 in any one location, the Government's Good Practice Guidance on Designing Gypsy and Traveller Sites states in para 4.7 states that 'experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage' and on the back of this suggests that sites should consist of up to 15 pitches unless there is clear evidence to suggest that larger sites are preferred by the Gypsy or Traveller community. However the guidance also notes that smaller sites, of 3-4 pitches, can also be successful, particularly where designed for one extended family. This guidance, together with conversations with Gypsy and Traveller groups in the Borough and the need identified in the Borough, sits behind the size of sites put forward in the DPD.</p>
<p>Response Reference: U0001568</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06175/1</p>
<p>Name: Mr Peter Jones</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10, GB18</p>
<p>Summary of Comment: Does not wish to speak at examination and wishes to be informed of the next stages.</p> <p>The SADPD is unsound because does not think GB10 or GB18 in the Proposals Map should ever be removed from the Greenbelt or considered for development for the following reasons:</p> <p>GB10 is performing its Green Belt functions by checking the unrestricted urban sprawl of built up areas which includes Broadoaks. None of the other potential sites have these encroachment concerns.</p>

Another function of Greenbelt is to enhance and preserve the countryside and any development on the GB10 site would most certainly undermine this. Noise and pollution created by the M25 on one side and a very proximate housing estate cannot be mitigated by landscaping. Smaller household Planning applications need to stringently justify release from green belt but larger scale development appears to undermine this. The combined plans for West Byfleet go far beyond what could be considered as a reasonable contribution. Other Greenbelt sites in, for example, Pyrford and Woodham, have been spared designation on grounds that could just as easily apply to GB10 or are there other factors that need to be published?

The site is regularly flooded and although the DPD proposes that, among many others, more detailed investigations need to be performed this study must incorporate a review of all drainage in and around Dartnell Park. The surface water drainage systems is inadequate. GB 10 site appears to act as a flood plain for the surrounding area. Strongly believe that the risk of flooding the entire Park estate would increase significantly and could not be mitigated against.

Increase in traffic, noise and air pollution that the GB10 site will inflict on the area. The A245 is already congested and users cut across Dartnell Park. Does not believe that any of the, unspecified, mitigation measures that the DPD assumptions rely upon will ever be possible. The distance between the GB10 site and West Byfleet Town Centre is sufficient to warrant taking a car which will exacerbate the traffic problem and upon arrival, assuming the Town centre plan goes ahead with its inadequate parking provisions. None of the assumptions and recommendations surrounding these factors make any sense to those of us who already live in the area.

The three main sites under current consideration for development in West Byfleet will increase the local population to levels that simply cannot be serviced by current local infrastructure establishments. The DPD recommends that a contribution to educational resources is considered appropriate but all three primary schools have already stated that they have already expanded to the limit of the land they occupy. There was an intention to locate a new school on the Broadoaks site but this has now become an elderly care home and in addition the only easily accessible secondary school in the area is already overcrowded. Impact on parents dropping children to school and quality of life. The three medical practices already operating at the West Byfleet Health Centre have all stated that they are under pressure with the existing population. The care home intended at Broadoaks plus the new housing there and in the Town Centre will easily absorb any underutilised capacity but there are absolutely no plans to invest in any supplemental facilities, a belief that reconfiguring existing services will be sufficient. The Woking Community Hospital will take on the Town Centre developments and other site developments. however, an ageing population is already placing an ever increasing demand on health and care services, which are currently inadequate.

The DPD states that alternative smaller more urban locations, which would have been preferable to the Council, have been rejected for Traveller pitches. Would like to know which urban sites have been rejected and for what specific reasons as the criteria the Council has used to select GB10 as a better site. Demands on the local schools and health services and have a significant detrimental effect on the character of the area as a whole. The potential cost of the land and section 106 agreements the Council tries to negotiate. Researched the locations of other traveller sites, with more than 10 pitches, in the County and note that the vast majority are located a fair distance from conventional residential

areas. The only exception was a site in Epsom where the housing surrounding the site was modest by comparison to West Byfleet and therefore the impact on the visual amenity and character of the area is not as dramatic as it would be by locating such a site in GB10. Although understands the reasons for wanting to locate such sites as close as possible to educational and other public amenities. impact on both communities forming a conventional neighbourhood.

GB18 Part of the justification for removing this site from the Greenbelt is created by removing West Hall. Strongly object to both proposals and think that both sites should retain the strongest possible Greenbelt protection.

The claim that the site allocation process is based upon evidence is unsound as it relies heavily on the outcome of future assessments, unspecified mitigation measures and assumptions that are not available to examine. The cumulative impact of all the plans proposed for West Byfleet, on Schools, Health Services, Traffic, Pollution, Parking, , Wildlife, Wellbeing , Village life and consequently House Prices (both existing properties and any new builds has not been properly assessed).

The process WBC has undertaken relies heavily on the voluminous material published on the website. This is daunting, very time consuming and troubling to examine and interpret this complexity and it is completely unfair to expect the worst affected neighbourhoods to defend themselves without the kind of resources, expert and financial, that is available to WBC.

Contributor Proposed Modification: GB18 and GB10 should not be removed

Modification Reference: U0000455

Officer Response: Objection to the removal of GB10 and GB18 is noted.

It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes. It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. The appropriateness of the Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12.

In regards to noise and air pollution these issues have been addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.

The Council accepts that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has made sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.

In terms of the Pyrford site GB13 not being allocated, GB13 is within the designated Escarpment of Rising Ground of Landscape Importance which policy CS24 Core Strategy specifically identifies as a key landscape to be conserved and where possible enhanced. GB13 form part of the setting of the Registered Park and Garden at Pyrford Court and the Aviary Road Conservation Area (both designated heritage assets). In their present open and rural form this site make an important contribution towards the respective heritage significance of those designated heritage assets. Paragraph 193 NPPF requires "great weight" to be attached to the conservation of designated heritage assets. The Council is therefore of the view that exceptional circumstances do not exist so as to justify the release of proposal sites GB 13 from the Green Belt. Moreover, contrary to Policy CS6 of

<p>the Core Strategy, it is considered that the development of GB13 would undermine the overall purpose and integrity of the Woking Green Belt.</p> <p>The reasons for not removing the Martyrs Lane site from the Green Belt are addressed in the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11.</p> <p>The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. The Council has an adopted parking standards SPD which can be found on the council website. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.</p> <p>It is not envisaged that the delivery of the DPD will have a significant adverse effect on house prices to the extent that it would undermine the viability of a scheme coming forward.</p> <p>The impact on wildlife is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 19. In terms of the loss of Green Belt on residents wellbeing see Section 4 of the paper.</p> <p>The reasoning behind the allocation of Traveller pitches in the Green Belt is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3 in particular paragraph 3.5, 3.6 and 3.7. All the SHLAA (2017) sites were considered for Traveller accommodation. None of them can be developed to achieve positive viability and maximise effective use of the land. The SHLAA (2017) and its appendices can be found on the Council Website www.woking2027.info/ldfresearch.</p> <p>Site GB18 will not be developed and will continue to provide open space and sports provision for the Junior and Infant schools.</p> <p>The Site Allocations DPD has evolved through various stages. Each stage had been used to inform and improve the subsequent version. The Council is satisfied that it has done what it can within the available resources but has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. It has done so in accordance with the Statement of Community Involvement and all other statutory and policy requirements. The Council is also satisfied that sufficient time had been allowed for the consultation and the consultation events were spread across the borough and amongst various groups to give everyone the opportunity to participate.</p>
<p>Response Reference: U0001086</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

Contributor Reference: 06747/1
Name: Helena Jones
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
Summary of Comment: Objects to ill-thought out proposals for development of Greenbelt in and around Byfleet. Quantity of housing proposed for this area is massively disproportionate to any other area within the borough. Infrastructure is already at breaking point - congested roads (e.g. A245 to and from the A3 and to local shops) at all times of day and weekends; lack of capacity at local schools and doctors surgery. Where will cars from an additional thousand homes park at the surgery. The area is prone to bad flooding, which will be exacerbated with the additional homes. Strongly objects to Traveller sites - particularly the quantity, which is disproportionate to that proposed elsewhere in the borough. Development should be spread around different parts of the borough in a more fair and logical way, using brownfield sites instead of greenbelt land.
Contributor Proposed Modification: Spread proposals around the Borough rather than concentrate it all in Byfleet. Use the many brownfield sites instead of Green Belt land.
Modification Reference: U0000442
Officer Response: This representation has been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper. Section 5 provides a response regarding the disproportionate distribution of proposals across the Borough. Section 6 provides a response regarding infrastructure capacity, including schools and healthcare facilities. Section 7 responds to concerns about flooding. Section 13 responds to concerns about traffic and congestion. Section 3 sets out in detail the justification for allocating sites for Travellers, in the proposed locations in the DPD. Section 11 sets out how brownfield sites have been comprehensively assessed ahead of Green Belt land.
Response Reference: U0000918
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06830/1
Name: Mr Barry Jones
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB12
Summary of Comment: Strongly objects to development of Green Belt land in and around Byfleet. Local infrastructure is already stretched beyond capacity e.g. roads, schools, surgeries. Allocations should be more fairly distributed across the Borough.
Contributor Proposed Modification: Fairer distribution of allocations across the Borough.
Modification Reference: U0000279
Officer Response: The Council sets out its response to concerns regarding infrastructure in Section 6 of its Regulation 19 Issues and Matters Topic Paper. The concerns regarding

disproportionate development in West Byfleet and Byfleet are addressed in Section 5; and details about how alternative sites were assessed are provided in Section 11.
Response Reference: U0001503
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06610/1
Name: Mr Stephen Joseph
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Objects to developing Green Belt sites in Byfleet and West Byfleet.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green belt land for development. Section 5 specifically addresses the issue regarding the loss of Green Belt land in Byfleet and West Byfleet.
Response Reference: U0001677
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06653/1
Name: Ms Sushmita Kakati
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB12, GB18
Summary of Comment: The DPD is unsound because GB10 should not be taken out of the Green Belt: It is unclear why so much land is being removed from Green Belt status when development plans are only being proposed for some of this land. This suggests an intent to build on all of the land being released from Green Belt status in the future. No legal protections are being offered to protect woodland or recreational grounds, the words used in the proposal are vague and not legally enforceable. There is no formal protection for the school playing fields that are also losing green belt status. The loss of this land will obviously have a detrimental effect on the health and education of the local children. The plans do not take into account the additional pressure that will be placed on the local infrastructure, harming the health of the local population. The proposals are well above a sustainable level of development for the West Byfleet and Byfleet area. The surgeries and schools are already very full. The Parvis road is already very busy during rush hours and already at the highest congestion category when it was assessed in the last 2 years. There will be a loss of recreational areas. There will be increased pollution. Many of the proposals are in direct and indirect conflict with the neighbourhood plan
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS

<p>Officer Response: The exact locations within site GB10 that will be developed are yet to be determined; to do this effectively will require more detailed design work, on the basis of the key requirements set out in the policy, at the planning application stage. The revision of Green Belt boundaries needs to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent (NPPF paragraph 139). The proposed new Green Belt boundary at GB10 meets this requirement, following field boundaries marked by hedges, an access road, and a woodland edge. Key requirements of the policy, such as 'Retain... tree belts and strengthen with planting to enhance the site's landscape character' are likely to lead to the strengthening of these features. This is the boundary that was proposed in the Green Belt Boundary Review (2015). By contrast, any attempt to draw new Green Belt boundaries around an expected developable area within the site would be likely to mean those boundaries cutting across open land at least until the main development takes place (after 2022), and potentially longer if a different layout is ultimately granted planning permission. This would not comply with the NPPF. Policy GB10 only allows just over half the site's area to be used for development, and makes various requirements regarding green infrastructure, public open space, woodland and landscaping on the remainder of the site. These requirements will form part of the development plan. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990). The school playing fields at site GB18 proposed for removal from the Green Belt will continue to have the protection of policy CS17: Open Space, Green Infrastructure, Sport and Recreation, and also of National Planning Policy Framework paragraph 97. The plan is therefore not considered likely to result in the loss of the playing fields. Given the removal of site GB11 from the Green Belt, it would not be possible to keep site GB18 in the Green Belt, and at the same time ensure a defensible Green Belt boundary. The effect of the proposals on local infrastructure, including healthcare and education facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The concentration of Green Belt loss in Byfleet/ West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on the wellbeing and amenity of residents, including for recreation, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The relationship of the proposals with the West Byfleet Neighbourhood Plan is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16.</p>
Response Reference: U0001141
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06490/1
Name: Peter Kane
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44

<p>Summary of Comment: Object to UA44 proposals. Suspect the stadium will be relocated to the Green Belt. Relocating the stadium is unnecessary and a waste of money; object to public money being used for expansion.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The proposals in policy UA44 are for the retention or replacement of the football stadium on the existing site, not in the Green Belt. The proposals in policy UA44 are neutral as to the source of funds used to redevelop the stadium.</p>
<p>Response Reference: U0001690</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06484/1</p>
<p>Name: Helen Kelly</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10, GB11</p>
<p>Summary of Comment: Objects to building on the greenbelt, housing should be allocated to brownfield sites instead. Concerns over Byfleet merging with West Byfleet. West Byfleet has limited green spaces. Removal of Green Belt status of school playing fields, confusion over whether the schools were allowed to develop this land to expand. Concerns regarding detriment to landscape and wildlife, particularly along the canal. Concerns regarding increased traffic congestion on inadequate road infrastructure. Excessive construction traffic, potential for multiple schemes to be built at the same time. Inadequate parking in village. Access to Dodds Lane is a concern. Questions if pollution and traffic assessments have been carried out. Concerns about strain on healthcare and educational infrastructure. National review on required level of housing has not been considered, and plans have not been amended based on this review.</p>
<p>Contributor Proposed Modification: Objects to building on the greenbelt, housing should be allocated to brownfield sites instead.</p>
<p>Modification Reference: U0000419</p>
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt in Byfleet and West Byfleet. Paragraph 1.5 covers the justification for the housing delivery figures. Paragraph 1.6 addresses the matter regarding allocation to brownfield land. Section 4 addresses the issue regarding the loss of open green space in West Byfleet and Byfleet. Section 6 addresses the issue regarding adequacy of infrastructure, including healthcare, education and transport. Section 13 specifically covers impacts of proposed development on road infrastructure. Section 8 addresses the issue regarding the consideration given to pollution. Section 19 addresses the issue regarding detriment to wildlife. Section 21 addresses concerns regarding urban sprawl (Byfleet merging with West Byfleet).</p>

<p>The issue regarding cumulative development has been addressed. Transport assessments have been undertaken to identify mitigation measures to minimise the impacts of both cumulative and site specific impacts of development.</p> <p>Dodds Lane has been identified as a route to improve accessibility to the South of the GB10 site. The DPD states that the existing footpath should be improved if necessary, however this will be addressed at the development management stage and any alterations to the route will be assessed to ensure that any detriment to existing properties and users of the route is minimised.</p> <p>The Core Strategy clearly specifies that Green Belt will need to be released to deliver the development aspirations and requirements of the Council. The School Playing Fields site (GB18) has been identified to be released from the Green Belt to ensure a defensible Green Belt boundary. This site has been designated as open space to serve the school and is protected by Policy CS17 of the Core Strategy. It is not identified for development.</p>
<p>Response Reference: U0001153</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06866/1</p>
<p>Name: Phil And Julia Kenworthy</p>
<p>Number of Signatories: 2</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11, GB18</p>
<p>Summary of Comment: Objects to the proposal to remove Green Belt land on the following sites, GB4, GB5, GB10, GB11 and GB18.</p> <p>Does not believe that the Draft Site Allocations Development Plan Document (DPD) passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, it is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. Reasons for this assertion are detailed below:</p> <p>This land has been previously set aside to protect the surrounding area from over-development both residentially and industrially and to keep and maintain the village feel for generations to come.</p> <p>These are village locations. The surrounding green belt land acts as buffers to prevent urban sprawl as well as providing amenity for local residents for exercise and relaxation.</p> <p>To earmark the land for over 900 residential properties in an area that already has major traffic problems, especially along the Parvis Road, where two of the sites are situated (GB10 and GB11), shows a lack of consideration to local residents. At certain times of the day, residents are already unable to access the roads leading to their houses off of the Parvis Road due to gridlocked queues of traffic.</p> <p>The surrounding area already has to deal with high levels of noise and air quality pollution; not only from the local roads, but from the thousands of vehicles using the M25 which the Parvis Road crosses. Planning should be thinking of ways of reducing traffic and not increasing it further (which a further 900 houses will undoubtedly do)</p> <p>Building on these Green Belt sites will increase the risk of flooding (especially in GB5), where the land is already permanently saturated.</p> <p>With regards to the removal of the school playing fields (GB18) from Green Belt this seems an absurd thing to do, considering the land was left to the people of West Byfleet in Perpetuity and therefore, having the additional protect of the Green Belt makes sense as this will prevent development of the land at a later stage.</p> <p>As above, both Byfleet and West Byfleets are villages and not towns. It is not clear how it is intended that local facilities (particularly schools and healthcare) will cope with such an uplift in residential housing.</p>

The planned residential locations are not close to either West Byfleet or Byfleet & New Haw Railway stations. In peak times, bus services along Parvis Road are already badly affected by the traffic problems mentioned above. As such, it is not clear how residents of these new locations would be effectively served by public travel services (thereby exacerbating the traffic problems further if they were to choose to travel to work by car). In summary, strongly object to these proposals. These are villages and not towns and wish to live in a town and enjoy the green belt amenities. Once green belt is lost it cannot be replaced. These proposals will greatly impact on the land buffers that exist to the detriment of both villages and the lifestyles of those that live here.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

The representation regarding the loss of the Green Belt and the impact on residents wellbeing and amenity are addressed in the Regulation 19 Issues and Matters Topic Paper see Section 4.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

GB18 will be removed from the Green Belt but not developed upon and will be designated to provide open space and sports provision for the school and protected by Policy CS17 of the Core Strategy.

In terms of lack of public transport services, the Council is aware the sites proposed will need site specific requirements. The exact nature of these sites specific requirements will be identified through the development management process and informed by a transport assessment. For example potential issues of GB10 and GB11 to be addressed include

bus stop provision and direct access to this and also infrastructure improvements to connect pedestrian and cycle networks. Sites GB4 and GB5 have not yet been allocated for development, only safeguarded, and their requirements will be determined as part of the review of the Core Strategy and or Site Allocations DPD to be informed by up to date evidence at the time.
Response Reference: U0001340
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 05293/1
Name: Mrs Margaret Keys
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Does not wish to speak at the examination of the DPD. Considers that the DPD is unsound as GB10 should not be removed from the Green Belt. Considers that the DPD does not pass the test of soundness required by the NPPF; in particular it is not an appropriate strategy, taking into account the reasonable evidence, nor is it consistent with national policy. Reasons for this assertion are detailed below: GB10 is not suitable for residential development as it frequently suffers from severe flooding. Parvis Road and Byfleet Road are very congested. There are already plans submitted for Sheer House and Broadaoks (adding 500 additional dwellings in West Byfleet), concern is raised that Parvis Road will become more congested when these homes are built. Does not believe that any solution which the Council has come up with could make the 570 residential units proposed by GB10 workable. To allow residents of West Hall access to Parvis Road there would have to be traffic lights and a pedestrian crossing, compounding congestion. Also concerned that there is no mention of essential infrastructure including healthcare and schools; does not believe there is adequate space for more doctors at the health centre or any more spaces available at the Infant or Junior schools.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation has been comprehensively addressed by the Regulation 19 Issues and Matters Topic Paper. Section 7 address the due consideration which has been given to flood risk. More specifically, the key requirements for GB10 comprise a number of specific requirements relating to drainage, flood risk and Sustainable Drainage Systems. Regarding Parvis Road, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. More generally, Paragraph 6.7 provides that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impact of the DPD to enable development to be acceptable in transport terms. Section 6 comprehensively addresses infrastructure provision. In particular, Paragraph 6.9 and 6.12 address education and healthcare provision respectively.
Response Reference: U0001052
Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06854/1

Name: Mr Martin Keys

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Consider that the DPD is unsound as GB10 should not be removed from the Green Belt. Consider that the DPD does not pass the test of soundness required by the NPPF; in particular it is not an appropriate strategy, taking into account the reasonable evidence, nor is consistent with national policy. Reasons for this assertion are detailed below:

GB10 is in addition to the Broadoaks and Sheer House developments; together, this is an excessive burden for a small area.

Parvis Road and Byfleet Road are very congested. There are already plans submitted for Sheer House and Broadoaks (adding 500 additional dwellings in West Byfleet), concern is raised that Parvis Road will become more congested when these homes are built. Does not believe that any solution which the Council has come up with could make the 570 residential units proposed by GB10 workable. To allow residents of West Hall access to Parvis Road there would have to be traffic lights and a pedestrian crossing, compounding congestion.

Also concerned that there is limited scope to develop capacity for essential infrastructure including healthcare and schools; does not believe there is adequate space for more doctors at the health centre or any more spaces available at the Infant or Junior schools. Hoe Valley School is not an adequate part of the solution- too far away, would add to traffic on A245 and other routes.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The concentration of Green Belt loss in West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 5.
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The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13.

The Broadoaks and Sheer House developments were included in the traffic mitigation evidence base, and also provided to inform the planning of infrastructure providers.

The impact of the proposals on local infrastructure capacity, including healthcare and schools, is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6.

Response Reference: U0001402

Officer Proposed Modification: No proposed modifications as a result of this representation
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Wishes to Attend Examination (T = Tick):

Contributor Reference: 06709/1

Name: Ms Angela King

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: The DPD is unsound, nor is it an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy. Objects to site GB10:
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- Loss of Green Belt land is not environmentally friendly, and more green space for our children will be lost;

<ul style="list-style-type: none"> - Parvis Road is already extremely congested. Another 550 houses and 15 traveller pitches will increase traffic significantly. Access to the site along Parvis Road will also need upgrading. - Air quality will reduce, and noise pollution will increase - this is already a concern given proximity to M25. - Healthcare facilities and schools do not have capacity: the West Byfleet centre caters for 2056 patients per GP compared to a national average of 1346; local schools are oversubscribed. Where would additional children be taught. - The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk. - Instead of building on Green Belt, development could be directed to buildings standing empty e.g. McCarthy and Stone offices, which have adequate parking spaces and could be redeveloped into apartments.
<p>Contributor Proposed Modification: Redirect development to previously developed land rather than Green Belt.</p>
<p>Modification Reference: U0000323</p>
<p>Officer Response: The Council believes exceptional circumstances exist for the release of site GB10 from the Green Belt. This is set out in more detail in Section 1 of the Regulation 19 Issues and Matters Topic Paper. Sections 4 and 5 address concerns about how removal of Green Belt in West Byfleet is environmentally detrimental, and would affect the wellbeing of residents.</p> <p>Access arrangements are a matter for detailed consideration at development management stage. However, it is envisaged that any development scheme coming forward for site GB10 would include improved access infrastructure.</p> <p>The Council accepts that the proposed development will generate traffic - a detailed response to this is provided in Section 13 of the Topic Paper.</p> <p>Section 8 of the Topic Paper provides a response to air and noise pollution concerns. Section 6 of the Topic Paper responds to concerns about how infrastructure will cope, including schools and healthcare facilities.</p> <p>Section 7 describes how flood risk has been comprehensively assessed, including that of site GB10, and how flood risk assessments will be required with planning applications. Section 22 of the Topic Paper describes how empty buildings have been considered during the preparation of the DPD.</p>
<p>Response Reference: U0001391</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06720/1</p>
<p>Name: Mr Jonathan King</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: Strongly objects to proposal at West Hall, GB10. The DPD is not sound, nor an appropriate strategy taking into account the reasonable alternatives and the evidence, nor is it consistent with national policy.</p> <ol style="list-style-type: none"> 1. Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. Characteristics and fabric of the village should be protected. 2. Pollution: 1000 cars with an average of 153g per km CO2 emissions for a uk car will contribute over 2000 tonnes of CO2 to the village's carbon footprint annually, based on average UK driver mileage.

3. Given this number of vehicles, road infrastructure (e.g. Parvis Road) will need to be upgraded. Congestion on these roads will also get worse.
4. The IDP makes no mention of education. Given ONS 1.9 children per average household, 1073 children will need accommodating at schools. That creates 60 children or 2 additional classes per age group. Where would additional children be educated without compromising on the quality of education offered to children in the village. IDP also fails to address healthcare provision - existing facilities are at capacity.
5. NPPF states planning should neither contribute nor be put at risk from pollution (noise / water / air / soil). Development at this site would be vulnerable to air and noise pollution given proximity to M25 and A245.
6. The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk.
7. Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.
8. Inadequate reasons given for excluding Martyrs Lane Green Belt.
9. This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment.
10. Inadequate consideration of alternative sites, in particular PDL in sustainable locations.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The Council believes exceptional circumstances exist for the release of site GB10 from the Green Belt. This is set out in more detail in Section 1 of the Regulation 19 Issues and Matters Topic Paper. The concern regarding the West Byfleet Neighbourhood Plan is addressed in Section 16 of the Topic Paper.

The Council accepts that the proposed development will generate additional traffic. Section 13 of the Topic Paper describes how this has been assessed, and how it can be mitigated - including infrastructure improvements to the A245. The air and noise pollution concerns are addressed in Section 8.

Section 6 of the Topic Paper responds to concerns about how infrastructure will cope, including education services and local amenities.

Section 7 describes how flood risk has been comprehensively assessed, including that of site GB10.

Section 3 addresses concerns about the allocation process for Traveller pitches, and highlights how alternative sites have been assessed.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

<ul style="list-style-type: none"> - The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF. - The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt; - It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land. - The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful. - There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course. - A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development. <p>The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.</p> <p>The representation regarding unnecessary, excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper. Section 11 of the Topic Paper explains how the Council has assessed alternative sites, prioritising previously developed sites within or near to town, local and district centres of the Borough.</p> <p>The Green Belt Boundary Review, in addition to the Sustainability Appraisal, assessed the sustainability of each Green Belt site. Site GB10 in particular performed very well in sustainability terms - the conclusions on sustainability are set out in detail in section 3.5 of the Review. The site is considered to have high suitability for removal from the Green Belt due to its potential to achieve sustainable development.</p>
Response Reference: U0001385
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06918/1
Name: Mr And Mrs Brian John And Rosemary Kirby
Number of Signatories: 2
Comment Type: COMM
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Considers that WBC has made the right decision to remove Regulation 18 sites GB12 and GB13 from the DPD, recognising the validity of objections that their inclusion would negatively impact the rural setting and character of Pyrford as a whole, as well as the character and conservation area around St Nicholas Church. It is also noted that the fields are sometimes used for crops, and allow for wildlife habitat. Furthermore it is noted that:

<p>1. Traffic through Pyrford is currently dangerously high for the narrow roads and an additional 500 houses would be unsupportable.</p> <p>2. The land safeguarded for development beyond 2027 (of which GB12 and GB13 were part) is excessive.</p> <p>3. The process for identifying parcels of land for removal from the Green Belt was flawed and the scoring criteria inconsistently applied.</p>
<p>Contributor Proposed Modification: The requirement for safeguarded land should be reevaluated.</p>
<p>Modification Reference: U0000343</p>
<p>Officer Response: Support for the removal of Regulation 18 sites GB12 and GB13 is noted.</p> <p>Section 2 of the Regulation 19 Issues and Matters Topic Paper confirms that Council has taken the correct approach in safeguarding land to meet future development needs beyond 2027.</p> <p>Section 12 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council is confident in the approach taken to the Green Belt boundary review. It is noted that as per Paragraph 12.2, the Local Development Framework Working Group considered the consultants' report and was satisfied that it had been prepared in accordance with the brief, and that the report provides a useful evidence base to inform the Site Allocations DPD.</p>
<p>Response Reference: U0001334</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 05572/1</p>
<p>Name: Ms Jean Knott</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05</p>
<p>Summary of Comment: Site GB5 includes Church land allocated for future burials. Site GB5 is too small for 155 dwellings.</p> <p>Concern over harm to the natural appearance and wildlife of the Murrays Lane area, that is perceived as having / may have taken place as a result of recent developments there. Particular concern over the narrowness of Murrays Lane in relation to mobile homes (from recent developments) and construction machinery (for proposed residential developments).</p> <p>85 dwellings here would have strong negative impact on traffic. Traffic from Green Lane Close to Parvis Road is already heavily congested from 7.30-9.30am and 4.30-7.00pm. Noise from the M25 is getting worse due to the surface wearing out.</p> <p>Byfleet has been flooded on many occasions due to it being an island. Where will all the water go?</p> <p>Byfleet has no Doctor, both schools are full and there are no plans to build more. Propose alternative development site: the site of the huge storage facilities in Oyster Lane.</p>
<p>Contributor Proposed Modification:</p>
<p>Modification Reference:</p>
<p>Officer Response: The issue of burial land on site GB5 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 15.</p> <p>The DPD stated an anticipated capacity of 135 dwellings (not 155). This figure has now been removed, to be consistent with the fact that no detailed requirements are made of</p>

<p>the development of this site, which is not allocated but safeguarded at this stage. When and if the site is allocated for development a number will be reinserted.</p> <p>The impact of the proposals on wildlife and vegetation is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. Detailed requirements are not made of development on the site, since it is not currently proposed to be allocated for development. When and if the site is allocated, that policy will be drafted taking into account the extant situation at that time.</p> <p>The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The issue of noise pollution in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p> <p>The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The impact of the proposals on infrastructure, including schools and doctors, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The assessment of brownfield sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 11. It is recognised that new sites will continue to become available and these can be included in the SHLAA, and if they are within the urban area they can come forward with planning applications as windfall sites or potentially be allocated in Neighbourhood Plans. In all cases such sites would be assessed against existing planning policies, including on the retention of viable employment sites.</p>
Response Reference: U0001584
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05572/2
Name: Ms Jean Knott
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Byfleet has alot of existing development such as the M25, the retail park, the storage facilities in Oyster Lane, the various housing constructions and three industrial parks. Objects to the proposal to use the only green belt land left for flora and fauna in Byfleet for more housing, all leading on to the already congested Parvis Road.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The justification to release Green Belt land for development and the loss in Byfleet has been comprehensively addressed in Section 1 and 5 of the Regulation 19 Issues and Matters Topic Paper. The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the

<p>effective avoidance and or mitigation of any adverse effects prior to approval of the development.</p> <p>In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess any site specific ecological issues. The Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 of the Topic Paper goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p>
<p>Response Reference: U0001162</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 04737/1</p>
<p>Name: Mr Tony Kremer</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference:</p>
<p>Summary of Comment: Does not consider the DPD to be sound, but it is legally compliant and complies with the Duty to Cooperate.</p> <p>The effect of the DPD would be to transform the town at an unprecedented scale. It would need to be justified. In fact, the DPD delivers many more units than are needed, and Woking would attract 10,000 newcomers by 2034. According to the housing needs assessment, 292 dwellings per year are being delivered without needing to introduce high-rise blocks of flats (370 in 2013/14, 325 in 15/16, 399 in 16/17).</p> <p>The DPD does not meet NPPF policy that we must "ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations". The proposals offer a very poor mix and not enough social or affordable housing. A gap in provision is appearing between small flats and spacious houses.</p>
<p>Contributor Proposed Modification: Based on the planning applications already being received, there are several sites where the proposed density is clearly excessive e.g. 34 stories and more. The Site Allocations DPD should have tighter guidance on density, it should avoid the subjective use of terms relating to the general character of a town centre that is foreseen to be radically redesigned. For example, UA18 has: "Density of development should maximise the efficient use of the site without compromising the general character of the area".</p> <p>The mitigation of risk against losing control during this radical regeneration must be strong. The reality is that the DPD describe only in vague and subjective terms, for example the height of the new block should respect the "local and wider Town Centre context" (quote from UA18 as an example), but as Victoria Square, Gateway and others come forward in excess of 30 stories, this "context" is a moving target. The Council have not set out a maximum acceptable height policy for town centre blocks.</p> <p>The Council should set out a maximum acceptable height policy for town centre blocks. What is an acceptable maximum height should be have been a matter for consultation</p>

throughout the process and has not been. In the absence of that the Inspector could consider imposing a recommended maximum height of 20 stories.

Modification Reference: U0000251

Officer Response: The Council's Regulation 19 Issues and Matters Topic Paper explains why the Council has allocated more land within the urban area to meet development needs over the plan period - see paragraphs 1.6-1.8.

The DPD does not propose the introduction of high-rise blocks of flats. In Appendix 4 it provides estimated development yields, based on ranges provided in policy CS10 of the Core Strategy, which in turn are based on the character of the area and on exemplar sites. The estimated yields for sites in the Town Centre, and the wider urban area, are considered to be fairly modest. Densities could go up (or down) depending on the nature of schemes coming forward, but this will be assessed in detail at pre-application and planning application stage. As described in the Core Strategy, the objective is to deliver homes of different types, tenures and affordability to meet needs of all sections of the community, in sustainable locations and at densities that maximise the efficient use of land without compromising the distinctive character of the local area. The Site Allocations DPD does not provide tighter guidance on density, nor provide maximum height policy, in recognition of the fact that surrounding character can evolve and change - actual densities and building heights will be determined at planning application stage in line with the Council's policies and guidance on Design, and which reflect circumstances at that time. It is highlighted that Policy CS1 of the Core Strategy offers in principle support for high-density development including tall buildings in the Town Centre.

Although net additional dwellings delivered over the quoted years have sometimes been in excess of the 292 housing requirement (which should be considered a minimum requirement), there are other times that they have been significantly lower; the Housing Land Supply Position Statement (available on the Woking2027 website) demonstrates an undersupply of 74 dwellings (at 1 April 2017) when cumulative completions are considered since 2006. The long-term pattern of historic delivery needs to be taken into account - see Section 4 of the Position Statement. This also demonstrates how important it is that a sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation, given the nature of the brownfield sites that are proposed for development.

Section 1 of the Topic Paper describes how the Council has allocated and safeguarded land to deliver the nature and type of family homes that the community also needs. Whilst it is now evident that families are living in flatted development, the land identified in the Green Belt (at West Hall for example), will meet a need for family homes, as well as contributing to the overall quantity of development needed. Page 17 of the DPD describes this in more detail. The Council's housing needs have been assessed (in the Strategic Housing Market Assessment) with affordability identified as a key issue. Core Strategy policy CS12 - Affordable housing, indicates that between 2010 and 2027, the overall target for Affordable Housing is 35percent of all new homes, equivalent to 1,737 new affordable homes. The sites identified in the DPD will ensure sufficient contingency to both cover the risk of non-implementation, but also ensure the comprehensive delivery of the Core Strategy affordable housing requirements. Key requirements have been introduced to the site allocation policies to ensure a contribution towards affordable housing provision in accordance with policy CS12 is made.

Response Reference: U0001521

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06320/1

Name: Ms Lisa Land
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
Summary of Comment: Objects to inclusion of Football Stadium (UA44) in the DPD for almost 1000 flats, commercial space and a 10,000 seat stadium. Inadequate consultation with residents over such a major development, which conflicts with the Council's own guidelines. This would have a profound impact on the local community.
Contributor Proposed Modification: There must be a full public consultation on site UA44.
Modification Reference: U0000267
Officer Response: The Site Allocations DPD seeks to identify specific, deliverable sites for the quantity of development proposed in the Core Strategy. It was agreed at Full Council meeting in October 2018 that the high indicative yield for the Football Stadium site would be removed from policy UA44. The latest draft policy now allocates the site for a mixed-use development, and sets out all the key requirements that a proposal would need to meet at planning application stage. It is highlighted that any proposed development should demonstrate a satisfactory relationship between the proposed uses on the site; and address issues regarding residential amenity, outlook and overlooking. The Regulation 19 consultation has given the public an opportunity to comment on the proposed site allocation and policy content. In a separate process to the Site Allocations DPD (which is prepared by the Local Planning Authority), the Council have entered into a development agreement with GolDev, who are currently working up a detailed planning proposal for the football stadium site. They intend to submit a planning application later this year. The planning merits of the scheme will be determined by the Council's Planning Committee in accordance with the Development Plan. There will be extensive public consultation as part of the planning process. The status of the site after any planning application has been determined will be taken into account by the Site Allocations DPD.
Response Reference: U0001479
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04830/1
Name: Mr David Lander
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB17
Summary of Comment: The DPD is not sound with respect to site GB17: Any proposals should allow the parts of the site which are currently arable farmland to remain in productive agriculture, this is valuable in its own right. Policy should state the need to take account of the fact that much of the land is in a High or Medium Flood Risk Zone. It also fulfils a flood storage purpose. Policy does not refer to the need to recognise and protect the amenity of neighbouring residents in Carters Lane. Policy is right to intend that proposals should be low-key in nature. However the references to parking provision and improved accessibility by all transport modes imply the potential for more intensive use, incompatible with the site's locally unique and valuable quiet rural atmosphere .

Policy is insufficiently clear owing to haphazard and repetitive criteria, needs substantial re-writing.
<p>Contributor Proposed Modification: Policy GB17 and its supporting text fails to recognise key considerations which are relevant to the acceptability of any proposals in respect of the implementation of this project. These are:</p> <ol style="list-style-type: none"> 1. A significant part of the site north of the River Wey is currently in use as arable farmland. Any proposals should allow for the land to remain in productive agriculture which is a valuable resource in its own right; 2. Much of the land is in a High or Medium Flood Risk Zone as defined by the Environment Agency and the need to take account of this should be expressly stated in the policy. The land also fulfils a flood storage purpose.; 3. Whilst the supporting text (page 320) states that the Council will work closely with (inter alia) adjoining landowners and neighbours, the policy makes no reference to the need to recognise and protect the amenities enjoyed by the occupiers of existing residential properties in Carters Lane; 4. The proposal rightly intends that any proposals should be low-key in nature, reflecting the sensitive location of the site. However the references to improved accessibility by all transport modes together with parking provision imply the potential for something more intensive that would undoubtedly be incompatible with the quiet rural atmosphere of the land. This is a unique and valuable characteristic which this land possesses so close to the town. 5. The policy lacks sufficient clarity because of the haphazard and repetitive nature of the criteria on pages 317 and 318. A substantial re-writing is called for to ensure that the policy requirements are clear and obvious.
Modification Reference: U0000189
<p>Officer Response: As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. This site is not classified as high quality agricultural land by DEFRA. The policy does not necessarily require the change of use of all parts of the site out of agricultural use.</p> <p>The supporting text to the policy recognises that the site is at risk of flooding. The policy itself requires the development to consider introducing flood attenuation within any landscape proposals, as well as highlighting the potential for a Flood Risk Assessment to be required.</p> <p>The amenity of neighbouring residents will be protected by the existing Local Plan policies CS21: Design, DM5: Environmental Pollution, DM6: Air and Water Quality, and DM7: Noise and Light Pollution, as well as the existing Outlook SPD and any successor documents. Hence policy GB17 includes a key requirement to 'be in keeping with other policies in the Development Plan for the area'. In addition there are several references in the policy to development being 'low-key' in various respects, this will reduce its impact on local residents as well as on the countryside more generally. These requirements will be taken into account to assess any development on the site.</p> <p>Agree there is a limited degree of repetition in the policy, this will be removed.</p>
Response Reference: U0001719
<p>Officer Proposed Modification: Remove key requirements 19 and 31 of policy GB17. Amend key requirement 3 of GB17 to read: 'Development should be sensitively designed and laid out to pay regard to, and minimise the impact on, heritage assets and their setting.'</p>
Wishes to Attend Examination (T = Tick): T
Contributor Reference: 06630/1
Name: Landowners of Woodham Court
Number of Signatories: 1

Comment Type: OBJ

Site Reference:

Summary of Comment: We act for the owners of Woodham Court, a brownfield site of 3.5ha including a residential dwelling and a former sports complex, largely now in use for ad-hoc commercial purposes, accessed from the Paragon Roundabout opposite the McLaren Technology Centre. The site is ideal for allocation being on the edge of the settlement, adjacent to existing major development, with excellent infrastructure and connectivity.

The 2014 and 2017 SHLAAs concluded that the site would be deliverable/developable if considered suitable to be released from the Green Belt through the SADPD process. The 2017 SHLAA is unsound since it fails to meet the 2018 NPPF definition of 'deliverable', by including sites still subject to planning applications.

The Green Belt Review (2014) was flawed: concluded that 'Parcel 2' within which the site lay did not function highly against the five Green Belt purposes. On the fifth purpose the site should have been scored still more poorly, since much of it is previously developed. The assessment's conclusion that the parcel had overall low suitability as an area of search for removal contradicts the assessment against Green Belt functions. Of the three parcels the review found to have potential for removal from the Green Belt, two scored worse than Parcel 2 in terms of suitability for Green Belt release; all three scored worse in the sustainability assessment; and one scored worse in terms of landscape sensitivity to change. It was premature to exclude Woodham Court from consideration without considering smaller elements of Parcel 2.

The Landscape Assessment and Green Belt Review (2016) is flawed: it contained the misleading statement that 'Parcel A', containing our clients' site, had a 'highly isolated nature, detached from any development'. In fact the site is already developed, is only 650m from development in Sheerwater, and is adjacent to McLaren Technology Centre, which serves no remaining Green Belt function.

The housing requirement is significantly below the Objectively Assessed Need. Therefore in order to avoid a review of the housing target in the short term, and also in case some allocations do not come forward, greater flexibility needs to be shown in considering alternative sites for delivery. NPPF paragraphs 11 and 81 cited.

The SADPD identifies three Green Belt sites, but these are only available for delivery between 2022-27, whereas our clients' site is available within the next five years. Site GB1 was also not in any parcel in the 2014 Green Belt Review.

The report taken to WBC's LDF Working Group (05.09.2018) was flawed in its recommendation not to safeguard land at Martyrs Lane, for the following reasons: The safeguarding of the land would be found sound in spite of the negative conclusions of the Green Belt Review about the land, because those conclusions and the recommendations drawn from it are flawed.

Woodham Court is PDL and not isolated, so its development would not undermine the purposes of the Green Belt.

The unavailability of the golf course for development (without compulsory purchase) should not prejudice the development of the land at Woodham Court, due to its suitability as stated above. The smaller number of homes that could be delivered on Woodham Court, compared to the wider site, is not a reason to exclude it from allocation; any additional housing should be received positively.

There is no evidence of testing to qualify the concerns raised about congestion.

Development of the site would allow for new bus stops and links. Delivery of Woodham Court alone would not result in significant additional pressures on the highway network. The Council should consider the allocation of the Woodham Court site for housing or, at the very least, apply a reserve to the land for future Green Belt release. This will ensure that the plan is positively prepared and contains contingency to avoid the under-delivery of housing.

We would be happy to work with the Council on the elements of unsoundness in the Plan that affect our client's site.

Contributor Proposed Modification: The Council should consider the allocation of the Woodham Court site for housing or, at the very least, apply a reserve to the land for future Green Belt release.
Modification Reference: U0000345
Officer Response: The process for allocating sites has been advised through the Core Strategy, which is that the Council should undertake a GBBR to inform the suitability of sites to ensure that any land that is taken out from the Green Belt will not undermine its overall purpose and integrity. This site has not been recommended by the GBBR to be allocated. The site is within Parcel 2, where the landscape assessment of the site demonstrates the significance of this particular parcel to the landscape setting of the Borough. It also performs a Green Belt function. The development of the site will lead to urban sprawl and encroachment into the Green Belt. Developing the site on its own will lead to an isolated development within the Green Belt. The robustness of the Green Belt Boundary Review methodology is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 12. The inappropriateness and lack of capacity for more Green Belt land to be allocated for development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 14. The reasons for rejecting the Martyr's Lane site as a whole are addressed by the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11.
Response Reference: U0001729
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06470/1
Name: Mr Simon Lane
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Dismayed by proposals for green belt development in West Byfleet and Byfleet. Current worsening traffic congestion in the area makes travel hard, slows emergency service responses and causes potholes. Proposed development would add to this. Doctors and dentists in the area are currently busy and parking there is difficult. The proposals would damage local wildlife and the environment, contrasts with WBC work to help GCN, bats and water voles. Bats are protected. Should leave some green belt nature and scenery for future generations.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 13. The impact of the proposals on local infrastructure, including health facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 6. The impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 19. Green Belt release has been carried out in a planned manner; the limits to the quantity of land released are addressed in the Regulation 19 Issues and Matters Topic Paper, Section 14. The safeguarding of land for development after 2027 is intended to remove the need for any further Green Belt release until at least 2040.
Response Reference: U0001661

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06692/1
Name: Mr Guy Langston
Number of Signatories: 1
Comment Type: COMM
Site Reference: GB01, GB04, GB05, GB07, GB10
<p>Summary of Comment: Reasons why the Site Allocations DPD is not legally compliant and It is unsound. The DPD complies with duty to cooperate. Does not wish to participate in the examination. Wishes to be informed of the next stages of the DPD.</p> <p>There are adequate urban sites to meet the 1-5 year and 5-10 year need. A need may arise in years 11-15 but these are sites to be safeguarded should a need arise in the 2028-2032 period. The DPD fails to place adequate weight on the more recent up to date evidence base documents. The proposed release fails to comply with paragraph 35 of the NPPF which seeks to ensure that plans are justified taking account of all reasonable alternatives. The Site Allocation DPD's proposed green belt release sites are not justified and do not take account of the most recent evidence on housing delivery. There is no need for green belt site releases for housing delivery within the plan period.</p> <p>The SHLAA 2017 has identified the 1-5 year supply and the 6-10 year supply without the release of the green belt sites that are being allocated for release from the green belt for the period 2022-2027.</p> <p>The Authority has also failed part a) in paragraph 137 of the NPPF that states the plan strategy should achieve sustainable development which is in part to develop on previously developed land in sustainable locations.</p> <p>GB1 SUPPORT for the release of GB1 is supported if a housing need case exists.</p> <p>GB4 OBJECTION is raised to the safeguarding of GB4 over the release of GB10, if the Authority can justify the need for green belt release sites GB4 is sequentially preferable to GB10.</p> <p>GB5 OBJECTION is raised to the safeguarding of GB5 over the release of GB10 if the Authority can justify the need for greenbelt release sites.</p> <p>GB7 SUPPORT the release of GB7 is supported if a housing needs case exists.</p> <p>GB10 OBJECT to the proposed release of GB10 for the following reasons: The sites minerals allocation is for the period of the minerals plan which is from 2011 to 2026. The DPD allocation of this site is for the period between 2022 -2027. That means that the deliverability of the site for the purposes set out in the DPD will be dependent on confirmation from the Mineral Planning Authority that the opportunities for the prior working of any significant resource are fully investigated. The promotion of GB10, as the largest green belt release site in the Borough, without robust evidence that the benefit outweighs the harm of delivering the site in conflict with Neighbourhood plan is contrary to paragraph 14 of the NPPF. The DPD assessment of GB10 fails to place sufficient weight (for traveller pitches and residential) impact on the River Weys conservation area status, especially where the allocated site is proposed to adjoin Dodds Bridge. The impact of the release on a heritage asset has not been adequately assessed.</p>

Core Strategy Policy CS14 which guides proposed traveller pitch delivery indicates that a sequential approach should be taken when identifying suitable sites for allocation in the DPD with sites in the urban area being considered before those in the Green Belt. The delivery of the pitches in the absence of a master plan for the whole site with all the proposed uses will undermine the sites ability to deliver high quality residential units and may undermine the viability and deliverability of housing on the site in the future. A master plan for the site would be premature without the supporting evidence of a significant under provision of housing and confirmation from SCC in relation to the absence of any significant resource.

In the NPPF there is a presumption in favour of sustainable development. Page 6 paragraph 11 states that Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

The GBBR notes that the provision of a range of green belt sites across the borough provides the flexibility required to adapt to rapid change, in accordance with the NPPF's underlying presumption in favour of sustainable development.

There are more mitigations that will need to be put in place for the development on GB10 to be acceptable than with the other allocated or safeguarded site. These include mitigations against:

Landscape Impact - The GBBR notes that the GB10 landscape is particular sensitivity to change (GBBR, paragraph 3.5.12). GB1, GB2, GB4, GB5 and GB7 are not noted as being particular sensitivity to change

Highway Impact - It is noted that highway, access and transportation improvements would be needed and that improvements to cycle routes and pedestrian routes are needed.

Some of these improvements rely on co-operation from a third party, the adjoining land owner, who has objected to the proposed release of GB10.

Conservation and Listed Building Impact - the redevelopment of the site has potential to harm the setting of heritage designations and assets including statutory and locally listed buildings at West Hall and Broadoaks and Wey Navigation Conservation Area;

Contamination remediation; and Future Mineral Resources Supply Impacts- which requires agreement from a third party

In addition to the above much weight is afforded to the site being very sustainably located there is a failure to adequately factor in the irregular shape of the sites impact on actual sustainable mode travel distances. For example, the entrance to the site is relatively narrow which means that majority of the housing will be accommodated in the middle or southern part of the site. There is no direct pedestrian access from the site to Dodd's Crescent to the west nor are the owners of Broadoaks likely to grant pedestrian access over their land as they have objected to the proposed release. The walking distance to West Byfleet station for majority of the houses would be 1.6km (20min walk), which will result in the use of motor vehicles.

Whilst pedestrian access may be possible to the footpaths linking at Dodds Bridge these paths are for recreation purposes and do not lead directly to any area with goods, services or public transport services. The walking distance from the bridge to West Byfleet train station is 1.6km.

The site is no more sustainable than GB1, GB4 and GB7 and is noted as being more sensitive in landscape terms and as having a less well defined boundaries to prevent urban sprawl than the other sites. The release of GB10 would undermine the purpose of the green belt more than the release of some of the safeguarded sites.

Another material consideration in releasing GB10 from the green belt in the period 2022-2027 is the redevelopment of West Byfleet town centre. Planning permission has been granted for the redevelopment of a significant part of the town centre. This is expected to be within the plan period, whilst the permission remains extant. The pending regeneration of the town centre has resulted in their being fewer facilities available and it will result in major disruption during the construction which could take between 3-5 years. The

promotion of GB10 relies heavily on its proximity to West Byfleet town centre. In the short to medium term the development within the town centre is going to result in major disruption to local highway networks and very limited access to goods and services. In addition, the consented permission within the town centre for up to 255 dwellings and on the Broadoaks land for 155 dwellings and a care home will deliver circa 500 new dwellings in West Byfleet where the social infrastructure, especially the local schools are oversubscribed and do not have capacity and there is limited ability to enhance their capacity on the plan period.

Suggested Modifications

Without the Authority making a robust demonstrable housing needs case the proposed green belt releases should not be made in this plan period.

According to the SHLAA and housing completions studies there is no demonstrated need for greenbelt release sites in the 1-5 and 5-10 year period.

Should a need be demonstrated making reference to the most recent background document studies findings then it is submitted that sites GB1, GB4, GB5 and GB7 should be released in advance of GB10.

1. If there was a demonstrated need for green belt release in accordance with the NPPF's sequential preference for urban land to be developed prior to the release of greenbelt land then GB10 should not be included in the sites to be allocated. GB10's deliverability in the short to medium term is questionable given the sites designation in the Surrey Mineral Plan as a safeguarded site until 2027. The site is also identified as requiring considerably more mitigations before it will be deemed not to cause harm than sites GB1, GB2, GB4, GB5 and GB7. Some of the GB10 policy aims rely on third party agreement. These factors undermine the deliverability of site GB10 in the plan period.

2. The release of the smaller sites would provide greater flexibility and delivering the most sustainable development possible. The release of GB10 in the plan period would be contrary to the presumption in favour of sustainable development

3. GB10's actual accessibility by sustainable modes of travel, rather than perceived access, to goods and services is not demonstrably better than that of GB1, GB4, GB5 and GB7.

4. The release of GB10 in the plan period, whilst there are two other significant developments delivering circa 500 units with West Byfleet, will result in harmful highways and amenity impacts and there will be unsustainable pressure on the existing social infrastructure, especially local schools.

Contributor Proposed Modification: Suggested Modifications:

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4. The release of GB10 in the plan period, whilst there are two other significant developments delivering circa 500 units with West Byfleet, will result in harmful highways and amenity impacts and there will be unsustainable pressure on the existing social infrastructure, especially local schools.

Modification Reference: U0000394

Officer Response: The justification to release Green Belt land, safeguarded land and the evidence base for development have been comprehensively addressed in Section 1 in particular paragraph 1.7, 2 and 10 of the Regulation 19 Issues and Matters Topic Paper. In regards to assessment of alternative sites see Section 11 of the Topic Paper.

In regards to the mineral allocation see Section 17 and for the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.

Concerns regarding heritage assets and River Way conservation Area are noted. The Council has identified these assets within the key requirements of GB10. The Core Strategy and the Development Management Policies DPD includes robust policies to protect the Conservation Area and heritage features within and in close proximity to the site.

The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.

Although parcel 4, within which site GB10 is situated, was found in the Green Belt Boundary Review to contain sensitive landscape, the key requirements within the policy require planning applications to be submitted with a landscape assessment, ecological survey and tree survey to determine the levels of biodiversity and valuable landscape features on the site; and for the design of any proposal to have regard to the landscape on the site. This would include matters such as TPOs, woodland and Biodiversity Opportunity Areas.

The Core Strategy and the Development Management Policies DPD contains robust policies to make sure that important trees and landscapes are protected as part of any future development. Particular reference is made to Policies CS21: Design, CS24: Woking's landscape and townscape of the Core Strategy and Policy DM2: Trees and landscaping of the Development Management Policies DPD.

In regards to soil contamination, the Council will consult with the relevant organisations including Environment Agency and Environmental Health during the detailed planning application stage as well as require applicants to carry out prior assessments of the site, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

In terms of lack of sustainable travel, the Council is aware the sites proposed will need site specific requirements. The exact nature of these sites specific requirements will be identified through the development management process and informed by a transport assessment. For example potential issues of GB10 and GB11 to be addressed include bus stop provision and direct access to this and also infrastructure improvements to connect pedestrian and cycle networks.

It is acknowledged that land at GB10 made some contribution to the Green Belt purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development which is supported by the Green Belt Boundary Review. Section 21 of the Topic Paper addresses concerns about urban sprawl.

The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery. In addition, development impacts such as the impact of construction and construction traffic as well as the impact

<p>on existing services, facilities and infrastructure will be fully considered at the Development Management stage.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p>
<p>Response Reference: U0001458</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 02470/2</p>
<p>Name: Mrs Sarah Lardner</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: SUPP</p>
<p>Site Reference: RG18GB12, RG18GB13</p>
<p>Summary of Comment: The DPD allocation is inevitably a challenging process. Thank you for taking the time to consider comments raised by the residents of the borough in relation to the DPD Site Allocations and more particularly in relation to the two fields either side of Upshot Lane in Pyrford.</p> <p>Believes that Woking Borough Council have made the right decision to drop the Upshot Lane fields from the Site Allocation proposals and am pleased that WBC recognise the validity of objections made at the preliminary Regulation 18 consultation held in June and July 2015. The implications of including these two the fields would include :</p> <ol style="list-style-type: none"> 1. Significantly increase the traffic through Pyrford, which is currently dangerously high for the narrow roads that were never built with purpose of accommodating so many motor vehicles. The traffic from a further 500 houses on Upshot Lane would be unsupportable. Traffic through the village will inevitably increase if current proposals to release greenbelt land in West Byfleet go ahead, as three routes through Pyrford link West Byfleet with the A3 and M25. 2. The people of Woking borough would lose some of the most pristine greenbelt land in the borough. The fields not only incorporate the stunning views from the Pyrford escarpment, but would risk irrevocably damaging the site of High Archaeological Potential, that covers parts of both fields. This is heritage that belongs to every resident in the borough of Woking. The Upshot Lane fields contribute very significantly to the semi-rural setting and character of Pyrford as a whole and if they were built upon the character and setting of the conservation area around St Nicholas Church would suffer enormously. The fields also provide a rich haven for wildlife. 3. The process for identifying which parcels of land could be removed from Green Belt was flawed and the scoring criteria inconsistently applied especially in the case of these two fields.
<p>Contributor Proposed Modification: None Stated</p>

Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06883/1
Name: Dr Benjamin Larwood
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
<p>Summary of Comment: The country village feel of Byfleet will be heavily eroded by this over development.</p> <p>I reject the use of greenbelt for the purpose of housing.</p> <p>Use of solely the EA river and sea flood zones (as referred to in the DPD) is inappropriate; surface water flooding needs to be considered. PPS25 requires decision makers to use the SFRA to inform their knowledge of flooding; the SFRA Volume 2 technical report also states that WBC needs to improve its flood record keeping, and that many of the recorded flood events have happened in Byfleet. I believe runoff to be the main issue. GB4 and GB5 are particularly useful in reducing flooding in Byfleet. If they are developed, rainfall runoff will not be able to flood these fields but will instead affect many more Byfleet residents. Climate change will increase runoff from urban areas.</p> <p>It is often impossible to travel on Parvis Road at peak times, or to turn right out of Queens Avenue. The name of the traffic mitigation document indicates that WNC recognise the issue; concentrating housing here is therefore not advisable.</p> <p>It seems like the traffic mitigation document is based solely on point modelling rather than building an entire model of the A245 simulating full volume traffic scenarios. The document suggests that further modelling take place. I have a degree in Civil Engineering and a MSc and PhD in computational modelling.</p> <p>A number of the suggested mitigation measures are outside Woking borough. Cannot support this, since there are no guarantees from neighbouring councils or the highway agency that these improvements could take place; and the layouts of these roads have not been changed for many years, despite existing traffic problems.</p> <p>Development of sites in the Green Belt 'buffer' between West Byfleet and Byleet will join the two towns, leading (together with the Sheerwater plans) to an unacceptable sprawl of built up area from Woking town centre to Byfleet. The Green Belt is meant to prevent this; if you can simply remove land from it, there was little point in having it initially.</p> <p>Should not plan beyond 2027 on the basis of statistical housing requirement forecasting. In addition, housing requirements are planned for revision downwards. Developing Green Belt land for an uncalculable housing requirement is unacceptable.</p> <p>Removing land from the Green Belt should only take place in exceptional circumstances; these are not demonstrated in the DPD.</p> <p>The DPD ignores Government requirements to develop smaller brownfield sites. Little support for large developments like this in Government planning guidelines.</p> <p>Land at Martyrs Lane should be reconsidered- it has excellent road connections.</p> <p>Schools are in short supply, a new school on the opposite side of Woking will not help secondary school need, and primary schools in both villages are oversubscribed. SCC recently sold off a former primary school, on land gifted to the children of Byfleet.</p>
Contributor Proposed Modification: I do not think that the DPD has adequately taken into account the risk of flooding from surface water runoff. Within the technical document,

point 4.26 notes that Woking Borough Council needs to improve on the record keeping of flood events. I therefore struggle to see how the EA flood zones are remotely appropriate. I would encourage the Planners to investigate further on this point. I urge WBC to reject the DPD.

Modification Reference: U0000248

Officer Response: With regard to local character, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites would increase the population of Byfleet. However, it is expected that development would be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development; development would be built to environmental standards in accordance with the environmental/climate change requirements of the time; and development will also be designed to respect the general character of its surroundings. Overall, the Council is satisfied that the social, environmental and economic character of the area would not be significantly undermined.

The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1.

Flood risk issues are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7. In particular, surface water flood risk issues are considered by the SFRA, which has informed the Local Plan, and if and when the sites are allocated for development after 2027, it will only be with adequate safeguards (for example, in the form of key requirements) in accordance with the law, national and local planning policy of the time.

Traffic issues are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. In particular, the DPD production process has involved with regular involvement and input by the Local Highway Authority on highways issues.

The impact of the proposals on urban sprawl are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 21. The Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that sufficient exceptional circumstances justification exists for the release of site GB10 from the Green Belt, based on its high potential to deliver sustainable development. A significant green gap will be retained between site GB10 and the motorway, with public access to this area enhanced by the creation of the Byfleet SANG and possibly off-site green infrastructure provided as part of the development of GB10, and the majority of the Green Belt on the west side of Byfleet will also be retained. Principles governing the removal of land from the Green Belt are set out in the National Planning Policy Framework.

The appropriateness of safeguarding land for development after 2027 is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 2.

The question of changing figures on housing need is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1 (paragraph 1.5).

A high proportion of the sites in the DPD are small brownfield sites. National planning policy and guidance does not discourage the use of larger sites in principle. The strategic housing policy CS10 specifically sets out a range of housing locations with the aim of 'achieving an appropriate mix of housing types and tenures to meet all types of local need and demand'.

The reasons for rejecting the Martyrs Lane site are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3 (paragraph 3.11).

The impact of the proposals on education facilities is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.

Response Reference: U0001466

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06556/1
Name: Mrs And Mr Katherine And David Mark Laver
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
Summary of Comment: Objects to the Green Belt building and traveller sites plans for Byfleet village on the below grounds: Flood risk in the area will increase; there will not be enough drainage and built areas in Byfleet are prone to flooding. There is not enough parking in the area, and highway safety in the village will suffer due to too much traffic. The proposals for Parvis Road are not sufficient and the current traffic is too much for the area, with significant daily congestion. Land at GB5 was bequeathed to the church and must not be developed if removed from the Green Belt. The noise and disturbance of additional houses in an area that is intended for recreation will be detrimental to the current inhabitants' enjoyment of the area.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation is addressed by the Regulation 19 Issues and Matters Topic Paper. Section 7 addresses the proper assessment of the flood risk implications of the Site Allocations DPD that has been carried out. In particular, Paragraph 7.7 confirms that the DPD takes due care to ensure that the risk of flooding is minimised in Byfleet and West Byfleet. The Council has an up to date Parking Standards SPD which sets minimum standards for residential parking at new development to ensure appropriate provision. It sets maximum standards for non-residential parking, and minimum cycle parking standards to promote sustainable transport choices to influence a shift to non-car modes. Paragraph 13.3 confirms that Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed. Section 15 addresses the area of GB15 which is owned by the Church, and which is consecrated as future burial land. Paragraphs 8.6 to 8.10 address noise pollution.
Response Reference: U0001322
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06567/1
Name: Ms Katherine Laver
Number of Signatories: 1
Comment Type: OBJ
Site Reference:

<p>Summary of Comment: Considers that the DPD is not legally compliant as there has not been enough consultation for, and consideration of, traffic congestion and the flood plain. No comment on the duty to cooperate. No comment on the tests of soundness. Wishes to be informed when the DPD progresses to the next stages.</p>
<p>Contributor Proposed Modification: No building in Byfleet village</p>
<p>Modification Reference: U0000233</p>
<p>Officer Response: The issues raised in this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper. Section 9 outlines the robust approach which the Council took to carrying out the Regulation 19 consultation. In particular, Paragraph 9.3 confirms that the Council is satisfied that it has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. It has done so in accordance with the Statement of Community Involvement and all other statutory and policy requirements. Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 provides further details regarding traffic and congestion considerations. Section 7 addresses the proper assessment of the flood risk implications of the Site Allocations DPD. As confirmed in Paragraph 5.1, the Council has determined through the Core Strategy that the significant unmet need for housing justifies the in principles need to release Green Belt land for housing development. In doing so it has ensured that first and foremost development is directed to the most sustainable locations of the Borough in accordance with the spatial strategy of the Core Strategy. It is therefore not considered appropriate to remove sites in Byfleet from the DPD.</p>
<p>Response Reference: U0001274</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 00527/2</p>
<p>Name: Mr Richard S Lawrence</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: SUPP</p>
<p>Site Reference: RG18GB12, RG18GB13</p>
<p>Summary of Comment: Support decision not to safeguard previously proposed green belt sites in Pyrford. Oppose development on those sites due to impact on amenity, and inadequacy of transport, education and health infrastructure.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Support noted</p>
<p>Response Reference: SUPPOR</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06519/1</p>
<p>Name: Heather Lawrence OBE</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: SUPP</p>
<p>Site Reference: RG18GB12, RG18GB13</p>

Summary of Comment: Support decision not to safeguard previously proposed green belt sites in Pырford. Oppose development on those sites due to impact on amenity, and inadequacy of transport, education and health infrastructure.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06777/1
Name: Ms Charlotte Lawrie
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: The DPD is neither sound nor legally compliant for the following reasons:</p> <ol style="list-style-type: none"> 1. The DPD is unsound because it fails to consider for allocation sites that would yield less than 10 dwellings, thereby restricting the possibility of removing any such site from the Green Belt. This restriction appears arbitrary and unreasonable. 2. Contrary to the obligation to permit a wide choice of high quality homes, the DPD fails to allocate sites for the building of sizeable single dwellings with more substantial gardens in the range of 0.5 to 1.0ha. 3. The DPD fails to allocate any sites specifically for self-build, contrary to its obligations. <p>The above reasons are consistent with a separate representation, the content of which is detailed below:</p> <ol style="list-style-type: none"> 1. If Green Belt sites are not allocated in the DPD they will remain in the Green Belt, however appropriate it might be that they should be removed from it. Sites that exemplify this are: the site at the corner of Blackhorse Road and Heath House Road; the site on the corner of Heath House Road and Rough Road (SHLAABR034) (owned by Gordon Bishop and his wife); and the site to the southwest of Blackhorse Road/Heath House Road (owned by Charlotte Lawrie). For instance, SHLAABR034 is suitable for a maximum of two houses, and has therefore not been included in the DPD, even though it is suitable for development. <p>By failing to consider such sites for allocation, the Council is not complying with the obligations in the NPPF and Core Strategy to provide sites on which sizeable houses can be built. Furthermore it unjust to those who have put forward such sites for consideration. It necessarily follows that the DPD is in this respect fundamentally flawed, not legally compliant and unsound.</p> <ol style="list-style-type: none"> 2. The NPPF requires Council's to deliver "a wide choice of high quality homes" which must include sizeable houses with sizeable gardens as well as medium and smaller size dwellings. The Core Strategy provides that "it is important that the Council provide an appropriate choice and mix of housing across the Borough in order to create balanced and sustainable communities." <p>Woking is seeking to encourage more businesses in the area, and therefore requires high quality sizeable homes to attract owners and senior executives of those businesses. Preventing their construction in suitable areas restricts supply and makes existing houses more expensive. This has a knock-on effect on smaller, less expensive homes. Despite the Council's obligation to provide sites for sizeable homes, and the need for such homes, the DPD fails to allocate any such sites. The DPD is therefore fundamentally flawed, not legally compliant and unsound.</p>

It is recognised that there are few areas in the Borough where sizeable homes can be built. However there are quite a number of suitable plots on, or adjoining, Heath House Road where such development would not compromise the purposes which the Green Belt serves. Most of the sites suitable for development for development in Bridley adjoin West Hill or Worplesdon golf course, and were originally intended to be built on, and many were sold in the early 20th century subject to covenants requiring houses to be built on them. The Green Belt Boundary Review found that "it is quite possible that individual sites might be sustainable and appropriate for removal from the Green Belt, despite the wider parcel within which they were being assessed, being considered inappropriate." Indeed, it found that although Parcel 19 as a whole is not suitable for removal from the Green Belt, some development could be integrated along Heath House Road "without wider visual harm." The review's description of residential development along Heath House Road as "scattered" is inaccurate. So too is the SHLAA's description of the area as ribbon development.

While the review recognises that development of these sites might result in "adverse effects on landscape features and its existing character", these could in any event be addressed by planning conditions. Any houses built will not adversely affect the "openness" of the area because they would be on large sites and, as PBA say, they would be very well contained visually from surroundings due to what PBA term the "high level of mature vegetation".

Contributor Proposed Modification: The DPD could usefully be amended to include the following sites in the allocations for residential development:

1. Land to the southwest of Blackhorse Road/Heath House Road (SHLAAHEA033)
2. Land on the corner of Heath House Road and Rough Road (SHLAABR034)
3. Land on the corner of Blackhorse Road and Heath House Road (SHLAABR030)

Allocating the relevant sites and thereby removing them from the Green Belt will provide sites on which sizeable homes can be built, including self-build homes, and thus fulfil the Council's obligations under the NPPF and the Core Strategy.

Modification Reference: U0000197

Officer Response: The decision not to allocate sites that will yield fewer than 10 dwellings is addressed in Paragraph 11.4 of the Regulation 19 Issues and Matters Topic Paper, and is justified on the grounds of ensuring that the appraisal process was manageable.

Due consideration has been given to providing the range and mix of houses that the Borough needs. Paragraph 1.8 of the Regulation 19 Issues and Matters Topic Paper demonstrates that the Council has given sufficient consideration to the evidenced need for family homes, and considers that the allocation of Green Belt sites in particular will address this need. Furthermore, Policy CS11 of the Core Strategy addresses housing mix and requires that "all residential proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs as evidenced in the latest Strategic Housing Market Assessment in order to create sustainable and balanced communities." The Council monitors housing mix through the Annual Monitoring Report. In particular, it is highlighted that larger properties continue to be delivered in the Borough; 4 bedrooms properties represented 24.2%, 17.8% and 23% of total housing completions in the past three monitoring years (2015/16, 2016/17, and 2017/18.)

The NPPF specifies that "under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permission to meet the identified demand." While the Council maintains a self build housing register, it has not identified any serviced plots. However, the Council has published a SHLAA which provides a comprehensive evaluation of all sites in the Borough that are considered deliverable or developable. This provides

<p>sufficient information for those wishing to carry out a self-build or custom housebuilding project. Indeed, through the CIL monitoring process, it is clear that a significant number of self-build schemes continue to come forwards in the Borough. Furthermore Policy DM12 of the Development Management Policies DPD provides in principle support for "the development of self and custom-build homes and custom-build projects in suitable locations, where they support the delivery of the Core Strategy and meet all other requirements of the Development Plan for the area." In this regard, the Council is not acting contrary to its obligations as it is addressing self-build and custom house building through a process independent of the Site Allocations DPD.</p> <p>The Green Belt Boundary Review methodology is considered robust, as outlined in Section 12 of the Regulation 19 Issues and Matters Topic Paper. In particular 12.3 clarifies that contrary to concerns expressed during the consultation, the review did indeed consider specific sites within land parcels where relevant.</p> <p>The sites which the respondent argues should be included within the Site Allocations DPD were not included within the SHLAA categories deliverable sites (0-5 years) or developable sites (6-10 years.) Therefore they were not considered suitable for allocation within the plan period. The SHLAA methodology is considered to be robust, as outlined in Paragraph 11.7 of the Regulation 19 Issues and Matters Topic Paper.</p>
Response Reference: U0001008
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06594/1
Name: Mr And Ms John And Lindsay Lay
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05, GB18
<p>Summary of Comment: Argues that developing Green Belt sites in Byfleet for houses will overcrowd the village and its facilities, and deny residents of their limited green spaces. Argues that an access road in GB5 that runs through the burial ground would be inappropriate.</p> <p>Highly concerned that the playing fields at West Byfleet Infants and Junior School will be released from Green Belt at a time when children do not have enough outdoor exercise.</p>
Contributor Proposed Modification: Reconsider these plans
Modification Reference: U0000154
<p>Officer Response: This representation has been addressed in the Council's Regulation 19 Issues and Matters Topic Paper</p> <p>Paragraph 5.1 explains that while development may not be evenly spread throughout the borough, it has been directed to the most sustainable locations in accordance with the spatial strategy of the Core Strategy.</p> <p>Section 6.0 addresses the due consideration which has been given to infrastructure and community facilities.</p> <p>Paragraph 4.2 addresses the robust policy framework relating to the provision of open space in the Borough. Further detail is available in Paragraph 6.8.</p> <p>Section 15 addresses the section of GB5 which is consecrated as a future burial ground. Paragraph 5.2 provides clarity that site GB18 will not be developed and will continue to provide open space and sports provision for the Junior and Infants schools.</p>
Response Reference: U0000963
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02400/3
Name: Mr Tom Leader
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: WBC have made the correct decision to remove Regulation 18 sites GB12 and GB13 from the DPD. Valid objections raised during the Regulation 18 Consultation include: 1. GB12 and GB13 contribute very significantly to the semi-rural setting and character of Pyrford. Their development would significantly harm the character and setting of the conservation area around St Nicholas Church. 2. The process for identifying parcels of land to be removed from the Green Belt was flawed, and the scoring criteria inconsistently applied. 3. The impact on Green Belt would be severe and unjustifiable unlike other allocated sites more akin to infill or brownfield sites in nature. 4. Traffic through Pyrford, including from the A3, is dangerously high. The narrow roads could not support traffic from an additional 500 houses on Upshot Lane. 5. Local infrastructure could not cope with additional demands. 6. The amount of land safeguarded for development beyond 2027 was excessive and therefore the requirement for GB12 and GB13 required re-evaluation.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support for the decision to remove Regulation 18 sites GB12 and GB13 from the DPD is noted. Section 12 of the Regulation 19 Issues and Matters Topic Paper addresses the methodology of the Green Belt Boundary Review.
Response Reference: U0000942
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06691/1
Name: Mr Mike LeBez
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB12
Summary of Comment: Woking MP Mr Jonathan Lord indicated that the proposals were not appropriate and he had great sympathy for the Byfleet residents concerns. Fully support the comments made by the Byfleet Residents Neighbourhood Forum below. No consideration has been given to the fact GB4 and GB5 plus the Byfleet SANG area are all potential sites for HS4 Air. This National Transport infrastructure project and the compromising impact these proposals from WBC could have on this have been completely omitted from this document and from WBC's assessments. No consideration has been given to possible future widening of the M25. GB4, GB5 and the Byfleet area of SANG run alongside one of the busiest stretches of the M25. During the drafting of the DPD WBC did not carry out adequate research into land ownership and land registry purpose of site GB5. The document has been prepared without knowledge or reference to the fact that 1/3rd of GB5 is owned by St Mary's church, having been bequeathed to the Church as an extension to the adjacent grave yard. It is registered as burial land with the Land Registry, burial rights granted on it into perpetuity.

Due to the existing road layout of this area it may be that safe access to the other 2/3rds of site GB5 can only be obtained by building a road on this church land. This would mean a forced acquisition on this bequeathed land.

Development of this land, or forced acquisition of church land for housing or access, is entirely inappropriate. If houses can not be built on GB5 without causing harm to bequeathed burial land then this site is not appropriate for development.

Inadequate consideration of land flooding, GB4- is subject to flooding as are the areas both North and South of this location. Photo evidence of regular periodic flooding of this entire area within the inside of the M25 has been provided to WBC. Development of this area will lead to additional flood issues and the increase of flood risk to neighbouring existing properties.

GB5- is also part flood zone. Development of this area will lead to additional flood issues and the increase of flood risk to neighbouring existing properties.

The Byfleet SANG area- is subject to extensive and frequent flooding. It is not suitable as a SANG as residents will have severely compromised use of this area in Autumn, Winter and Spring. Wooden walkways are not sufficient to offset this.

GB10 is also an area subject to frequent and severe flooding.

Adequate assessments regarding flooding in Byfleet from both river and surface water have not been carried out.

Inadequate consideration has been given to including Martyrs Lane Greenbelt. This much larger area of land which includes areas of developed greenbelt could be available for some housing or traveller sites. The reasons for its removal as a site for consideration are insufficient to support that decision. The same reasons for this land's removal from the Plan could also equally be applied to GB4, GB5 and GB10.

Inadequate reasons for excluding Pyrford greenbelt sites. Again the same criteria that resulted in their removal from the draft plan could equally be applied to GB4, GB5 and GB10.

Pollution assessments. The pollution sensors on the A245 showed the highest pollution readings in Woking. In 2016 the sensor was repositioned to a location away from the A245 which resulted in lower readings.

These lower readings are however, misleading and give an inaccurate picture of true pollution levels in Byfleet and West Byfleet on the A245. Increased traffic numbers will further impact on the pollution levels. Developments at GB4, GB5 and GB10 will all increase traffic and therefore pollution levels on the A245.

No proper consideration has been given to noise pollution for locations GB4 and GB5 which sit alongside the M25.

Office of National Statistics Housing Numbers. It is expected that the previously stated housing requirement numbers will be reduced by Central Government. The DPD does not take this expected change into consideration and therefore is using inaccurate housing targets.

As a precedence neighbouring council Guildford has already requested a reduction to their housing target be incorporated into their DPD due to the expected change in housing requirement predictions.

Inadequate infrastructure provisions. The infrastructure report, although lengthy, is lacking in even basic detail. The villages of Byfleet and West Byfleet are recommended for an increase of 800+ houses within a small geographical area.

The provision and consideration given for infrastructure to support an increase of this size to the population of the 2 villages is wholly inadequate.

Traffic - The A245 is already heavily congested. The traffic flow improvements suggested are minimal and are very unlikely to be even moderately successful in improving traffic flow for even the current traffic volume let alone 1500+ additional cars. The only entry and exit points for Byfleet (only 3 in total) are all on to the A245.

Healthcare services for Walk in Centres and GP surgeries is already overstretched with 1 GP location in West Byfleet serving both villages as well as further neighbouring villages.

The nearby Weybridge Walk In Centre was lost in a fire and has not been replaced, further stretching the services of other Walk In Centres.

The infrastructure report completely fails to address how and where adequate healthcare could be provided for an increased population.

Education - The infrastructure report fails to make proper recommendations for school place provision. Both West Byfleet School and St Mary's School in Byfleet have already undergone expansion which required the construction of additional school buildings within their grounds. Byfleet Primary school is regarded as having insufficient space for any further building or classes as they are located on a small land area.

Overdevelopment - WBC has stated that there are 5000 planned houses over the next 10 years. This is a surplus of 2000 to the number required even before a likely reduction in housing need is announced.

This housing quantity is unnecessary, excessive and is overdevelopment.

If housing need is already met or in fact exceeded there is no justifiable reason or exceptional circumstance to release any greenbelt for development.

Exceeding the required plan term. The DPD is required to make recommendations up to 2027. Any recommendations past this date, or specific allocation of greenbelt land for later development is therefore unnecessary. GB4 and GB5 are therefore not needed to be included within the report.

Predicting need and making recommendations beyond a 10 year span leaves recommendations subject to, too high a degree of change and inaccuracy. Inaccurate predictions will lead to unsuitable, unsustainable recommendations.

Inadequate consideration given to alternative sites. WBC commissioned an externally prepared report specifically designed to identify greenbelt land for development. No such report has been commissioned to identify brownfield sites.

Therefore equivalent or adequate consideration has not been given to suitable alternatives. In view of the lack of accuracy and knowledge on factors such as land ownership/purpose of GB5 identified above, it is likely that WBC's knowledge of suitable brownfield locations is also lacking and professional external assessment should have been sought.

Inaccurate Statements regarding the greenbelt function of GB4, GB5 and GB10. The DPD states the selected greenbelt is not performing a greenbelt function. The purposes of the greenbelt to check the unrestricted urban sprawl of built up areas. GB4, GB5 and GB10 provide an area of green space between the two entirely separate villages of Byfleet and West Byfleet. These areas of greenbelt are successfully performing the greenbelt function of preventing urban sprawl.

To prevent neighbouring towns merging together. The level of development proposed on GB4, GB5 in Byfleet and GB10 West Byfleet (over 800 extra houses in a small geographical area) will effectively merge the two villages together. Byfleet and West Byfleet are entirely separate villages with their own village centres, and are not separate regions of one larger town. The greenbelt at GB4, GB5 and GB10 is required and performing the function of preventing merger.

To assist in safeguarding countryside from encroachment. GB4, GB5 and GB10 are maintaining clear areas of countryside with an already well defined greenbelt boundary. Development of these areas will adversely impact upon the countryside.

To preserve the setting and special character of historic towns. Byfleet is a historic village named in the Doomsday Book and also the home of the former royal palace, Byfleet Manor. As a historic village it should be preserved and not merged with West Byfleet. The greenbelt is required to maintain this and development would go against the greenbelt function currently being performed.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and

West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network. The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper. The concern regarding vulnerability of the sites to flooding is addressed in section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.

- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.

- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.

- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

Sections 1 and 2 of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. Paragraph 1.5 gives clarity on how the latest housing need figures would not affect the Borough's housing requirement. In February 2019, the Government confirmed that the 2016-based household projections should not be used to calculate housing need. The 2014 projections should form the basis for calculating housing need.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

The representation regarding unnecessary, excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper.

Section 2 sets out in detail why sites GB4 and GB5 need to be safeguarded for development beyond 2027. Sites GB4 and GB5 have not yet been allocated for development, only safeguarded. There are no key requirements in recognition of the fact that needs, and the planning policies reflecting them, may change beyond 2027.

The Council conducted the brownfield site assessment in-house because it has the expertise and resources to do so, rather than waste public money on engaging consultants to do the study. This is set out in detail in section 11, particularly paragraph 11.7, of the Topic Paper.

It is argued that the Green Belt sites perform several Green Belt functions. It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made a greater contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development.

Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl.
Response Reference: U0001233
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 00882/2
Name: Ms Carol Le'Bez
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB4, GB5, GB10, GB11
<p>Summary of Comment: The Green Belt land currently fulfils its function of restricting urban sprawl, by providing a green space between Byfleet and West Byfleet. The Plan ignores the fact that the villages have always been separate; the proposals would effectively merge them. Byfleet is a historic village and as such should be preserved by the Green Belt.</p> <p>Traffic on the A245 is continually congested, with a knock-on effect on Byfleet and West Byfleet. The Plan proposes minimal measures to ease congestion, which would do little to improve current traffic problems, and would not be likely to solve the problems caused by traffic from the proposed development. It is not sustainable.</p> <p>The health centre for the two villages is already overstretched; the study fails to identify where additional healthcare would be provided for the new residents. It is not sustainable. Our schools are full. There is no answer to where additional school places would be found. It is not sustainable.</p> <p>Byfleet already has considerable flooding problems. Area of land within the proposed development are within the flood zone. Development on this scale would increase the possibility of flooding to neighbouring properties.</p> <p>Pollution on the A245 is already high, increased traffic will exacerbate it.</p> <p>Land opposite St Mary's Church has been bequeathed to the Church granting burial rights in perpetuity. Forced acquisition of this land to provide access to the new development cannot be permitted.</p> <p>No need and not acceptable to make recommendations for after 2027, there is a lack of evidence for how things will have changed by then.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The Green Belt boundary review assessed the parcels of Green Belt land against the purposes of the Green Belt, one of which is to check the unrestricted sprawl of large built up areas. None of the proposed allocations will lead to unacceptable urban sprawl. The review concluded that land in Parcel 6 (the west side of Byfleet) made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. A substantial green gap will remain between the edge of site GB10 and the M25, and to a lesser extent east of the M25, and public access to this area will be enhanced through the establishment of the Byfleet SANG (site GB12) and potentially through off-site green infrastructure connected with site GB10.</p>

<p>Paragraph 20.2 of the Regulation 19 Issues and Matters Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR.</p> <p>The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13.</p> <p>The implications of the proposals for local infrastructure, including medical and education facilities, are addressed in the Regulation 19 Issues and Matters Topic Paper, Section 8.</p> <p>Flood risk issues affecting the proposals are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7. In particular, only a small proportion of site GB5 lies within Flood Zone 2, the zone of medium risk of flooding from rivers; the great majority of this site and all of sites GB4 and GB10 are in Flood Zone 1, which is of low flood risk from rivers.</p> <p>The impact of the proposals on pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 8.</p> <p>The issue of future burial land on site GB5 is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 15.</p> <p>The need to make provision for development after 2027 is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 2.</p> <p>A sustainability appraisal has been carried out on the proposed sites which found them to be sustainable. The availability of alternative brownfield development sites is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 11.</p>
Response Reference: U0001414
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06725/1
Name: Ms Claire Lee
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
<p>Summary of Comment: Strongly objects to release of Green Belt land at GB7, because:</p> <ul style="list-style-type: none"> - Does not meet 'special circumstances' required to build on Green Belt. Removing Green Belt status was to allow a school to be built, not housing development or a David Lloyd gym. Land should revert to Green Belt and be reviewed on that basis. - Unethical procedure - the field to the right of the school has been fenced off. Concerned about agreements in place with landowners and the Council. - Lack of access points to the proposed site, which is landlocked. If access is via school it would put children's safety at risk. - Site plans in the DPD are inaccurate - should reflect existing state of development and is misleading. - Lack of impact assessment that development would have on Green Belt e.g. increased traffic and risk to school children. There have already been serious accidents.
<p>Contributor Proposed Modification: Site plans should reflect the current state of development.</p> <p>Revert land at GB7 to Green Belt status.</p>
Modification Reference: U0000317
<p>Officer Response: The points listed in the representation are addressed below.</p> <ol style="list-style-type: none"> 1. The representation is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, section 1. 2. As part of the Strategic Housing Land Availability Assessment (SHLAA) the Council periodically contacts planning agents, landowners and other interested parties to request that potential sites are put forward to consideration. In the case of these sites, this may

have been the case, and the Council will have had discussions with the landowner and/or their agent to work out the scope of and potential for development. This sits as background to the Site Allocations presented in the draft DPD. The majority of the Hoe Valley School application site is owned by the Council, with the remainder of the GB7 site being highway land or land owned by a third-party. The Council's intentions for the site are set out in Council meeting reports which are accessible to the public, and which were discussed in detail at a Council meeting in July 2018. The report to the Council is available on the Council's website. It is proposed that the Egley Road land is purchased by the Council, subject to planning approval being obtained for the Kingfield Road and Egley Road schemes. The Egley Road scheme would involve the relocation of the existing David Lloyd Leisure Club along with new residential accommodation, in order to help facilitate the enhancement of the football club at Kingfield Road, which is considered to be an important community asset. The Council has entered into a Development Agreement with GolDev. GolDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this year. The planning merits of the scheme will be determined by the Council's Planning Committee. There will be extensive public consultation as part of the planning process. This is a separate matter to the preparation of the Site Allocations DPD.

3. New site access to the A320 is listed under the key requirements of the policy, the details of which will be determined as part of the Development Management process, as and when a planning application is submitted for the site. At this stage, the Council is confident that appropriate and safe access can be made, based on background assessment provided by Surrey County Council.

4. The site plan for GB7 published within the Site Allocations DPD at Reg 19 in Oct 2018 is up to date. It is acknowledged that the proposals map (October 2018) and the aerial photography within the DPD are not, which is an oversight and will be updated to show the latest available mapping and aerial photography prior to submission of the Plan to the Secretary of State.

5. On child safety due to traffic, para 6.7 of the Council's Regulation 19 Issues and Matters Topic Paper and site specific requirements that will be implemented through the Development Management process, mean that the Council is satisfied that traffic and access from the development will not adversely impact pedestrian or Highway safety. Individual instances of speeding and dangerous driving are not planning matters, and will be dealt with as appropriate by the Police.

The need to develop land in this location, and appropriateness with regard to a breadth of evidence is covered in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1, 2, 10 and 11. The point about engagement of Mayford residents is noted, but in this case does not change the need for development and appropriateness of development at GB7 and GB8. The Council sympathises with the concern about the loss of Green Belt, but overall the amount of land to be lost from the Green Belt is modest (see para 4.1 of the Council's Regulation 19 Issues and Matters Topic Paper for detail) and the Council is confident that adequate infrastructure can be provided to support the delivery of these sites. Further detail on infrastructure can be found in section 6 of the Council's Regulation 19 Issues and Matters Topic Paper.

Response Reference: U0001369

Officer Proposed Modification: Replace aerial photo on p264 with an up-to-date photo to show the newly constructed school and sports facilities. Update base OS map on the Proposals Map to show new facilities, if available.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06760/1

Name: Mr Andrew Lee
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07, GB08
<p>Summary of Comment: Objects to the proposed development for the following reasons:</p> <ol style="list-style-type: none"> 1. Legal basis - does not meet 'special circumstances'. Accepts the school, but not housing development or a gym. 2. Ethics - what is the agreement between WBC and the landowner re Green Belt development? 3. Site Access - the site is landlocked and safe access arrangements should be clearly explained. 4. Incorrect documents - plans should reflect the current state of development. The published map fails to show the school and deliberately misleads those unfamiliar with the site. 5. Child safety - due to increased traffic, no impact assessment carried out. <p>Financial greed to build should be checked where a site is not appropriate (land locked site). Mayford residents need to be engaged, due to the direct impact on them from the proposed development.</p>
Contributor Proposed Modification: Plans should reflect the current state of development for GB7.
Modification Reference: U0000468
<p>Officer Response: The points listed in the representation are addressed one by one below.</p> <ol style="list-style-type: none"> 1. The representation is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, section 1. 2. As part of the Strategic Housing Land Availability Assessment (SHLAA) the Council periodically contacts planning agents, landowners and other interested parties to request that potential sites are put forward to consideration. In the case of these sites, this may have been the case, and the Council will have had discussions with the landowner and/or their agent to work out the scope of and potential for development. This sits as background to the Site Allocations presented in the draft DPD. The majority of the Hoe Valley School application site is owned by the Council, with the remainder of the GB7 site being highway land or land owned by a third-party. The Council's intentions for the site are set out in Council meeting reports which are accessible to the public, and which were discussed in detail at a Council meeting in July 2018. The report to the Council is available on the Council's website. It is proposed that the Egley Road land is purchased by the Council, subject to planning approval being obtained for the Kingfield Road and Egley Road schemes. The Egley Road scheme would involve the relocation of the existing David Lloyd Leisure Club along with new residential accommodation, in order to help facilitate the enhancement of the football club at Kingfield Road, which is considered to be an important community asset. The Council has entered into a Development Agreement with GolDev. GolDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this year. The planning merits of the scheme will be determined by the Council's Planning Committee in accordance with the Development Plan, which includes the Site Allocations DPD. There will be extensive public consultation as part of the planning process. This is a separate matter to the preparation of the Site Allocations DPD. 3. New site access to the A320 is listed under the key requirements of the policy, which will be monitored. The details of this will be determined as part of the Development Management process, as and when a planning application is submitted for the site. At this stage, the Council is confident that appropriate and safe access can be made, based on background assessment provided by Surrey County Council.

4. The site plan for GB7 published within the Site Allocations DPD at Reg 19 in Oct 2018 is up to date. It is acknowledged that the proposals map (October 2018) and the aerial photography within the DPD are not, which is an oversight and will be updated to show the latest available mapping and aerial photography prior to submission of the Plan to the Secretary of State.

5. On child safety due to traffic, para 6.7 of the Council's Regulation 19 Issues and Matters Topic Paper and site specific requirements that will be implemented through the Development Management process, mean that the Council is satisfied that traffic and access from the development will not adversely impact pedestrian or Highway safety. Individual instances of speeding and dangerous driving are not planning matters, and will be dealt with as appropriate by the Police.

The need to develop land in this location, and appropriateness with regard to a breadth of evidence is covered in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1, 2, 10 and 11. The point about engagement of Mayford residents is noted, but in this case does not change the need for development and appropriateness of development at sites GB7 and GB8. The Council sympathises with the concern about the loss of Green Belt, but overall the amount of land to be lost from the Green Belt is modest (see para 4.1 of the Council's Regulation 19 Issues and Matters Topic Paper for detail) and the Council is confident that adequate infrastructure can be provided to support the delivery of these sites. Further detail on infrastructure can be found in section 6 of the Council's Regulation 19 Issues and Matters Topic Paper.

Response Reference: U0001155

Officer Proposed Modification: Replace aerial photo on p264 with an up-to-date photo to show the newly constructed school and sports facilities. Update base OS map on the Proposals Map to show new facilities, if available.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06467/1

Name: Ms Elizabeth Leese

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB18, SA1

Summary of Comment: Objects to site allocations GB4, GB5, GB10 and GB18, as well as temporary traveller pitches on Murrays Lane becoming permanent.

Concerns regarding inadequate infrastructure.

No evidence that WBC have liaised with Surrey County Council to determine viability of proposed sites from an infrastructure perspective. There is no infrastructure assessment addressing improvements to highways (Parvis Road is a particular concern), utilities, healthcare or education.

Concerns about funding to secure new infrastructure.

Concerns regarding flooding.

Many of the allocated sites act as flood alleviators.

Planning guidance for traveller sites states that sites should not be located in areas which are at high risk of flooding.

Concerns regarding the development of Green Belt land.

The Green Belt currently acts as a noise buffer from the nearby M25. The new development at West Hall would be impacted by noise pollution.

Noise has an adverse impact on mental health.

Brownfield land should be used instead.

Is there evidence of a full brownfield assessment for the Borough to identify sites?

Has any consideration been given to Windfall sites in this plan? If so, why not?

Population increase for Byfleet and West Byfleet will be too high, infrastructure will not cope.

<p>Errors in plans. Burial ground included in GB5. Concerns regarding Sheer House development. Current street scene and retail situation needs to be addressed. Conflict of interest. Are Woking Borough Council not in direct conflict in their role as trustee of the charity which was set up to oversee the playing fields? Where will increased number of children play after the recreation ground is reduced in size? Concerns regarding a wider development scheme to release playing fields for the development of a pub which is strongly opposed by local residents. Feelings of marginalisation within Byfleet and West Byfleet, due to previous development decisions.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development, paragraph 1.6 addresses the issue regarding the assessment of brownfield land. Section 3 addresses concerns regarding traveller sites. Section 4 addresses the impact of the loss of Green Belt land on the amenity and general wellbeing of residents. Section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet. Section 6 addresses the issue regarding adequacy of infrastructure, including funding. Section 13 specifically addresses road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 7 addresses the issue regarding flooding. Section 8 addresses the issue regarding pollution. Section 15 addresses the issue regarding the burial land on GB5. It is noted that Sheer House and the surrounding area is allocated for redevelopment as Policy UA42 of the Site Allocations DPD. A windfall allowance is made for the period over ten years in the future, allowing it to become clear whether or not recent trends for windfall sites to contribute to supply will in fact continue. It is emphasised that when windfall sites come forwards for development, they are counted as part of the overall housing completions for that period (year). As stated in the DPD, windfall sites have not been counted when planning overall development supply through the Core Strategy. This therefore provides an allowance of flexibility for non-implementation of any particular site. The pub in the park proposal is beyond the remit of the DPD. However, it is confirmed that the developer will no longer be pursuing the proposal. The GB18 site is allocated for the delivery of green infrastructure. As stated in the DPD, this land would not be developed. It is existing open space associated with an educational use. Accordingly it is allocated for continued use as open space and will be designated as Urban Open Space (Policy CS17) to serve the schools. As outlined in Section 5 of the Regulation 19 Issues and Matters Topic Paper, the Council recognises that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.</p>
<p>Response Reference: U0001446</p>

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02346/2

Name: Mr Mike Legg

Number of Signatories: 1

Comment Type: OBJ

Site Reference:

Summary of Comment: This draft of the DPD is not legally compliant, nor sound, nor does it comply with the Duty to Cooperate, due to:

- Procedural requirements: travellers sites in the east of the Borough were not included in the Regulation 18 consultation;
- Positively prepared: the allocated sites in the east are not sustainable due to current and future inadequate infrastructure;
- Justified: LDF decision-making has been skewed by the chairmanship of a Pyrford Councillor on the LDF Working Group since July 2016. He has deviated from Officers' recommendations to select six professionally reviewed sites and to locate a traveller site in Mayford. He intended for the six Regulation 18 sites to be deleted and replaced with one large site on land to the east of Martyrs Lane. It was intended to include this in a Regulation 19 consultation, but on the day of the Council meeting in October 2016 the Councillor was forced to submit an amendment to do a bespoke round of consultation on Martyrs Lane first. Councillors at this Council meeting were confused, and had little time to prepare. An FOI request (upheld by the ICO), and the results of the Martyrs Lane consultation (which was subject to a long delay before being published), demonstrated that the Martyrs Lane route was a ridiculous option. Again, at the LDF Working Group meeting the same Pyrford Councillor chairing the meeting deviated from the officers' recommendations and put everything in the Byfleets. This information (300-400 pages) was only published 7 days before the Council meeting in October 2018, and did not give Councillors or the Byfleets time to properly organise. Having made concessions on sites in Mayford in order to get the DPD passed by the LDF committee, the majority of buildings and traveller sites are allocated in the Byfleets to 2040, rather than being spread across Byfleets, Pyrford and Mayford.
- Effective: insufficient joint working has been carried out to assess Woking's needs. More weight should have been given to the Duty to Cooperate. Several neighbouring Councils have complained about Woking's lack of involvement with them.

Contributor Proposed Modification: The Council, Inspector and Secretary of State should look carefully at the whole process followed, which has not been in the best interest of Woking. It is in the best interest of the Council to revert back to the original plan that was put forward before Councillor Bowes joined the LDF committee, and submit the one recommended by the council officers before that time. I think any plan after that time has been tainted and that there is a great risk that the Inspector and Secretary of State will reject this, opening up the possibility for development on any area of Woking's Greenbelt in the future, not just those sites described in any plan.

Modification Reference: U0000301

Officer Response: The inclusion of different proposed Traveller sites in the draft DPD is due to changing circumstances, such as the loss of Ten Acre Farm which occurred after the Regulation 18 consultation had concluded. The need to identify substitute pitches led to the inclusion of new proposal sites, which have now been subject to Regulation 19 consultation. Section 3 of the Council's Regulation 19 Issues and Matters Topic Paper sets out the justification for allocating Traveller pitches, and Section 9 sets out in detail how the Council believes the consultation procedure has been sufficient.

Section 6 describes how infrastructure assessments have been conducted to ensure future development is supported by adequate infrastructure. The Council is confident that the evidence base such as the Infrastructure Delivery Plan addresses adequately the provision of infrastructure to support the delivery of sustainable development.

Section 24 of the Topic Paper addresses concerns regarding the political procedures and committee make-up.

Due to the volume of responses to the Martyrs Lane consultation, it took longer than expected to process the representations and publish the outcome of the consultation. The timeframes involved are therefore predominantly due to the sheer volume of the representations, the labour intensiveness of some of the administration of the process and the willingness to process, analyse and respond to the representations thoroughly, in addition to allowing sufficient time between working group, committee and council meetings for reports and other documentation to be available for Members to read and analyse fully. All working group, committee and council procedure rules have been followed at every stage of the Site Allocations DPD process, as per the Council's Constitution.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the originally proposed sites in Pyrford and Mayford. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10.

The Council published the DPD for a six week Regulation 19 consultation period, designed to give residents and organisations ample opportunity to participate. This is described in more detail in Section 9 of the Topic Paper.

The decision to exclude sites in Pyrford and Mayford was a decision agreed by full Council, the planning judgments that led to this decision were well informed by careful consideration of all the available evidence, and the reasons for the decision were published and transparent. The recommendations of the LDF Working Group, including the amendments to Officer recommendations, were available for all Members to read in advance of the full Council meeting, in accordance with the timeframes set out in the general provisions for meetings.

The Council has been and is acutely aware of its responsibility under the Duty to Cooperate to engage with its neighbouring authorities, and has done so in a constructive manner throughout the process. The Council will continue to engage throughout the process and with regards to any post adoption delivery and monitoring that might be necessary. The Council will in due course publish its Duty to Cooperate Statement to set out how it has engaged with key stakeholders throughout the preparation of the DPD.

Response Reference: U0001260

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06447/1

Name: Leigh Place Properties Ltd

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB07

Summary of Comment: The respondent considers that the Council has treated him unfairly and writes, in relation to GB7, that the DPD is not legally compliant, not sound and does not comply with the Duty to Cooperate.

1. A contract was signed in July 2015 which set out the integrity gap between Woking and Mayford. Land shaded in yellow [essentially the land which has now been developed for sports pitches/facilities] was to be used as amenity land.

2. Why, if the Green Belt Boundary Review, advised that the school should be built in the north of GB7, did Woking Borough Council chose to build it at the southern end.

3. The southern parcel of the site is in Mayford ward and its retention as green space would protect the village.

4. The southern parcel would not be able to deliver the envisaged 168 dwellings due to the 3 acres of woodland contained therein.

5. Concerned that a landowner who has contributed land for community use, has to supply land with no public access and lose financial security because of mistakes in positioning the school and sports facility.

6. Why, given that PLAN/2015/0703 (for the school and sports facilities) was approved 3 years ago, is the Council seeking to revise the Brett report?

7. Considers that the amendment to GB7 submitted to Council in October 2018 is incorrect. The Hoe Valley School does not have any playing fields of its own; it can use the amenity land pitches. The athletics track is a replacement for the track being redeveloped in Sheerwater.

8. The amenity land was sold on an understanding that the Council would not object to other parcels of the site being removed from the Green Belt.

9. When Councillors approved the permission for the Hoe Valley School and sports facilities, they would have been aware of the contract.

10. Contends that councillors responsible for the amendment should not have been able to submit it as they were involved in the purchase of the site.

11. It is argued that the southern parcel cannot accommodate 168 units as it was approved for purchase in 2018 for a relocation of the David Lloyd Centre and up to 65 residential units.

Wishes to participate at the public examination in order to provide further information and to express a view on the reason for the amendment to GB7.

Wishes to be informed when the DPD progresses to the next stages.

Contributor Proposed Modification: The southern section of the site should be kept as the green wedge between Woking and Mayford.

Modification Reference: U0000430

Officer Response: It is noted that the school within GB7 was permitted under PLAN/2015/0703. It was considered that very special circumstances existed to outweigh the harm to the Green Belt at this location.

Policy GB7 gives due consideration to the character of Mayford village, providing inter alia that "density of development to the south of the site should maximise the efficient use of the site without compromising the general character of the area." Furthermore Paragraph 20.3 of the Regulation 19 Issues and Matters Topic Paper addresses the identity and character of Mayford. In particular, it is noted that Core Strategy Policy CS6: Green Belt specifically highlights that development will not be allowed if it is considered to have an unacceptable effect on the primarily residential character of the village and Green Belt.

The indicative figure of 168 residential units at GB7 is based on a density of 40dph, assuming a developable area of 4.16 ha. However this area includes the woodland in the south of the site. Given that this portion of the site is covered by a TPO, it is proposed that it be subtracted from the developable area, and the indicative yield adjusted accordingly. The school is newly built and further development on the site should take account of its presence.

The Council does not consider that there has been a mistake in positioning the school and sports facilities. This was carefully considered as part of the application, taking into account the character, and topography of the site and the functionality of the various uses. An important objective for this allocation and any development that comes forward is to maintain a visual gap and a separation between Woking and Mayford. The site is in a sensitive location and it is essential that development is sensitively laid out in order not to compromise this important objective. The Green Belt boundary review acknowledges the sensitivities surrounding the development of the site and had suggested that this necessary visual gap could be achieved by accommodating the built development of the school and the element of residential development to the northern part of the site, allowing the southern part to be used as school playing fields, thus maintaining their openness. The school has now been built and is operational. Based on careful and detailed site specific considerations during the development management process, the school playing fields have now been configured to the north of the school buildings. This layout in any way does not diminish the essential objective of maintaining a visual gap between Woking and Mayford. Given the current site context, the most logical and effective way of achieving the objective is to maintain the visual gap towards the north of the site as set out in the allocation.

To allocate the north of the site for residential development, in combination with safeguarding the sustainable brownfield site GB8: Woking Garden Centre for future development, would result in near-continuous built development along the western edge of Egley Road and therefore would not ensure the separation of the two settlements. In the conclusion of the Green Belt Boundary Review Report regarding this site, it is noted that the site is "considered suitable for development...provided that a visual sense of a gap between Woking and Mayford can be retained." Fundamentally, it is the retention of this gap that is of primary importance in planning this site. Policy GB7, as currently drafted, ensures that this gap will be retained.

It is considered that the amendment to GB7 submitted to the Council in October 2018 is sufficiently clear to identify the developable area of the site and the land which is to be retained as a separation gap between the two settlements.

It is noted that all of GB7 is being removed from the Green Belt, but that part of the parcel is to be protected from built development in order to ensure visual separation between the settlements of Mayford and Woking.

It is noted that the Council's intentions for site GB7 are set out in the Council meeting reports which are accessible to the public, and which were discussed in detail at the Council meeting in July 2018. It is proposed that the Egley Road land is purchased by the Council, subject to planning approval being obtained for the Kingfield Road and Egley Road schemes. The Egley Road scheme would involve the relocation of the existing David Lloyd Leisure Club along with new residential accommodation, in order to help facilitate the enhancement of the football club at Kingfield Road, which is considered to be an important community asset. This is a separate matter to the preparation of the Site Allocations DPD. The arrangements agreed in the Council's report are neither implemented nor at a stage at which the Site Allocations DPD should take full account of them.

Response Reference: U0001544

Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site".

Amend third paragraph of reasoned justification to read 118 dwellings.

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06565/1

Name: Ms Rosanna Leney

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05

Summary of Comment: Objects to the proposals to release the majority of the remaining Green Belt in Byfleet village for residential development.

Values the contribution that Green Belt makes to quality of life and enjoyment of surroundings.

Has significant concerns including flooding, impact on local traffic, air pollution, and impact on local services.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The issues raised in this representation are addressed by the Regulation 19 Issues and Matters Topic Paper.

The impact of the proposed allocations on the general wellbeing and amenity of residents is addressed in Section 4. In particular, the Council accepts that any land taken out of the

<p>Green Belt will lead to a reduction in the benefits which Green Belt land brings to particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. Furthermore Paragraph 4.2 confirms that whilst there is a loss open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents, as set out in Core Strategy Policy CS17: Open Space, green infrastructure, sport and recreation. Section 7 addresses the flood risk implications of the Site Allocations DPD. In particular, Paragraph 7.7 confirms that the DPD takes due care to ensure that the risk of flooding is minimised in Byfleet and West Byfleet.</p> <p>Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Further detail regarding traffic and congestion considerations is provided in Section 13. Air quality is addressed by Paragraphs 8.1 to 8.5.</p> <p>Section 6 addresses infrastructure broadly, including the impact on local services.</p>
Response Reference: U0001272
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06571/1
Name: Mr Robert Leney
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Objects to proposals to release the majority of the remaining Green Belt in the village of Byfleet for residential development Values the contribution of Green Belt to quality of life and enjoyment of surroundings. Has significant concerns regarding flooding, impact on local traffic, air pollution, and impact on local services.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper. Paragraph 5.3 recognises that the Site Allocations DPD proposes to remove 18.3% of the existing Green Belt in the former ward of Byfleet. Excluding site GB12 which will not be developed and is proposed to be used as publically accessible natural greenspace (SANG), the total amount of Green Belt to be lost to development in Byfleet is 7.3% (10.26ha). As discussed in Paragraph 5.1, the Council recognises that the proposed allocation of sites for development is not evenly spread across the Borough. However this could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development. Section 4 addresses the proposed allocations' impact on the general wellbeing and amenity of residents. The Council recognises that any land taken out of the Green Belt will lead to a reduction in the benefits Green Belt land brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensured through a number of studies that any land that is released from the Green Belt

will not undermine its overall purpose and integrity. Furthermore, Paragraph 4.2 provides that while there is a loss of open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents as set out in Core Strategy Policy CS17: Open Space, green infrastructure, sport and recreation.

Section 7 addresses the proper assessment of the flood risk implications of the Site Allocations DPD. In particular, Paragraph 7.7 confirms that the DPD takes due care to make sure that the risk of flooding is minimised in Byfleet and West Byfleet.

Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.

Section 13 provides further information regarding traffic and congestion considerations. In particular Paragraph 13.3 confirms that the Council has also worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential measures that might be necessary to address development impacts on the network.

Paragraphs 8.1 to 8.5 address air quality.

Section 6 comprehensively addresses infrastructure provision, including the impact on local services.

Response Reference: U0001278

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06433/1

Name: Lisa Leonard

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11

Summary of Comment: Objects to development of Green Belt land in Byfleet and West Byfleet.

Housing needs over the next 20 years are overstated; a substantial quantity of homes are provided in Town Centre, therefore the figure proposed for Byfleet is unjustified.

Concerns regarding the following:

- Merging of Byfleet and West Byfleet leading to urban sprawl;
- Destruction of Green Belt making the area less conducive to physical/mental health of residents;
- Development on flood plain;
- Inadequate infrastructure, including roads, health care and education. Parvis road is a particular concern;
- Destruction of wildlife habitats;
- Environmental impact. Extra traffic will contribute to CO2 emissions.

Is there evidence that WBC have exhausted brownfield sites?

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development, paragraph 1.5 addresses the matter regarding the housing need figures. Section 4 addresses the issue regarding the associated detriment to wellbeing, and section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet.

Section 6 addresses the issue regarding adequacy of infrastructure, and section 13 specifically addresses road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the

potential mitigation measures that might be necessary to address development impacts on the network. Section 7 addresses the issue regarding flooding. Section 8 addresses the issue regarding pollution. Section 19 addresses the issue regarding destruction of wildlife habitats. Section 21 addresses the issue regarding urban sprawl.
Response Reference: U0001371
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06354/1
Name: Mr Andrew Leong-Son
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
<p>Summary of Comment: Objects to proposals regarding the proposed developments at West Hall, West Byfleet and the reclassification of Green Belt land in West Byfleet. The respondent submitted a representation to the Regulation 18 consultation which has been appended to the Regulation 19 consultation.</p> <p>1. Traffic Issues. Developments that have occurred since 2015 will only increase the issues raised during the Regulation 18 representation. In particular, the development at Broadoaks will create a significant increase in traffic in West Byfleet, particularly along Parvis Road. The Council has not updated traffic modelling to reflect this development nor the proposed inclusion of a "toucan crossing" at the Parvis Road entrance to Broadoaks. The Council has also not modelled the impact of 555 houses at West Hall. From the modelling completed for the now superseded proposal for a school at Broadoaks, it was shown that cars would have to queue for an hour to get onto Parvis Road at peak times. This is considered irresponsible as it will impact existing residents in Dartnell Park. In addition, the Council has not reflected the developments in Lavender Park Road, where the two buildings repurposed for residential use will add to congestion. Whilst the redevelopment of Sheer House has yet to be confirmed, it is likely that this will result in over 200 additional apartments. Cumulatively this development will result in a total of over 1,000 additional properties in a village of approximately 2,500 homes. This represents an increase of over 40%.</p> <p>2. Loss of Green Belt. The Green Belt Boundary Review identified the land at West Hall as having a critical importance to the maintenance of the integrity of the Green Belt. With development already in process/complete at Lavender Park Road and Broadoaks and the expected redevelopment of Sheer House, there is no need to release land at West Hall to meet WBC's housing targets. The release of Green Belt land is against the wishes of the residents of West Byfleet who have established a Neighbourhood Development Plan that was democratically approved and should be respected. Raises concerns about the reclassification of land from Green Belt creating moral hazard to sell the land in the future for development. The Regulation 18 representation raises the below issues which are relevant to the Regulation 19 consultation:</p> <p>1. Is concentrating development in one area of the borough "fair and reasonable"? Has the impact in terms of traffic, infrastructure and community change been fully evaluated? 2. Numerous transport reports and assessments have identified the A245 and the route through West Byfleet as a hotspot, identifying congestion and traffic issues. With the level of traffic already rated as "forced breakdown" or operating beyond "its' theoretical</p>

capacity", it is irresponsible to locate major developments in this area. Concerns are raised about the knock-on impact on smaller roads. Further questions raised include:
(a) If the proposed development at Broadoaks is completed, why not wait to fully assess the impact of this development on traffic flows in West Byfleet before proposing West Hall as a development opportunity?

(b) What assessment has been made on the impact to air quality of the significant increases in traffic numbers and poor flow?

(c) Can the Council provide data to show that the "traffic mitigation" measures that they are proposing will result in a traffic improvement despite the proposed development?

3. The Peter Brett Associates Report provides that the land around West Hall:

(a) Is of critical importance to the Green Belt purpose of checking the unrestricted sprawl of large, built-up areas.

(b) Is of major importance to the Green Belt purpose of preventing neighbouring towns from merging into one another.

(c) Is of critical importance to the Green Belt purpose of assisting safeguarding the countryside from encroachment.

In addition the report finds that "the area has a high landscape sensitivity to change."

The report also incorrectly identifies West Byfleet as having a secondary school and community centre, meaning that the assessment associated with sustainability is incorrect.

In a survey conducted by the Neighbourhood Forum, 89% of residents who responded wanted the council to "keep & robustly protect our present Green Belt Boundary." How does the Council justify the allocations in light of this?

Should the Council contact all owners of Green Belt land and assess the potential for sale up to 2040, rather than rely on a "call for sites" which could miss critical targets?

4. There is no external independent evidence that the review of brownfield sites is thorough or complete, and no documentation that allows residents to challenge

assumption/conclusions/judgments made due to the lack of any supporting evidence.

By way of illustration, the site at Camphill Tip, Camphill Road, West Byfleet is proposed for industrial use. Why not residential use? Is this due to the potential costs associated with contamination? Assuming this is the case, could the site be used to release other

land for residential development? For instance, were the site to be used as a replacement station car park (it is an estimated 0.4 mile walk from West Byfleet Station), this would

enable the existing station car parks at West Byfleet to be developed for residential use.

It is queried whether WBC should employ an external consultancy to provide a more complete and detailed analysis of the brownfield sites in the Borough; whether a "call for sites" exercise for brownfield sites could be conducted; and whether all of the owners of

developed sites in Woking could be conducted to better understand intentions up to 2040.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Paragraph 6.7 of the Regulation Issues and Matters Topic Paper provides that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 addresses transport and congestion considerations in greater detail, and Paragraph 13.3 confirms that Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed. It is noted that in the most recent transport modelling, a figure of 592 dwellings was used for development at West Hall.

Paragraph 12.4 of the Regulation 19 Issues and Matters Topic Paper sets out the various assessments that were undertaken as part of the review, including:

1. An assessment of how various parcels of land in the Green Belt contribute to its purpose;

2. An assessment of the landscape character and sensitivity to change of developing the parcels of land assessed;
3. An assessment of the sustainability of sites with respect to their proximity to key services and facilities and how accessible they are by various modes of travel; and
4. The availability, viability and deliverability of the sites were also considered.

These different factors were weighed and the Green Belt Boundary Review recommended part of Parcel 4, which contains West Hall, for release from the Green Belt.

Section 1 of the Regulation 19 Issues and Matters Topic Paper sets out that a very special circumstances justification exists for the release of Green Belt land for the delivery of housing to meet the development requirements of the Core Strategy between 2022 and 2027 and to safeguard land to ensure the enduring permanence of the Green Belt boundary well beyond this Core Strategy period. As outlined in Paragraph 1.14 of the Regulation 19 Issues and Matters Topic Paper, all the proposed sites will make a significant and a meaningful contribution towards meeting the housing requirement. Not allocating any or all of the sites (or not having new sites to replace any site that is rejected) could undermine the overall delivery of the Core Strategy. The key requirements set out as part of the proposed allocations will further make sure that any adverse impacts on the purpose and integrity of the Green Belt and the general environment of the area is minimised. The objective of the Green Belt Boundary Review is to help make sure that any land that is released from the Green Belt does not undermine its purposes and integrity.

Section 16 of the Regulation 19 Issues and Matters Topic Paper confirms the compatibility of the Site Allocations DPD with the West Byfleet Neighbourhood Plan.

Paragraph 5.1 of the Regulation 19 Issues and Matters Topic Paper recognises the proposed allocation of sites is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.

Paragraph 6.2 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and Site Allocations DPD.

Paragraphs 8.1 to 8.5 of the Regulation 19 Issues and Matters Topic Paper address air quality.

The GBBR does not identify West Byfleet as having a secondary school and community centre. Table 3.8 identifies whether there are existing community facilities within a reasonable distance (1km) of each parcel (these do not necessarily have to be within the District Centre or the ward). Parcel 4 was identified as being within a reasonable distance of a secondary school and community centre.

Section 11 of the Regulation 19 Issues and Matters Topic Paper sets out that a thorough assessment of reasonable alternative sites has been undertaken to inform the selection of preferred sites, including a Strategic Housing Land Availability Assessment (SHLAA). It is noted that the Council identified a wide range of sites for inclusion in the Assessment, from a range of sources, such as:

1. Sites identified in existing and emerging Development Plan (including Core Strategy safeguarded sites and proposed allocated and safeguarded sites from the draft Site Allocations DPD)
2. Existing employment sites
3. Unimplemented and commenced planning permissions
4. Sites where there has been a previous planning refusal or application withdrawn
5. Sites of previous development interest/sites where there is an undetermined planning application

<p>6. National Land Use Database 7. Sites considered as part of PFI and land in public ownership 8. Previous Housing Potential Study sites 9. Sites for which unimplemented planning briefs have been prepared 10. Sites put forward by stakeholders</p> <p>Paragraph 11.7 of the Regulation 19 Issues and Matters Topic Paper provides that the SHLAA is considered robust and adequate to inform the DPD. It is based on a tried and tested methodology that has been commended by the Secretary of State. The Inspector has this to say about the methodology used for the SHLAA: 'it adopts a comprehensive methodology to assessing potential housing sites within the Borough. There is no substantive evidence to indicate that its density and housing yield assumptions, with due regard to exemplar schemes and the housing mix requirement proposed by the Core Strategy is flawed. With regard to the NPPF, it represents an adequate, proportionate and robust evidence source.' The Council has the expertise and resources to carry out the SHLAA. It would be a waste of public money in these circumstances to engage consultants to do the study.</p> <p>The SHLAA (2017) provides a number of reasons for excluding the Camphill Tip, Camphill Road, West Byfleet, namely "Access through Industrial Estate unsuitable. Decontamination costs likely to be significant for residential uses. Noise mitigation required. Within Flood Zone 2."</p>
Response Reference: U0001444
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04833/1
Name: Mrs Julie Lewis
Number of Signatories: 8
Comment Type: OBJ
Site Reference: UA33
<p>Summary of Comment: Site Reference UA33, considers the DPD to be Legally Compliant and complies with duty to cooperate. The DPD is not sound. Given the Borough's need for land to provide housing, the re-development of the site of the Royal Mail as depicted on plan UA33, without the inclusion of the adjoining properties, is 'unsound'. Piecemeal development of the area would be inefficient in terms of the density of housing which could be accommodated. Piecemeal development would also have a negative impact on traffic flows in this crucial area giving access to the town, the station and the station car parks.</p> <p>The soundness of the plan needs to be looked at as two scenarios. First, the Royal Mail depot being developed alone, with the adjoining properties remaining as they are, and second, all, or a substantial number of the properties bounded by White Rose Lane, Heathside Crescent, Oriental Road being included.</p> <p>In the first scenario residents will have major concerns about the height and character of the building elevations, and will likely object to high density plans with building heights above those of the existing properties within the island which would impact our sunlight and daylight due to the nature and proximity of the proposed development.</p> <p>If the whole island (or a major part) is included then a more holistic approach can be taken that would allow a sounder, more integrated development of the site to take place, that would optimise its development potential .</p> <p>Existing residents have a definite interest in how this is taken forward and are willing to be partners in developing solutions under scenario 2 but will fight to minimize the impact on their properties under scenario 1.</p>

<p>Inclusion of all the properties in this 'island' site bounded by Heathside Crescent, Oriental Road, White Rose Lane, would allow a more comprehensive scheme which would afford more housing. It would also allow for sensible planning around the impact of traffic flow in the area - the road boundaries to this 'island' being one of the main accesses to the town, the station and the station car parks.</p> <p>In order to facilitate an improved re-development plan, the owners of the following properties are currently in favour of exploring a scenario 2 development affording a greater number of dwellings to be built.</p> <p>Does not wish to participate at the oral examination and wished to be informed when the Site Allocations DPD progresses to the next stage.</p>
<p>Contributor Proposed Modification: Inclusion of all the properties in this 'island' site bounded by Heathside Crescent, Oriental Road, White Rose Lane, would allow a more comprehensive scheme which would afford more housing. It would also allow for sensible planning around the impact of traffic flow in the area - the road boundaries to this 'island' being one of the main accesses to the town, the station and the station car parks.</p>
<p>Modification Reference: U0000423</p>
<p>Officer Response: The Royal Mail site is available and has been promoted by the land owners for re-development and is expected to come forward within the plan period. None of the 15 surrounding properties were put forward for re-development in the SHLAA 2017. At this stage, we do not have any evidence of the likely prospect of all 15 of these sites coming forward during the plan period, and on that basis it would be unreasonable to allocate them, as there will not be any certainty that they will contribute to the delivery of the Core Strategy. Nevertheless, this doesn't imply that these sites could not come forward as windfall or through negotiation with the developers of the Royal Mail depot, if the owners of the sites are agreeable to the sites' availability to come forward during the plan period.</p> <p>In regards to the concentration of housing, the Council takes the view that the proposed anticipated densities are reasonable and are broadly in line with the Core Strategy. It is always emphasised that the proposed densities are indicative, based on ranges provided in policy CS10 of the Core Strategy (which are in turn based on the character of the area and on exemplar sites) and actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. Densities could go up or down depending on the nature of the scheme, and this will be managed at pre-application / planning application stage. The Council has policy CS21 Design and Outlook, Amenity, Privacy and Daylight SPD which assess the adverse impacts on neighbouring properties in terms of loss of light, loss of outlook and loss of privacy. A detailed transport assessment to determine site specific mitigation measures is part of the key requirements for the site development. A Town centre Modelling Assessment has been undertaken to allow a better understanding of potential traffic impacts in the vicinity of the Town Centre. With appropriate mitigation, the transport impacts of development can be addressed.</p> <p>The Council has worked with the County Council to review its Infrastructure Delivery Plan (2018). It includes up to date information on transport infrastructure and how that will be funded. The County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.</p>
<p>Response Reference: U0001281</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 02052/2</p>

Name: Mr Richard Ley
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports the omission of Upshot Lane fields from the latest draft DPD, to reflect objections made during the Regulation 18 consultation, namely: incorrect methodology used for identifying suitability of removal of Green Belt land; inconsistency of scoring criteria employed; increase in traffic congestion that this would cause on adjoining narrow lanes; and increase in air pollution in close proximity to Pyrford Primary School.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support is noted. Paragraph 14.2 of the Council's Regulation 19 Issues and Matters Topic Paper details the reasons why the sites were removed from the DPD.
Response Reference: U0001212
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04266/1
Name: Mr Christopher Light
Number of Signatories: 2
Comment Type: SUPP
Site Reference: GB07
Summary of Comment: We are writing to give our support to maintaining the buffer between Woking and Mayford, either by the maintenance of the Green Belt or by the amendment passed by the council preventing development of the land at the north of GB7. This is to prevent Urban Sprawl.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06436/1
Name: Mr James Linehan
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
Summary of Comment: Representation refers to site UA44. Considers that the DPD is not legally compliant, is not sound and does not comply with the Duty to Cooperate. Does not wish to participate at the public examination. Wishes to be informed when the DPD progresses to the next stages.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS

<p>Officer Response: The Council considers that the Site Allocations DPD passes the required tests of soundness in that it is positively prepared, justified, effective and consistent with national policy. The DPD is also considered legally compliant. Paragraph 9.2 of the Regulation 19 Issues and Matters Topic Paper sets out how the Council has complied with the Duty to Cooperate. Paragraph 1.4 of the Regulation 19 Issues and Matters Topic Paper provides that The Site Allocations should be judged on whether it has identified a sufficient deliverable range of sites in sustainable locations in the context of the spatial strategy of the Core Strategy to meet the development needs of the Borough. The Council considers that the Site Allocations DPD meets this objective, and that UA44 makes a positive contribution in this respect.</p>
<p>Response Reference: U0001296</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06397/1</p>
<p>Name: Ms Lucy Lines</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: SA1</p>
<p>Summary of Comment: Concerns regarding temporary traveller pitch on Blanchards Hill in Sutton Green being allocated as a potential permanent site. The site is a bufferzone between Guildford and Woking boroughs. Development of this site had been prohibited for the previous 30-40 years. Site is too small to accommodate facilities. Too close to Sutton Park Conservation Area. Check planning history, previous objections and constraints of site e.g. PLAN/2019/0035. The temporary 3 year permission has never been fully implemented as there is not enough room on the site for a touring caravan or welfare facilities.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The Council has a responsibility to meet the accommodation needs of all sections of the community including Travellers. The Government's policy on Travellers is set out in Planning policy for Traveller sites (August 2015). The overall aim of the Government is to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community. Core Strategy Policy CS14 - Gypsies, Travellers and Travelling Showpeople states that the Council will make provision for the additional pitches needed for Gypsies and Travellers and Travelling Showpeople in the Borough between 2017 and 2027. The Core Strategy requires the Council to identify sites to meet the need through the Site Allocations DPD process. The Council first considered any sites in the urban area, as these are the most preferred location in national planning policy and Core Strategy terms. No urban sites could be identified for Traveller accommodation. The Council looked at sites within the Green Belt and considered intensifying existing sites such as Five Acres. In addition a number of sites that previously had the benefit of temporary planning permissions are proposed to be permanent sites. The Council accepts that detailed matters such as provision of facilities will have to be addressed before an application for permanent occupation can be approved. One of the temporary sites considered with in principle support to become permanent if a planning application were to come forward is Gabriel Cottage. The development management stage</p>

will analyse these detailed matters and whether they have been addressed appropriately by the applicant.
Response Reference: U0001222
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06870/1
Name: Taranjeet De Lisio
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB18
<p>Summary of Comment: Object to proposals for West Byfleet/Byfleet. It is criminal to remove 60% of West Byfleet's Green Belt. There are a number of brownfield and under utilised sites which should be developed before any Green Belt is released. The proposals appear to take the easy route. More importantly, Green Belt release should be spread more fairly across the Borough. This Green Belt land is the Byfleets' natural barrier to air/noise pollution from the M25, keeping air quality safe. I have heard that air pollution on the A245 is the worst in the Borough. This will deteriorate with traffic increases in future years, and the development will exacerbate this problem. Consider air pollution in other cities. The area is prone to flooding, and the proposed site acts as a floodplain, necessary considering climate change. How will property on a floodplain be insured? Consider the mistakes of floodplain development in Staines. Adding 1000+ homes to the existing 2,320 in the village will have a devastating impact on its character. The road infrastructure is at capacity and struggles to move in peak hours; gridlock easily occurs and takes hours to clear. The proposed homes will be car reliant, since they are more than 1km from the station and local amenities. Existing buildings and protected trees will not allow for dual carriageways. There is a lack of school places, yet the proposals look to take land away from West Byfleet schools. Will the new residents have to drive their children to school elsewhere, adding to traffic and pollution? The Byfleet Health Centre is overstretched, with 50% more patients per GP than the national average, and with practice sizes significantly larger than the Woking average. How will they cope? Why isn't the development spread across the Borough? All evidence suggests the wastewater infrastructure will not be able to cope. Concerns over Traveller pitches, including how they are justified in the Green Belt.</p>
Contributor Proposed Modification: I sincerely hope the council will act in the interest of residents and future generations and move away from these terrifying plans for our village, our home.
Modification Reference: U0000264
<p>Officer Response: The justification for Green Belt release, and the consideration of alternative sites, are addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 11 respectively. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. The impact of the proposals on air pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The effect of flood risk issues on the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p>

<p>The Sustainability Appraisal of site GB10 (West Hall) identifies potential risks to landscape character from the site's allocation, although these can be mitigated by various measures required by the policy. On the other hand, it notes that the site's development would play a strong role in supporting and enhancing West Byfleet District Centre's economy, and would create significant new areas of public open space. On the whole, therefore, it is considered that provided the requirements of the policy are complied with, the allocation would have a neutral or positive impact on local character.</p> <p>The traffic implications of the proposal are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The implications of the proposals for local infrastructure, including education and healthcare facilities and the wastewater system, are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The justification for allocating sites for Traveller pitches in the Green Belt, and other matters relating to this type of site, are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p>
<p>Response Reference: U0001204</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06873/1</p>
<p>Name: Arnaldo De Lisio</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11</p>
<p>Summary of Comment: Objects to the proposed development plan for West Byfleet/Byfleet.</p> <p>West Byfleet is a green and natural environment unlike Woking urban environment. The current proposals would mean losing 60% of West Byfleet's greenbelt to development. The village currently has 85 hectares of greenbelt land of which the council is proposing to release 50.8 hectares. There are a number of brownfield and under utilised sites across the borough. These ought to be developed before any greenbelt is even considered for release.</p> <p>The plans are looking to remove 1.93% of Woking's greenbelt, however 1.09% of this falls in the West Byfleet village alone. More importantly, Green Belt release should be spread more fairly across the Borough. This Green Belt land is the Byfleets' natural barrier to air/noise pollution from the M25, keeping air quality safe. Air pollution on the A245 is the worst in the Borough. This will deteriorate with traffic increases in future years, and the development will exacerbate this problem. Consider air pollution in other cities.</p> <p>The area is prone to flooding, and the proposed site acts as a floodplain, necessary considering climate change. How will property on a floodplain be insured? Consider the mistakes of floodplain development in Staines.</p> <p>Adding 1000+ homes to the existing 2,320 in the village will have a devastating impact on its character.</p> <p>The road infrastructure is at capacity and struggles to move in peak hours; gridlock easily occurs and takes hours to clear. The proposed homes will be car reliant, since they are more than 1km from the station and local amenities. Existing buildings and protected trees will not allow for dual carriageways.</p> <p>There is a lack of school places, yet the proposals look to take land away from West Byfleet schools. Will the new residents have to drive their children to school elsewhere, adding to traffic and pollution?</p>

The Byfleet Health Centre is overstretched, with 50% more patients per GP than the national average, and with practice sizes significantly larger than the Woking average. How will they cope? Why isn't the development spread across the Borough? All evidence suggests the wastewater infrastructure will not be able to cope. Has a number of concerns with regards to the proposed permanent traveller sites. The impact the quality of life and future generations. There are a number of brownfield and under utilised sites which should be developed before any Green Belt is released. The proposals appear to take the easy route.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

In regards to the amount of Green Belt loss in Byfleet and the assessment of alternative sites see Section 5 and Section 11 of the Regulation 19 Issues and Matters Topic Paper. Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The concentration of housing in Byfleet and West Byfleet is addressed in Section 5 of the Topic Paper.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Waste Water provision was considered in the IDP, please see the Council Website. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.

In regards to wellbeing of residents and the loss of Green Belt see Section 4 of the Topic Paper.

The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

Response Reference: U0001275

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 01359/2
Name: Mr And Mrs Roy And Pam Lomax
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07, GB08
Summary of Comment: Concerned over the loss of greenbelt between Mayford and Woking - particularly the woods and habitats on GB7 - which plays a critical part in preventing urban sprawl of Woking swallowing up the historic, rural village of Mayford. Further development will have a major impact for Mayford and the Egley Road.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The representation has been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper. Section 1 and 2 sets out the justification for releasing and safeguarding Green Belt land to meet future development needs of the Borough. Section 19 responds to concerns about impacts on local habitats and wildlife. Sections 20 and 21 describe how the separation between Woking and Mayford, and the degree of urban sprawl suggested, has been assessed in preparing the DPD.
Response Reference: U0000956
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06479/1
Name: Miss Claire Lonsdale
Number of Signatories: 1
Comment Type: COMM
Site Reference: UA15
Summary of Comment: Proposes modification to strengthen the soundness of the DPD by requesting that site UA15 include a community music venue. No proposed modifications to make DPD legally compliant. Does not wish to participate in public examination. Wishes to be informed of next stages.
Contributor Proposed Modification: Proposes modification to strengthen the soundness of the DPD by requesting that site UA15 include a community music venue.
Modification Reference: U0000417
Officer Response: The UA15 site has been allocated to include community and leisure uses, however at this stage it would be unreasonable to specify material operations that might occupy the proposed development such as a music venue. This will be subject to arrangements between the prospective occupants and the developer.
Response Reference: U0001737
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04669/2

Name: The Rt Hon Jonathan Lord
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Strongly supports the thrust of the official submission to the Regulation 19 consultation by the Byfleet, West Byfleet and Pyrford Residents' Association.</p> <p>As the Member of Parliament for Woking, has received numerous representations made by local residents and Councillors; trusts that each detailed point of every objection submission will be very carefully examined for validity and relevance in this important process. Would be very happy to discuss with any Officers or any senior relevant Councillors if that would be helpful.</p> <p>The official submission of the Byfleet, West Byfleet and Pyrford Residents' Association is as below:</p> <p>The RA is very concerned that existing infrastructure is under pressure, in the following areas:</p> <ol style="list-style-type: none"> 1. Traffic levels on the A245 and surrounding roads 2. Lack of school places 3. Full doctors practices 4. Lack of NHS dentists 5. Waste water management 6. Existing river and surface water flooding <p>Of the three villages, Pyrford is considered the least impacted by the DPD as there are no proposed traveller sites, no release of Green Belt nor any allocated sites. Nonetheless the extra traffic generated by the additional dwellings in Byfleet and West Byfleet will have an impact as there are three routes through the village to get to the A3 and M25.</p> <p>Byfleet village has two sites safeguarded for Green Belt release after 2027, with a capacity of 210 dwellings, and 4 temporary traveller pitches due to become permanent. The village regularly suffers from surface water and river flooding, as well as traffic congestion in the morning and evening on the A245.</p> <p>West Byfleet is significantly impacted by the DPD proposals as it will completely change the character of the area. GB10, GB11 and GB18 will result in the loss of 50.8 hectares of Green Belt, 60% of the current Green Belt in the village.</p> <p>The number of dwellings proposed by GB10 and GB11, when added to Sheer House outline application (PLAN/2017/0128 for 255 dwellings), will result in an additional 1,150 dwellings which, based on the 2011 census, is a significant 50% increase in dwellings. The resulting population and traffic increase will have serious and detrimental infrastructure consequences which the mitigation proposals totally fail to address. The document contains inconsistencies and/or lack of details:</p> <ol style="list-style-type: none"> 1. Appendix 1 of the Sustainability Appraisal Report shows the West Byfleet Neighbourhood Plan as not fully adopted. However it has been adopted. Have all the plan's policies been considered when appraising West Byfleet? 2. Why has the DPD used the SHLAA (2014) rather than the more up-to-date and relevant SHLAA (2017)? 3. The SHLAA (2017) Table 1 shows a windfall provision of 42 dpa for the period 11-16 years, but not in the years 0-5 years or 6-10 years. Surely this is inconsistent? 4. There is inconsistency regarding the yield for UA44. The DPD doesn't include an estimate, as it does for other sites, while the Sustainability Appraisal shows 992 based on an developer's proposal, and the SHLAA shows it as 40. There is a significant discrepancy in the evidence bases which will impact the deliverable number of dwellings in the period 0-6 years. What confidence can anyone have in the different numbers, and what number has been used in the DPD?

5. For many of the proposed sites, it is unclear which part of the site is being proposed for development. For example GB5 includes a playground and land transferred to the church as a burial ground. It seems that only half the site has actually been promoted by the landowner for development. The lack of detail has caused great consternation in the Byfleet community.

Paragraph 134 of the NPPD summarises the five purposes of the Green Belt, and paragraph 137 sets out the process for changing Green Belt boundaries. In this context, a review was carried out into options for changing the Green Belt boundary. However there appears to be no equivalent report into "making as much possible use of suitable brownfield sites and underutilised land", except possibly the SHLAA (2011, 2014 and 2017).

WBC notes that it "periodically contacts planning agents, landowners and other interested parties, to request that potential sites are put forward for consideration. This is referred to as a 'Call for Sites' and provides the Council with up to date information on potential sites for development across the Borough."

This is a reactive process which only identifies land offered by landowners, rather than a review of all possible brownfield sites.

Paragraph 136 of the NPPF is noted, regarding the exceptional circumstances in which the Green Belt boundary can be justifiably altered. As set out below, the evidence suggests that to deliver the target of 4,964 to March 2017, it is not required to remove any further land from the Green Belt.

Regarding delivery trajectory, the DPD only shows one table, which is from the SHLAA (2011) since which two reports have been issued. It projects a total supply of 3,966 over 15 years.

If the SHLAA (2017) figures were used, it would read as below:

Pre-SHLAA (2010/11-2016/17): 1,789 residential units (through dwelling completions)

0-5 years (2017/18-2021/22): 1,654 residential units (through commenced or unimplemented planning permissions and sites with potential for redevelopment)

6-10 years (2022/23-2027/28): 2,103 residential units (through commenced or unimplemented planning permissions, sites with potential for development and Green Belt)

11-15 years (2028/29-2032/33): 1,661 residential units (through commenced or unimplemented planning permissions, sites with potential for development, Green Belt and windfall sites)

Total: 7,207 residential units which is 783 in excess of the Core Strategy requirement.

If one were to include the developer's application number of 992 for the Woking Football Club, include windfall sites in all periods and remove all Green Belt sites, the table would be as below:

Pre-SHLAA (2010/11-2016/17): 1,789 residential units (through dwelling completions)

0-5 years (2017/18-2021/22): 2,806 residential units (through commenced or unimplemented planning permissions, sites with potential for redevelopment, adjustment for Woking Football Club and windfall sites)

6-10 years (2022/23-2027/28): 1,753 residential units (through commenced or unimplemented planning permissions, sites with potential for development and windfall sites)

11-15 years (2028/29-2032/33): 1,266 residential units (through commenced or unimplemented planning permissions, sites with potential for development and windfall sites)

Total: 7,614 residential units which is 1,190 in excess of the Core Strategy requirement.

Even if 25% of the 992 dwellings were delivered, the surplus number would be 670.

The Core Strategy, adopted in 2012, assumed the need to release Green Belt land for 550 homes. The numbers above show that as Woking Borough Council has decided to use the Town Centre instead of the Green Belt, none of the latter need be released. There are clearly sufficient dwellings proposed in Woking Town Centre and Sheerwater regeneration.

The SHLAA (2017) shows a yield of 408 dwellings as part of the regeneration. However planning application PLAN/2018/0337, not determined as at 7 December 2018, seeks 869 dwellings. The increase of 461 eliminates the deficit of 194 (the proportionate deficit against the requirements in years 11-15).

As a result the RA contends that no Green Belt land needs to be released.

Regarding infrastructure it is noted that the A245 is congested both morning and evening between the Sheerwater Road/Albert Drive junction and the A3 interchange. The A245 Mitigation Study states that "the Byfleet Road/Seven Hills Road junction is currently at or just above capacity", the Parvis Rod/Camphill junction is currently "at or just below its capacity", "the A245 between Old Woking Road and Broadoaks is one of the most heavily congested areas in the study" and that "the A245 Parvis Road is already at its theoretical capacity." It also notes that the WSP Review (2002), which identified no ideal solution due to the constraints of urban development, is used as the basis of mitigation options. As circumstances have changed, a more up to date mitigation study is required; other significant nearby developments include Sheerwater, Fair Oaks and Wisley Airfield.

Regarding school places it is noted that St Mary's Church of England Primary School, Byfleet Primary School, West Byfleet Infant and Junior Schools, Marist Catholic School and Pyrford Church of England Primary School are already oversubscribed. Over the past few years some of these schools have increased their PANs. The Draft Infrastructure Plan notes a requirement of 22 primary classes, a significant proportion of which will be in West Byfleet. However the West Byfleet Infant and Junior Schools have recently expanded, and there is insufficient land to expand again. Fullbrook, the nearest secondary school to major developments, has reduced its PAN in September 2016 from 280 to 240 per year "to improve the learning environment." The Draft Infrastructure Plan also notes a need for 16 secondary classes, "some of which will be located at Bishop David Brown School, St John the Baptist School and Hoe Valley School." Bishop David Brown has only one service from Byfleet and West Byfleet scheduled at the right time in the morning. No education infrastructure is allocated in the DPD.

The local GP practices for the three villages in West Byfleet Health Centre are over-subscribed. The Draft Infrastructure Report accepts that "overall there is inadequate GP provision across the borough. The average in Surrey is 1,994 patients per GP, whereas the national average is 1,364 per GP. The average practice size in Woking is 8,645 while the national average is 7,685.

The dental practices are oversubscribed. According to the Infrastructure Report, there are 27 dental clinics in Woking, but only 13 offer NHS funding. The report indicates gaps in provision include Pyrford.

In Byfleet, surface water flows into foul sewers and poor maintenance means that significant surface water causes flooding. In December 2013, the waste pumps failed and there was surface water flooding. The Infrastructure Report notes Thames Water's comments from 2015 that in the case of Land at Station Approach, West Byfleet; Land surrounding West Hall; Land South of Murray's Lane and Land rear of Lovelace Drive, Pyrford (now removed from the DPD) "waste water capacity...is unlikely to be able to support the demand anticipated. The comments note that it "would take 18 to 36 months to deliver a solution." Three years later, waste water infrastructure is still causing major concern.

Much of Byfleet is in Flood Zone 2 and 3, yet not flood alleviation scheme has been agreed.

The process has been implemented in such a way that the residents of Byfleet and West Byfleet are unable to comment on the proposed Traveller pitches in the villages during the Regulation 18 consultation. During Regulation 18, no Traveller pitches were allocated in the East of Woking; now 19 are proposed, and the detail of GB4 and GB5 suggests these sites may be suitable for further pitches. There appears to be a disproportionate allocation in Byfleet and West Byfleet.

The RA believes that the Green Belt in the three villages should not be used for future development. The Green Belt protects the land, and prevents the merging of the villages. The RA believes that the DPD is unsound because the tests have not been met:

1. Procedural requirements: Travellers' sites in the East of the borough were not included in the Regulation 18 consultation.
2. Positively prepared: The allocated sites in East Woking are not sustainable due to inadequate infrastructure, now and in the future.
3. Justified: Reasonable alternatives in Kingfield regarding Woking Football Club have not been properly taken into account
4. Effective: It is not clear that sufficient joint working has been undertaken to consider fully the proposed developments at Fair Oaks and Wisley Airfield.

The RA wishes to appear at the public examination to defend the existing Green Belt boundaries by seeking to convince the Planning Inspector that there is sufficient availability in existing non-Green Belt land.

Contributor Proposed Modification: The RA contends that no Green Belt land needs to be released in the Borough, including in Byfleet, West Byfleet and Pyrford. A more up to date and realistic A245 mitigation study is needed.

Modification Reference: U0000244

Officer Response: The Council ensures that it carefully considers each of the representations submitted during the Regulation 19 consultation and proposes modifications where appropriate.

The Site Allocations DPD has evolved through various stages. Each stage had been used to inform and improve the subsequent version. A draft DPD was published for Regulation 18 consultation between 18 June and 31 July 2015. About 1,692 individuals and organisations submitted comments comprising 32,712 separate representations. The Council also consulted on the possibility of substituting the sites safeguarded in the draft Site Allocations DPD to meet future development needs between 2027 and 2040 with land to the east of Martyrs Lane. 3,018 individuals and organisations submitted comments comprising 32,164 separate representations. The representations received during these two separate consultations have informed the Publication Version of the DPD that was published for Regulation 19 consultation between 5 November and 17 December 2018. Section 6 of the Regulation 19 Issues and Matters Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools, waste water and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Dental practice provision is addressed in the IDP which confirms that although there are no known plans for new dental surgeries to 2027, a Surrey and Sussex Dental Local Professional Network has been established to promote a strategic, clinically informed approach to the planning and delivery of dental services that reflects the needs of local populations. The Council continues to engage with the North West Surrey CCG regarding any commissioning decisions.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding.

The representation regarding the loss of Green Belt land in West Byfleet has been addressed in Section 5 of the Topic Paper.

The comment regarding the Sustainability Appraisal and the West Byfleet Neighbourhood Plan having not yet been adopted is noted. As set out in Section 16 of the Topic Paper, the Council is satisfied that there is conformity between the Site Allocations DPD and the West Byfleet Neighbourhood Plan.

In regards to the DPD only showing the SHLAA 2014 figures, the Site Allocations takes into account the latest land supply for deliverable and developable sites identified in the 2017 SHLAA, but it also draws attention to the historical context to which the Site Allocation DPD has been derived from 2011-2019. This matter has been clarified at Council in response to a query by a Councillor.

In Table 1 of the SHLAA, windfall allowance has been discounted from the periods 0-5 years and 6-10 years. This is to account for non-implementation of developments currently in the pipeline, either as extant permissions and/or as allocated sites. It must be noted that developments that are completed on windfall sites are counted towards the overall completion figures for each given year.

This is considered consistent with the Inspector's Report from the Core Strategy examination which found that "the Council has identified a consistent stream of small sites that have resulted in an average of more than 40 additional dwellings per year...the leeway that such small sites provide would nonetheless appear capable of compensating for any delay in the housing which is anticipated to be delivered from, for example, Moor Lane or Brookwood Farm."

In the period 11-15 years, it is anticipated that only 32 units will come forward from sites under construction or for which there is unimplemented planning permission. It is therefore not considered proportionate to discount windfall as an allowance for non-implementation of pipeline developments during this period.

In regards to UA44 the yield of 992 is not included in the Site Allocation DPD, however, this could change if a Planning application is granted. Council took a decision to delete the capacity of the site from the DPD to ensure consistency in the approach taken to estimate development yield of sites. Regarding the enhancement of the football club at Kingfield Road, it is noted that the Council has entered into a Development Agreement with GolDev. GolDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this year. The planning merits of the scheme will be determined by the Council's Planning Committee. There will be extensive public consultation as part of the planning process. This is a separate matter to the preparation of the Site Allocations DPD.

The Sheerwater Planning application PLAN/2018/0337 had not been determined at the time the Regulation 19 version of the DPD was produced.

The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper.

As set out in section 1 of the Topic Paper, there is a justification for the release of Green Belt land to meet future development requirements of the Borough. The capacity of the urban area to accommodate further growth has been assessed through the SHLAA. The evidence continues to justify the principle established in the Core Strategy that land will be required to be released from the Green Belt to meet housing delivery between 2022 and 2027, and in particular, the need for family homes that could not be met by high density flatted units at the Town Centre.

Sections 11 and 22 of the Topic Paper provide further detail regarding the assessment of alternative sites and the SHLAA.

It is noted that the SHLAA takes a comprehensive approach to identifying and appraising sites for residential development:

1. Sites allocated in the Core Strategy and emerging Development Plan
2. Existing employment sites
3. Unimplemented and commenced planning permissions
4. Sites where there has been a previous planning refusal or application withdrawn

5. Sites of previous development interest/sites where there is an undetermined planning application
6. National Land Use Database
7. Sites considered as part of PFI and land in public ownership
8. Previous Housing Potential Study sites
9. Sites for which unimplemented planning briefs have been prepared
10. Sites put forward by stakeholders

Sufficient land has been identified to meet the requirements of the Core Strategy, including Green Belt sites. Given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing needs across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

The Council is aware that some of the infrastructure implications for developing the allocated sites could have cross boundary significance. This would also be the case with development impacts resulting from within the adjoining authorities that could have impacts in Woking. There are also some types of infrastructure that due to their catchment areas of service provision, their patronage crosses administrative boundaries. These are common and examples are secondary schools, hospitals, transport and drainage. The Council is aware and works with providers and the neighbouring authorities to take that into account.

Under the Duty to Cooperate the Council has informally and formally consulted all the neighbouring authorities about the Regulation 19 consultation. This includes Runnymede, Surrey Heath, Waverley, Guildford and Elmbridge Borough Councils. In particular, the Council has been in discussions with them about how best to quantify and address the cumulative implications of proposals within the respective boroughs that could have cross boundary significance. The neighbouring authorities have made their respective representations as part of this consultation, which the Council will take into account. In regards to Traveller pitches and inadequate consultation for Regulation 19 see Section 3 and 9 of the Topic Paper.

Response Reference: U0001783

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06608/1

Name: Ms Suzanne Lovell

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05

Summary of Comment: GB4 and GB5 site allocations are not sound or sustainable. Mitigation proposals will do little to alleviate issues. Concerns regarding inadequate infrastructure. Access and egress roads are limited throughout Byfleet, as the area is cut off by various boundaries including the River Wey, M25 and railway embankment. There are already high levels of traffic congestion, additional development will exacerbate this issue. Concerns regarding flooding. Byfleet is subject to frequent flooding from river and surface water sources. It is the floodplain for the River Wey.

<p>No flood alleviation schemes have been agreed. Climate change is likely to exacerbate this issue, and needs to be anticipated in local planning. Surface water flows into foul sewers, which are poorly maintained by water agencies, leading to increased flooding. Additional development will exacerbate this issue, especially in GB5. Concerns regarding inadequate health and educational infrastructure. Concerns regarding loss of Green Belt resulting in detriment to health and well being of local residents.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt for development. Section 2 addresses the issue regarding the safeguarding of Green Belt land, in this case GB4 and GB5. Section 4 addresses the issue regarding the loss of Green Belt land to the detriment of the wellbeing of residents. Section 3 addresses the issue regarding travellers. Section 6 addresses the issue regarding adequacy of infrastructure. Section 13 specifically addresses road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 7 addresses the issue regarding flooding.</p>
<p>Response Reference: U0001610</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06613/1</p>
<p>Name: Mr Richard Lovell</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05</p>
<p>Summary of Comment: GB4 and GB5 site allocations are not sound or sustainable. Mitigation proposals will do little to alleviate issues. Concerns regarding inadequate road infrastructure. Access and egress roads are limited throughout Byfleet, as the area is cut off by various boundaries including the River Wey, M25 and railway embankment. There are already high levels of traffic congestion, additional development will exacerbate this issue. Concerns regarding flooding. Byfleet is subject to frequent flooding from river and surface water sources. It is the floodplain for the River Wey. No flood alleviation schemes have been agreed. Climate change is likely to exacerbate this issue, and needs to be anticipated in local planning. Surface water flows into foul sewers, which are poorly maintained by water agencies, leading to increased flooding. Additional development will exacerbate this issue, especially in GB5. Concerns regarding inadequate health and educational infrastructure. Concerns regarding loss of Green Belt resulting in detriment to health and well being of local residents.</p>
<p>Contributor Proposed Modification: None Stated</p>

Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt for development. Section 2 addresses the issue regarding the safeguarding of Green Belt land, in this case GB4 and GB5. Section 4 addresses the issue regarding the loss of Green Belt land to the detriment of the wellbeing of residents. Section 3 addresses the issue regarding travellers. Section 6 addresses the issue regarding adequacy of infrastructure. Section 13 specifically addresses road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 7 addresses the issue regarding flooding. The effects of development on climate change have been acknowledged. The DPD is underpinned by numerous climate change studies and strategies, which ensure that any adverse impacts of development on climate change is minimised. Policy CS9 'Flooding and water management' of the Core Strategy acknowledges climate change in relation to the issue of flooding in the borough, and requires development to comply with responses to mitigate flooding.
Response Reference: U0001597
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): F

Contributor Reference: 04913/1
Name: GolDev Woking Ltd
Number of Signatories: 1
Comment Type: COMM
Site Reference: GB07, SA1, UA44
Summary of Comment: GolDev Woking is undertaking the coordinated promotion of two key sites in the Borough, in order to realise a Community Stadium. The sites form two allocations in the DPD: UA44 and part of GB7 which it is considered will give rise to significant regeneration, social and economic benefits. It is noted that the DPD does not provide approximate yields for any of the proposed allocations. It is therefore difficult to determine whether the DPD will deliver the Core Strategy requirement. The principle of UA44 being allocated for the proposed use is supported. However a number of technical amendments are proposed to address the below points: 1. UA44 does not provide a capacity for the site in terms of residential development or proposed commercial floorspace. Without an indication of capacity is not possible to predict the housing trajectory nor provide robust evidence of the feasibility or delivery of the stadium. 2. The words 'retain' and 'improve' in relation to the football stadium are misleading. 3. 40% affordable housing provision at UA44 is unlikely to be viable. 4. Initial design concepts for the site indicate that a taller development than that found in the immediate vicinity of the site may be required in order to deliver the quantum of residential floorspace required to fund the stadium. 5. It is considered that given the location of the site it would not be appropriate to strictly apply the car and cycle parking standards. 6. Appendix 4 (Movement and Mobility Report) indicates that the number of trips anticipated to be generated by the proposed development would not result in the need for any improvements to the existing junction (Knaphill Road and Westfield Avenue).

7. Appendix 3 (Environmental Baseline Report) has identified that there are no significant constraints in terms of flooding, air quality, heritage, archaeology, ecology or ground conditions which would render the site unsuitable for development.

8. It is considered prudent to include a link in the policy wording to policy GB7. Allocation GB7 is intrinsically related to allocation UA44 as it is to be the location of the new David Lloyd Centre. The provision of a policy link will provide clarity that the David Lloyd Centre is to be relocated and additional certainty as to where the new club will be provided. Regarding Policy SA1, it is noted that the scope of potential D2 leisure uses to be located in GB7 is not mentioned.

The allocation of GB7 is supported in principle and the site is considered deliverable in the period to 2027. However a series of amendments to policy are considered necessary to address the below issues:

1. Taking into account the separation gap and the now operational secondary school, the remaining area of the allocation to be developed comprises the southern portion (the Egley Road site). The question therefore arises as to the purpose of including this larger area within policy GB7.

2. It is noted that the proposed policy does not provide reference to the proposed D2 Leisure and Community uses.

3. Key requirement 3 is for protected trees and tree belts to be retained and strengthened. There is a TPO protected all trees on site, however this woodland appears to largely comprise a plantation woodland associated with the Nursery. In light of the designations on site, additional woodland surveys are required to assess the justification for the current designation.

4. The developable area of the site falls outside of the Area of High Archaeological Potential.

5. Key requirements 9 and 12 do not take into account that the school has been built.

6. It is unlikely that shared access between GB7 and GB9 will be required. It is not considered that the delivery of GB7 will jeopardise the delivery of GB9.

7. The requirement to provide 50% affordable housing is unlikely to be viable.

8. Key requirements 2, 13, 19 and 21 are written as though the school development has not yet taken place.

9. Appendix 3 (Environmental Baseline Report) has identified that there are no significant constraints in terms of flooding, air quality, heritage, archaeology, ecology or ground conditions which would render the site unsuitable for development.

10. Given the proximity of the site to the railway, it is accepted that a noise impact assessment will be required. However, as the site is not located in an AQMA, the policy recommendation for the submission of an Air Quality Assessment with any application is questioned.

11. It is considered prudent to include a link in the policy to to policy UA44.

Regarding the Sustainability Appraisal:

1. It is considered that Site UA44 has rightly scored positively which demonstrates that it is a highly sustainable site, suitable for development and therefore allocation through the DPD.

2. It is noted that the negative score regarding the impact of GB7 on the natural environment relates largely to the Area of High Archaeological Potential towards the north end of the site, rather than the developable southern portion. Additionally, it is considered that through SuDS, the development could result in an improvement with regard to local flooding. The broad conclusions of the Sustainability Appraisal are however supported; the site has scored positively against a number of objectives which demonstrates that it is a highly sustainable site, suitable for development and therefore allocation through the DPD.

Regarding the Habitats Regulations Assessment, it is noted that:

1. There is a discrepancy regarding the reference for UA44.

2. The HRA accounts for 40 dwellings, rather than 950-1000, at UA44.

3. While sufficient SANG capacity is available within the Borough, the HRA recognises that it will be necessary for each housing site to be explicitly allocated to a particular SANG or to confirm that it can provide a bespoke SANG.
Considers that the DPD is legally compliant and complies with the duty to cooperate, but is not sound. Wishes to participate at the public examination and wishes to be informed when the DPD progresses to the next stages.

Contributor Proposed Modification: Regarding Policy UA44:

1. The allocation for should be amended to make clear that the following is allocated:
 - a. A new community stadium with capacity for approximately 10,000 people.
 - b. Associated commercial uses of approximately 500-1000 sqm
 - c. Approximately 950-1000 residential dwellings
 - d. Associated new parking
 - e. Relocation of David Lloyd Centre to part of allocation GB7delete any reference to the ongoing use for snooker club or gymnastics club
2. It should be made clear in the first key requirement that it is acceptable to replace the stadium. Policy wording should be amended to state: "the site is allocated for the delivery of a new Community Stadium, with associated commercial uses, at a capacity of approximately 10,000 people."
3. Policy or supporting text should be amended to make clear that "the primary objective of the allocation is to achieve the delivery of a Community Stadium, and that as part of this objective an appropriate level of affordable housing will be sought, subject to the provisions of Policy CS12."
4. On the basis of design evidence, the key requirements of the policy or supporting text should explicitly allow for taller buildings than those in the immediate surrounds of the site. Additional policy wording should be added, stating that "the primary objective of the allocation is the provision of a new Community Stadium and appropriate enabling and high quality residential development, to meet local identified needs."
5. The requirement should be reworded to remove the specific reference to car parking standards
6. Key requirement 14 should be removed from the draft policy.
7. Appropriate policy or supporting text referencing the role of part of Allocation GB7 in enabling the delivery of the Community Stadium should be provided.

Regarding Policy SA1:

1. Clarity as to the re-provision of the community facility, as well as a strengthened link between UA44 and GB7 should be provided. It is recommended that the policy wording is altered to include reference to the provision of D2 Assembly and Leisure uses as well as residential and educational uses in regard to policy GB7.
2. It is recommended that the policy wording is strengthened to emphasise that there are clear Exceptional Circumstances to justify the release of the site from the Green Belt. The appropriate re-use of land, and delivery of a new Community Stadium for Woking FC are clearly part of the overall package of Exceptional Circumstances.

Regarding Policy GB7:

1. It is recommended that the policy is reworded to include reference to the provision of Assembly and Leisure uses on site, and to link to policy UA44.
2. Whilst the entire area of GB7 should be removed from the Green Belt and this is supported, elements of the allocation could be broken down:
 - GB7a) Land north of the Secondary School - identified open gap;
 - GB7b) Land safeguarded for the ongoing operation of a Secondary School/Education purposes;
 - GB7c) Land allocated for approximately 50-80 dwellings and the relocation of the David Lloyd Centre from allocation UA44 with associated access and parkingThis should be reflected on the Proposals Map

3. Key requirement 3 should be altered to reference that the plantation woodland to the south of the site could be removed as part of the comprehensive redevelopment of the site subject to further investigation; the retention of any significant/valuable trees on site;

the provision of additional planting elsewhere on site; and the provision of ecological and biological benefits on site following its development.

4. Key requirement 6 should be removed as it is not relevant given the archaeological potential of the portion of the allocation that is to be developed.

5. Key requirements 2,13 ,9, 12, 16, 19 and 21 should be removed.

6. Policy or supporting text should make clear that the primary objective of the allocation is to enable the delivery of a Community Stadium, and that as a part of this objective an appropriate level of affordable housing will be sought, subject to the provisions of Policy CS12.

7. The recommendation for an Air Quality Assessment to be submitted as part of an application for the development of the site should be removed.

8. Appropriate policy wording or supporting text should be included to reference the role of part of GB7 in enabling the delivery of the Community Stadium.

Regarding the Sustainability Appraisal:

1. The Sustainability Appraisal should reflect that through SuDS, the development of the site could result in an improvement with regard to flooding in the wider area.

Regarding the Habitats Regulations Assessment:

1. It is recommended that Table 5 of the HRA is updated to ensure that all site references and distances to the SPA are correct to ensure robustness. The Woking FC site should be referred to in the HRA as allocation UA44 to ensure consistency with the DPD and all other evidence base documents.

2. The HRA should be updated to account for the provision of between 950 and 1000 dwellings at UA44, rather than the 40 dwellings currently indicated.

3. It is recommended that the HRA is updated to confirm which SANG is to support each of the proposed allocations in order to ensure that the capacity of available SANGs for each site is clearly demonstrated and therefore that the HRA is sufficiently robust.

Modification Reference: U0000285

Officer Response: It is noted that the DPD provides indicative yields for all of the proposed allocations with the exception of UA44. The decision not to include a yield for this site was made by Council prior to the publication of the document for the Regulation 19 consultation. This reflects that the stadium is the key driver of UA44 and will determine the level of residential units provided. This can only be determined when a specific proposal comes forward. In any case, the anticipated capacity of the site will not be determined by a planning application that may or may not come forward for determination. The potential inconsistency of the words 'retain' and 'improve' is noted, and a modification is proposed to address this.

Core Strategy Policy CS12 provides that "on sites providing 15 or more dwellings or on sites of over 0.5ha (irrespective of the number of dwellings proposed), the Council will require 40% of dwellings to be affordable." As this site is 4.64 ha, policy requires that 40% of housing is affordable. Policy CS12 also notes that "full details of how this policy will be implemented will be set out in an Affordable Housing SPD." The Affordable Housing Delivery SPD sets out that "there may be exceptional circumstances where the application of the Policy in full makes the site financially unviable, in these circumstances the Applicant will need to prove that the site is unviable by submitting a Financial Viability Appraisal (FVA)." In this way, any concern relating to the viability of providing 40% affordable housing within a given scheme will be addressed at the Development Management stage. The Council will always expect a policy compliant scheme unless it can be justified otherwise.

The Site Allocations DPD does not address detailed design matters. These will be addressed at the Development Management stage in accordance with Policies CS21 and CS24 of the Core Strategy.

The Parking Standards SPD was adopted in April 2018. It is an up-to-date document informed by a credible evidence base and there is prima facie no reason for it not to be applied to UA44.

The key requirements for UA44 include the provision that "Highway improvements may be required at the junction of the site with Knaphill Road and Westfield Avenue to ensure an effective access arrangement to ensure highway safety." This is to be determined at the Development Management stage. A transport assessment will be required to determine the site specific nature of mitigation needed.

The Environmental Baseline Report is noted.

It is not considered necessary to include a link to GB7 in the policy wording for UA44.

Council plans relating to prospective relocation of David Lloyd Leisure Club are a separate matter to the preparation of the Site Allocations DPD.

As set out in Paragraph 1.3 of the Regulation 19 Issues and Matters Topic Paper, the Core Strategy makes provision for residential, office, warehouse and retail floorspace.

There is no evidence of need to justify its allocation in the DPD. This is without prejudice to the Development Management process and any redevelopment scheme including D2 uses will be assessed on its own merits.

The separation gap and the now operational secondary school are included within GB7 to avoid creating an isolated pocket of Green Belt in the urban area. Were they not to be included in the allocation, the Green Belt boundary would not be considered defensible.

The third key requirement for Policy GB7 is considered appropriate and consistent with Development Management Policy DM2: Trees and Landscaping.

It is considered prudent to retain key requirement 6 that "the site features an Area of High Archaeological Potential in the north of the site. To ensure full information about its heritage and archaeology informs its development, the developer will need to undertake an archaeological investigation and submit full details of this to the Local Planning Authority, in accordance with Core Strategy CS20."

It is accepted that key requirement 9 does not take into account that the school has been completed. A minor modification is proposed to clarify that satisfactory access to the A320 will be required.

Key requirements 12 and 16 refer mistakenly to GB9 rather than GB8. This is due to modification since the Regulation 18 consultation. It is proposed to make a modification accordingly.

Core Strategy Policy CS12 provides that "all new development on Greenfield land and land in public ownership will be required to provide 50% of the dwellings as affordable housing, irrespective of the site size or number of dwellings proposed." As the developable area of the site is greenfield land, the 50% affordable housing requirement is considered appropriate. As outlined above, Policy CS12 notes that "full details of how this policy will be implemented will be set out in an Affordable Housing SPD." The Affordable Housing Delivery SPD sets out that "there may be exceptional circumstances where the application of the Policy in full makes the site financially unviable, in these circumstances the Applicant will need to prove that the site is unviable by submitting a Financial Viability Appraisal (FVA)." In this way, any concern relating to the viability of providing 50% affordable housing within a given scheme will be addressed at the Development Management stage.

It is noted that key requirements 2, 13, and 21 are written as though the school development has not yet taken place. This is due to wording having been mistakenly retained following the Regulation 18 consultation. It is proposed to make a modification accordingly.

Key requirement 19 that there is an "opportunity to provide a pedestrian crossing on Egley Road, linking the existing primary school and proposed secondary school, plus existing (Hoe Valley Linear Park) and future green infrastructure corridors" should be retained as it does not relate exclusively to the school, but also to broader connectivity to green infrastructure.

Regarding air quality, it is noted that the Reasoned Justification for Policy DM6 of the Development Management Policies DPD provides that for sites anywhere in the Borough where development is in excess of 100 dwellings or 10,000sqm of other floorspace an Air Quality Assessment will be required. As GB7 has an indicative yield of 168 dwellings in

the Regulation 19, which is proposed to be modified to 118 dwellings, the key requirement that "an Air Quality Assessment is recommended" is considered prudent.

It is not considered necessary to include a link to UA44 in the policy for GB7. As outlined above, plans for the prospective relocation of David Lloyd Leisure Club to Egley Road is a separate matter to the preparation of the Site Allocations DPD.

The Council is confident that the Sustainability Appraisal is sufficiently robust to inform the Site Allocations DPD. As set out in Paragraph 11.2 of the Regulation 19 Issues and Matters Topic Paper, it provides a consistent basis for describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations DPD.

The discrepancy relating to UA44 in the Habitats Regulations Assessment is noted. The HRA assesses the impact of UA44 based on an indicative yield of 40 dwellings as this is the yield provided by the SHLAA (2017).

It is noted that sites are allocated to specific SANGs during the Development Management stage, taking into account available capacity.

Response Reference: U0001457

Officer Proposed Modification: Amend the first paragraph of policy UA44 to read: "This 4.64 ha site is allocated for a mixed use development to include an enhanced football stadium, residential including Affordable Housing, and commercial retail uses."

Amend the first key requirement of policy UA44 to read "retain a football stadium at this location with enhanced facilities as a part of any redevelopment scheme."

Amend the first paragraph of policy GB7 to read: "This 18.65ha site is excluded from the Green Belt and allocated for a mixed-use development to include residential, including Affordable Housing, and recreational/open space between 2022 and 2027 in accordance with Policy SA1. The release of part of this land for a school has been supported a secondary school opened in September 2018."

Delete the second key requirement of on p265 beginning "Shared school and community sports playing fields..."

Delete the seventh bullet point on p266, beginning "any drop off point for the school..."

Delete the penultimate bullet point on p266 beginning "opportunity for the relocation of the Athletics Track..."

Amend the ninth key requirement of policy GB7 to read "achieving satisfactory access onto the A320, subject to the approval of Surrey County Council as Highway Authority for the area".

Amend sixth bullet point on p266 to read "Potential for development to share access with any later development on the adjoining Proposal Site GB8"

Amend tenth bullet point on p266 to read "...will in no way prejudice the later development of adjoining Proposal Site GB8."

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06566/1

Name: Mr Stephen Lutley

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB07

Summary of Comment: Considers that GB7 should be kept in the Green Belt for the following reasons:

Mayford is a semi-rural village, but with the addition of the new secondary school, leisure centre and athletic clubs, the traffic and light pollution affecting the village has far exceeded that promised by the council.

To add 168 dwellings would harm the village.

The village doesn't have appropriate infrastructure to support this number of dwellings.

Concerned by additional traffic and pollution

GB7 has hundreds of mature trees at Hook Hill woods which make up the predominant view from Mayford village towards the proposed site. The woods have a well-established ecosystem, with native wildlife including deer, pheasants and endangered hedgehogs, and birds including owls and birds of prey. They also provide Hook Hill Lane residents screening of the light and noise pollution from the athletics track, school and sports courts. GB7 serves the following aims:

1. To keep in check the sprawl of Woking
2. To prevent Woking and Mayford merging into one another
3. To assist in safeguarding Mayford Village and green space from encroachment
4. To preserve the setting and character of Mayford, an historic village that appeared in the Domesday Book.
5. Woking Borough Council has brownfield land already which has no plans for regeneration.

Contributor Proposed Modification: The established trees and woodland at Hook Hill Woods should be protected and perhaps even enhanced for the benefit of everyone in the local area.

Modification Reference: U0000234

Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper establishes that there is a very special circumstances justification for the release of Green Belt land for the delivery of housing to meet the development requirements of the Core Strategy between 2022 and 2027 and to safeguard land to ensure the enduring permanence of the Green Belt boundary well beyond the Core Strategy period. Paragraph 1.14 provides that all the proposed sites will make a significant and meaningful contribution towards meeting the housing requirement. Not allocating any or all of the sites (or not having new sites to replace any site that is rejected) could undermine the overall delivery of the Core Strategy.

Policy GB7 includes a number of key requirements to ensure that the character of Mayford is given due regard. This includes inter alia that "density of development to the south of the site should maximise the efficient use of the site without compromising the general character of the area." Furthermore Policy GB7 provides that "the northern part of the site which is hatched on the location plan is designated as an area of local separation to provide a visual gap between Mayford and the rest of the urban area. This part of the site is not for built development."

Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses infrastructure provision. In particular, Paragraph 6.2 confirms that the Council has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD.

Paragraph 6.7 of the Regulation 19 Issues and Matters Topic Paper confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 provides further information regarding transport and congestion considerations. In particular Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A320 Corridor Study to identify potential mitigation measures that might be necessary to address development impact on the network.

Section 8 of the Regulation 19 Issues and Matters Topic Paper addresses air and noise pollution.

The site contains an Area TPO and the mature trees to the south of the site are protected in this regard.

Section 19 addresses the due consideration which has been given to biodiversity. In particular, during the preparation of the Site Allocations DPD, the council consulted with

<p>Surrey Wildlife Trust and Natural England regarding the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed.</p> <p>Paragraph 4.1 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity.</p>
<p>Response Reference: U0001443</p>
<p>Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site".</p> <p>Amend third paragraph of reasoned justification to read 118 dwellings.</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06464/1</p>
<p>Name: Mr And Mrs William And Beryl MacConnol</p>
<p>Number of Signatories: 2</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11</p>
<p>Summary of Comment: A disproportionate amount of green belt development is proposed for Byfleet and West Byfleet. The Broadoaks development should be taken into account, this will cause further congestion. No green belt sites appear to have been considered in Pyrford.</p> <p>Why have the extra housing units already provided in Woking not been taken off the overall allocation figure of new builds needed to comply with requirements?</p> <p>Urgent action is needed on Sheer House and surroundings which are vacant and seem unlikely to re-vitalise.</p> <p>The road system is already under strain and could not conveniently absorb traffic from the proposals. Also, where would cars from the new development park in West Byfleet centre?</p> <p>Medical and school infrastructure can hardly cope now and would have difficulty meeting additional demand. The proposals would compromise the entire existing environment.</p>
<p>Contributor Proposed Modification: 6. I submit that these allocation plans should be reviewed with a view to spreading the load throughout the borough more fairly, and consideration be given to using more brown field sites to better advantage</p>
<p>Modification Reference: U0000133</p>
<p>Officer Response: The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 5.</p> <p>Development at Broadoaks has already been considered in the traffic evidence base that supports the SADPD.</p> <p>Green Belt sites were considered for removal and safeguarding for development in Pyrford. However, these sites were ruled out. The reasons for this are set out in the Regulation 19 Issues and Matters Topic Paper, Paragraph 14.11 - 14.13.</p> <p>The housing units already provided have been taken off the requirement. Please see pages 17-18 of the SADPD for more details.</p> <p>The area around Sheer House is allocated for development in the Site Allocations DPD. This will support the redevelopment of the site.</p> <p>The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13.</p>

The impact of the proposals on local infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6.
Response Reference: U0001704
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06753/1
Name: Mr Paul Mace
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
<p>Summary of Comment: Objects to GB7 allocation.</p> <p>Concerns regarding the merging (urban sprawl) of Mayford Village with the rest of Woking. The village has always been separate.</p> <p>Concerns regarding impact on wildlife.</p> <p>Concerns regarding flooding, as the fields along Egley Road soak up large amounts of rainwater.</p> <p>Concerns regarding increased traffic congestion along Egley Road.</p> <p>Main artery between Guildford/A3/M25, close to 30,000 car movements per day.</p> <p>Concerns regarding associated safety issues for children.</p> <p>Possibility of five leisure centres in the area.</p> <p>Concerns regarding air, noise and light pollution.</p> <p>Residents of Woking and surrounding area are already experiencing affects of redevelopment in the town.</p> <p>Historic buildings are being demolished to make way for high rise development, widening gap between rich and poor.</p> <p>What is the point in Green Belt if it is not safe?</p> <p>Not opposed to change, however previous developments in the town have been poor.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Section 1 of the Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt for development.</p> <p>Section 7 addresses the issue regarding flooding.</p> <p>Section 8 addresses the issue regarding pollution.</p> <p>Section 13 addresses the issue regarding the adequacy of road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A320 Corridor Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.</p> <p>Policy CS18: Transport and accessibility of the Core Strategy ensures that development proposals provide appropriate infrastructure measures to mitigate the adverse effects of development traffic and other environmental and safety impacts.</p> <p>Section 19 addresses the issue regarding detriment to wildlife.</p> <p>Section 20 addresses the issue regarding the loss of Green Belt land and the associated issue regarding the physical separation of Woking and Mayford.</p> <p>Section 21 addresses the issue regarding development of Green Belt land leading to urban sprawl.</p> <p>Section 23 addresses the issue regarding impact on historical buildings. Within the Town Centre, where schemes comprising tall building are likely to occur, there is a designated Conservation Area which protects historical buildings of merit. This area comprises of buildings situated on High Street, The Broadway and Chertsey Road.</p>

With reference to the comment regarding the widening gap between the rich and poor, in order to ensure that there are residential properties available to rent and purchase at an affordable price, new development, including tall buildings, is required to meet criteria set out in the Core Strategy Policy CS12 'Affordable Housing'. Developers are also required to make contributions to community infrastructure for the benefit of public good, which is accessible to all.
Response Reference: U0001642
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06803/1
Name: Mr Neil MacLennan
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: The DPD is unsound. The introduction to the DPD states "The Site Allocations DPD takes a long-term strategic view of the future and safeguards sites to meet future development needs beyond the present plan period, between 2027 and 2040. It also proposes amendments to ensure a strong, defensible Green Belt boundary that will endure in the longer-term." Contrary to this statement, the proposed site is on Greenbelt neighbouring West Hall. The existing infrastructure - roads, education, medical facilities etc - are already overburdened and there is no provision for meeting future development and population needs.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. The performance of the parcel including site GB10 against Green Belt purposes was assessed in the Green Belt Boundary Review (2015) and the site found suitable for removal from the Green Belt. The Green Belt Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.
Response Reference: U0001776
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06835/1

Name: Dr Rudo N Madada-Nyakauru
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
<p>Summary of Comment: Opposes reviewing Green Belt status of GB4, GB5 and GB10. It is of crucial importance for separate areas to maintain their identity/character; the Green Belt enables this by preventing neighbouring settlements from encroaching on one another.</p> <p>The areas protect rural ecosystems, flora and fauna e.g. deer, and also the stabling of horses.</p> <p>Next to the fields of GB5 is a children's park/recreation ground used for sporting events, dog walking etc. The fields provide an important setting for these activities; children learn from and enjoy its proximity. Having space for young people to spend time in affects psycho-social development and keeps them away from delinquent behaviour.</p> <p>The Green Belt vegetation currently filters noise pollution from the M25, as experienced in Byfleet. Urbanising the area would dramatically increase the noise pollution.</p> <p>There are already traffic problems in the area in rush hour or when there are problems on the M25/M23. More housing would lead to extreme gridlock.</p> <p>There would be insufficient school and medical health facilities to cope with additional housing; as a surgeon I know what the impact would be on the health services.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6, including sites GB4 and GB5, made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. A significant green gap will be retained between site GB10 and the motorway, with public access to this area enhanced by the creation of the Byfleet SANG and possibly off-site green infrastructure provided as part of the development of GB10, and the majority of the Green Belt on the west side of Byfleet will also be retained.</p> <p>The impact of the proposals on wildlife is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 19. The reduction in land available for the stabling of horses is not currently considered to weigh significantly against the large need for housing and Gypsy and Traveller accomodation in the borough.</p> <p>The impact of the proposals on the general wellbeing and amenity of residents is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 4. Site GB5 is currently only safeguarded for future development. When and if it comes to be allocated for development, a policy will be drafted with requirements based on the relevant policy and evidence available at that time, including on the value of current uses of the site and how any needs could continue to be met on the site or elsewhere.</p> <p>The impact of the proposals on noise pollution are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8. The trees in the centre of site GB5 and immediately to its west are protected by Tree Preservation Orders.</p> <p>The impact of the proposals on traffic congestion is dddressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The impact of the proposals on infrastructure more generally, including school and medical facilities, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p>

Response Reference: U0001558
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02449/2
Name: Mr Andrew Malcher
Number of Signatories: 1
Comment Type: OBJ
Site Reference: RG18GB12
Summary of Comment: Land to the rear of Lovelace Drive and Teggs Lane (Randall's Field, SHLAA ref SHLAAPYR003) supports a critical purpose of the Green Belt, restricting urban sprawl and safeguarding the countryside from encroachment. It ranked only 18 out of 31 sites in terms of sustainability in the GBBR - it is not a sustainable location for development. It is bounded by protected trees and serves to protect the rural nature, green infrastructure and biodiversity of the area.
Contributor Proposed Modification: The DPD should never have introduced SHLAAPYR003 Randall's Field and this site should remain in the Green Belt and not be 'safeguarded' as this only encourages developers to make speculative planning applications.
Modification Reference: U0000275
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02449/2
Name: Mr Andrew Malcher
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: DPD is unsound: the justification for the number and type of extra households is out of date after the recent revised ONS projections. Need to review in light of these. Safeguarding sites blights adjacent properties and encourages speculative planning applications that do not comply with the Local Plan. Sustainability Appraisal is unsound: taking land out of the Green Belt contradicts the NPPF requirement for sustainable development, as it compromises the ability of future generations to meet their own needs for building, for a less polluted environment and for growing food. Should only meet the minimum requirement for new households, on brownfield sites. Sustainability Appraisal is unsound: there is insufficient data on current levels of air and noise pollution, so it is not possible to model the effects of development. Need to establish current levels of pollution before planning to make it worse. * There is no time related data or automatic monitoring of NO2 * There is no monitoring at all of particulate pollution <10micron * There is no monitoring at all of particulate pollution <2.5micron * There is no monitoring at all of SO2

<p>Contributor Proposed Modification: The DPD should reflect the most recent statistics. There should be no 'safeguarding' of identified sites, as this directly leads to 'blighting' of adjacent properties and encourages developers to make speculative planning applications that do not fit in with the local plan. Concentrate on meeting only the minimum requirement for new households, on brownfield sites. Establish current levels of pollution before planning to make it worse.</p>
<p>Modification Reference: U0000191</p>
<p>Officer Response: The issue of changing housing need figures as a result of recent changes to Government policy and ONS projections is addressed by the Regulation 19 Issues and Matters Topic Paper, see Paragraph 1.5. A speculative planning application that does not comply with the Local Plan will be refused, unless material considerations indicate otherwise. Taking land out of the Green Belt does not contradict the NPPF requirement for sustainable development. NPPF paragraph 9 states that the sustainable development objectives 'should be delivered through the preparation and implementation of plans and the application of the policies in [the] Framework'. The NPPF does contain a mechanism for taking land out of the Green Belt, which has been followed by the council. The impact of the proposal on air quality is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p>
<p>Response Reference: U0001590</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 02626/3</p>
<p>Name: Mrs Marion Malcher</p>
<p>Number of Signatories: 923</p>
<p>Comment Type: SUPP</p>
<p>Site Reference: RG18GB12, RG18GB13</p>
<p>Summary of Comment: Woking Borough Council have justifiably removed the Green Belt fields either side of Upshot Lane, Pyrford (Aviary Road Field and Randalls Field) from the Site Allocation proposals. It is most welcome to know that the the importance of these fields has been recognised by the Council at this stage. Wishes to draw the attention of the Council to the strength of feeling from those who cherish our Green Belt in Pyrford by making this representation to the Regulation 19 Consultation on behalf of 923 petitioners. Reserve the right to present this petition to the full Council should the fields be threatened again during the ongoing planning process. I further reserve the right to make representation on behalf of the petitioners to the Government Inspector. Pyrford's fields, particularly those either side of Upshot Lane, are essential to the character of our semi-rural community and fulfil clear green belt purposes as laid down by the NPPF (National Planning Policy Framework). The farmland is a rare resource in the Woking area providing a home for declining farmland birds and a natural setting for many heritage assets, which include Pyrford Court and Gardens and St.Nicholas Church. Pyrford's farmland provides a setting for an escarpment which provides outstanding views to the Surrey Hills Area of Outstanding Natural Beauty; views which may be enjoyed by the general public from the Sandy Lane Path (Surrey Bridleway 401) where local residents planted a WWI Memorial Hedgerow in 2015. Furthermore, the biodiversity of neighbouring Pyrford Common SNCI (Site of Nature Conservation Importance), and Rowley Bristow Woods would be damaged by the</p>

fragmentation of irreplaceable wildlife habitat. If Pyrford's Green Belt is lost, it will be lost forever. Pyrford residents and their supporters wish to ensure this valuable asset is saved for future generations.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 02626/4
Name: Mrs Marion Malcher
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB17
<p>Summary of Comment: The DPD is not legally compliant nor sound.</p> <ol style="list-style-type: none"> 1. Green Belt land at GB10 fulfills two key Green Belt purposes - checking urban sprawl (from inside the built-up areas within the M25 from reading Woking Borough) and preventing neighbouring towns merging into one another i.e. Byfleet from West Byfleet and West Byfleet from Pyrford. 2. Land at West Hall could be easily reverted back to productive agricultural use - it has been farmed previously and this would contribute towards local food production. Allocating it for housing would contravene Core Strategy 5.145 which speaks of allocating land for agriculture and forestry. 3. The traditional orchard land at West Hall should be protected and maintained as the Byfleet Seedling apple was developed here in 1915 - it is part of Woking's horticultural heritage. The DPD fails to allocate land for horticulture. Growing food locally also helps mitigate climate change. 4. GB10 policy wording is muddled and wrong. Either the 'northern part' of GB10 is to be excluded from the Green Belt as suggested, or it is to be retained to avoid perception of development narrowing the Green Belt separation between Byfleet and West Byfleet. It is unclear what the 'northern part' refers to. Is Tins Wood (south of the A245 Parvis Road) to be retained in the Green Belt - the policy states access to the development could be provided through Green Belt land from Parvis Road. If it is proposed to retain Tins Wood to provide 'the perception' of narrowing separation, this does not comply with NPPF (section 13) which makes it clear that one of the essential characteristics of Green Belt is its openness, nor the perception of openness. 5. GB10 lacks clarity about access arrangements to proposed housing. Parvis Road is already congested. There is no 'Blackwood Copse' in the vicinity of GB10. However a new roundabout at the junction of Parvis Road and Blackwood Close, Dartnell Park, is 75m away from the stated 'secondary access - existing A245/West hall drive, Parvis Road (for emergency purposes)'. It is unclear what is meant by improving Dodds Lane Footpath, which is in fact Surrey County Council Bridleway 92. This runs through an ancient strip of woodland which joins to the Wey Navigations and River Wey Biodiversity Opportunity Area. Any upgrade would adversely affect biodiversity in contravention of Core Strategy 5.26 which aims to protect and enhance green corridors. Is the DPD proposing to open Dodds Lane to vehicular traffic - this would be a significant and unwelcome change. In summary, the local cannot be considered sustainable.
Contributor Proposed Modification: Remove proposal GB10 from the DPD.
Modification Reference: U0000273

Officer Response: It is acknowledged that land at GB10 made some contribution to the Green Belt purposes than some of the other recommended parcels, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl. As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. None of the proposed sites are classified as high quality agricultural land by DEFRA.

The Green Belt Boundary Review considered the environmental constraints for each parcel of land (see Section 3.3.19 onwards). The Agricultural Land Classification data, obtained from Natural England, was taken into account. The GBBR identified large portions of the land in Parcel 4 (within which site GB10 is situated) as Grade 3 Agricultural Land. The Sustainability Appraisal also identified parts of the site to be Grade 3 Agricultural Land, however Natural England data does not subdivide this into Grade 3a/3b. Further survey work would be required. As a result, this is reflected in a key requirement within policy GB10 requiring developers to engage with Natural England to determine the agricultural quality to shape proposals coming forward.

Whilst it is agreed that agricultural land is important for sustainable food production, the agricultural land constraint on this site is not considered to be significant, and can be accommodated in proposals with good layout, design and mitigation measures.

The ecology of the site is also recognised, including how the site supports a traditional orchard of county value. The key requirements within the policy expect any proposal to take this into account, and be designed so that development is focused on the least valuable grassland and that the most valuable ecological resources (such as the orchard) are retained within an interconnected network of green infrastructure. Whilst the Site Allocations DPD does not aim to allocate land for horticulture, a significant portion of the Borough's Green Belt, including its existing agricultural and horticultural land and all the benefits these bring, will not be affected by proposed allocations for housing and commercial development. However, the Council recognises that the orchard at West Hall is designated as a Traditional Orchard on the Priority Habitats Inventory and a minor modification is proposed to highlight this as an asset within policy GB10.

The extent of Parcel 4 is shown in Figure 3 of the GBBR. The parcel extends to the River Wey in the east and to the A245 to the north. The key requirement of policy GB10 that refers to retaining the northern part of the parcel within the Green Belt refers to land outside of, and to the north-east of site GB10 - it forms a wedge of retained Green Belt between the proposal site and the River Wey and M25. To updated Proposals Map adds clarity to this key requirement, showing where the new Green Belt boundary would be formed. The woodland known as Tins Wood, however, is within the northern section of the proposal site (within the red line of the site shown on pages 277-278), and forms part of the land proposed for release from the Green Belt. Section 1 of the Regulation 19 Issues and Matters Topic Paper describes in detail why the Council believes that exceptional circumstances exist for the release of Green Belt land to meet future development needs. The contribution of Parcel 4 to the purposes of the Green Belt as per NPPF policy, and to landscape character, are acknowledged by the GBBR, but this was weighed against its very high potential to deliver sustainable development. In this regard, key requirements have been introduced to policy GB10 to ensure development would be sensitively designed, and is directed to certain parts of the site, which seek to minimise impacts on landscape character and openness of the area.

Details of any access arrangements will be determined as part of the development management process. In all sites that have been allocated, the Council is confident that suitable and safe access can be provided (informed by advice by Surrey County Council), and this will be determined in detail on a case-by-case basis. This is because it needs to be done in parallel with the detailed configuration and layout design of the site, taking into

account issues such as impacts on landscape. The policy should refer to Blackwood Close rather than Blackwood Copse, and this will be modified accordingly. The references to Dodds Lane public footpath are intended only to improve pedestrian connectivity through the site, joining up pavements and walkways within the built environment to the existing footpaths surrounding the site, to facilitate walking and its associated health benefits. There is no intention to upgrade the byway or adversely affect its biodiversity; only to improve pedestrian access to it from new development. There is no intention at all to open it to vehicular traffic.

Response Reference: U0001484

Officer Proposed Modification: Add 'traditional orchard' to the list of assets to be protected by key requirements, Policy GB10 bullet point 5. Should read as follows: "Retain large areas of woodland, traditional orchard, and parkland setting and strengthen where possible".

Delete Blackwood Copse in fifth to last bullet point on p280 and replace with "Blackwood Close".

Amend penultimate key requirement on p280 to read: "Dodds Lane bridleway is adjacent to the southern boundary of the site. Development should seek to connect to this bridleway to increase accessibility to/from and through the site. Improvements should be carried out to the existing bridleway if necessary."

Wishes to Attend Examination (T = Tick):

Contributor Reference: 02626/4

Name: Mrs Marion Malcher

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB17

Summary of Comment: The DPD is neither legally compliant nor sound.

GB17 is a site containing various landscape types and should not be viewed as a whole. The Woking Palace site itself is particularly sensitive in historical heritage terms and also natural heritage. It includes Old Hall Copse - ancient woodland and irreplaceable, containing precious plants which should be protected at the highest level. The historic fishponds and moats form habitat for threatened wildlife, which would be threatened with increased public access. The water meadows adjoining the River Wey are highly biodiverse and land on the opposite bank is worthy of SSSI status. The Green Belt fields either side of Carters Lane are productive agricultural land - in short supply in Woking and essential to food security and availability of local food.

The meadows, fields and various areas of the site should be protected rather than becoming a visitor attraction or SANG.

Wishes to speak at the Examination to support the biodiversity of GB17. Is a Surrey Wildlife Trust volunteer and member of the River Search project, whose survey stretch of the River Wey includes the wider water meadows and the moats and ponds at Woking Palace.

Contributor Proposed Modification: Recognise the importance of the natural heritage of Old Hall Copse in GB17 by designating the Woking Palace site as a Site of Special Scientific Interest.

Recognise the importance of the natural heritage of the River Wey watermeadows in GB17 by designating them as a Site of Special Scientific Interest.

Recognise the importance of local food production in Woking Borough by retaining the Green Belt agricultural fields either side of Carters Lane in GB17.

Woking Council to demonstrate an understanding that the creation of a Country Park with the intention of increasing public access to such a sensitive landscape would damage the biodiversity of GB17. Further that such an objective is counter to CS7 in the Core Strategy

which states "The Council is committed to conserving and protecting existing biodiversity assets within the Borough".
Modification Reference: U0000271
Officer Response: Old Hall Copse is recognised on the Proposals Map accompanying the Site Allocations DPD, and is designated as both Ancient Woodland and a Site of Nature Conservation Importance. This part of the site is therefore afforded great protection. Policy GB17 also sets out in its key requirements the need for any proposal to retain existing landscape features to conserve and enhance biodiversity; and to retain and enhance habitats and features with biodiversity value, including Old Hall Copse SNCI. All areas of the site would need to be assessed to determine biodiversity value, including the watercourses, water meadows and their habitats. The site is not being proposed for SANG use, but rather is allocated for use as a Heritage Parkland / Country Park. In recognition of the potential impact this proposal could have on wildlife, the Council has included a range of key requirements to ensure biodiversity is conserved and enhanced; which would also comply with the objectives of policy CS7. The Council has also incorporated suggestions from Surrey Wildlife Trust. The Council recognises the major contribution this site makes to the landscape and biodiversity of Woking. The intention of the allocation is not only to allow the public to enjoy the site and benefit from its recreational opportunities; but also very much to improve this valuable area of green infrastructure, enhance nature conservation and maintain its important historical features. The Council would work closely with key stakeholders, including Heritage England, Natural England, Friends of Woking Palace and local nature groups to develop an appropriate proposal for the site.
Response Reference: U0001483
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 02626/4
Name: Mrs Marion Malcher
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: The HRA is not sound, and is out of date. The site reference numbers need updating to reflect those used in the latest Regulation 19 round of consultation, rather than previous rounds. It is confusing.
Contributor Proposed Modification: Update the HRA to reflect revised reference numbers used in the DPD.
Modification Reference: U0000269
Officer Response: The HRA report was produced by external consultants. Whilst the Council does not wish to cause any confusion, changing the site references has become an unavoidable part of the process as the DPD continues to evolve and changes continue to be made. It is therefore advised that readers refer to the land description rather than the site references where possible, or refer to the Regulation 18 draft of the DPD for previous references. Whilst reference numbers have changed, site addresses and descriptions have remained the same.
Response Reference: U0001481
Officer Proposed Modification: No proposed modifications as a result of this representation.
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02626/4
Name: Mrs Marion Malcher
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: The DPD is unsound and has not been positively prepared. It is a result of an undemocratic, untransparent process. Although various legal stages have been conducted, comments have been dismissed with 'no modifications will be made as a result of this representation'. Informed that previous representations are 'time expired' which means they will never be seen again or considered by the Inspector. The final stage of the consultation should not be held just before Christmas, with all the site references renumbered. Will speak on this topic if required at Examination.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Regulation 18 Consultation responses will form part of the evidence base which will be available for the Inspector at Examination. All representations were considered in detail and modifications were made where appropriate. To supplement the formal consultation exercise, Officers carried out several events including presentations to local communities and being available for questions; holding drop-in events across the Borough; and highlighting the documents in local newspapers. Full details of consultation activities will be detailed in the Consultation Statement, which will be published in due course as part of the submission documents to the Secretary of State. The Council is satisfied that it has done what it can within the available resources but has gone beyond the statutory requirements. Further details are provided in Section 9 of the Regulation 19 Issues and Matters Topic Paper. The renumbering of site references was necessary as the DPD evolved through the stages of preparation - including and excluding sites for various reasons - it was not the intention to confuse residents.
Response Reference: U0001499
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 02626/4
Name: Mrs Marion Malcher
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: The Sustainability Appraisal Report is not sound. Section 12 refers to the 'relationship between the SA of the Site Allocations DPD and Green Belt Boundary Review Reports'. The GBBR forms a key document in the DPD process and should have been subject to democratic and locally informed consultation.
Contributor Proposed Modification: Public consultation on the GBBR documents should be held.
Modification Reference: U0000270
Officer Response: It is important to note that the Green Belt boundary review (GBBR) does not allocated any land for development. It makes recommendations to the Council about the land that could be released from the Green Belt to meet development needs, which the Council has considered as part of the Site Allocations DPD process. The GBBR is an evidence base document, which is publicly available. The Council has also provided

<p>other evidence base studies that have been used to inform the DPD. The decision of the Council regarding Green Belt land broadly follows the recommendation of the GBBR but overall they are justified by the available and relevant evidence set out in Appendix 1 of the DPD.</p> <p>Several of its recommendations have been reflected in the DPD, which is the appropriate document to be subject to public consultation. The Regulation 18 and 19 consultation exercises have given the public the opportunity and sufficient time to comment on the proposals on the sites the Council wishes to release from the Green Belt. The Examination will provide an additional means for the public to be involved.</p>
<p>Response Reference: U0001482</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 02626/5</p>
<p>Name: Mrs Marion Malcher</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference:</p>
<p>Summary of Comment: The Site Allocations DPD is unsound, not legally compliant. It has not been positively prepared.</p> <p>The SADPD is the result of a process which has been neither transparent, nor democratic. On the surface, the various legal stages have been conducted, but whilst residents have been asked and encouraged to "have their say", they have been ignored. Development sites have appeared and disappeared, without clear explanation, causing consternation and expense - in time/effort/financial terms - to Woking communities. Now, we are told that all previous representations are "time expired" which means they will never be seen, yet alone considered by the Government Inspector. At the Reg18 Consultation, a Freedom of Information Request showed that in 99.65% of instances, representations were dismissed with the phrase "no modifications will be made as a result of this representation". The last straw for communities is holding the final stage of consultation in the run up to Christmas and renumbering the site references. The process has been completely unacceptable and wishes to draw this to the Inspector's attention. Would like to speak at the examination on this topic should it be called by the Inspector to do so.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The representation is noted. The Council disagrees that residents have been ignored, all representation received were analysed and responded to. The Council has also been transparent in publishing the representations and the responses in the public domain.</p> <p>Development sites have been removed because they have started development during the time from the Reg 18 to the Reg 19 Consultation and will be completed by the time the DPD is adopted. See Appendix 6 of the DPD for more information on sites which have commenced or been delivered.</p> <p>In regards to Green Belt sites being removed. The sites were identified in the draft Site Allocations DPD to be safeguarded to meet future development needs beyond the plan period between 2027 and 2040. This was published for Regulation 18 consultation between June and July 2015. The Council has considered the representations received during this consultation and has also reviewed all the available evidence and the policy context for safeguarding the sites, and has come to the conclusion that very special circumstances justification does not exist to safeguard the sites for the following reasons:</p>

All the sites would give rise to a certain level of harm to the sustainability objectives of the Sustainability Framework used for the Sustainability appraisal. In particular, it is noted that GB 9, 10 and GB13 are all within the designated "Escarpment of Rising Ground of Landscape Importance" which policy CS24 Core Strategy specifically identifies as a "key landscape" to be "conserved" and where possible "enhanced". Furthermore, whilst GB11 is not within the Escarpment designation, it is adjacent to the Escarpment and forms part of an important rural landscape setting to the southerly boundary with the urban area of Woking it is consider to also be protected by policy CS24. Moreover, GB11 together with GB13 form part of the setting of the Registered Park and Garden at Pyrford Court and the Aviary Road Conservation Area (both designated heritage assets). In their present open and rural form these sites make an important contribution towards the respective heritage significance of those designated heritage assets. Paragraph 193 NPPF requires "great weight" to be attached to the conservation of designated heritage assets. The Council is therefore of the view that exceptional circumstances do not exist so as to justify the release of proposal sites GB 9, 10 and 11 from the Green Belt because the use of those sites for residential development would: (i) conflict with policy CS24 Core Strategy and thus not be in accordance with the development plan's strategy for sustainable development contrary paragraph 139(a) of the NPPF, (ii) fail to protect or enhance a valued landscape in accordance with paragraph 170(a) of the NPPF, (iii) in the case of GB11 GB13, fail to conserve designated heritage assets and (iii), result in the permanent loss of Green Belt land assessed within the Green Belt Review as performing variously a "critical" and "major" role to check urban sprawl and a "critical" and "major" role towards safeguarding the countryside from encroachment Moreover, contrary to Policy CS6 of the Core Strategy, it is considered that the development of GB9, 10 and 11 and GB13 would individually and certainly collectively, critically undermine the overall purpose and integrity of the Woking Green Belt.

The decision to determine whether very special circumstances justification exist to safeguard the sites is a matter of planning judgment. It is clear from the above reasons that the decision of the Council is well informed by the careful consideration of all the available evidence and defensible.

Although 99.65% were no modifications proposed in response to Reg 18 representations. The Reg 19 Plan was modified by removing the Pyrford and Mayford sites as stated above. The DPD has evolved with changes made to reflect new evidence and information. Due to the removal of sites from the Reg 18 Site allocation, the site numbers had to change inevitably and be re-numbered. The site addresses and description has broadly stayed the same to enable the changes to be tracked.

The representation regarding the Regulation 19 consultation is inadequate has been addressed in the Council's Regulation 19 Issues and Matters Topic Paper Section 9.

Response Reference: U0000902

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06532/1

Name: Mrs Daniela Marev

Number of Signatories: 1

Comment Type: OBJ

Site Reference: UA44

Summary of Comment: Wishes to participate in oral examination.

Wishes to be informed of next stages.

Objects to development of UA44.

Concerns regarding the following:

- Overcrowding/over development, large scale out of character, loss of daylight;
- Noise from traffic, as well as disturbance from potential anti-social behaviour, detrimental to quiet residential area;
- Disturbance caused by construction;
- Safety with regards to increased number of people in the area, and children playing on streets;
- Crime arising due to overcrowding;
- Traffic congestion on Kingfield Road;
- Increased traffic and associated detriment to the health and safety of children walking to school;
- Not enough car parking spaces provided (671) for a 992 dwelling development;
- Lowered property prices;
- Inadequate amount of places at local primary schools;
- Lack of local amenities and facilities to accommodate new population.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The Regulation 19 Consultation is an opportunity for residents of the Borough to comment on future development plans, such as the allocation for the redevelopment of Woking Football Club. The Council is satisfied that it has done what it can within the available resources but has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. This is set out in detail in Section 9 of the Regulation 19 Issues and Matters Topic Paper.

The Council has not yet received a planning application for the redevelopment of the Woking Football Club. When it does, this will be a separate process to the Site Allocations DPD. The purpose of the Site Allocations DPD is to identify and allocate sites for development. If a site subsequently comes forward for development, a planning application would then be submitted, which would be considered carefully at the Development Management stage.

Policy UA44 in the DPD does not identify the site for the delivery of 992 flats. The scale of development will be determined at pre-application and/or planning application stage, as and when a scheme comes forward.

At planning application stage, were the application to be approved, planning conditions would accompany any approval to minimise construction disturbance. The Development Management process would also address impacts of any proposed scheme regarding traffic, noise, overcrowding and general impacts on amenity and safety of existing residents. Transport and parking issues would also be considered in detail. The Council sets specific requirements within its Parking Supplementary Planning Guidance and has a policy framework for car parking in Core Strategy policy CS18 on Transport. The policy aims to ensure development proposals provide appropriate infrastructure measures to mitigate any adverse effects of development traffic and other environmental and safety impacts. Transport Assessments will be required for development proposals to fully assess the impacts and identify appropriate mitigation measures. These will be required during any planning application stage should a scheme come forward.

At this stage, it will be unhelpful to speculate that development of the site will result in negative impacts on local property values. The Council has a number of planning policies which will ensure that development makes a positive contribution to the local area. This includes policy CS21 on Design of the Core Strategy as well as best practice guidance set out in the Design SPD. Guidance includes how developments can be best designed to minimise concerns such as increased crime, and to maximise safety, for example. Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses concerns about the adequacy of infrastructure, including schools and amenities. The Council has undertaken a number of studies, including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the

<p>delivery of the Core Strategy, and the Site Allocations DPD. This includes any proposals identified in the Hoe Valley ward.</p> <p>Section 8 addresses concerns about air quality and pollution associated with future development.</p> <p>Section 13 addresses concerns about increased traffic and congestion.</p>
Response Reference: U0000927
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T
Contributor Reference: 06811/1
Name: Ms Annabel Marks
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Strongly oppose the proposals at GB10. DPD does not pass tests of soundness - it is not an appropriate strategy taking into account the reasonable alternatives based on proportionate evidence, nor is it consistent with national policy.</p> <ul style="list-style-type: none"> - Infrastructure: in addition to proposals at Sheer House and Broadoaks, additional pressure from a 40% increase in population on healthcare provision, schools and roads cannot be accommodated. Facilities are over-subscribed and are under immense pressure. Additional dwellings will exacerbate congestion on Parvis Road, and parking issues. Due to distance from station, driving will be mode of choice. - Greenbelt land: the site currently prevents urban sprawl with Weybridge - without it, Weybridge and Woking would effectively merge over the M25, with continuous unbroken development between Byfleet, West Byfleet and Woking. Any planning permission at GB10 would go against planning law as defined by paragraph 47 of the NPPF as it would not comply with West Byfleet Neighbourhood Plan objectives to protect the unique character of West Byfleet. Green spaces filter pollution (essential given proximity to M25), lower temperature and provide numerous other benefits to health and wellbeing of residents - they must be protected. - Traveller pitches: these proposals are politically motivated. Seek to ghettoise the community into a single area within Woking next to M25 with high levels of noise and air pollution and on land likely to flood. This goes against best practice in siting of homes for the traveller community, including the Council's own guidelines. Urban areas in all wards should be identified for the traveller community to live and thrive and embed into the local community. One large site at West Hall will not work for either community as the resources and environment to support them will be put under too much pressure. - Flooding: the site is a flood plain and is vulnerable to flooding. It is not suitable for development. - Lack of assessment of suitable brownfield sites, and windfall sites. These areas should be prioritised before Greenbelt land. Martyrs Lane site is more suitable as impact on local community and urban sprawl would be less. - Disproportionate allocation in West Byfleet: West Byfleet expected to take on nearly 25% of the 4,400 new homes needed in the next 10 years, or a 40% increase. This is unfair, unjust and is clearly overdevelopment (taking into account growth already committed with secured planning permission at Sheer House and Broadoaks).
<p>Contributor Proposed Modification: Assessment of brownfield sites to be conducted, and consider including windfall sites.</p> <p>Identify urban sites spread across other wards around the Borough to provide suitable Traveller pitches, near to services and amenities.</p>
Modification Reference: U0000258

Officer Response: The issues raised in the representation have been addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

It is acknowledged that parcel 4, within which site GB10 is situated, makes some contribution to the Green Belt purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl. A wedge of Green Belt will be retained between the proposal site and the M25 to avoid the perception of development narrowing the Green Belt separation between Byfleet and West Byfleet.

Section 16 responds to concerns about conflicts with the West Byfleet Neighbourhood Development Plan. These policies will be taken into account during the development management process once a planning application is submitted. There has been no planning application submitted affecting West Byfleet Recreation Ground to date. However, this is a separate matter to the preparation of the Site Allocations DPD by the Local Planning Authority. It should be noted that the developer is no longer pursuing this proposal. The release of the school playing fields is purely to create a defensible Green Belt boundary and prevent the formation of a Green Belt 'island'. Policy GB18 makes it clear that the playing fields will not be developed. The Council recognises the benefits of green space for both community health and for wildlife - Sections 4 and 19 respond to these concerns in detail. The Council has to weigh these benefits with the significant need for housing, particularly affordable housing, and believes that very special circumstances exist to justify the release of this small amount of Green Belt land in the Borough. This is detailed in Section 1 of the Topic Paper.

The Council accepts that the proposed development will generate additional traffic, and potentially more car journeys - the Council details its approach to addressing this in Sections 9 and 13 of the Topic Paper.

Section 3 of the Topic Paper sets out in detail the Council's approach to Traveller sites, including details of how alternative sites in urban areas have been assessed. Concerns about flooding are set out in Section 7 of the Topic Paper, including how surface water flooding will be taken into account. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

Section 11 of the Topic Paper describes how alternative, brownfield sites has been conducted. The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson

Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. The Council has considered including windfall sites in the DPD. In line with evidence presented through the Core Strategy, windfall sites are assumed to deliver an average of 42 dwellings each year during the present plan period. The Core Strategy assumes that these will compensate for non-implementation of sites on previously developed land in the urban area. It should be noted that when windfall sites come forward for development they are counted towards the completion figure during that period. Paragraphs 1.6-1.8 explain why Green Belt land is also being allocated in addition to previously developed land. Section 5 of the Topic Paper responds to comments about disproportionate allocation in West Byfleet.

Response Reference: U0001534

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06689/1

Name: Mr Chris Martin

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10
Summary of Comment: Wishes to be informed when the SADPD progresses to the next stages Considers the SADPD is unsound, does not think GB10 in the Proposals Map should be taken out of Green Belt for the following reasons Parvis road is already heavily congested at peak travel times and this would only be made worse with an addition of 555 dwellings and 15 travel pitches. The area proposed for building is prone to severe and frequent flooding. Additional building of these houses will make the existing flooding worse putting our home at greater risk of flooding. Adequate flooding assessments have not yet taken place. It is a Greenbelt site and as such must be protected. What's the point in Greenbelt land if the area can be developed on The minerals allocation currently in place on the site until 2026 would make development on the site unattractive commercially speaking until at least this time. Therefore the ability to deliver the allocation has got to be questioned.
Contributor Proposed Modification: GB10 Should not be removed
Modification Reference: U0000383
Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. GB10 site has been assessed through the Green Belt Boundary Review (2015) and found to be suitable for removal from the Green Belt. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. Issues of flood risk are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7. In regards to the mineral allocation see Section 17 of the Regulation 19 Issues and Matters Topic Paper.
Response Reference: U0001100
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06543/2
Name: Martin Grant Homes
Number of Signatories: 1
Comment Type: OBJ
Site Reference: RG18GB10, RG18GB11
Summary of Comment: The DPD is not sound or legally compliant and does not comply with the Duty to Cooperate. Background Martin Grant Homes (MGH), whom Savills is representing, own two parcels of land. These representations deal with 'Plot 1', land to the north east of Saunders Lane, promoted for approximately 210 dwellings, and 'Plot 2', land to the north east of Saunders Lane, promoted separately for approximately 170 dwellings.

The sites were proposed as safeguarded sites under draft Policy GB10 (land north east) and Policy GB11 (land north west) in the Regulation 18 consultation (2015), for between 2027 and 2040 (supported by the Green Belt Review). The sites were later removed from the emerging Regulation 19 plan as a result of amendments tabled by Councillors, considering that exceptional circumstances did not exist to justify the sites' release. This amendment is contrary to the SADPD evidence base, including the Sustainability Appraisal (SA), several iterations of the SHLAA and the Green Belt Review, and is not based on a reasoned justification. The draft SADPD therefore fails the tests of soundness.

Approach regarding overall strategy

A robust case is presented demonstrating that the housing need for Woking between 2010 and 2027 should be based on the standard methodology for calculating housing need using 2014 household projections. On this basis, Woking's need is a minimum of 6,953 dwellings, rather than the 4,864 planned for, which leaves a shortfall of at least 491 dwellings by 2027.

Whilst the principle of the spatial strategy, i.e. to develop firstly urban area sites and subsequently release Green Belt land, alongside safeguarding land for future Green Belt release is supported, it must be based on robust evidence and not be used as a mechanism to further constrain development through ignoring the technical evidence base and advice of officers. Amendments to the methodology and approach are therefore required in order for the plan to be found sound and ensure Woking seeks to meet as much of its housing need as possible in accordance with its own evidence base.

Approach regarding the Green Belt

Exceptional circumstances have been fully evidenced and justified to warrant the review and alteration of Green Belt boundaries.

The broad purposes of the Green Belt Review, i.e. to identify suitable sustainable and deliverable sites to deliver homes is supported. However, the review is based on the outdated requirements of the NPPF 2012. It should be updated to reflect the NPPF 2018 and the February 2015 PAS Guidance note entitled, 'Planning on the Doorstep, The Big Issues - Green Belt'.

Were the relevant Green Belt purposes to be applied following the advice in the PAS note (also by PBA), it would be clear that the actual contribution that these parcels make against Green Belt purposes is significantly less. Environmental constraints/ other considerations should not influence a review of the parcels' contribution to the Green Belt purposes.

To make the plan sound, WBC should remove these sites from the Green Belt, in accordance with their evidence base and officers' advice, this case being strengthened through our own analysis, and subsequently allocate these available sites to support the much needed delivery of housing within the Borough.

Landscape analysis

The sites are not covered by any national designations. The Escarpment and Rising Ground of Landscape Importance is a local designation only. Most of Land North East of Saunders Lane, and the lower parts of Land North West of Saunders Lane, do not contribute significantly to the local landscape designation. Policy CS24 and its accompanying text seek only to restrict development specifically on the steep slopes of the Escarpment. The majority of the sites proposed for development however comprises lower and relatively flat land.

Concept masterplans have been developed which illustrates how development can be delivered having regard to the existing landscape character.

Landscape and Visual Appraisals have been undertaken which consider that the sites does not comprise a 'valued landscape'.

The Council's evidence base (notably the Regulation 18 and Regulation 19 SAs) confirm that the site is suitable for development and development on the lower, flatter areas will not harm the integrity of the escarpment.

The decision not to identify the sites for development within the Regulation 19 draft Site Allocations DPD is therefore not 'justified' or 'based on proportionate evidence' and therefore fails the NPPF tests of soundness.

Impact on Heritage Assets

Development of Land North West of Saunders Lane would alter the setting of the Grade II listed building Little Gorsewood and the agricultural land in the vicinity of Fishers Hill Hook Heath conservation area; with appropriate design, including appropriate planting to screen/soften new built form, any harm to these assets as a result of the proposed development would be less than substantial, towards the lower end of the less than substantial harm spectrum, and outweighed by the significant merits of the development. Development of Land North East of Saunders Lane would alter agricultural land adjacent to the Grade II listed building Sunhill House and therefore result in some minimal harm which is considered to be negligible, and outweighed by the significant merits of the proposal.

Development would not adversely impact any other designated heritage assets or locally listed buildings.

Sustainability appraisal

The sites identified for development in the Regulation 19 draft Site Allocations DPD have not been informed by the SA. The draft Site Allocations DPD should therefore be amended accordingly in line with the evidence base.

Detailed policy matters

There is an increasing requirement for larger properties within Woking. Sufficient Green Belt sites must therefore be identified to meet this need, such as Land north west and Land north east of Saunders Lane.

There is a significant need for affordable housing in Woking. Green Belt sites such as Land north west and Land north east of Saunders Lane can provide a significant contribution towards addressing this need.

Land north west and Land north east of Saunders Lane already benefit from good access to key local services, as identified in the 2017 SHLAA, and SCC highways officers are satisfied with the proposed access and transport aspects of the developments.

Viability and deliverability

The Government places significant emphasis on delivering a sufficient supply of homes.

This position has been strengthened through the recent publication of the NPPF 2018.

Many of the SADPD sites are in active use, with multiple land ownerships, constrained by technical issues such as access and require high levels of affordable housing; all of which bring into question whether they will be brought forward for housing. These are significant constraints which totally undermine any confidence in the ability to actually deliver these emerging allocations. Regardless, the SADPD proposes that sites with these constraints are allocated.

Given the constraints identified and definition of the term 'developable', the approach taken by Woking to allocate these sites regardless of the significant constraints identified, demonstrates that this is not an appropriate strategy and that the plan is therefore not justified.

Land north east and Land north west of Saunders Lane are available for development now. The sites are in single ownership of MGH and can each be delivered independently of any other sites. These sites can be brought forward in accordance with the timescales in the spatial strategy - i.e. between 2022 and 2027.

Contributor Proposed Modification: WBC should remove Land North West of Saunders Lane and Land North East of Saunders Lane from the Green Belt, in accordance with their evidence base and officers' advice, this case being strengthened through our own analysis, and subsequently allocate these available sites to support the much needed delivery of housing within the Borough (for delivery in the period 2022-27)

Modification Reference: U0000358

Officer Response: Support for elements of the overall strategy is welcomed.

The Council has an up to date Core Strategy to set the strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. In accordance with Section 6 of the Core Strategy, the Council is committed to the comprehensive delivery of the requirements of the Core Strategy and the preparation of the Site Allocations DPD is a key means to achieving this objective.

The Site Allocations DPD has a clear purpose set out in the Core Strategy to identify specific sites to enable the delivery of the Core Strategy. Policies CS1 (A spatial strategy for Woking Borough), CS2 (Woking Town Centre), Policy CS6 (Green Belt), Policy CS10 (Housing provision and distribution) and Section 6 (Monitoring and implementation) of the Core Strategy all highlights the role of the Site Allocations DPD to identify sites to enable the delivery of the Core Strategy. Previous Local Development Schemes also highlights the distinct purpose of the Site Allocations DPD. The Site Allocations DPD has been prepared to meet this objective by identifying sufficient land to enable the delivery of the Core Strategy. In accordance with paragraph 139 of the NPPF, the DPD goes further and safeguards land to meet future development needs beyond this plan period to ensure the enduring permanence of the Green Belt boundary. The need to safeguard land to meet future development needs beyond 2027 is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1.

The Core Strategy sets out the spatial strategy for the borough, including the broad spatial distribution of development and the timing for the release of Green Belt land. Policy CS1 directs most new development to previously developed land in the town, district and local centres which offers the best access to a range of services and facilities. Land in the Green Belt will only be released to enable housing provision between 2022 and 2027. Policy CS10 specifies the overall quantum of housing units to be accommodated in the Green Belt during the plan period. This is specified as 550 dwellings. The brownfield first approach adopted by the Core Strategy is necessary to ensure sustainable development across the Borough. The Inspector who conducted the Core Strategy Examination had this to say about the spatial strategy of the Core Strategy: 'with due regard to its means of production, the Core Strategy provides the most appropriate spatial strategy for sustainable development within the context of the Borough with clear objectives for the plan period in accord with the aims of national planning policy'. The Core Strategy recognises that Green Belt land will be needed to meet development needs between 2022 and 2027. The Green Belt and the Town Centre are therefore identified as future direction of growth.

Peter Brett Associates were commissioned to carry out the Green Belt boundary review. The consultants' brief was approved by the Local Development Framework Working Group. The Working Group considered the consultants' report and was satisfied that it had been prepared in accordance with the brief, and that the report provides a useful evidence base to inform the Site Allocations DPD. It is important to emphasise that Officers reviewed a number of examples of Green Belt boundary reviews before finalising the brief for the consultants. The Council believes that the Green Belt boundary review report is robust to inform the DPD and to make sure that any land that is released from the Green Belt does not undermine its purposes.

There is no prescribed methodology for carrying out a Green Belt boundary review. The Council had been concerned to ensure that the review is founded on a robust and credible methodology. In this regard, the consultants published the methodology for carrying out the Green Belt boundary review for stakeholder consultation to make sure that all technical aspects of how to carry out a Green Belt boundary review would be covered. Comments received were taken into account before the review was undertaken. The Council is satisfied that the methodology for the review is robust, logical, coherent, and comprehensive to form the basis of the review, and that the review is consistent with the NPPF 2018. The appraisal of individual parcels of land that were carried out and the

conclusions and recommendations of the report follow the methodology in a logical and coherent manner. The Green Belt Boundary Review Methodology can be accessed by this link: <http://www.woking2027.info/ldfresearch/gbmethod>.

Section 19 of the Planning and Compulsory Purchase Act (2004) and Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) expects the Site Allocations DPD to take into account the requirements of the Core Strategy. It is critical that the Site Allocations DPD is prepared in the context of the above requirements. The preparation of the Site Allocations DPD is informed by a number of evidence based studies such as the Green Belt boundary review, which is prescribed by policy and the Strategic Land Availability Study which is prescribed by national policy. All the sites that are either allocated or safeguarded are justified by the available evidence. The Council has also carried out a Sustainability Appraisal of reasonable alternative sites urban and Green Belt sites to demonstrate that the allocated and safeguarded sites are the most sustainable when judged against all the other alternatives.

Regarding the Green Belt sites, there has been an additional material consideration to be taken into account. As required by paragraph 136 of the NPPF, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. It is therefore important that very special circumstance justification exists for the sites that are allocated or safeguarded in the DPD. The Council is confident that the sites that are allocated or safeguarded meets this particular test. The same cannot be said for the alternative sites that are being promoted. For any other site to be accepted, a case has to be made to demonstrate that the site being promoted is the most sustainable when compared against the sites that are allocated and safeguarded in the DPD. No credible evidence has been provided so far to convince the Council that the alternatives sites being promoted are better alternatives.

It would be simplistic and bad planning for the Site Allocations DPD to allocate further land for development to meet Woking's objectively assessed housing need up to 2027. It is highlighted that it is not the purpose of the Site Allocations DPD to determine the housing requirement for the Borough. That is the distinct purpose of the Core Strategy. Paragraph 20 of the NPPF clarifies the role of strategic policies. Strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement of the natural, built and historic environment. It would be wrong to expect non-strategic policies in the Site Allocations DPD to be performing the role of the Core Strategy by planning for a higher housing requirement.

The development requirements of the Core Strategy, including the housing requirement have been identified in an integrated manner and justified by a significant body of evidence base studies. These include an Infrastructure Delivery Plan, Employment Land Review and an Employment Topic Paper. The studies have informed the necessary scale and type of infrastructure and economic growth necessary to support and align with the expected quantum of housing growth. To allocate land to meet the objectively assessed need up to 2027 without due regard and a corresponding review of office floorspace, warehouse floorspace, retail floorspace and the necessary infrastructure to align with the revised housing requirement would at best be irresponsible, overly simplistic and ill conceived. It would undermine the overall purpose of the plan-led system to plan in a holistic manner and would also undermine the sustainable development of the Borough, which is the overall aim of national policy.

There are some representations seeking to remove the time restrictions for releasing Green Belt land for development. To do so will be at odds with the spatial strategy for the Core Strategy. The timing for the release of Green Belt land is prescribed by Policies CS1 and CS6 of the Core Strategy. They require land to be released from the Green Belt to meet housing need between 2022 and 2027. This is necessary to ensure that most new development is focused on previously development land in the urban area which offers the best access to a range of services and facilities, in line with the objective of sustainable

development. Policy SA1 of the Site Allocations DPD is drafted to be in general conformity with this objective. The Site Allocations DPD clearly demonstrates that sufficient land has been identified on previously developed land in the urban area to meet development needs up to 2022. The request to remove the time restrictions on the release of Green Belt land is therefore not justified and unacceptable.

It is acknowledged that the Green Belt boundary review report has recommended that Land to the North East of Saunders Lane (formerly called GB10) and Land to the North West of Saunders Lane (formerly GB11) be released from the Green Belt to meet future development needs of the Borough.

The sites were identified in the draft Site Allocations DPD to be safeguarded to meet future development needs beyond the plan period between 2027 and 2040. This was published for Regulation 18 consultation between June and July 2015. The Council has considered the representations received during this consultation and has also reviewed all the available evidence and the policy context for safeguarding the sites, and has come to the conclusion that very special circumstances justification does not exist to safeguard the sites for the following reasons:

The sites would give rise to a certain level of harm to the sustainability objectives of the Sustainability Framework used for the Sustainability appraisal. In particular, it is noted that GB10 and GB11 are within the designated "Escarpment of Rising Ground of Landscape Importance" which policy CS24 Core Strategy specifically identifies as a "key landscape" to be "conserved" and where possible "enhanced". The Council is therefore of the view that exceptional circumstances do not exist so as to justify the release of proposal sites GB10 and 11 from the Green Belt because the use of those sites for residential development would: (i) conflict with policy CS24 Core Strategy and thus not be in accordance with the development plan's strategy for sustainable development contrary paragraph 139(a) of the NPPF, (ii) fail to protect or enhance a valued landscape in accordance with paragraph 170(a) of the NPPF, and (iii), result in the permanent loss of Green Belt land assessed within the Green Belt Review as performing a "critical" and "major" role to check urban sprawl and a "major" role towards safeguarding the countryside from encroachment. Moreover, contrary to Policy CS6 of the Core Strategy, it is considered that the development of GB10 and 11 would individually and certainly collectively (together with former sites GB12 and GB13), critically undermine the overall purpose and integrity of the Woking Green Belt.

The Green Belt Boundary Review forms part of the evidence base. The allocation of sites is a decision-making process based on evidence and on the merits of the sites. In this case, the Council has reviewed the Green Belt Boundary Review and Sustainability Appraisal, both of which highlighted both positive and negative characteristics of the sites in question, and has come to the conclusion that special circumstances justification does not exist to allocate or safeguard the land for housing. The work by Savills on sites North East and North West of Saunders Lane has been reviewed and none of the points are significant enough to override the weight that the Council has given to the damage of allocating or safeguarding these sites to the integrity of the landscape and, in particular, the designated Escarpment and Rising Ground of Landscape Importance. Allocating or safeguarding the sites would be contrary to the objectives of Core Strategy policy CS24. The Council is aware that sites recommended for removal from the Green Belt and allocated for housing may provide a particular opportunity for development of family homes and affordable housing. The (Green Belt release) allocations put forward in the DPD are underpinned by careful consideration of all the available evidence. While it is accepted that the sites North West and North East of Saunders Lane could contribute to affordable and family housing, the Council is of the view that this reason (alongside other reasons put forward) is not significant enough to outweigh the in principle harm that the development of the site could cause to the landscape and to Woking's Green Belt. With this in mind, a very special circumstances case to safeguard the site for future development needs cannot be demonstrated.

Response Reference: U0001785
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06644/1
Name: Ms Jessica Masey
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB12, GB18
Summary of Comment: As a resident of Byfleet, objects to release of Greenbelt sites in Byfleet and West Byfleet due to lack of infrastructure - unsustainable pressure on schools (already oversubscribed and unable to expand further), medical facilities (only one health centre already serving both villages and neighbouring villages) and increase in traffic (in an already heavily congested area, especially in rush hour). A fantastic GP recently left due to stress and being overworked. Over 800 houses in such a small geographical area is ridiculous. The Council should preserve the little remaining Greenbelt for the sake of their residents.
Contributor Proposed Modification: The proposals should be rejected, and Green Belt preserved.
Modification Reference: U0000454
Officer Response: The concerns regarding infrastructure are addressed in detail in the Regulation 19 Issues and Matters Topic Paper in Section 6. The concerns about congestion are addressed in section 13. The concerns about the proportion of West Byfleet and Byfleet's Green Belt being lost are addressed in section 5. The justification for the release of Green Belt land to meet future development requirements in the Borough, and for safeguarding Green Belt land to meet future development needs, is provided in sections 1 and 2 respectively.
Response Reference: U0001074
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06862/1
Name: Thomas Masey
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: I strongly object to the 1000+ houses and 21 traveller pitches that are threatening our protected green belt land in Byfleet/West Byfleet. The village has already got high pollution and traffic, it cannot take any more.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing and Traveller sites. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 1, 2 and 3. The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.

Response Reference: U0001490
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06573/1
Name: Mrs Louise Mason
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Considers that the DPD is unsound.</p> <p>The NPPF requires local authorities to allocate land for a range of housing, including sites suitable for low density housing with large gardens. The Woking Core Strategy recognises the importance of providing an appropriate mix of housing for a wide range of needs and the role low density housing plays in the long term sustainability and attractiveness of the Borough. Due to constraints meeting this requirement is a challenge for Woking. However, the DPD seems to make no allowance for the type of land low density development will require, including small parcels of land that could be developed with adversely impacting character of integrity of the Green Belt.</p> <p>The DPD states that only sites which yield at least 10 dwellings will be considered for removal from the Green Belt. It therefore excludes small yet suitable sites in the Green Belt from potential development which offer the potential for low-density housing and self build. This contradicts the Core Strategy provision that a wide range of housing is needed, which can only be developed on smaller sites.</p> <p>Wishes to participate at the public examination.</p> <p>Wishes to be informed when the Site Allocations DPD progresses to the next stages.</p>
<p>Contributor Proposed Modification: The Site Allocations DPD should address the land required for a wider range of housing stock identified in the Woking Core Strategy. The Site Allocations DPD should make allowance to bring small and suitable sites forward for development within the context of the Green Belt policy. The recent Green Belt review highlights areas across the assessed parcels of land where small development could happen sympathetically and this could be incorporated into the DPD.</p>
Modification Reference: U0000224
<p>Officer Response: Due consideration has been given to providing the range and mix of houses that the Borough needs. Paragraph 1.8 of the Regulation 19 Issues and Matters Topic Paper demonstrates that the Council has given sufficient consideration to the evidenced need for family homes, and considers that the allocation of Green Belt sites in particular will address this need. Furthermore, Policy CS11 of the Core Strategy addresses housing mix and requires that "all residential proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs as evidenced in the latest Strategic Housing Market Assessment in order to create sustainable and balanced communities." The Council monitors housing mix through the Annual Monitoring Report. In particular, it is highlighted that larger properties continue to be delivered in the Borough; 4 bedrooms properties represented 24.2%, 17.8% and 23% of total housing completions in the past three monitoring years.</p> <p>The decision not to allocate sites that will yield fewer than 10 dwellings is addressed in Paragraph 11.4 of the Regulation 19 Issues and Matters Topic Paper, and is justified on the grounds of ensuring that the appraisal process was manageable.</p> <p>As set out in Paragraph 1.4 the Site Allocations DPD should be judged on whether it has identified a sufficient deliverable range of sites in sustainable locations in the context of the spatial strategy of the Core Strategy to meet the development needs of the borough. The Council is confident that it has achieved this objective.</p>

Response Reference: U0001290
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06780/1
Name: Dr Ian Mason
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, SA1
<p>Summary of Comment: Please keep the respondent informed when the SA DPD progresses to the next stages.</p> <p>The SA DPD does not pass the test of soundness required in para 35 of the NPPF. It is not an appropriate strategy, taking account of reasonable alternatives and based on proportionate evidence. The SA DPD is unsound and site GB10 should not be taken out of the Green Belt for the following reasons:</p> <ul style="list-style-type: none"> - preservation of the green belt is vital for the health, amenity and well being of the community. Rightly called the 'green lungs' of the community, the Green Belt includes significant local biodiversity and captures carbon - the Green Belt provides space for water to prevent flooding, of special consideration at West Hall where significant areas flood regularly, and several areas have developed a wetland character for avian and other species. - the benefits the green belt provides deserve protection, it should contain urban sprawl that now threatens West Byfleet with these major development applications. - West Hall's development threatens and is contrary to a core objective of the West Byfleet Neighbourhood Development Plan (NDP2017) ; to maintain and enhance the character of West Byfleet and its green spaces. This is not compliant with Planning Law, defined in the NPPF para 47. - Parvis Road is heavily congested at peak times, and the road could not cope with the enormous increase in traffic if this major development were permitted. Extra traffic would lead to already high levels of pollutants, including carbon dioxide, nitrogen dioxide and particulate matter (PM10), which are deleterious to health, and new development of this size could constitute maladministration or negligence, because it puts at risk the inhabitants of residents. - the land at West Hall and Broadoaks is on the urban fringe, the proposed development would blur the boundary between settlements, leading to loss of open land and coalescence of settlements, with a detrimental impact of the environment, landscape and amenity. - development proposed would put undue pressure on local infrastructure, particularly schools, roads, community and health facilities. - the proposed numbers of houses are excessive, increasing the village population by at least one third, and constitutes 'overdevelopment' for a village setting like West Byfleet. - inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Travellers sites (temporary or permanent) in the Green Belt are inappropriate development, defined in government planning policy. <p>In summary, building on this Green Belt is not a solution to the national housing crisis. The proposals are overbearing and at odds with the character and density of village housing stock. Doubts there is local demonstrable need for this quantity of housing, and if there is, have alternative brownfield sites been fully evaluated?</p>
Contributor Proposed Modification:
Modification Reference:
Officer Response: This representation is comprehensively addressed in sections 1, 3-8, 10 -11, 13 16, 19 and 21 of the Council's Regulation 19 Issues and Matters Topic Paper.

Regarding the point on the proposal at GB10 being at odds with the character and density of West Byfleet's housing stock, the indicative capacity proposed at the site is at a density of 40 dwellings per hectare, which reflects the character and nature of existing built development in the area. As background to policy GB10, contained in the Green Belt Boundary Review, is the expectation that large parts of the site should not be built on and left green to help maintain a good transition between the urban area and Green Belt. It is proposed that the site should contain substantial areas of open space and green infrastructure, including large areas of woodland and parkland setting which should be strengthened where possible. This will serve residents of the development, and also help conserve the distinctive function of green infrastructure and links to the Wey Navigation corridor, which contribute to the character of the area. These points are included as key requirements in the policy for GB10. While there will be a loss of green space and Green Belt (as covered in sections 4 and 5 of the Council's Regulation 19 Issues and Matters Topic Paper) steps have to been taken to ensure the allocation and new Green Belt boundary does not blur the boundary between settlements, and includes policy requirements to minimise any detrimental impact on local environment, landscape and amenity.
Response Reference: U0001512
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06826/1
Name: Mr Hugo Mason
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: DPD not justified, effective or sound: The impact of development on infrastructure needs more consideration- West Byfleet (including its roads and schools) would be completely overwhelmed. Need to weigh the need for additional homes against community impact. Parvis Road is the only viable route out of the area for most residents and is already frequently clogged; the proposals would turn the village into a car park, with many more and longer idling engines causing environmental problems. Local schools will quickly become oversubscribed.
Contributor Proposed Modification: Reduce the number of proposed homes and provide more community facilities, retail spaces, cinemas, sports facilities, schools etc. Dedicate more thought to the effect on the roadways and propose alternative routes for access to, and egress from, the community via these new developments.
Modification Reference: U0000193
Officer Response: The impact of the proposals on infrastructure (including schools) is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.
Response Reference: U0001592
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06875/1

Name: Ms Mary Mauvis
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: DPD is unsound since GB10 should not be taken out of the Green Belt. Parvis Road is already congested, could not cope with the extra traffic. The infrastructure report fails to address how the healthcare will cope with increased population. The Traveller pitches would not have a safe highway access, or adequate parking, infrastructure or utilities.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on infrastructure, including healthcare facilities, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6. Issues in relation to the access and on site facilities on Traveller pitches are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3.
Response Reference: U0001469
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06882/1
Name: Mr Jean-Francois Mauvis
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is not sound, justified, effective or consistent with national policy. Object to additional dwellings and traveller pitches leading to the removal of Green Belt in the area.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1. The requirement to use Green Belt land to accommodate Traveller sites is addressed in Section 3.
Response Reference: U0001468
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 01768/2
Name: Ms Judith Mawhood
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB05, GB10, GB11

Summary of Comment: Object to allocation/safeguarding of GB5, GB10 and GB11: Green Belt land should not be re-designated or developed if it contributes to urban sprawl. Removing this land from the green belt would be likely to lead to its development, causing urban sprawl and ruining the separation and character of West Byfleet and Byfleet. Much of the Green Belt has considerable environmental value. Climate change increases the importance of Green Belt land in mitigating flooding and storing carbon. Removing pieces of the Green belt for development would harm its integrity and benefits. Permanence of the Green Belt discourages land speculation and encourages investment in agriculture etc. In many cases, developing Green Belt sites close to train stations defeats the key purpose of preventing sprawl and the merging of settlements. Ireland and Spain show the negative effects of urban sprawl. All existing brownfield sites (including small plots) should be used before Green Belt sites are considered, otherwise developers will prefer Green Belt sites. Development here would significantly harm the visual appearance of the Parvis road area. Development is likely to be out of scale and character with existing development. Construction traffic on these sites would add to existing congestion in the area, harm highway safety and the convenience of road users. January 2015 Sensitivity Test Transport Assessment identifies A245 as particularly congested.. Risk of the Sheer House redevelopment being delayed and coming forward at the same time as development on these sites, causing additional congestion. Dodds Lane footpath adjoining GB10 is well used, its amenity, outlook and air quality would be damaged by development. The fields are a route for wildlife between different sites; this would be damaged. The area far from self contained and is dependent on nearby centres of West Byfleet and Woking. Parking, railway station and facilities in West Byfleet are already overstretched; residents are likely to go to Woking station instead. Utilities in the area are unsuitable for a large number of additional houses. Schools in the area have limited capacity and are a cause of traffic congestion. Local medical facilities have limited capacity.

Contributor Proposed Modification: The release of these parcels of Greenbelt land for development should not be permitted.

Modification Reference: U0000156

Officer Response: The impact of the proposals on urban sprawl is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 21. The Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes, including checking urban sprawl and the prevention of towns from merging, and concluded that land in Parcel 6 (including site GB5) made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It also concluded that sufficient exceptional circumstances justification exists for the release of sites GB10 and GB11 from the Green Belt, based on their high potential to deliver sustainable development. A significant green gap will be retained between site GB10 and the motorway, with public access to this area enhanced by the creation of the Byfleet SANG and potentially through off-site green infrastructure connected with the West Hall development, in line with the twelfth Key Requirement of policy GB10, and the majority of the Green Belt on the west side of Byfleet will also be retained. In addition, the Broadoaks site is already designated as a Major Developed Site in the Green Belt through the Core Strategy, and has the benefit of planning approval for significant development. The allocation of this site will therefore not have a net negative impact on the factors mentioned, in comparison to the baseline situation. Consideration of climate change has been incorporated into the Site Allocations process at various points, in particular the Sustainability Appraisal, the Strategic Flood Risk

Assessment and the inclusion of sustainable development factors in the Green Belt Boundary Review. Any loss of carbon storage capacity should be minimised by a key requirement of policy GB10 to 'retain large areas of woodland and parkland setting and strengthen where possible', while most of the trees on sites GB5 and GB11 are covered by Tree Preservation Orders. Other issues related to flooding are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.

The limits to proposed Green Belt release are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 14. The safeguarding of land for development after 2027 is intended to remove any need to review Green Belt boundaries again until at least 2040, to ensure the enduring permanence of the Green Belt boundary.

The consideration of brownfield sites and other alternative sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 11.

The visual appearance, outlook and amenity of Parvis Road and Dodds Lane would be protected by key policy requirements including 'Retain large areas of woodland and parkland setting and strengthen where possible' and 'Provision of new and enhanced green infrastructure... with a view to minimise impact of development on character of landscape' (Policy GB10) and 'Retain protected trees and tree belts and strengthen with planting to enhance the site's landscape character' (Policy GB11), as well as adopted policies such as CS21: Design, CS24: Woking's landscape and townscape, and the Design SPD. The main impacts on these routes are likely to be improvements to their usability by pedestrians and cyclists, and in the case of Parvis Road, also improvements to vehicular movements and a new road access to site GB11. Site GB5 will not have a direct impact on either route.

The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.

The impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19.

The proximity of sites GB10 and GB11 to West Byfleet District Centre was a significant factor in their selection for development. Allocation policies UA7 and UA42 are intended to facilitate the improvement of railway services on the Wessex Route (including West Byfleet station) and local services in West Byfleet respectively.

The impact of the proposals on infrastructure, including utilities, schools and medical facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19.

Response Reference: U0001670

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 04098/1

Name: Mr Roger Mawhood

Number of Signatories: 1

Comment Type: SUPP

Site Reference: RG18GB12, RG18GB13

Summary of Comment: Support decision not to safeguard fields either site of Upshot Lane, Pyrford, for future housing development:
Green Belt land should not be re-designated or developed if it contributes to urban sprawl. Removing this land from the green belt would be likely to lead to its development. Green Belt protects the character of settlements and much of it has considerable environmental value.

Removing pieces of the Green belt for development would harm its integrity and benefits. Permanence of the Green Belt discourages land speculation and encourages investment in agriculture etc.

In combination with the proposed Green Belt losses in Byfleet and West Byfleet, loss of the Green Belt in Pyrford would significantly harm the Green Belt in this area.

All existing brownfield sites (including small plots) should be used before Green Belt sites are considered, otherwise developers will prefer Green Belt sites.

Development here would be likely to be out of scale and character with existing development in Pyrford.

Construction traffic on these sites would add to existing congestion in the area, harm highway safety and the convenience of road users.

January 2015 Sensitivity Test Transport Assessment identifies the nearby Parvis Road as particularly congested. There is chronic congestion on the B267 and Coldharbour Road at school opening and closing times. Development would be car dependent, due to an infrequent bus service, so would worsen these issues.

Risk of the Sheer House redevelopment being delayed and coming forward at the same time as development on the Pyrford sites, causing additional congestion.

The fields are essential to the character of Pyrford and fulfil green belt purposes.

Climate change increases the importance of Green Belt land in mitigating flooding and storing carbon.

Footpaths adjoining the fields are well used, their amenity, outlook and air quality would be damaged by development.

The fields are a habitat for farmland birds, and part of a habitat network that contributes to the biodiversity of nearby SNCIs; this would be damaged.

The fields are a setting for heritage assets.

The fields are the setting for an escarpment with outstanding views of the Surrey Hills AONB.

The area far from self contained and is dependent on nearby centres of West Byfleet and Woking.

Parking, railway station and facilities in West Byfleet are already overstretched; residents are likely to go to Woking station instead.

Sewers in the area are old, poorly mapped and have overflowed showing that they are over-stretched already.

Schools in the area have limited capacity and are a cause of traffic congestion.

Local medical facilities have limited capacity.

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04811/1
Name: Mayford Village Society
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Formed 27 years ago, Mayford Village Society seeks to promote, maintain and protect the status of Mayford as a village. It represents over 700 local residents. The Core Strategy seeks to protect the rural and open character and heritage assets and landscapes of Mayford, and ensure that any new development is in

keeping with this character, and Green Belt status of the area. Only limited types of building will be permitted in the small urban area.

The village has seen a disproportionate amount of large-scale development in contrast to other areas of the borough. This includes significant incursions into Green Belt land including a secondary school, sports centre, running track and gym club. Mayford now has sports facilities in abundance. This has undermined the character of the village, and the remaining Green Belt has become invaluable to the residents; as well as serving a critical purpose in maintaining the separation of Woking, Mayford and Guildford. It serves a number of rural land uses, including agriculture and open recreation (golf); and provides ecological and environmental benefits.

This includes site GB7, which provides a critical, visual green break between Mayford and the urban sprawl of Woking. Additionally it helps prevent neighbouring settlements merging into one another; safeguards the countryside from encroachment; and preserves the setting of Mayford which is a historical settlement. The village has been separated from Woking since before the Domesday Book.

The Hook Heath escarpment and area of rising land falls within the site, which should be maintained, enhanced and restored as per CS24 of the Core Strategy. This policy also states that the setting and relationship between settlements must be respected. The escarpment is one of the largest topographical rises in the borough and has not been given enough weight.

Policy CS7 protects and preserves the biodiversity assets present on the site, including wildlife habitats and heavily wooded areas. Much wildlife has already been lost to recent development in Mayford's Green Belt. Does not consider there to be enough assurances written into policy GB7 to ensure that all trees and habitats on the site will be preserved. The northern end of GB7 contains an area of high archaeological importance, one of the few that exist in the borough.

It is inaccurate that the site has 'excellent accessibility' to local services. There is only one bus per hour; and a Post Office and barber in the village parade.

The A320 is one of the busiest roads in the borough, suffering from gridlock. Traffic has increased with the school and sports centre, and will become worse with the gym club and track. Narrow, local roads, with its few unlit footpaths and narrow bridges, cannot cope with additional traffic.

The light and noise pollution from facilities that are used into the night has also increased. Air pollution along the A320 is a significant problem and set to rise.

Contributor Proposed Modification: Do not remove Green Belt status of GB7 as it is protected by the recognised purposes of the site.

Modification Reference: U0000338

Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Section 20 addresses concerns about the separation of Woking, Mayford and Guildford, and the impact of development on its historical character. The Council recognises that there have been incursions into the belt of separation, but believes there are exceptional circumstances in accordance with national policy which justify this, and in line with conclusions of the Green Belt Boundary Review (GBBR). Sections 1 and 2 of the Topic Paper sets out in detail the justification for the release and safeguarding of Green Belt land, including that in and around Mayford. The Council has reacted to the concerns of local residents and followed the conclusions of the GBBR, and designated the northern part of site GB7 as an area of local separation, to provide a visual separation gap between Mayford and the rest of the urban area. The northern end of the site, with its area of rising land and area of high archaeological importance, as identified in the representation, will therefore be protected from built development.

The Council accepts that the proposed allocation of sites is not evenly spread across the Borough. Paragraph 5.1 of the Topic Paper explains the reasons behind this.

The Core Strategy has several objectives for the borough as a whole, and the challenge of delivering different types of homes to meet needs whilst minimising adverse impacts on the environment and local character is recognised. The Council is satisfied that it has identified the most sustainable sites for development, based on a robust evidence base. This is described in more detail in Section 10 of the Topic Paper. Where relevant, key requirements of the proposed allocated sites set out conditions for the need for more detailed assessments, such as landscape, heritage and ecological assessments, which will be taken into account at development management stage. A landscape assessment, for example, would need to demonstrate (in accordance with policy CS24 of the Core Strategy) that new development would respect and, where appropriate, enhance the character and distinctiveness of the landscape character area in which it is proposed, including taking into account designations such as escarpments of importance.

The Green Belt Boundary Review (GBBR) acknowledges that the land around the periphery of Woking town contributes to the fulfilment of Green Belt purposes. Whilst the escarpment was considered to be a major constraint to development along the ridge and steeper slopes of the area, sites GB7 and GB8 are situated in an area of weaker landscape character along the A320, which is considered to be less sensitive to change from development in landscape and visual terms. The Council is confident that these sites can be developed without affecting the overall integrity of the escarpment, and that GB7 and GB8 which fall on the flatter land and lower slopes of the escarpment are suitable for built development. The upper slopes and ridgelines are considered to be more suited to the provision of Green Infrastructure.

As identified in the representation, policies of the Core Strategy and Development Management Policies DPD, in addition to key requirements for development schemes under policy GB7, serve to protect and enhance the biodiversity assets of the borough. This is explained in detail in Section 19 of the Topic Paper. Officers have included several key requirements within policy GB7, including retaining and strengthening protected trees and tree belts and planting to create a wide landscape frontage; creating buffers between the development, railway and the escarpment; submitting archaeological assessments; proportionate on-side measures to support the creation, protection, enhancement and management of local biodiversity and Green Infrastructure; conduct landscape, ecological and tree assessments to determine levels of biodiversity and valuable landscape features on and adjacent to site; and to take opportunities to make a positive contribution towards biodiversity. The Council believes these key requirements serve well to reinforce policies of the Development Plan which seek to assure valuable trees and habitats on the site will be preserved. However, based on issues raised by the local community in representations, and further information obtained from the Council's green infrastructure team, the Council consider it reasonable to include a further key requirement to preserve the woodland to the south of the site.

The GBBR conducted a sustainability assessment, and sites GB7 and GB8 were considered to be very sustainable in strategic terms. Access to local services in the neighbourhood centre is available, although it is recognised that facilities are limited and there is not at present a local centre. The provision of services can be improved as part of development on site GB8, as identified in the reasoned justification. There is good connectivity to Woking Town Centre via a well established transport corridor - the A320 - which also provides bus services. The concerns about increased congestion are addressed in Section 13 of the Topic Paper. The County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. This includes key requirements under relevant policies, including policy GB7, for detailed transport assessments to support planning applications (see paragraph 13.2).

The concerns about air and noise pollution are addressed in Section 8 of the Topic Paper.

Response Reference: U0001236
Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site". Estimated yield should be amended to reflect this. Amend third paragraph of reasoned justification to read 118 dwellings.
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04738/1
Name: Mr Ian McAtamney
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB18
Summary of Comment: Considers the SA DPD is not legally compliant, as the document has not been prepared in accordance with the Council's Statement of Community Involvement. It has not met minimum standards of consultation as defined in the Town and Country Planning (Local Dev't)(England) Regulations 2012. Significant sections have been added last minute without any public consultation e.g. at site GB10 there has not been any consultation on the 15 traveller pitches. This represents most of the pitches in the Borough. GB18 is referred to in the West Byfleet Neighbourhood Plan as Green Belt land and was voted in by referendum last year. No consultation has taken place on removing this land from Green Belt. 60% Green Belt is being lost to development in West Byfleet, which will change the character of the village. There is inadequate infrastructure (roads, schools, health) to support such large development. Suggests a proposal to make the DPD legally compliant / to strengthen its compliance, which is to do proper consultation, and use up to date road traffic assessments and infrastructure. The assessments being used are out of date. Considers that the DPD does not meet the requirements of the Duty to Cooperate. Significant nearby developments at Wisley and Fair Oaks have not been taken account when accessing [assessing?] total housing need. Green Belt land in West Byfleet is being released unnecessarily for demand that does not exist. The DPD is not positively prepared, justified, effective, consistent with national policy or sound. The DPD is not prepared objectively with regard to release of Green Belt, assessment of need for West Byfleet is poorly informed and the DPD does not account for the already significant development in West Byfleet e.g. at Broad Oaks and in the district centre. There has not been proper assessment of brownfield sites. Wishes to attend examination in public, with regard to legal compliance - that elements of the DPD have been added last minute, the effect of such large scale Green Belt release on the character of the village, contribution to urban sprawl, and the lack of consideration given to already significant housing development in West Byfleet and other areas, and to brownfield sites. Justifications used are unsafe. Please keep informed of next stages.
Contributor Proposed Modification: To make the DPD legally compliant and/or to strengthen its compliance, the Council should do proper consultation, and use up to date road traffic assessments and infrastructure. The assessments being used are out of date.

Modification Reference: U0000474

Officer Response: The Site Allocations DPD has been prepared in accordance with the Council's Statement of Community Involvement and the Town and Country Planning (Local Development)(England) Regulation 2012, and is considered to be legally compliant. This is detailed further in section 9 of the Council's Regulation 19 Issues and Matters Topic Paper. In accordance with the relevant guidance, changes were made between the Regulation 18 and Regulation 19 stages of consultation regarding travellers pitches at the West Hall site. The changes reflect the latest evidence including the sequential approach to selection of sites, and land availability, and go towards meeting the accommodation needs of travellers. For further detail, including explanation about the location of 15 traveller pitches in West Byfleet, please see section 3 of the Council's Regulation 19 Issues and Matters Topic Paper.

Regarding compliance with West Byfleet Neighbourhood Plan, please refer to section 16 of the Council's Regulation 19 Issues and Matters Topic Paper.

Regarding the proportion of Green Belt being lost to development in West Byfleet (ward area) the actual figure is 38%. GB18 will also be lost from the Green Belt (accounting for a total 43.5% loss of existing Green Belt in the ward area) but not for development, as set out in the DPD. While the Council sympathises with this loss of Green Belt, it has ensured that land released from Green Belt does not undermine its overall purpose and integrity. This is further detailed in section 5 of the Council's Regulation 19 Issues and Matters Topic Paper. Although it is acknowledged that new development will lead to change in the area, the density of the development being put forward at site GB10 is reflective of current densities in the area and will need to be sensitively designed. The site will contain substantial areas of public open space and green infrastructure, to help provide a good transition between the urban area and the Green Belt, and to minimise the loss of the green feel of the area. These points are set out in the key requirements of Policy GB10. Development will be supported by adequate local infrastructure, detailed in section 6 of the Council's Regulation 19 Issues and Matters Topic Paper.

The Duty to Cooperate has been met, following continuous engagement with relevant neighbouring authorities, statutory consultees and key stakeholders throughout the preparation of the DPD. A Duty to Cooperate Statement and Consultation Statement will be published in due course as part of the submission documents to the Secretary of State, to demonstrate in detail how the Council has engaged with key stakeholders, including Duty to Cooperate bodies, and local residents in the preparation of the DPD.

The Council's Regulation 19 Issues and Matters Topic Paper highlights how the DPD is positively prepared, justified, effective, consistent with national policy, sound and legally compliant. It is informed and justified by a breath of evidence which is robust, comprehensive and able to withstand scrutiny. This evidence includes assessment of the cumulative, total scale of housing development coming forward in West Byfleet and other areas. There has been a thorough assessment of reasonable alternative brownfield sites. This is detailed further in sections 10 and 11 of the above mentioned paper. The point on urban sprawl is addressed in section 21 of the Council's Regulation 19 Issues and Matters Topic Paper.

The Council considers that adequate consultation was carried out and that up to date, robust road traffic and infrastructure assessments have been undertaken. This is detailed in sections 9, 10 and 13 of the Council's Regulation 19 Issues and Matters Topic Paper.

Response Reference: U0001515

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06502/1

Name: Rev Dr John McCabe
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
Summary of Comment: Objects to GB4, GB5 and GB10 (Used previous Regulation 18 site references). Representor is the custodian trustee owner of 1/3 of Parvis Road site GB4 East section, it is Church burial land due for consecration and should remain in perpetuity Green Belt and hence influence the adjoining.
Contributor Proposed Modification: Representor is the custodian trustee owner of 1/3 of Parvis Road site GB4 East section, it is Church burial land due for consecration and should remain in perpetuity Green Belt and hence influence the adjoining.
Modification Reference: U0000406
Officer Response: Section 15 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the allocation of GB5 and the associated concern regarding the burial land at this site.
Response Reference: U0001262
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06261/1
Name: B McConville
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Objects to the proposal for these reasons: 1. Legal basis - housing development and a private gym does not meet 'special circumstances' to remove Green Belt. Land should revert to Green Belt. 2. Ethics - what existing agreement was in place between WBC and the landowner re Green Belt development? No answer received from Councillors on this. 3. Site access - proposed site is 'landlocked' with no access points. The Council should clearly explain how safe access would be made. 4. Incorrect documents - site plans should reflect the current state of development. The map fails to show the school in a way that deliberately misleads those unfamiliar with the site. 5. Child safety- there is no impact assessment of traffic and the risk to children travelling to How Valley School. The financial greed to build needs to be checked where it is not appropriate. When will the Council engage with Mayford residents who are directly impacted by the proposed urban Green Belt development?
Contributor Proposed Modification: Land should revert to Green Belt. The Council should clearly explain how safe access would be made to the site. Site plans for GB7 should reflect the current state of development. Better engage with Mayford residents.
Modification Reference: U0000492
Officer Response: The points listed in the representation are addressed one by one below. 1. The representation is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, section 1.

2. On ethics and the agreement between WBC and the landowner re development, it should be noted that the majority of the Hoe Valley School application site is owned by the Council, with the remainder of the GB7 site being highway land or land owned by a third-party. The Council's intentions for the site are set out in Council meeting reports from 26 July 2018, which are accessible to the public, and available on the Council's website. It is proposed that the Egley Road land is purchased by the Council, subject to planning approval being obtained for the Kingfield Road and Egley Road schemes. The Egley Road scheme would involve the relocation of the existing David Lloyd Leisure Club along with new residential accommodation, in order to help facilitate the enhancement of the football club at Kingfield Road, which is considered to be an important community asset. The Council has entered into a Development Agreement with GoIDev. GoIDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this year. The planning merits of the scheme will be determined by the Council's Planning Committee in accordance with the Development Plan, which includes the Site Allocations DPD. There will be extensive public consultation as part of the planning process. This is a separate matter to the preparation of the Site Allocations DPD. However, if the planning application is to be approved, the Site Allocations DPD will take that into account.

3. New site access to the A320 is listed under the key requirements of the policy, the details of which will be determined as part of the Development Management process, as and when a planning application is submitted for the site. At this stage, the Council is confident that appropriate and safe access can be made, based on background assessment provided by Surrey County Council.

4. The site plan for GB7 published at Reg 19 in Oct 2018 is up to date. It is acknowledged that the aerial photography is not, which is an oversight and will be updated to show the latest available aerial photography prior to submission of the Plan to the Secretary of State.

5. On child safety due to traffic, para 6.7 of the Council's Regulation 19 Issues and Matters Topic Paper and site specific requirements that will be implemented through the Development Management process, mean that the Council is satisfied that traffic and access from the development will not adversely impact pedestrian or Highway safety. Individual instances of speeding and dangerous driving are not planning matters, and will be dealt with as appropriate by the Police.

The need to develop land in this location, and appropriateness with regard to a breadth of evidence is covered in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1, 2, 10 and 11. The point about engagement of Mayford residents is noted, but in this case does not change the need for development and appropriateness of development at GB7 and GB8. The Council sympathises with the concern about the loss of Green Belt, but overall the amount of land to be lost from the Green Belt is modest (see para 4.1 of the Council's Regulation 19 Issues and Matters Topic Paper for detail) and the Council is confident that adequate infrastructure can be provided to support the delivery of these sites. Further detail on infrastructure can be found in section 6 of the Council's Regulation 19 Issues and Matters Topic Paper.

Response Reference: U0001174

Officer Proposed Modification: Replace aerial photo on p264 with an up-to-date photo to show the newly constructed school and sports facilities. Update base OS map on the Proposals Map to show new facilities, if available.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06705/1

Name: Ms Jan McDermott

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05

Summary of Comment: Strongly objects to proposals to release Green Belt in Byfleet for housing development. Born and lived in Byfleet 65years, and is raising his own family in the village. Has witnessed the village change, and the detrimental effects that expansion has had. Byfleet is an island and if the village continues to be overloaded and used as a dumping ground for development, it will fail to fulfil what it is designed for.

- Losing vital, remaining small pockets of Green Belt land is irreversible. Building on it will not only have devastating climatic effects, but also environmental and social impacts. It acts as Byfleet's 'boundary of green' and helps maintain an ancient village status. The purpose and benefits of Green Belt are widespread - there is a reason it is protected by law. It has been dramatically reduced over the years through overbuilding. The little that is left helps prevent urban sprawl and merging of villages. There need to be 'very special circumstances' to override the protection of Green Belt. It is ludicrous to consider Byfleet for over 1000 houses and 21 traveller pitches. Should be seeking out more green spaces to improve the environment, reduce global warming and rectify the wrongs of previous generations, but instead the Government is actively seeking to remove green spaces.
- Flooding: huge parts of Byfleet sit on the floodplain. Has experienced major flooding over the years, including 1968 floods. The Green Belt benefits the flood plain as the plants and trees help absorb the water and reduce the levels. The field behind the Queen's Head pub is sodden for the majority of the year and resembles a lake after prolonged rainfall. Land at West Hall floods, and fields south of Murray's Lane flood. Flooding is traumatic for local residents, and relatives of those buried in St Mary's Churchyard which is also vulnerable to flooding.
- The field opposite the churchyard was gifted to the church for burial plots. Where will we be able to bury our dead? The Council intend to CPO this land.
- Traffic: gridlock is suffered daily. It takes hours for traffic to clear. Local roads are used as ratruns, disabling those who want to move within the confines of the village. Queues along the A245 are relentless. Roads are at capacity - congestion, air pollution and damage to roads will result.
- Infrastructure: GP surgeries in West Byfleet are overstretched - takes a long time to get an appointment. There are no facilities in Byfleet, and no plans to provide any. Schools are oversubscribed, with no plans to provide new ones. The infrastructure is overwhelmed already.
- The Council is neglecting to recognise new ONS figures suggesting fewer houses are required.
- Disproportionate development in one, small area - seek alternative, smaller areas around the borough. Redevelop non-Green Belt land, renovate delapidated buildings and vacant properties. Use empty office buildings, and those that are no longer needed. Lack of recognition of alternative sites.
- Flaws in consultation: coincided with a by-election and run-up to Christmas. Timeframe was too short. Too little time to digest gravity of the plans - the consultation period should be extended.

For the Council to build houses on the flood plain, and steal remaining pockets of Green Belt, amounts to a failure in its duty of care. Please draw on knowledge of those who have lived in the area and witness firsthand the detrimental effects expansion has had.

Contributor Proposed Modification: Seek alternative sites for development, and retain Byfleet's Green Belt.

Modification Reference: U0000329

Officer Response: It is acknowledged that residents of Byfleet wish to preserve the identity and character of the village, and that they greatly value the Green Belt. The many benefits of the Green Belt are recognised. Section 4 of the Council Regulation 19 Issues and Matters Topic Paper sets out the Council's views on how the reduction of Green Belt land may affect the wellbeing and amenity of residents, and Sections 1 and 2 set out how the Council believes exceptional circumstances exist for its release; and how the overall

integrity and function of the Green Belt will be maintained. Section 21 describes how the Council believes future development will not lead to urban sprawl. Section 3 sets out the need to release Green Belt to meet the accommodation needs of Travellers.

Concerns about flooding are addressed in Section 7 of the Topic Paper. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements.

Section 15 of the Topic Paper responds to concerns about the ownership of the land at site GB5 by the Church.

Concerns regarding congestion are addressed in Section 13, and air pollution in Section 8 of the Topic Paper.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

The overall goal in plan-making, both locally and at a national level, is to achieve sustainable development. The adopted Core Strategy recognises the challenge between identifying sufficient land that is available and suitable in sustainable locations to meet all types of housing need, without compromising the character of the area, including its green spaces. The Council has included a number of key requirements under each site allocation policy to ensure that development makes a positive contribution to biodiversity and green infrastructure. This is explained in more detail in Section 19 of the Topic Paper. Paragraph 1.5 of the Topic Paper gives clarity on how the latest housing need figures would not affect the Borough's housing requirement. In February 2019, the Government confirmed that the 2016-based household projections should not be used to calculate housing need.

In response to comments about concentrating development in one small area, Section 11 describes how alternative sites across the Borough were assessed, and Section 5 responds to concerns about a disproportionate reduction of Green Belt in West Byfleet and Byfleet area. Section 22 outlines how the Council has considered empty offices and industrial buildings.

Comments regarding the consultation process have been responded to in Section 9 of the Topic Paper.

Officers did not intend to appear to deliberately dump future development in the village of Byfleet. Officers assessed hundreds of sites around the Borough, many of which were subject to absolute development constraints such as being situated in Flood Zone 1 or were in or affected by environmentally designated sites, for example. The Green Belt Boundary Review assessed a wide range of sites across the Borough to measure their contribution to the purposes of the Green Belt, their sustainability, their landscape sensitivity and the degree to which they were subject to environmental constraints. The

Council has made its judgements on the allocation and safeguarding sites based on a wide range of evidence. This is set out in detail in Section 10 of the Topic Paper.
Response Reference: U0001217
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06362/1
Name: Ms Elaine McGinty
Number of Signatories: 1
Comment Type: COMM
Site Reference: UA15
<p>Summary of Comment: Site UA15, The DPD is legally compliant and would like to be informed of the next stages.</p> <p>We are currently in site UA15 until March 2020 operating as Fiery Bird Live Music & Community Arts Venue - this site has been allocated for Leisure and Community Use in the Site Allocation document.</p> <p>In 2014 our petition was accepted by Full Council but there was no space at the time, now is the opportunity to make that part of the new town centre that will provide a vibrant cultural offer to attract new residents in to the new town centre who have been used to such a venue in previous place (woking is unique in not having a single live music venue), contribution to the local night time economy as they spend at restaurants and bars before and after our events, reduce anti social behaviour in the town by offering an alternative social opportunity , bring a wider mix of patrons of all ages, it can fulfil the role of a higher education/placement location working with local colleges , it will be something started and run by the community to reflect our diverse, unique town and it's community, host wellbeing activities and continue to offer affordable workshops to enable all to take part in creative activities, learn music and gain confidence</p> <p>Would like to be re-sited in Woking Town Centre post 2020 as we fulfil many objectives that are set out in the 2027 Core Strategy document and operate our objectives for the benefit of Woking - socially, culturally, economically and educationally. We are also now instrumental in promoting and assisting community led businesses across the UK. We have negotiated with several sources of funding which would lift the revenue burden off the Borough.</p> <p>In addition the following comments summarised from our volunteers we ask to be considered</p> <p>The Phoenix Culture Centre in Woking (& Fiery Bird) needs to be relocated A Cultural home to celebrate and nurture our town's wonderful diversity After 8 years of negotiating, in May 2018, the Phoenix Culture Centre moved from a shopfront on Goldsworth Road to the Quake site next to HG Wells, formerly part of the Big Apple Complex.</p> <p>Basically,</p> <ul style="list-style-type: none"> o By 2027 many buildings will be demolished and new ones put up o The new developments must comply with objectives and frameworks outlined in the consultation documents. o Music is not mentioned in them at all. o If you fill in the consultation form, Woking Borough Council will hear not just the large developer's wishes, but the community here. o Further education: music or skills workshops, apprenticeships in light and sound (training of community members who are now proficient to run events already underway)

<p>o Health: mental health for all ages from a community space - helping social isolation through a grant funded guitar lessons, wellness day, women's disco, dry nightclub or open mic night.</p> <p>o Social and Community infrastructure: flexible and appropriate events to improve quality of life for all age groups such as hosting community business leaders programmes, RSA talks, the Moth,</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Site Allocation DPD does not deal with individual companies but focusses mainly on uses. The Big apple includes community uses. The Fiery Bird can negotiate with the owners to occupy that allocation.
Response Reference: U0001103
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05492/1
Name: Dr M A McHarg-Parry
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Over 1000 new homes and 15 Traveller pitches will overwhelm West Byfleet's infrastructure, including medical services, roads (A245 - already at a standstill) which is also a risk to the progress of emergency vehicles. Infrastructure should be addressed prior to house-building.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The concerns raised in the representation have been comprehensively addressed in Sections 6 and 13 of the Council's Regulation 19 Issues and Matters Topic Paper. As set out in policy CS16 of the Core Strategy, the Council will ensure an effective integration of proposed development and the infrastructure to support it. In this regard, it will be necessary in some cases to require developers to put in place the necessary infrastructure before development commences. Development will be required if necessary to enable the timely delivery of infrastructure to ensure that the infrastructure provision is not lagging behind the development. Detailed decisions about this will be determined on the merits of individual schemes through the development management process, rather than through Site Allocations DPD policy. However, policy GB10 for West Hall reinforces infrastructure needs by including a number of key requirements. One such requirement is that the developer contribute to the provision of essential transport infrastructure related to the mitigation of the impacts of the development of the site, in addition to the relevant Community Infrastructure Levy (CIL) contribution. The exact nature of the site specific requirements will be identified through the development management process at planning application stage.
Response Reference: U0001101
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05492/2

Name: Dr M A McHarg-Parry
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Objects to development of GB10. Concerns regarding inadequate road infrastructure (Parvis Road). It is already congested, carrying twice its designed traffic load, which makes it difficult for emergency vehicles to move. Attended a meeting held on 3rd December, but did not receive clear answers to questions. Contention regarding number of houses needed to be built and where they should be built. Questions regarding how much land traveller sites would occupy. Concerns regarding strain on services. Proposal is contrary to green development principles published on 2nd December 2018.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet. Section 3 addresses concerns regarding traveller pitches. The size and location of the traveller site within GB10 is yet to be determined as part of either the development management process or masterplan of the site. However, the requirement is very clear that the site should enable the delivery of 15 pitches. There should always be space to provide for amenities as well as other facilities to serve the needs for the development. In Appendix G of the Green Belt Boundary Review there are design templates for example sites, and it is suggested that a 5 pitch public site would occupy 0.72 acres and a 1-2 pitch private site would occupy 0.14 acres. Section 6 addresses the issue regarding the adequacy of infrastructure. Section 8 addresses the issue regarding increased pollution. To address the comment regarding Michael Gove's greener development proposals, the Council, through the Site Allocations and other projects is seeking to improve the environmental quality and accessibility of remaining Green Belt land. Land has been allocated for green infrastructure and SANGs, which will enhance the remaining land for people's enjoyment. Some of the SANGs, such as Westfield Common, are being used to pilot the conservation of Great crested newts which will contribute to a significant improvement of the environmental quality of the area. Furthermore, the DPD sets out in the Key Requirements for GB10 (West Hall) that any scheme which comes forward for the site should retain large areas of woodland and parkland setting and strengthen where possible, and it also requires development to integrate a substantial amount of green infrastructure.
Response Reference: U0001464
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06538/1
Name: McKay Securities PLC
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA15
Summary of Comment: The DPD is not legally compliant, nor compliant with the Duty to Cooperate. It is unsound.

Generally supportive of redeveloping the site, but objects to policy UA15 as it is not positively prepared or flexible enough.

Seeks changes to the policy to reflect events since Regulation 18 stage: changes in the property market; planning history on the site (e.g. Rat and Parrot 2017/0802) and nearby; ongoing discussion with landowners regarding redevelopment of the Big apple and HG Wells Conference Centre (e.g. PREAPO/2017/0059). The Rat and Parrot permission would deliver the entire allocation for 67 dwellings, without any of the wider policy requirements. Done in this piecemeal way, the allocation of the wider site is superfluous as the prospects of delivering a comprehensive scheme across the wider site are negligible.

It will now be exceptionally difficult to deliver the many requirements of the draft allocation - it is not effective. The site needs to be broken down to separate the land in McKay's ownership (including Crown House) from the rest of the allocation. The only viable redevelopment option will involve high density housing. This must be reflected in the policy or redevelopment of the site will be blighted. Preliminary studies indicate that the portion of the site owned by McKay can support circa 400 dwellings. This will be a crucial element of any redevelopment of the site to ensure scheme viability and optimise contributions toward strategic redevelopment objectives of the Town Centre. For the policy to be effective, the proposed number of dwellings should be amended to at least 400 dwellings.

Delivery of affordable housing is unviable - as demonstrated by recent planning applications in the town centre - and reference to a 50% affordable housing provision on-site should be amended to reflect viability. The allocation should recognise that, if viable, an off-site contribution to affordable housing in the form of family homes (to meet most pressing needs) would be preferable.

The requirement for re-provision of the conference facility is not sound. The Doubletree Hotel and Conference Facility was permitted as part of Victoria Square. There is no objectively assessed need for a standalone conference facility; there is no prospect of this being delivered if the redevelopment of this underutilised site is to be successful and viable.

There is potential for this site to be a landmark/gateway site - high density development should take advantage of the opportunity to increase heights. Tall buildings can support the efficient use of land.

The supporting text leads to uncertainty and is therefore not effective: "there is potential for the site to also include Crown House". Reference to buildings outside the allocation reduces deliverability. Crown House is in McKay's ownership, and should be included within the allocation.

A significant number of policy requirements within UA15 are generic and unnecessarily repetitive. This is not in accordance with NPPF para 16(f) which requires plans to serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. Elements of the policy duplicated elsewhere should be deleted. A revised policy has been provided which would make Policy UA15 sound.

Due to the significance of the Site and its strategic importance, the landowner should be given opportunity to participate at examination hearings. The Site has the ability to provide a significant contribution towards the LPA housing targets. Participation at hearing sessions will give client the ability to engage in discussions on the complexity of the sites requirements.

Contributor Proposed Modification: Policy UA15 should be amended to reflect the only viable redevelopment option for the site: high density housing with some appropriate town centre uses at ground floor to address the street scene.

Regulation 19 version should reflect permission granted for the Rat and Parrot portion of the site (PLAN/2017/0802) and ongoing discussions regarding redevelopment of the site (PREAPP/2017/0059).

The site needs to be broken down to separate the land in McKay's ownership, which includes Crown House, from the rest of the allocation.

Amend the policy to refer to affordable housing requirements being subject to viability. If it is viable to contribute to affordable housing, the allocation should recognise that a contribution towards off-site family housing is the most appropriate option.

Reference to re-provision of the conference facility should be removed.

In order to support the efficient use of land, policy UA15 should recognise the gateway potential of the site; it should effectively reflect the need to make the best use of the site through tall buildings / opportunities to increase heights.

Crown House is in McKay's ownership and it should be included within the allocation that converts McKay's ownership. Amend references in the supporting text to buildings outside the allocation.

The allocation and policy must be amended to increase the proposed number of residential dwellings on this site to at least 400 dwellings.

Amend the policy as per document provided. This includes:

- removing reference to "the former Rat and Parrot PH, 48-58 Chertsey Road, GU21 5AJ" from the title.

- Amend first paragraph to: "This site is appropriate for a residential-led, mixed use scheme including community, leisure, offices, retailing".

- Amend second paragraph to: "To achieve this, the development should address the following key requirements..."

- Delete "Re-provision of the existing conference facility is a prerequisite of redevelopment of this site".

- Insert "If necessary" before "a contribution towards Strategy Access Management and Monitoring..."

- Insert "If viable, a contribution" towards Affordable Housing provision. Insert "Given the location of the site in the heart of the town centre, if a contribution is required, it can be in the form of a contribution towards off-site provision". Delete "in accordance with Policy CS12..."

- Delete "in accordance with the adopted car and cycle parking standards....".

- Amend building heights to read: "Building heights should reflect the need to make best use of this key gateway site. An application should be accompanied by a view management assessment to ensure that the potential of the site is optimised, whilst respecting local and longer distance views and an assessment of the impact of the development on the micro-climate in terms of wind, overshadowing and glare".

- Delete "the development should consider local and long distance views of the development".

- Amend "protect and enhance" to "preserve" the character of the adjacent Town Centre Conservation Area (delete "its setting") and nearby locally listed buildings.

- Delete "Building footprints....". Insert "The proposals should seek to improve the site's permeability".

- In Density paragraph, delete "without compromising the general character of the area".

- Delete the paragraph relating to trees (there are no trees of amenity value on the site).

- Delete "Buildings should be designed to be adaptable...." sentence. Retain "Lifetime homes will be encouraged....".

The reasoned justification should be redrafted in conjunction with McKay to reflect the reworded policy and the potential of the site to deliver a significant number (at least 400) of much needed new homes that can act as a catalyst for the regeneration of the east of Woking town centre.

It is expected that the site would come forward for development "early" in the Plan period.

Delete comments about land assembly; potential to include Crown House; 48 and 50/52 Chertsey Road known to be available; some units are vacant; landowners have been contacted.

Reference should be made to up-to-date and relevant evidence, including evidence submitted in support of applications elsewhere in the town centre.

A revised site plan has been submitted.

Modification Reference: U0000360

Officer Response: The purpose of the Site Allocations DPD is to identify a sufficient range of sites to enable the delivery of the requirements of the Core Strategy. The Council believes that Policy UA15 will make a meaningful contribution towards this objective. Policy UA15 allows scope for the comprehensive redevelopment of the site to maximise its effective use and would be encouraged as a preferred goal to achieve. The Council however accepts that the Rat and Parrot site has got the benefit of planning approval and could be developed separately on its merits, but it is also important to recognise that it is yet to be implemented and a such any effort to bring forward a comprehensive redevelopment of the area should not be abandoned as a matter of principle. If part of the allocation such as the Rat and Parrot site is to come forward as standalone development, the Council would not object to that in principle but would seek to ensure that the development of any part of the allocation does not compromise or undermine the effective delivery of the other parts. The same principle would apply to the development of the part of the site in the ownership of McKay.

The anticipated capacity for the site is indicative and has been calculated using a consistent methodology. The Core Strategy is clear to emphasise that actual capacity can only be confirmed when an acceptable schemes is considered through the development management process. It would be unacceptable to therefore set a minimum capacity of 400 dwellings on the site at this stage.

Although the UA15 policy does not state that a high density scheme including tall buildings is desired for the site, there is in principle support for such schemes if it is appropriate for the context and is of high quality design. The Core Strategy identifies the Town Centre as a location where tall buildings can be delivered, and this will be encouraged, provided that developments of this nature enhance the setting and are not detrimental to the character and appearance of nearby areas. It is stressed that gateway developments do not necessarily have to be tall buildings, similarly high density development does not always have to be tall buildings. Gateway developments are well designed developments that are exemplar within their surrounding contexts, stating the significance of their locations.

Policy CS12 of the Core Strategy sets out the Council's affordable housing policy. It is unacceptable to rule out the provision of affordable housing in principle as part of the redevelopment of the site. Policy CS12 is clear that all new residential development on Greenfield land and land in public ownership will be required to provide 50% of the dwellings as affordable housing, irrespective of the site size or number of dwellings proposed. On sites where the Council is seeking a 50% affordable housing contribution, generally, the Council's preference will be to provide all the 50% affordable housing in-situ as part of the development. However, one of its over-riding objectives is to ensure an effective distribution of affordable housing across the Borough. In this regard, it is prepared to negotiate for a percentage of the 50% target to be provided offsite if that will ensure a more effective distribution of affordable housing across the Borough. The actual level of off-site provision will be determined on the merits of individual schemes that will come forward. As a guide, the Council will seek to ensure that 40% of the provision is secured in-situ.

Policy CS12 allows scope for an applicant to make a case based on evidence of viability if it is felt that the development of the proposed is unique to the extent that the requirements of Policy CS12 cannot be met. However, this can only be determined at the development management stage based on the specific merits of the scheme that would come forward for determination.

Planning legislation requires development to be determined in accordance with the development plan for the area, unless other material considerations demonstrate otherwise. The key requirements set out to make development acceptable are necessary to ensure a policy compliant scheme. It is up to an applicant at the development management stage to demonstrate why the policy requirements should be set aside for any scheme that comes forward.

There is an existing conference facility on the site that continues to perform a significant function to the economic vitality of the Town Centre and the Borough as a whole. It is

therefore defensible that the allocation is seeking the re-provision of this facility, and should be retained as a requirement. The Surrey Hotels Futures Study - Final Report (2015) provides sufficient evidence of need for hotels and conference facilities in Surrey and Woking in particular. This study can be accessed on the County Council's website by this link: https://www.surreycc.gov.uk/land-planning-and-development/development/economic-development/surrey-hotel-futures-study-2015 . Up to date evidence of market signals on need will be taken into account in the consideration of any scheme that comes forward.
Response Reference: U0001753
Officer Proposed Modification: No modifications necessary.
Wishes to Attend Examination (T = Tick): T
Contributor Reference: 06564/1
Name: Mr Jonathan McKenna
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
Summary of Comment: Considers that the DPD is not legally compliant, is not sound and does not comply with the Duty to Cooperate. UA44 was not part of the consultation as described the LDS. The DPD has not been prepared in accordance with the Council's 'Statement of Community Involvement' as the site did not receive a public consultation. As it was not consulted on it is not legal or sound to include it in the current Site Allocations Proposals Map: 1. It needs to be consulted on; 2. It needs a full sustainability appraisal; 3. The SHLAA says that site SHLAAHOE001 "is suitable for 40 additional dwellings." This was not consulted on. Suggestions that the site has "excellent accessibility" are desktop studies and have no measured the actual distance to local shops and amenities on foot or by bike. 4. The site in the SHLAA is smaller than the site in the DPD and there is no evidence that the larger site is available for development. 5. The provision that "density of development should maximise the efficient use of the site without compromising the general character of the area" should be consulted on as many local people do not want maximised density on the site. Does not wish to participate at the public examination. Does wish to be informed when the DPD progresses to the next stages.
Contributor Proposed Modification: Remove site UA44 from DPD as it has not been consulted on and has no Sustainability Appraisal backing the entire site being added to the document.
Modification Reference: U0000235
Officer Response: The Council considers that it has taken a robust approach to the Regulation 19 consultation on the Site Allocations DPD, including site UA44. Section 9 of the Regulation 19 Issues and Matters Topic Paper outlines the approach in detail, and Paragraph 9.3 confirms that the Council has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. It is noted that site UA44 has been subject to an assessment as part of the Sustainability Appraisal under the reference SHLAAHOE001 (extended site). As set out in Paragraph 11.2 of the Regulation 19 Issues and Matters Topic Paper, the Sustainability Appraisal Framework used for the appraisal of alternative options is objective-led and has provided a consistent basis for describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations DPD. The report is on the Council's website and includes all the reasonable alternative sites that were appraised and why sites have either been selected or rejected.

<p>The indicative yield of the site is yet to be determined. This will be confirmed at the planning application stage, given that the main driver for the redevelopment of the site is the football stadium.</p> <p>The site is considered to have excellent accessibility based on a desktop study. The Council is confident in its approach to making such determinations, which are informed by distances to key services and facilities, including inter alia GPs, primary and secondary schools, employment and the town centre.</p> <p>The site in the SHLAA is smaller than the site in the DPD. However during the preparation of the DPD it became apparent subsequent to correspondence with the developer, that the site boundary could be expanded. The extended site was assessed as part of the Sustainability Appraisal, the framework for which is outlined above.</p> <p>The key requirement that "density of development should maximise the efficient use of the site without compromising the general character" is included within the Regulation 19 consultation document. Section 9 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has taken a robust approach to this consultation.</p> <p>UA44 is justified by evidence. It is not considered appropriate to remove it from the Site Allocations DPD.</p>
Response Reference: U0001327
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06908/1
Name: Mr And Mrs Walter McLaren
Number of Signatories: 2
Comment Type: OBJ
Site Reference: UA36
Summary of Comment: Considers the DPD to be legally compliant and complies with duty to cooperate. The building on site UA36 (7York Road) should continue to have planning consent for office and professional use. At present the building is let as offices to small businesses and start ups. It is almost fully occupied and provides excellent facilities on flexible terms at a reasonable rent. It is all very well building thousands of residential units but employment must also be provided for the residents. at present about 30 people are employed on the site.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: While it is recognised that the redevelopment of the site for residential use would result in a loss of office floorspace, the current office is not considered significant in contributing to the employment strategy of the Core Strategy. Consequently, Planning permission PLAN/2016/0834 has been granted and the Council will not object to that in principle and the Site Allocations DPD has been drafted to reflect this Planning permission.
Response Reference: U0001365
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06923/1
Name: Mr Bruce McLaren
Number of Signatories: 10
Comment Type: OBJ
Site Reference: UA36

<p>Summary of Comment: Wishes to participate at the public examination to explain that 7 York Road, an existing building at UA36, is very important for SMEs in the Borough. Wishes to be informed when the DPD progresses to the next stages. The respondent is one of the freehold owners of 7 York Road (part of UA36) and the submission is on behalf of himself and the tenants of the office, namely: CSE Ltd; Winser Surveyors; Groma Consulting; Clarus Wealth; Chronicle Software; Phillips Grant Associates; Mutuel Pay; Kesnet; and Dalziel. Principally objects to the claims that "the loss of B1A floorspace would be minor", and that the site is not considered to be "located in a strategic employment area." It is noted that there is little or no self-contained office accommodation in or around the town of the size at 7 York Road (250-950 sq feet per suite). Accommodation elsewhere is often modular/open plan, and not suited to small professional firms requiring quiet, enclosed and secure rooms. Some of the companies are start up SMEs and alternative cost-effective space is unavailable, especially with parking provision. The number of people employed at the site (30) is significant. The modest gain of housing units proposed (46) has to be considered against the inconvenience or worse for a number of SMEs and the removal of a vital asset for start-ups in the town. It is noted that the building has received considerable investment and improvements to make it fit for modern working. Given the loss of small size office accommodation at Elizabeth House, it is even more important that 7 York Road is retained. Regarding the strategic employment area, it is noted that UA35 Quadrant Court is directly opposite 7 York Road and is allocated for an additional 1000 sq feet of office floorspace. Presumably this is located in a strategic employment area. Within the adjacent New Central development, it is noted that there Orion Gate offices amount to 50,000 sq feet. Presumably these are also located in a strategic employment area. Finally the building is sympathetic to the York Road street scene.</p>
<p>Contributor Proposed Modification: 7 York Road should continue in its current usage as that would bring more economic benefit to the town than a modest number of apartments.</p>
<p>Modification Reference: U0000347</p>
<p>Officer Response: Site UA36 has been assessed as part of the SHLAA (2017) and found to be developable within 6-10 years. While it is recognised that the redevelopment of the site for residential use would result in a loss of office floorspace, in the broader context of the Council's spatial strategy this is considered to be relatively minor. As set out in the Employment Floorspace Topic Paper (October 2018), the Council is confident that it can meet its development requirements for employment uses, and carry forward the economic objectives of the Core Strategy. It is noted that the Employment Areas are included on the Council's Proposals Map, which was published in October 2016 alongside the adoption of the Development Management Policies DPD, and is available on the Council's website. Regarding street scene, it is noted that the key requirements of Policy UA36 include inter alia that "development should directly address the street scene on the ground floor to add interest and vibrancy to the street and this corner position." It is not considered that UA36 should be removed from the Site Allocations DPD. As set out in Paragraph 1.4 of the Regulation 19 Issues and Matters Topic Paper, all the proposed sites will make a significant and meaningful contribution towards meeting the housing requirement. Not allocating any or all of the sites (or not having new sites to replace any site that is rejected) could undermine the overall delivery of the Core Strategy.</p>
<p>Response Reference: U0001485</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick): T</p>

Contributor Reference: 03027/2
Name: McLaren Technologies Group LTD
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: The DPD is legally compliant but not sound; not positively prepared, justified or consistent with national policy.</p> <p>There is a clear justification and benefit to the McLaren campus being removed from the Green Belt and allocated as a strategic employment site or, particularly, its being explicitly identified/allocated as a strategic employment site in the Green Belt. McLaren has undertaken a Green Belt boundary review to justify that the site can be released from the Green Belt for employment development without undermining its purposes.</p> <p>Describe McLaren as a company, its contribution to the local/regional/national economy and widening field of activities. Describe the McLaren campus and its development since the mid 1990s, various stages of which have demonstrated the existence of very special circumstances to justify Green Belt development. Given the above, there is a clear and demonstrable rationale for the campus to be formally recognised in the Local Plan.</p> <p>The very special circumstances relating to McLaren, which justified the original permission for the campus in 1996, still prevail and have grown stronger. McLaren has promoted the recognition of its site at each consultation stage on the SADPD. This would be the next logical step from the supportive approach WBC has taken to individual applications at the campus to date.</p> <p>The planning process required to justify development in the Green Belt (and the potential for Secretary of State call-in) creates significant uncertainty and risk around investment decisions on the campus. This hinders further growth, with wider economic implications for the town and region. A specific supportive policy (especially allocation) in the Local Plan would provide the certainty McLaren needs for long-term investment decisions.</p> <p>Cite examples of the Warner Bros site in Three Rivers District and Peterhouse Park in Cambridge (both removed from the Green Belt, the former on the advice of the Local Plan inspector).</p> <p>Note McLaren's proposals at SADPD Martyr's Lane consultation stage (2017), either for the whole campus (plus land east of the A320) to be a strategic employment site (inside the Green Belt or removed from it), or the land east of the A320 to become part of the Martyr's Lane safeguarding area while the campus west of the A320 is removed from the Green Belt and allocated as a strategic employment site. Note WBC's negative response to these proposals, given the policy context, the sensitivity of Green Belt and the compatibility of past developments by McLaren with standard Green Belt status.</p> <p>National and local policy supports the allocation of the campus, as per McLaren's 2017 representation. Cite NPPF paragraph 80; paragraph 81 sections (c) and (d); Woking Core Strategy objective of supporting the economy, Core Strategy paragraphs 5.130, 2.16 and 2.18 (identifying the manufacturing is under-represented), and policies CS1, CS15 and CS6. Policy CS6 allows for the allocation of 'Major Developed Sites in the Green Belt' where limited infilling/redevelopment can occur.</p> <p>The SADPD proposes to allocate several Green Belt sites. Allocation (and removal from Green Belt) does not remove the need for planning permission, only for special justifications for Green Belt development.</p> <p>Positively Prepared:</p> <p>The DPD is not positively prepared since it only provides for sufficient employment land to meet the Core Strategy requirement and does not respond to wider exceptional circumstances to further support economic growth. The Broadoaks allocation highlights the lack of high quality office/R&D facilities in the Borough, so there are extremely limited opportunities for McLaren to grow in Woking other than at the existing campus. The</p>

campus is an exceptional and unique circumstance, has never formed part of the overall assessment of employment need/provision in Woking, and is already significantly developed; its history demonstrates the continuing existence of very special circumstances. Its formal recognition would be a positive approach.

Justified:

The DPD is not justified. WBC's Green Belt Review does not provide justification to conclude that the campus is a sensitive location washed over by the Green Belt. The Council's studies have not appropriately assessed the site in terms of strategic and exceptional employment purposes. McLaren have commissioned an LVIA, which concluded that the areas surrounding existing development on site (plus an area in the parkland to the west) could accommodate further development; and a Green Belt review based on Peter Brett Associates' methodology, which found that WBC's review ruled out large parts of the campus without assessing them, since it was based on suitability for housing; and found that future development on the site would only have a moderate/less than moderate impact on one of the Green Belt purposes.

Brookwood Cemetery (site GB3) is allocated for future development, despite no landscape or Green Belt assessment supporting this policy. In this context WBC's refusal to allocate the McLaren site, which has several similarities with GB3, is not justified.

Consistent with National Policy:

The DPD is inconsistent with national policy, since it is not doing all it can to support sustainable economic growth.

Contributor Proposed Modification: Whilst McLaren strongly believes that there is justification for the allocation of the campus, it also recognises the council's position and concerns on a number of matters, particularly relating to McLaren's land immediately adjacent to the campus, east of the A320. As such, in order to address McLaren's concerns relating to the tests of soundness set out in Question 5, McLaren would support the removal of its campus from the Green Belt or allocation in line with that proposed for Brookwood Cemetery (draft policy GB3), recognising the site as either a Major Developed Site or a Strategic Employment Site in the Green Belt. Any policy for the campus would be able to set out clear development parameters and requirements for any future development. McLaren considers that this would overcome the council's key concerns, whilst also providing greater certainty for McLaren relating to future growth of the campus, and avoiding the need to continue to justify the presence of very special circumstance, along with the risks associated with Secretary of State referral.

McLaren accepts the council's position relating to the land east of the A320, in that its context and site history differ from that of the campus. Therefore, McLaren would be prepared to accept this land being excluded from any allocation. With regard to the campus itself, based on the clear and justified evidence presented in the landscape assessment and Green Belt Review, McLaren believes that any proposal should comprise the entire campus inclusive of the parkland, as it has been demonstrated that further development can be accommodated within this area without causing any significant harm to the surrounding landscape and visual character or to the Green Belt.

McLaren would very much welcome the opportunity to work proactively with the council to determine the allocation boundary and policy wording should the council be minded to review their position in respect to the campus.

Modification Reference: U0000355

Officer Response: Policies CS1 (A spatial strategy for Woking) and CS6 (Green Belt) of the Core Strategy directs the Council to undertake a Green Belt boundary review to make sure that any land that is removed from the Green Belt to meet future development needs does not undermine its purposes and overall integrity. The Council has carried out a Green Belt boundary review. One of the assessments carried out as part of the study is landscape sensitivity and capacity for change for various parcels of land within the Green Belt. The McLaren site falls within parcel 2 of the study. The report of the study concluded

that this area of the Green Belt is fine-grained landscape where it will be difficult to accommodate significant change without significant adverse effects on the landscape pattern and features. Removal of any of the land from the Green Belt would leave an area of development unconnected to the urban area. The report also highlighted that there are no clear well-defined features that may be used to secure an enduring alternative Green Belt boundary. The NPPF stresses the importance of having an enduring permanence of the Green Belt boundary. Another study carried out by Hankinson Duckett Associates on behalf of the Council came to a similar conclusion that the development of this part of parcel 2 would be too isolated to be standalone development. The area also makes a moderate contribution to the separation of Woodham and Ottershaw.

It is acknowledged that the focus of the Green Belt boundary review had been on the release of Green Belt land to meet future housing need. However, the characteristics and the sensitivity of the landscape to accommodate change would similarly apply to the employment use of the land. It is clear from the evidence that the release of the McLaren site from the Green Belt for employment purposes would lead to an isolated development within the Green Belt without any clear defensible boundary to ensure the enduring permanence of the Green Belt boundary. Consequently, the request to remove the land from the Green Belt for strategic employment use is unacceptable and should be resisted. It is noted that McLaren has provided a critique of the Council's Green Belt boundary review report and a landscape and visual impact appraisal of the campus. A critique of the Green Belt boundary review report in itself is not a substitute for a Green Belt boundary review. Neither of the two appraisals carried out by McLaren on their own or combination with each other are of sufficient weight and substance to override the recommendation not to release the land from the Green Belt for strategic employment use.

McLaren has also argued that the historic development of the site in combination with its planning history demonstrates that very special circumstances justification exists for the in-principle development of the site within the Green Belt, and that the special circumstances reason highlighted by the Secretary of State when granting planning application for the development of the site continues to prevail. In this regard, McLaren has requested that the campus should be identified as a strategic employment site within the Green Belt. The Council is acutely aware of the planning history of the site and the Secretary of State decision on the planning application, and as such there is no need to repeat that, except to highlight that very special circumstances justification for a proposal cannot be based on retrospective decisions however similar the proposals might be. The fact an application was granted permission within the Green Belt does not imply that another proposal should be automatically acceptable even in principle. Special circumstances justification requires each application to be determined based on their own individual merits. There is no doubt also that the Council has historically supported the expansion of McLaren operations at this location and continue to generally support the economic growth of the Borough. The Council working in partnership with McLaren has managed to achieve sustainable development of the campus by exercising strict control over details of any development proposal on the site to ensure that their impacts on this sensitive landscape and Green Belt functions are minimised. Apart from the landscape significance of the area, the campus also abuts the Thames Basis Heaths Special Protection Area (SPA) and is within the 400 metres zone of influence. No doubt, activities on the site have to be carefully managed to avoid harm to the nearby SPA.

A key issue identified in the Core Strategy (page 21) to address is how to deal with unallocated employment sites within the Green Belt without compromising its openness. In this specific instance, the Council believes that a careful balance can be struck by designating the campus as a major developed site within the Green Belt in accordance with the definition of Major Developed Sites within the Green Belt set out in the Core Strategy, whilst setting out specific key requirements to manage the development impacts of any proposal that might come forward. In practice, the proposed designation would mean that very special circumstances justification case would not have to be made for the in-principle use of the site for McLaren operations that meets all the requirement of the

proposed designation, including the definition of Major Developed Site within the Green Belt.

The tilted balance for this recommendation is the overriding economic significance of McLaren operations to the economy of Woking and the entire nation, and the need to allow some flexibility for their managed growth at this particular location. McLaren is a successful global brand and a significant contributor to the local and national economy. It is a leader in advanced applied technologies and is continuing to research and diversify. It will continue to play a significant role in the local economy.

The need for McLaren to be able to respond to fast changing technological advances and global competitiveness is evidently real. The proposed designation would allow McLaren to flexibly respond to those challenges but with much attention to addressing site specific development impacts to ensure that any expansion or changes in operations does not undermine the important landscape and ecological integrity within which the campus sits. The Council believes that the key requirements of the policy are not unduly burdensome to ensure the expansion on the campus and would expect them to be met.

The proposed policy for designating the campus as a Major Developed Site with the Green Belt is set out under proposed modifications. Consequential amendment is made to Policy SA1 to reflect this new policy. The proposed amendment to Policy SA1 is also set out under proposed modifications. It is likely that if the Inspector of the Secretary of State is minded to accept this new policy, it will be published as a main modification for consultation, and for comments to be taken into account before the DPD is adopted.

Response Reference: U0001746

Officer Proposed Modification: Policy SA1 should be modified by adding the following text: Land at McLaren campus is designated as a Major Developed Site within the Green Belt for strategic employment use in accordance with the definition of Major Developed Sites within the Green Belt as set out in the Core Strategy. This designation will allow limited infilling and redevelopment without compromising the integrity of the Green Belt. The designation is for the sole use of McLaren Group Limited for McLaren operation. The suitability of any proposed development will be measured against the key requirements of the designation, the requirements of the NPPF and the policies of the development plan for the area. The policy will take effect from the date of adoption of the DPD.

Introduce a new policy to Section B of the DPD as follows:

Policy GB13: McLaren Campus - Major Developed Site within the Green Belt

The McLaren Campus to the west of the A320 (excluding land in the ownership of McLaren to the east of A320) as defined by the Location Plan is designated as a Major Developed Site in the Green Belt for high quality office, research and development, laboratory facilities, high technology engineering and manufacturing uses. This designation is restricted for the specific and sole use by McLaren Group Limited and solely for operations undertaken by the Group and does not seek to change the existing uses of the site.

Limited infilling and redevelopment of the site in accordance with the requirements set out by the definition of Major Developed Sites in the Green Belt in the Glossary of the Core Strategy will be acceptable in principle without undermining the purposes and integrity of the Green Belt. Any proposal for the development of the site will be subject to a detailed planning application to be measured against the requirements of the NPPF and the policies of the development plan for the area. This policy will apply from the date of adoption of the DPD.

Prior to further development coming forward on the site, McLaren Group Limited will produce a Masterplan to be agreed by the Local Planning Authority. The Masterplan will set out a clear vision for future development of the campus with indicative locations of where the development would be located within the campus.

The development of the site must address the following key requirements:

- o The layout of development should seek to reduce to a minimum any perception of merging with Ottershaw and should not compromise the important contribution the site and its vicinity makes to the landscape setting of the northern part of Woking;
- o Development should be sensitively designed to preserve the existing high levels of visual screening from key vantage points, and specifically from the A320 and Horsell Common. Development should provide adequate and appropriate landscaping of its boundaries to minimise any adverse impacts on the visual amenity of the adjacent Green Belt. Development proposals should be accompanied by visual impact assessment to demonstrate that the overall integrity of the Green Belt and the surrounding landscape is not compromised;
- o Development should avoid harm to the environmental objectives of the Thames Basin Heaths Special Protection Areas (SPA). Early engagement with Natural England will be required to make sure that the overall integrity of the Thames Basin Heaths Special Protection Areas is preserved. Evidence of consultation with Natural England will be required as part of any planning application for the development of the site. Development should be screened to determine whether or not an Appropriate Assessment will be required;
- o Development should be of high quality design standards in accordance with Policy CS21 of the Core Strategy, and taking into account relevant requirements of Policy CS22 of the Core Strategy on sustainable construction;
- o Development will contribute to the provision of essential infrastructure related to the mitigation of the impacts of the development of the site in accordance with Section 6 of the Core Strategy. The nature of the site specific infrastructure requirements will be identified through the development management process and informed by relevant impact assessments such as a transport assessment to be carried out by the developer. In particular, development should include improvements to sustainable transport connectivity to the Town Centre by staff and visitors. Early engagement with Surrey County Council, Highway England and other relevant key stakeholders will be helpful;
- o No public parking will be permitted on the site. Parking provision on the site must serve staff and visitors of the campus. This is necessary to avoid harm to the integrity of the nearby SPA;
- o A robust travel plan with an in-built mechanism for monitoring its effectiveness and reviewing it will be required. Surrey County Council and Woking Borough Council should be consulted in the preparation of the plan;
- o Development should incorporate biodiversity improvements to achieve overall biodiversity net gain through the inclusion of wildlife corridors and features;
- o Design of development to have regard to nearby listed buildings and their setting, as set out in the Core Strategy Policy CS20: Heritage and conservation;
- o Flood risk from onsite and adjacent ordinary watercourses will be assessed and details submitted as part of the Flood Risk Assessment for any planning application, including any relevant mitigation measures to address existing and future risk of flooding (Policy CS9: Flooding and Water Management and NPPF). Early engagement with the Council's Drainage and Flood Risk Engineer will be required;
- o Development to meet relevant Sustainable Drainage Systems requirements at the time of planning application for the development of the site;
- o The Common Land situated within the site as defined on the Council's Local Development Documents' Proposals Map should be conserved;
- o Retain and enhance where possible public rights of way and accessibility to parkland. Any loss of existing publicly accessible parkland will have to be justified and re-provided on/off site. The Council's preference would be for any off-site re-provision to be in the form of physical provision. However, if it can be demonstrated that this cannot be achievable, the Council would accept a financial contribution equivalent to what would have been required to provide the facility on site, including the cost of land to provide an alternative facility elsewhere;

- o Historic contaminative uses may have led to soil and groundwater contamination that will need to be considered during any development of the site, dependant on detailed proposals and consultation with the Environmental Health section of the Council and the Environment Agency;
- o Development should take into account the potential of any versatile agricultural land within the site. The view of Natural England will be sought on this matter;
- o An assessment of potential noise and light pollution impacts of development to determine any measures of mitigation that may be necessary to minimise any potential adverse impacts;
- o Any other site specific and other requirements will be determined on a case by case basis depending on the nature of the scheme that would come forward.

Insert **Reasoned justification:** The McLaren Campus as defined by the Local Plan is designated as a Major Developed Site in the Green Belt to allow flexibility for McLaren Group Limited to respond effectively to changes in market signals. The McLaren Campus is situated at a sensitive location within the Green Belt. The parcel of land within which the site sits make a significant contribution to the overall purpose and integrity of the Green Belt. Removing the site from the Green Belt for employment use would lead to an isolated development within the Green Belt without any clear defensible boundary to ensure the enduring permanence of the Green Belt boundary. In this regard, it is expected that the site will continue to be washed over by the Green Belt.

Given the economic significance of the McLaren operations to the local and national economy, and the current planning status and history of the site, the site is designated as a Major Developed Site in the Green Belt in accordance with the definition of Major Developed Sites in the Green Belt as set out in the Glossary of the Core Strategy. This designation will enable the company to respond effectively to the fast changing technological advances and global competitiveness of the research and development, high technology engineering and manufacturing sector.

Whilst the designation would establish an in-principle use of the site by McLaren Group Limited for the specified uses as set out in the policy, detailed planning application will be required for development of the site. The Council will seek to make sure that the key requirements set out in the policy are met before a development proposal would be considered acceptable. This is necessary to ensure that a careful balance is struck between the need to protect the integrity of this sensitive part of the Green Belt and the ability of McLaren Group Limited to respond effectively to market signals.

Delivery arrangements:

- The land is in the ownership of McLaren Group Limited, and the designation is restricted for the sole use by McLaren Group Limited for McLaren operations.

Key evidence base:

- Green Belt boundary review;
- Thames Basin Heaths Special Protection Area Avoidance Strategy;
- Habitats Regulations Assessment;
- Sustainability Appraisal Report;
- Transport Assessment.

Insert Local Plan for this policy (Appendix C). Modify the Proposals Map to include the McLaren site as a Major Developed Site within the Green Belt.

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06457/1

Name: Mr David McQueen
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11, GB18
<p>Summary of Comment: DPD is not legally compliant or sound and does not comply with Duty to Cooperate.</p> <p>Concerns regarding increased traffic congestion.</p> <p>Parvis Road is heavily congested (mainly during the hours of 7.30am - 10.00am and 14.30 -19.00). The single carriageway road is inadequate. This issue is made worse when an incident occurs on the A3 or M25, as commuters and goods vehicles use it as a through route. Additional housing will exacerbate this issue.</p> <p>Concerns regarding increased noise and air pollution from extra traffic, including construction vehicles and service vehicles such as waste collection lorries and street cleaners.</p> <p>Concerns regarding inadequate health and educational infrastructure. Schools and GPs need to expand capacity to accommodate additional residents.</p> <p>Concerns regarding the development of flood plain on GB10.</p> <p>Concerns regarding ongoing redevelopment plans for West Byfleet.</p> <p>Previous proposals including a gas-fired electricity generating facility and a pub next to the infant and junior school have not been well received.</p> <p>With the exception of the Sheer House development, there has been little time and consideration given to other redevelopments.</p> <p>Lack of transparency from council to residents.</p> <p>Greater detail and consultation needed regarding traffic and infrastructure issues.</p> <p>Reassurance needed with regard to noise and air pollution, and also building on flood defences.</p> <p>Does not wish to participate in oral examination.</p>
<p>Contributor Proposed Modification: Greater detail and consultation needed regarding traffic and infrastructure issues.</p> <p>Reassurance needed with regard to noise and air pollution, and also building on flood defenses.</p>
Modification Reference: U0000391
<p>Officer Response: Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding adequacy of infrastructure. Section 13 specifically addresses road infrastructure. As stated in paragraph 13.3, the Council has also worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.</p> <p>Section 7 addresses the issue regarding flooding.</p> <p>Section 8 addresses the issue regarding pollution.</p> <p>Section 9 addresses the issue regarding the adequacy of the Regulation 19 consultation. The council has engaged with key stakeholders in preparation of the DPD, including those responsible for highways.</p> <p>Schemes such as the pub in the park and the electricity generating facility are beyond the remit of the DPD. However, at the development management stage, planning applications are carefully considered and will be subject to thorough analysis to ensure that schemes contribute positively to the setting in which they are situated.</p>
Response Reference: U0001388
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06637/1

Name: Ms Julie McQueen
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11, GB18
<p>Summary of Comment: DPD is not legally compliant or sound and does not comply with Duty to Cooperate.</p> <p>The removal of 50% of West Byfleet's Green Belt land is an unacceptable proportion compared to other developments in the Borough. This land should continue to be protected. Has there been sufficient research into alternative brownfield sites?</p> <p>A 50% increase in dwellings for West Byfleet is excessive, cannot be integrated into a densely populated area- no consideration for the impact on residents. What about other parts of the Borough?</p> <p>The roads are already struggling to cope with the volume of traffic, how will the Council ensure they cope with a massively increased load?</p> <p>The M25 and railway line are massive pollutants hemming the area in on two sides. Has the Council duly considered the legal requirements and thresholds for air and noise pollution with any future developments?</p> <p>Public services are already at breaking point, in particular the health centre and schools. How will the Council increase capacity to accommodate new residents with wide demographics?</p> <p>The area next to West Hall is an essential flood plain. The area dramatically flooded in 2000/01; how can the Council justify putting existing houses at risk by losing green belt?</p> <p>A disproportionate number of traveller sites are scheduled for Byfleet and West Byfleet. There should be no traveller sites on Green Belt land; this should be subject to legal challenge.</p> <p>Raise concerns over WBC's approach to recent planning applications in the area.</p> <p>Does not wish to participate in oral examination.</p>
<p>Contributor Proposed Modification: I believe WBC must allow time for a more detailed consultation and to listen to the very real concerns of the residents of the villages that will be affected by this new development. The impact on a number of issues - including potential flooding, traffic density, noise, air pollution and the pressure on other already stretched public services in the area (such as schools and the health centre) - could be catastrophic for the local community.</p>
Modification Reference: U0000449
<p>Officer Response: The concentration of development and Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p> <p>WBC's research into alternative brownfield sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p> <p>The impact on local infrastructure (including health and education) is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The impact on and effect of pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>Flood risk issues associated with the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The allocation of Traveller sites on Green Belt land, and the number proposed for the Byfleet and West Byfleet area, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p> <p>The adequacy of the Regulation 19 consultation is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 9.</p>

Response Reference: U0000980
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06825/1
Name: Fay Meadows
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is unsound. It is not an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy. Concerned about strain on infrastructure, including schools, nurseries, roads, healthcare facilities. Roads are already congested, schools are already under pressure, and it is difficult to get GP and dentist appointments. Building on Green Belt would not be characterful of the area. It would create urban sprawl. It should be protected for future generations to enjoy cleaner air and space.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: A comprehensive response is provided in the Council's Regulation 19 Issues and Matters Topic Paper. Section 6 provides a response regarding infrastructure, including schools, healthcare facilities and roads; section 13 concerns how congestion will be addressed; sections 4 and 5 provide a response concerning impacts of removing Green Belt on the wellbeing and amenity of residents and on overdevelopment; section 21 responds to concerns regarding urban sprawl. Section 1 provides a detailed response on the justification for releasing Green Belt land. It is acknowledged that residents of West Byfleet wish to preserve the identity and character of the area. Policies in the Development Plan, and key requirements within policy GB10, aim to preserve landscape character through good design. Any development proposal coming forward will need to comply with these policies to be found acceptable.
Response Reference: U0001501
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00197/5
Name: Ms Marianne Meinke
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA06, UA25, UA28, UA32, UA33, UA37, UA38
Summary of Comment: The responses received are unlikely to be representative of the town's population; many were from Green Belt locations with neighbourhood forums and people with time/campaigning skills, few from the town centre and edge of town areas e.g. Maybury, with a mixed community, including some people with English as a second language. The consultation and documents are confusing and complex; should have been simplified. The consultation was held at a time when most people are busy getting ready for Christmas, and simultaneous with several large planning applications people want to respond to. The website is hard to navigate and contains too much information. More hard copies should have been made available in more locations. Recent communication sessions were badly organised, and why was none offered in Maybury?

The proposals are not what was expected. Developments should be spread across all wards, including small Green Belt developments; this would reduce density in the town centre.

Little thought has been given to the appalling road infrastructure and little green space in the town centre. It is important that everyone can cross roads safely and reach common/open land where there is clean air. Concerned about the Maybury side of Horsell Common. Ask WBC to ensure common land is retained around the Lion Retail Park; why was a new building allowed on Green Belt at Britannia Wharf?

The roads through Horsell Common are increasingly busy and changes to Six Crossroads will increase traffic levels, congestion and add to pollution.

Pinch points on Maybury Hill and Oriental Road have been left out of the final version of the A320 report. The interim report showed those roads (plus Monument Road and College Road) are congested, they are also dangerous. Monument Bridge can be impassable, requiring long detours. The plans in the DPD will vastly increase traffic in this area. The density of a number of proposals in this area is too great and will bring more traffic. It is important to reduce vehicle speed and ensure pedestrian safety, and for planners to consider traffic and pedestrian safety when making planning decisions. Concerned over issues about a recent planning application. Parking restrictions by themselves are easy to breach.

Increasing pressure for parking spaces at Lion Retail Park, including from new developments nearby, merely moves traffic and pollution along the road, but does not reduce them. WBC should start monitoring particulate pollution.

People in Woking are tired of infrastructure works and temporary traffic lights. The proposals should be phased in more detail to avoid chaos, and test whether a project has actually worked before embarking on the next.

There are many other issues in the area, including flooding, overflowing drains, failure to cut back hedging, etc.

Site GB6: The Six Crossroads proposals disregard pinch points at the three roundabouts higher up Maybury Hill and in Oriental Road. This congestion will worsen with greater traffic flow from Six Crossroads roundabout. There should have been consultation on this.

Site UA28: The proposals will improve the look of the area, but bring in more traffic, making it harder to cross what are already congested and dangerous local roads.

Priority Place Maybury: This has the potential to be attractive and useful, but do consider pedestrians and traffic congestion as the site develops. It may worsen existing congestion and pollution, with businesses and HMOs in the area already creating unmet parking demand and parking on pavements. Density of buildings here should be low, with sufficient parking spaces.

Site UA25: Concerned that, with local discontent about this project, some of the housing projects could be shifted to Maybury.

Site UA32: This car park is virtually full on a daily basis; a large car park is needed here. 250 dwellings seems too much if there is to be the necessary easily accessible, safe, communal green space at ground level. Private gardens cannot be regarded as open space. Roof gardens are not the answer for most people. People need fresh air and places to sit, play or walk. There has been a worrying lack of open space over 20 years. Why can play areas not be built for all children? Woking Park has too many demands on its space and is too far from this area. Most people who can will drive to nice areas; the bus service is poor. The vehicles from 250 dwellings on this site will cause havoc; children walk to school along this road, but if it becomes more dangerous, parents will drive.

Site UA33: This proposal will add to traffic in Oriental Road, if not of cars then of taxis. The road has become very congested.

Site UA37/UA38 will further add to the traffic congestion referred to earlier.

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS

Officer Response: A number of the concerns raised are noted and are outside the scope of the Site Allocations DPD. They will be passed on to the appropriate persons or organisations for consideration.

The adequacy of the Regulation 19 consultation is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 9. Public drop-in sessions and presentations were organised in the Town Centre (considered to be accessible from Maybury) and also, at the invitation of local community groups, in Byfleet, West Byfleet and Mayford.

The Council continues to find ways to improve the presentation of the DPD, including its complexity, and the comments raised in this respect are noted. The challenge will always be balancing the requirements of what is a technical document with its user-friendliness. The purpose of the Site Allocations DPD is to allocate land to deliver the spatial vision, objectives and development requirements of the Core Strategy. Policy CS1 of the Core Strategy states that 'Woking Town Centre will be the primary focus of sustainable growth... In the town centre, well designed, high density developments that could include tall buildings and which enhances its image will be encouraged...'. Policy CS10 in the Core Strategy sets out indicative dwelling figures for different areas of the Borough, with 43.9% of these being in the Town Centre. This figure is very similar to the proportion of allocated dwellings in the Site Allocations DPD, which are on sites that fall substantially within the Town Centre (43.6%).

The impact of the proposals on road infrastructure and congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 13.

The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 8. Suggestion re. measuring particulate pollution passed to the relevant Council team.

The provision of, and improvement of access to, green space (including common land) and the public realm, is addressed in the Infrastructure Delivery Plan (2018), in particular under the headings 'Walking and Cycling Infrastructure (pp. 61-65)' and 'Green Infrastructure' (pp. 215-249). There is no common land around the Lion Retail Park; the nearest is Horsell Common, north of the canal. Issues relating to the principle of Green Belt development at Britannia Wharf are explained in the committee reports for recent applications on the site, PLAN/2015/1438 and PLAN/2016/1204, which can be found on the Council website.

The impact of the proposals on infrastructure more generally, including drains, is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 6.

The impact of the proposals on flood risk is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 7.

With regard to site UA25, rather than projects being shifted to Maybury, the number of dwellings on this site would be substantially increased if the revised application is approved.

With regard to site UA32, the policy requires no overall loss of parking serving the railway station as a result of development on this site; this could be through decked parking on the western car park. Private gardens do have a role to play in meeting requirements for amenity space, but in a high density development such as proposed for this site (at least 200dph), this is likely to be a minor role. See the Outlook and Amenity SPD for more details. Any proposal on this site would be subject to the requirements of policies CS17: Open space, green infrastructure, sport and recreation (which requires all proposals for net additional dwellings to contribute to the provision of open space and green infrastructure, including play areas), DM17: Public Realm, and the Outlook and Amenity SPD and any successor document.

Response Reference: U0001742

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):
Contributor Reference: 05580/1
Name: Mr William Menzel
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
<p>Summary of Comment: DPD is not legally compliant, nor is it positively prepared, justified, effective, consistent with national policy or sound.</p> <p>Concerns regarding the following:</p> <ul style="list-style-type: none"> - Distribution of affordable housing and traveller pitches. These need to be distributed evenly to allow people more choice of where to buy and visit. This will strengthen the soundness of the DPD; - Increased traffic congestion on Parvis Road and Old Woking Road. Issue has been raised before but plans have never addressed it; - Increased noise and air pollution from traffic; - Inadequate infrastructure; - Parking; - Safety issues. <p>Proposes that an air quality test be undertaken and infrastructure specialists plan either a road expansion, bus lane, or an overground in order to transport local residents before the population increases as a result of development. This will strengthen legal compliance. There are many changes occurring in the centre of West Byfleet, there is no support for plans that solely meet the needs of the Secretary of State.</p> <p>Wishes to participate in public examination for the following reasons:</p> <ul style="list-style-type: none"> -Previous meetings between the Council and West Byfleet have been ineffective -Councillors have not addressed the needs of local residents -Older issues raised have not been addressed -People are not against change as long as development is distributed evenly -Residents of Byfleet and West Byfleet need to be consulted before and throughout all local planning (Including via mail) <p>Wishes to be informed of next stages.</p>
Contributor Proposed Modification: Proposes that an air quality test be undertaken and infrastructure specialists plan either a road expansion, bus lane, or an overground in order to transport local residents before the population increases as a result of development. This will strengthen legal compliance.
Modification Reference: U0000387
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet and also covers the issue regarding distribution of development.</p> <p>Section 3 addresses the issue regarding traveller pitches.</p> <p>Section 6 addresses the issue regarding adequacy of infrastructure and section 13 specifically covers road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.</p> <p>The Development Management process would address impacts of any proposed scheme regarding site specific traffic, pollution, and general impacts on amenity and safety of existing residents. Transport and parking issues would also be considered in detail as part of determining any application that might come forward. The Council sets specific requirements within its Parking Standards Supplementary Planning Document and has a policy framework for car parking in Core Strategy policy CS18 on Transport. The policy</p>

aims to ensure development proposals provide appropriate infrastructure measures to mitigate any adverse effects of development traffic and other environmental and safety impacts. Transport Assessments will be required for development proposals to fully assess the impacts and identify appropriate mitigation measures. These will be required during any planning application stage should a scheme come forward. Section 8 addresses the issue regarding pollution.
Response Reference: U0001425
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 02172/2
Name: Ms Florence Mills
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: No objection to the proposed DPD, which does not show the sites formerly proposed as GB12 and GB13 (at Regulation 18 stage) being removed from the Green Belt and safeguarded.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06853/1
Name: Mr Ian Mills
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: The DPD is legally compliant, sound and complies with the Duty to Cooperate. The removal of the Regulation 18 sites GB12 and GB13 (in Pyrford) shows recognition of the large number of objections from residents, including about the road system and other infrastructure which is at or near capacity, the loss of agricultural fields and the harm this would cause to the neighbourhood's character. Support the DPD as presented, but would wish to appear at Examination in Public if changes are made affecting these fields.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06764/1

Name: Mr Colin Mitchell
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: The proposal will increase traffic congestion, noise and pollution beyond reasonable limits. There are safety issues for local school children. The proposal to move the football ground to this land would create gridlock on match days and parking would be a serious concern. Infrastructure can not cope, particularly the roads, utilities (water) and doctors. The Green Belt is a natural break between Woking and Mayford.
Contributor Proposed Modification:
Modification Reference:
Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Options Topic Paper sections 6 and 20. With regard to the management of parking and traffic on match days, this will be set out in the operators Travel Plan and Transport Assessment, as required by adopted Council policy, and dealt with through the Development Management process. A key requirement in Policy GB7 sets out that development must ensure appropriate and adequate provision of car and cycle parking in accordance with the adopted car and cycle parking standards.
Response Reference: U0001241
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06702/1
Name: Mr Jonathan Mole
Number of Signatories: 1
Comment Type: SUPP
Site Reference: GB07, GB08
Summary of Comment: The DPD is considered to be legally compliant, sound and compliant with the Duty to Cooperate. Owns land opposite sites GB7 and GB8 on Egley Road (SY204226). Considers the land to be no different, and therefore should be included in the DPD. Wishes to participate at Examination.
Contributor Proposed Modification: Include land reference SY204226 in the DPD. It is available for future housing. It is no different to land being developed on the opposite side of the road at GB7 and GB8.
Modification Reference: U0000331
Officer Response: The Council has set out a detailed response in Section 14 of the Regulation 19 Issues and Matters Topic Paper setting out why allocating more land in the Green Belt will be resisted. The site (referenced SY204226 by the Land Registry) is situated to the east of Egley Road, opposite Hoe Valley School (in proposal site GB7). It is subject to several absolute constraints, including being within a Site of Nature Conservation Importance, Green Belt, and Flood Zones 2 (majority of the site) and Zone 3 (eastern edge of the site). The majority of the site therefore fell within 'excluded land' from assessment in the Green Belt Boundary Review (GBBR), but the southern part of the site fell within Parcel 20. Whilst parts of parcel 20 were recommended for removal from the Green Belt, the promoted site was not identified by the GBBR as a proposed site for development or safeguarding. It is considered to be different to the identified sites opposite, due predominantly to its environmental constraints.

The site has also been assessed in the Sustainability Appraisal for the proposed use. The Council's view is that the site is not suitable for residential development. This is set out in detail in the Sustainability Appraisal.
Response Reference: U0001229
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06676/1
Name: Aine Montague
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Objects to the planning of 130 houses in Sanway, 100 houses behind the queens head, 15 traveller pitches and 500+ houses in west byfleet. Byfleet is already heavily traffic congested and the infrastructure does not support the additional houses in the area Both primary and secondary schools are full. A number of schools have already had to extend to cope with existing demand (SJB and St Dunstons to name but two) This is green belt land and strongly oppose this proposal.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Objection noted. Section 6 of the Regulation 19 Issues and Matters Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. Sections 1 and 2 of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough.
Response Reference: U0001151
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06529/1
Name: Miss Hollie Moore
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA15
Summary of Comment: The DPD is legally compliant and meets the DTC but is not sound, positively prepared, justified, effective or consistent with national policy.

The Phoenix Centre is Woking's only live music venue and a massive part of Woking's history and culture, and provides a safe space for youth to show their talents, keeping some away from rough sleeping and public drinking. When demolished it needs to be replaced with a new and modernised live music venue.
Contributor Proposed Modification: Please relocate the venue rather than leaving woking without any place for young people to review there talents in music
Modification Reference: U0000124
Officer Response: The allocation of UA15 does not deal with individual companies or operations, but focusses on uses. The allocation policy does require development to include community and leisure uses. This could include the provision for the retention of the Fiery Bird/Phoenix Centre. Recommend that the operators of this venue engage with the potential developers of the site to secure this retention.
Response Reference: U0001727
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06776/1
Name: Councillor Louise Morales
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA04, UA05, UA06, UA15, UA44
<p>Summary of Comment: 1. UA44 - remove site from plan. Or re-consult on the site with a full sustainability appraisal and evidence of inclusion in a SHLAA. Without this further consultation and evidence that the site is suitable for the proposed uses, it should not be included in the final plan.</p> <p>2. Designate Loop Road Recreation Ground as public open space on the proposals map.</p> <p>3. UA4, UA5, UA6 and UA15 - remove sites from plan, due to their historical importance and Victorian style that adds significantly to the urban environment. Further to request submitted at Reg 18 consultation, and ignored.</p> <p>The DPD has not met the requirement of the Duty to Cooperate. This is because UA44 Westfield site was included in the plan after the end of the Reg 18 consultation, so no other Council or local residents have had a chance to comment. The site has no validity in the final version of the plan.</p> <p>The DPD is not positively prepared, justified, effective, consistent with national policy and it is unsound, where it relates to town centre sites UA4, UA5, UA6 and UA15, as it ignores local and national policy on preserving conservation areas and historic buildings. UA44 is also totally unsound, as it is not in any SHLAA, not considered fully in the sustainability appraisal, which covers a different area of land closer to the town centre, and has had NO previous public consultation.</p> <p>Loop Road recreation ground being labelled a sports ground does not cover the range of other users of this public open space, who use it 90% of the time i.e. dog walking, children's play area etc.</p> <p>Proposes modifications to make the plan sound or to strengthen its soundness: remove sites UA4, UA5, UA6, UA15 and UA44 from the plan.</p> <p>Wishes to participate in the examination, because the respondent feels it necessary to explain the multiple reasons why UA44 is unsuitable to be included in the plan, as alluded to above. Feels that previous comments to the Reg 18 consultation were misread or interpreted to mean the opposite of what was written.</p> <p>Three supporting documents to the main e-form representation.</p>
Contributor Proposed Modification:
Modification Reference:

Officer Response: The DPD has evolved, and it is normal practice for new information or new sites to be added or taken out at subsequent stages. In this regard, although the proposed allocation UA44 was not included in the Regulation 18 version of the DPD, everyone including residents had the opportunity to comment on the allocation during the Regulation 19 consultation. There will be further opportunity for anyone who is not satisfied with the allocation to present their case to the Inspector at the DPD examination.

1. It is not justified to remove the site from the plan, and it is supported by the necessary evidence, as outlined in section 10 of the Council's Regulation 19 Issues and Matters Topic Paper. It should be clarified that the proposal put forward in the DPD is a site allocation, that sets out policy requirements for future development at the site as part of the Borough's Development Plan. It is not a 'final plan' for development, which will come forward in a planning application, through the Development Management process, the details of which will need to be consulted on further, in accordance with the Council's Statement of Community Involvement and relevant planning regulations.

2. Loop Road Recreation Ground is protected under Policy CS17 of the Core Strategy, which sets out a presumption against any development that involves the loss of a sport, recreation or play facility except where it can be demonstrated that there is an excess of provision, or where alternative facilities of equal or better quality will be provided as part of the development. As the Core Strategy sets requirements for open space and outdoor sports facilities, it will be at the point of the review of the Core Strategy that the Council's evidence in this regard will be reviewed and updated, and the Proposals Map updated where necessary. The information regarding uses of this open space is noted and will be investigated further at the relevant time.

3. Regarding UA4, UA5, UA6 and UA15, consideration of their historical significance is incorporated into key requirements of relevant policies, in terms of protecting and enhancing the relevant Conservation Area, listed buildings in the vicinity and their setting. Where relevant, specific details or assets for protection are referenced, for example the listed signal box that falls within UA4. At UA6 and UA15 policy key requirements state that redevelopment should take account of the setting of the adjacent Woking Town Centre conservation area (the latter wording is protect and enhance). In addition Core Strategy CS20 Heritage and conservation, and NPPF guidance applies to all development. Therefore it is considered that development can go forward in a way that is sensitive to heritage assets, and provide much needed development in highly accessible town centre locations. In this respect, the sites do not need to be removed from the plan.

Regarding the Duty to Cooperate, the Council has engaged with relevant neighbouring authorities, statutory consultees and key stakeholders before and during the consultation period. A Duty to Cooperate statement and a Consultation Statement will be published in due course as part of the submission documents to the Secretary of State to demonstrate the detail of this.

Sites that have appeared for the first time in the DPD at the Regulation 19 stage have been included due to evolving evidence during the DPD's preparation. The Woking Football Club site was put forward in response to the Regulation 18 consultation in 2015, and has been assessed as suitable for inclusion in the DPD through the Council's Strategic Housing Land Availability Assessment and Sustainability Appraisal. It is agreed that the site, as per the representation's attachments, was not included in the Regulation 18 consultation as it was not known about at that stage. This follows the correct process, in allowing sites put forward during consultation to be considered, assessed and included in the plan where appropriate, and consulted on at the next stage. The Regulation 19 consultation allowed residents and the Council to comment on the inclusion of the site. As mentioned above there will be a further opportunity to comment at or before the planning application stage.

Response Reference: U0001566

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06838/1
Name: Ana Moreira
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Object to release of most of the remaining Green Belt in Byfleet for housing/Traveller site.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1. The requirement to use Green Belt land to accommodate Traveller sites is addressed in Section 3. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in Section 5.
Response Reference: U0001495
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06510/2
Name: Mr Derek Morton
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: When the proposals map was adopted it was agreed with the Environment Agency that the proposals map should exclude areas at risk of flooding. Several severe floods have occurred in Byfleet in recent decades, new flood defences will be expensive and just move the problem elsewhere; climate change will make the problem worse. Road system in Byfleet can't cope with present traffic, adding construction and residential traffic will cause total gridlock and increase pollution. Local schools, hospitals, doctors and West Byfleet car park already struggle, will not cope with the increase in population. The apportionment to Byfleet is disproportionate considering it has the smallest area of Green Belt in the borough; should be preserved for the future.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: A significant number of issues raised in this representation have been addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Section 7 addresses flooding. In particular Paragraph 7.3 confirms that the Site Allocations is informed by an up-to-date Strategic Flood Risk Assessment (2015). A Sequential Test has been applied to determine the suitability of sites according to their susceptibility to flood risk. The Environment Agency had been consulted on the Sequential Test. Furthermore, Paragraph 7.7 confirms that the DPD takes due care to ensure that flood risk is minimised in Byfleet and West Byfleet. Paragraph 6.7, and Section 13 address transport infrastructure. In particular Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Regarding the redevelopment

<p>of Sheer House, it is noted that the extant planning outline planning permission would not result in a net loss of parking spaces.</p> <p>Section 8 addresses the due consideration which has been given to air and noise pollution during the preparation of the Site Allocations DPD.</p> <p>Paragraph 6.9 addresses education provision.</p> <p>Paragraph 6.12 addresses GP provision.</p> <p>Section 5, in particular Paragraph 5.3, addresses the loss of Green Belt in Byfleet. As noted in Paragraph 5.1, the Council recognises that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.</p> <p>In addition, Section 10 of the Draft Infrastructure Delivery Plan (2018) addresses hospital provision.</p>
Response Reference: U0000949
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06634/1
Name: Ms Lucia Mosko
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Object to West Hall proposals because:</p> <p>The site is Green Belt and it would be a shame to take this away from residents</p> <p>Infrastructure is already suffering, including schools and doctors, not sure how it could carry on with the new residents.</p> <p>Traffic is ridiculous, Parvis Road is difficult most of the day.</p> <p>The site should have safe highway access, adequate parking provision and turning areas.</p> <p>The site should have adequate amenity for intended occupiers, including space for related business activities</p> <p>The site should not have unacceptable impact on the visual amenity and character of the area</p> <p>The site should have adequate infrastructure and on-site utilities to service the number of pitches proposed.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The loss of amenity to residents arising from the removal of land from the Green Belt is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4.</p> <p>The impact of the proposals on infrastructure, including education and healthcare, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p> <p>Issues of highway access, parking and turning provision, amenity for occupiers and neighbours, impact on the character of the area, and the provision of on-site utilities, are dealt with by key requirements included in the site allocation policies, and also by the</p>

Borough-wide policies in the Core Strategy and Development Management DPDs. All these policies will be used in the determination of planning applications.
Response Reference: U0000981
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04061/1
Name: Mr David Moxey
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
Summary of Comment: Concerns regarding additional traveller pitches in West Byfleet and Byfleet, and associated impact on traffic (Parvis Road), local character, recreational spaces and local facilities.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 3 of the Regulation 19 Issues and Matters Topic Paper addresses concerns about development of traveller pitches taking place in Byfleet and West Byfleet. The Site Allocations DPD is informed by various Transport Assessments to assess the impact of the proposed developments and where mitigation would be needed. As stated in paragraph 13.3 of the Issues and Matters Topic Paper, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. It is not envisaged that the allocation of Traveller pitches at this location would have a detrimental impact on the character of the area if it is managed effectively. Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses concerns regarding lack of infrastructure, this includes impact on local facilities. The Council has robust policies to make sure that development makes appropriate contributions towards open space provision to serve the development. Policies CS17 and CS8 are examples of such policies.
Response Reference: U0000984
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06553/2
Name: Mr Andrew Murphy
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Objects to the DPD which is not considered to pass the tests of soundness on the following grounds: 1. The site currently allocated as Green Belt. The site is within the boundary of the West Byfleet Neighbourhood Plan 2017 which serves to maintain and enhance Green Belt land and green spaces, not develop them. 2. Inadequate arrangements to tackle existing or future traffic issues on the A245. Inadequate plans to address healthcare and school places provision.

<p>3. The Travellers' pitches are not considered in keeping with WBC policy on identifying suitable sites for Gypsies, Travellers and Travelling Showpeople as other urban sites have not been investigated and there are no special circumstances which warrant using Green Belt land.</p> <p>4. Noise pollution has not been given appropriate consideration.</p> <p>5. WBC has not focused on PDL in sustainable locations; this is a requirement which must be given due consideration before Green Belt land is allocated.</p> <p>Wishes to be updated on the progress of the DPD.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 1 addresses the justification for releasing Green Belt land for development to meet future development requirements of the Core Strategy.</p> <p>Section 16 addresses the compatibility of GB10 with the West Byfleet Neighbourhood Plan. Regarding open spaces, Paragraph 4.2 confirms that whilst there is a loss of open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents as set out in Core Strategy Policy CS17: Open Space, green infrastructure, sport and recreation.</p> <p>Paragraph 13 addresses transport. In particular, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. More generally, Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.</p> <p>Paragraph 6.9 addresses the consideration that has been given to education provision.</p> <p>Paragraph 6.12 addresses the consideration that has been given to GP provision.</p> <p>Section 3 confirms that the Council has followed a sequential approach to identifying suitable sites for Gypsies, Travellers and Travelling Showpeople. In particular, Paragraph 3.6 confirms that the Council is satisfied that there is a demonstrated lack of deliverable sites in the urban area to meet the identified need to provide a robust case on special circumstances to justify the use of Green Belt land.</p> <p>Paragraphs 8.6 to 8.10 address noise pollution.</p> <p>As set out in Paragraph 1.6, the Core Strategy directs most new development to previously developed land in the Town, District and Local Centres, which offers the best access to a range of services and facilities. The capacity of the urban area to accommodate further growth has been assessed through the SHLAA. The evidence continues to justify the principle established in the Core Strategy that land will be required to be released from the Green Belt to meet housing delivery between 2022 and 2027, and in particular, the need for family homes that could not be met by high density flatted units at the Town Centre.</p>
<p>Response Reference: U0001292</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06572/1</p>
<p>Name: Ms Lucy Murphy</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>

Summary of Comment: Objecting to the proposals in DPD, which affect West Byfleet considerably. Considers that the DPD does not pass the tests of soundness; in particular the DPD is not an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy. Reasons for this assertion are detailed below:

1. Green Belt Land. This site [GB10] is allocated as Green Belt land; it falls within the boundary of the West Byfleet Neighbourhood Development Plan (NPD) of which a key objective is to maintain, enhance and protect the distinctive and special character of West Byfleet. The NDP emphasises the protection of Green Belt land and green spaces; the DPD is contrary to this document and therefore not compliant with planning law as defined in NPPF paragraph 47.

2. Infrastructure including traffic. The site [GB10] is adjacent to Parvis road. There is no evidence of infrastructure planning to alleviate the current issue of the future issues with increased traffic of 1130 vehicles (based on an estimate of 2 cars per dwelling). The Infrastructure Report fails to make appropriate recommendations to address infrastructure requirements such as school places and healthcare for an increased population.

3. Noise and air pollution. Noise pollution has not been given appropriate consideration. NPPF paragraph 170(e) states that planning should prevent new development from contributing to or being put at unacceptable risk by unacceptable high levels of soil, air, water or noise pollution. Considering the site's proximity to the M25 and A245, future residential development is considered at risk from both noise and air pollution that would be difficult to mitigate, resulting in an allocation that is inconsistent with national policy.

4. Traveller pitches. The allocation of 15 traveller pitches at one site is considered inconsistent with the sequential approach to identifying suitable sites. A lack of urban area sites must be shown before considering special circumstances making necessary development in the Green Belt. The DPD does not take into account key considerations such as visual amenity, character, adequate infrastructure and on-site utilities to service the number of pitches proposed.

5. Other

a) WBC has not focused on PDL in sustainable locations as required.

b) The housing quantity of 550 is excessive and constitutes overdevelopment

c) The site [GB10] is subject to frequent and severe flooding; insufficient assessments appear to have been carried out

d) The site [GB10] does in fact perform the Green Belt functions of preventing urban sprawl, preventing the merging of neighbouring towns and safeguarding the countryside from encroachment.

Wishes to be informed when the DPD progresses to the next stages.

Contributor Proposed Modification: Due and proper consideration must be given to alternative sites.

Modification Reference: U0000232

Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper.

Section 1 addresses the justification for releasing Green Belt land for development to meet future development requirements of the Core Strategy.

Section 16 addresses the consistency of GB10 with the West Byfleet Neighbourhood Plan.

Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.

Section 13 addresses transport and congestion considerations in greater detail. In particular, Paragraph 13.3 provides that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

Section 6 addresses infrastructure provision generally. In particular, Paragraph 6.9 addresses education provision, and Paragraph 6.12 addresses GP provision. Section 8 addresses noise and air pollution. Section 3 confirms that the Council has taken a sequential approach to identifying suitable sites for traveller pitches. In particular, Paragraph 3.6 confirms that there is a demonstrated lack of deliverable sites in the urban area to meet the identified need to provide a robust case on special circumstances grounds to justify the use of Green Belt land to deliver Traveller pitches. Paragraph 3.10 also provides inter alia that key requirements for the proposed allocations will ensure that the siting, layout, and design of the site minimises any adverse impacts on the amenity of nearby residents and the landscape setting of the area. Furthermore Policy CS14 of the Core Strategy provides that the provision of adequate infrastructure and on-site utilities will be taken into consideration when determining the allocation of land for Gypsies, Travellers and Travelling Showpeople.

The Council has sought to direct most new development towards PDL in sustainable locations. As outlined in Paragraph 1.6, the Core Strategy directs most new development to previously developed land in the Town, District and Local Centres, which offers the best access to a range of services and facilities. The capacity of the urban area to accommodate further growth has been established through the SHLAA. The evidence continues to justify the principle established in the Core Strategy that land will be required to be released from the Green Belt to meet housing delivery between 2022 and 2027, and in particular, the need for family homes that could not be met by high density flatted units at the Town Centre.

It should be noted that the yield of 550 homes at GB10 is indicative. Nonetheless such a quantum of development on a site of this size would not be considered over-development, and would constitute a fairly modest density of 40 dwellings per hectare, in accordance with policy CS10 of the Core Strategy. This density figure only relates to the developable area of the site, and does not include the areas of existing woodland and new green infrastructure which are proposed to take up nearly half the site's total area. Furthermore Section 6 confirms that sufficient consideration has been given to the infrastructure provision necessary to support this development.

Section 7 addresses the proper assessment of the flood risk implications of the Site Allocations DPD. In particular, Paragraph 7.2 confirms that the advice of the NPPF has been carefully followed, and the Site Allocations DPD directs development to areas with the lowest probability of flooding from all sources. Furthermore the key requirements for GB10 provide inter alia that "The site is within Flood Zone 1 but features a number of existing drainage channels meaning there is a risk of flooding. The site is also adjacent to Flood Zones 2 and 3 whilst a principle aquifer is located within the site. Consideration of sustainable drainage and flood attenuation within the landscape are potential options. Early engagement with the Environment Agency is required. Flood Risk from onsite and adjacent ordinary watercourses will need to be assessed and details submitted as part of a Flood Risk Assessment with any planning application."

The proposal to release GB10 from the Green Belt has been informed by a credible methodology as set out in Section 12. In particular, Paragraph 12.2 confirms that the Green Belt Boundary Review is sufficiently robust to inform the DPD and to make sure that any land that is released from the Green Belt does not undermine its purpose. Furthermore as set out in Section 11, there has been a thorough assessment of reasonable alternative sites to inform the selection of preferred sites.

Response Reference: U0001282

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06678/1

Name: Miss Daphne Murray
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: No comment on legal compliance, no modification proposed, considers the DPD not positively prepared, not justified, not effective and has no comment if the DPD is consistent with national policy. Considers the DPD to be unsound. The definition of green belt land is that it is an area of open land on which building is restricted, this seems to have been completely ignored in these proposals. Impact on flora and fauna on the green belt land. The infra-structure will not cope with the extra demand on roads, doctors etc. There is only one road giving access to the south side of Byfleet Village (Parvis Road - A245) and at peak times it is already at a standstill and it is becoming increasingly difficult to get into or out of the south side of the village or to reach West Byfleet. Dismayed that WBC is even considering the Development Plan and strongly urge the Council to reconsider before it is too late and the villages of Byfleet, West Byfleet and Pyrford are lost for ever.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. In regards to the impact on fauna and flora see Section 19 of the Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.
Response Reference: U0001184
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06893/1
Name: National Grid
Number of Signatories: 1
Comment Type: COMM
Site Reference: GB04, GB05
Summary of Comment: Sites GB4 and GB5 are crossed by a National Grid high voltage electricity transmission overhead line. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed, including by changes to ground levels. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

<p>National Grid prefers buildings not to be built directly beneath its overhead lines. Land beneath and adjacent to the line should be used for a positive contribution to the development e.g. nature conservation, open space, landscaping areas or parking courts. See 'A Sense of Place' (National Grid/David Lock Associates) for more detailed guidelines. National Grid will only consider relocating overhead lines for projects of national importance.</p> <p>The detailed development of site options should take into account any High Pressure Major Accident Hazard Pipelines (MAHP).</p> <p>National Grid may have deeds of easement that restrict development or land use. Written permission will be required before any works commence within the easement, and a deed of consent is required to cross the easement. Recommend checking Land Registry first, then the National Grid if more information is needed.</p> <p>Maps of the transmission assets in relation to these sites are provided.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Sites GB4 and GB5 are only proposed for safeguarding without development at present, so it would not be appropriate to draft detailed site layout and design requirements, of the type that might determine the land use beneath and adjacent to the overhead lines on each of these sites. This constraint would be considered when the sites come to be allocated for development after 2027.</p>
<p>Response Reference: U0001662</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06392/2</p>
<p>Name: Natural England</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: COMM</p>
<p>Site Reference:</p>
<p>Summary of Comment: No further comments to make on DPD, beyond previous comments made 17 January 2017 regarding SANG provision. In summary, the representation supported the proposed mitigation measures in the form of financial contribution towards SANG and SAMM (or a bespoke SANG where necessary). Remaining comments specifically related to land to the east of Martyrs Lane, which is now excluded from the proposals in the DPD, which suggested increasing the hectareage of SANG per 1000 population to serve this large site.</p> <p>In section 5.5.4 of the HRA, it is stated that in combination effects of impacts on the Thames Basin Heaths will be looked at for sites within Woking Borough. It is felt that the mitigation for this in combination effect could be increased SANG capacity per 1000 population.</p> <p>Agree will point 6.3 in HRA - would welcome a full air quality report on any roads within 200m of a protected site which will experience increased traffic flow.</p>
<p>Contributor Proposed Modification: Mitigation for the in-combination effects from development in surrounding local authorities on European sites within Woking Borough could be increased SANG capacity per 1000 population.</p> <p>A full air quality report would be welcomed on any roads within 200m of a protected site which will experience increased traffic flow, as per recommendations in the HRA.</p>
<p>Modification Reference: U0000465</p>
<p>Officer Response: The site referred to in the 2017 representation is now excluded from the proposals in this latest draft DPD.</p> <p>The Council has already identified sufficient existing SANG land to mitigate the SPA impacts of residential development for around 11.1 years of the 15 year plan period up to</p>

2027, leaving a residual amount to be identified. Further SANG land has therefore been identified in the DPD to meet the shortfall in provision up to 2027. The potential SANG land being considered is significantly higher than the identified shortfall, therefore the Council is confident that the combination of the existing and new sites will ensure that there is sufficient SANG land to meet the projected growth within the borough up to 2027. This SANG infrastructure, together with infrastructure identified by surrounding local authorities through their Avoidance Strategies to protect the SPA from excess recreational pressure, led the HRA to conclude in Section 5.5.4 that no adverse effects on the integrity of European sites from Woking's Site Allocation DPD in combination with other plans and projects would be caused through this impact pathway. In addition to this, key requirements included within the Site Allocations DPD policies also require a contribution towards Community Infrastructure Levy towards SANG infrastructure provision, as well as a contribution towards Strategic Access Management and Monitoring. Section 6.3 of the HRA points to policy DM6 in the Development Management Policies DPD, which requires development proposals that are likely to affect the SPA or SAC through deteriorating air quality to carry out an assessment of the impacts, followed by avoidance and mitigation measures if necessary. The planning authority, in agreement with Natural England, follows the approach that development proposals which fall under the parameters in paragraph 4.15 of the reasoned justification of policy DM6 could potentially contribute to traffic emissions on roads within 200m of protected sites. These development proposals will need to submit a detailed air quality assessment and any necessary avoidance measures that would need to be implemented to make the development acceptable. It is reasonable to make this more explicit by including as a key requirement site specific air quality assessments where relevant.

Response Reference: U0001249

Officer Proposed Modification: In accordance with the Habitats Directive 1992, as interpreted into English and Welsh law by the Conservation of Habitats and Species Regulation 2010, it is reasonable to require as a key requirement site specific air quality assessments where the scale of development has the potential to cause traffic impacts to roads within 200m of European protected sites within Woking Borough. A key requirement should be added to relevant policies (UA4, UA5, UA13, UA25, UA32, UA34, GB7, GB10, GB11) as follows: 'Detailed Air Quality Assessment to determine potential impact of development on European protected sites through deteriorating air quality, taking account of in combination effects'.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06643/1

Name: Ms Patricia Van Nederveen

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Object to site GB10:

Parvis Road is already very congested and would not be able to cope with the proposals. Green Belt status of the site should continue.

Contributor Proposed Modification: I would like the Greenbelt status of the site to continue

Modification Reference: U0000291

Officer Response: The effect of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 13.

The justification for removing land from the Green Belt for development is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 1.

Response Reference: U0001135
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06598/1
Name: Network Rail
Number of Signatories: 1
Comment Type: COMM
Site Reference: GB03, GB07, UA04, UA07, UA27, UA32, UA34, UA40, UA41, UA43
Summary of Comment: These representations are made on behalf of Network Rail. Regarding UA7, Network Rail welcomes Woking's commitment to safeguarding of the site for essential infrastructure improvements, and looks forward to further collaboration with the Council to ensure successful delivery. Regarding UA34, Network Rail welcomes Woking's support for the redevelopment of the site, and the proposed allocation for residential uses. However, it is noted that in its current form the proposed allocation is incorrect and requires modification as it extends beyond the area Network Rail have allocated to a potential development scheme. At present, the proposed allocation boundary includes parts of railway infrastructure required for operational purposes and land which is located within a Supplemental Strategic Freight Site. The land and infrastructure is occupied and operated by rail freight user Day Group, Network Rail's tenant. Through discussions with the Day Group, Network Rail have confirmed that the site is safeguarded as a key freight location and Supplementary Strategic Freight Site and that Network Rail would only continue to support residential development that is brought forward as part of a masterplan that works with the existing freight users. It is noted that Network Rail has gone through the railway industry clearance process in relation to this site, and has been granted clearance for the blue area detailed in Figure 2. Network Rail support the proposed inclusion of third party land around Waverley Court to the south. This will assist in opening up a new access from Bradfield Close and provide a separation of operation/aggregates trucks and residential traffic. UA4, UA27, UA32, UA40, UA41, UA43, GB1, GB3 and GB7 are located adjacent to operational railway land and infrastructure. WBC and potential developers should consider Network Rail's standard guidelines and requirement when developing sites located adjacent to or in close proximity to Network Rail's land, assets and operational railway infrastructure.
Contributor Proposed Modification: Regarding UA34, Network Rail request that the allocation boundary is amended to reflect the blue line site boundary detailed within Figure 2 and the attached Network Rail - UA34 - Site Boundary Plan.

Modification Reference: U0000302
Officer Response: Support for UA7 is noted. It is noted that the site boundary currently includes parts of railway infrastructure required for operational purposes and land which is located within a Supplemental Freight Site. A modification is proposed accordingly. Appropriate consideration will be given to the relationship between sites UA4, UA27, UA32, UA41, UA43, GB3 and GB7 and adjacent railway land and infrastructure during the Development Management process.
Response Reference: U0001336
Officer Proposed Modification: On both the Proposals Map and site maps in the DPD, amend UA34 site boundary in accordance with the proposed boundary supplied with representation.
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05064/1

Name: Mr Roland Nevett
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Object to removal of GB10 from the Green Belt: the proposal is unsound and will result in unsustainable development; will significantly degrade the social, economic and environmental life of residents of nearby communities; and is contrary to the NPPF, West Byfleet Neighbourhood Plan and Woking core policies. The proposal is also inadequately researched, based on unreliable data, and unnecessary. GB10 performs all the Green Belt functions other than no. 4 (regarding historic towns). This defeats removal from the Green Belt.</p> <p>No exceptional circumstances have been demonstrated to justify changing the Green Belt boundary.</p> <p>The GB10 proposals, in combination with recent and permitted developments in the area, will completely overload local infrastructure and substantially reduce existing residents' quality of life. WBC assertions that the infrastructure can cope are totally unrealistic, compared with the existing situation. Much WBC decision making is based on responses by public bodies which bear little resemblance to what is happening in the real world- proposals therefore unsound. No significant improvements to infrastructure are planned, to cater for current lack of capacity, let alone for a 40% increase in population. No Green Belt land should be released without a workable plan to deal with additional demand. Parvis Road is already at capacity at peak times and, with the projected traffic increases in Government Road Traffic Forecasts, will become intolerable even without new housing. The walking distance to the nearest stations exceeds the recommended 800m. The bus service is totally inadequate with 30-60 minute intervals with no proposal to improve. West Byfleet Health Centre is at capacity with three week waits for appointments. Schools are at capacity and having to increase class sizes.</p> <p>No plans to cater for increased demand on public utilities.</p> <p>A disproportionate amount of Green Belt release is proposed for the north-east of the Borough, which is already under-provided with green space for sports and leisure. The format for making representations is opaque, over-complicated and not user-friendly; this will have deterred many concerned citizens from voicing their views. The online form is unfit for purpose. The consultation should be re-run in a manner that allows and encourages all residents to make their views known.</p>
Contributor Proposed Modification: This consultation should be rerun in a manner that allows and encourages all residents to make their views known.
Modification Reference: U0000306
<p>Officer Response: The Council considers the removal of GB10 from the Green Belt to be justified by very special circumstances, necessary and consistent with national policy. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1.</p> <p>The performance of the parcel including site GB10 against Green Belt purposes was assessed in the Green Belt Boundary Review (2015) and the site found suitable for removal from the Green Belt. The credibility and robustness of the Green Belt Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12.</p> <p>The impact of the proposals on local infrastructure, including healthcare and education, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of the proposals on amenity for local people is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 4.</p> <p>The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p>

<p>It is true that only part of the site is within standard walking distance of West Byfleet District Centre and the station. However this level of proximity to services is still better than that for most other sites considered through the Green Belt Boundary Review. In addition, only slightly over half the total area of the site is considered to be developable, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is likely to limit development on the areas of the site furthest from the District Centre. The key requirements in policy GB10 include to 'improve sustainable transport infrastructure including pedestrian and cycle links and bus services to West Byfleet District Centre'. It is therefore not considered that the residents would be car reliant.</p> <p>The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p> <p>The consultation methodology is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 9.</p>
Response Reference: U0001011
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06617/1
Name: Ms Fran Nevett
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Objects to proposals for housing allocations in West Byfleet, in particular the proposed development at West Hall in combination with the Broadoaks and Sheer House developments.</p> <p>The proposal conflicts with National and Local planning policy.</p> <p>The proposal will degrade quality of life and will be a social, economic and environmental disaster for the community.</p> <p>Concerns regarding inadequate infrastructure.</p> <p>No significant improvements to infrastructure have been planned to cope with additional development.</p> <p>Parvis road is already heavily congested.</p> <p>Trip times between the A3 junction with the A245 and West Byfleet Village (approximately 3.8 miles), exceed 30 minutes.</p> <p>Walking distances from proposed sites exceed recommended 800 metres journey to local train stations.</p> <p>Bus service is inadequate with 30 to 60 minute intervals and no proposal to improve.</p> <p>Traffic levels in the South East are projected in the Government's Road Traffic Forecasts 2015 and 2018 to grow by 21% to 53% up to 2050.</p> <p>Concerns regarding inadequate health and educational infrastructure.</p> <p>The proposal to release Green Belt land in West Byfleet lacks soundness.</p> <p>40% population increase is disproportionate, as there are alternative Green Belt sites throughout the borough which could be allocated.</p> <p>There is a lack of green space for sports and leisure.</p> <p>Further reasons to reject proposed release consist of the following;</p> <p>Unsustainable, inadequately researched, based on unreliable data, unnecessary.</p> <p>Does not wish to speak at oral examination.</p> <p>Wishes to be informed of all further developments.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS

<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt for development. Section 5 specifically addresses the loss of Green Belt in Byfleet and West Byfleet, in comparison to the potential of Green Belt sites in other areas of the borough. Conformity of the proposals with national policy is addressed throughout the Topic Paper as a whole.</p> <p>As stated in the GB10 policy, there is a Key Requirement for development of the site to include the creation of new/improvement of existing open space for leisure and recreation. Section 6 addresses the issue regarding adequacy of infrastructure. Section 13 specifically covers road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.</p> <p>The Green Belt boundary review has identified that the sites to be released from Green Belt land in West Byfleet have high sustainability credentials. One of the criteria for assessing the sustainability of sites is the strategic accessibility to railway stations, it was identified that the sites in West Byfleet are less than a kilometre away from the railway station, thus indicating a relatively sustainable distance.</p> <p>The Council is satisfied that its evidence base is adequately robust, comprehensive and able to withstand scrutiny.</p>
<p>Response Reference: U0001549</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 01212/2</p>
<p>Name: Mr Matt Newman</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: Objects to Development on GB10. The DPD does not pass the test of soundness. The DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy.</p> <p>The current land is listed as green belt and should remain as such. The neighbourhood plan was put in place to safeguard and maintain the unique character of West Byfleet. This proposal contradicts the core principals of the Neighbourhood Plan and will only serve to reduce the overall appeal of the area.</p> <p>Traffic on the A3 and West Byfleet between 3pm and 5pm demonstrates this road infrastructure and surrounding areas are not equipped to be able to cope with this increase of vehicles.</p> <p>Noise and Air Pollution, the site is sandwiched between m25 and a245 therefore it will be hard to ensure adequate noise and air pollution levels are reached.</p> <p>Surrounding areas are already being developed and this represents an excessive number of new properties when considering broad oaks and sheer house are already being pursued.</p>
<p>Contributor Proposed Modification: GB10 should remain in the Green belt.</p>
<p>Modification Reference: U0000402</p>
<p>Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>In regards to the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.</p>

<p>The effect of the proposals on traffic are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The impact of the proposed development on noise and air pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.</p>
Response Reference: U0001109
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00299/2
Name: Ms Debbie Nicholson
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Objects to the loss of Green Belt at GB10 which will effectively join Byfleet to West Byfleet/Pyrford.</p> <p>Notes that there is a plan to release the playing field in West Byfleet to allow for a pub. Considers that this would be contrary to public health objectives.</p> <p>Considers that Parvis Road is congested, without additional development. Received assurance that traffic lights would be changed to allow more flow along Parvis Road, however this would cause a greater knock-on impact on feeder roads. Congestion is a greater problem on the M25.</p> <p>The West Hall fields provide wildlife habitat. The path leading to the canal is of natural beauty and should not be developed.</p> <p>Asks whether the decrease in the Government's housing requirement has been taken into account.</p> <p>Notes that the field immediately adjacent to West Hall flooded due to rain.</p> <p>Considers that the trainline from West Byfleet to Waterloo is at capacity. Concerned that an increase in passengers will exacerbate the situation.</p> <p>Considers that the Health Centre at West Byfleet is at capacity; it can take three weeks to get an appointment, unless it is an emergency and this situation will worsen with additional population.</p> <p>The schools in the area are equally oversubscribed. Fullbrook cannot take any more students.</p> <p>Expresses concerns relating to Traveller pitches. Would prefer Traveller sites to be located in more rural areas. Expresses concerns relating to the feasibility of large Traveller sites.</p>

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The issues raised in this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 12 addresses the approach which has been taken to the release of Green Belt land. Paragraph 12.2 in particular provides that the Green Belt Boundary Review is considered sufficiently robust to inform the DPD and to make sure that any land that is released from the Green Belt does not undermine its purpose.</p> <p>The prospective development of a public house in West Byfleet is beyond the remit of the Site Allocations DPD. Nevertheless, the Council has published a news release stating that Marston's will no longer be pursuing the proposal for a pub at this location.</p>

Section 19 addresses the due consideration which has been given to biodiversity. In particular, Paragraph 19.1 confirms that during the preparation of the Site Allocations DPD, the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any issue that could not be addressed. In addition the key requirements for GB10 include inter alia that "any development here will need to include significant elements of Green Infrastructure, having regard to the landscape's particular sensitivity to change (GBBR, paragraph 3.5.12)"

Paragraph 6.7 addresses transport infrastructure, as does Section 13. In particular Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

Paragraph 1.5 confirms that the Council is taking the correct approach in continuing to plan for the housing requirement of 292 dwellings per annum as set out in the Core Strategy. Indeed Paragraph 14.1 confirms that the Core Strategy is up-to-date and therefore forms a legitimate strategic policy basis for the preparation of the Site Allocations DPD.

Section 7 addresses flooding and Paragraph 7.7 in particular confirms that due care has been taken to ensure that the risk of flooding in Byfleet and West Byfleet is minimised. Paragraph 6.4 confirms that the Council is working with Network Rail to deliver significant improvements to the rail network and other transport improvements in the vicinity of the station.

Paragraph 6.9 and 6.12 address education and GP services provision respectively. Section 3 outlines the approach which has been taken to allocate Traveller pitches in the most sustainable locations. In addition, it is advised that there are many example of sites with more than 15 pitches that continue to operate and manage very well.

Response Reference: U0000991

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 00700/2

Name: Mr Ian Nicholson

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Objects to the proposed development at West Hall. Does not believe that the site allocations proposal passes the required test of soundness required by para 35 of the National Planning Policy framework 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. The reasons for this are as follows:

Objects strongly to the green belt being taken for further housing in our overstretched village. This will effectively join West Byfleet to Byfleet, Pyrford and Woking with just the M25 providing a break.

Parvis Road is already overused and jammed during many times of the day, including off peak. Further up, passing Brooklands and onwards up towards the A3 is log jammed morning and afternoon. No change in traffic light operations will alleviate this amount of increased traffic. Air and noise pollution will be increased to an unacceptable level.

Local schools and the West Byfleet medical Centre are oversubscribed now as is St Peter's Hospital, as anyone will know who has had to go there for appointments/treatment. No mention of how this would be addressed was explained at any of the meetings attended.

Regarding traveller pitches. My understanding is that urban sites should be considered over any green belt sites. Any site will have, as others in the area do, 'an unacceptable impact on the visual amenity and character of the area'. This is an area of natural beauty, whether defined as such or not in a legal sense and one we want to preserve for future generations.

The fields regularly flood and many areas with surface water providing lakes for ducks.

Does not believe WBC have provided good enough reason to release this area from green belt.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in this corridor.

The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.

The concern regarding vulnerability of the sites to flooding is addressed in section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

Response Reference: U0001273

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06596/1

Name: Mr Simon Nicholson

Number of Signatories: 1

Comment Type: OBJ

Site Reference:
Summary of Comment: No comment on legal compliance Duty to cooperate has not been met. The DPD is not positively prepared, neither is it justified, effective nor consistent with national policy. The DPD is unsound. Wishes to participate in the public examination Does not wish to be informed when the DPD progresses to the next stage.
Contributor Proposed Modification: None stated
Modification Reference: U0000157
Officer Response: The Council considers that the DPD is sound. The Council considers that the DPD is justified, effective and consistent with national policy. Please see Section 10 of the Regulation 19 Issues and Matters topic paper regarding the evidence which supports the Site Allocations DPD. The Council considers that, in preparing the DPD, it has complied with the Duty to Cooperate. Please see Paragraph 9.3 of the Regulation 19 Issues and Matters Topic Paper in this regard.
Response Reference: U0000966
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06847/1
Name: Mr James Nicholson
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is unsound, not an appropriate strategy taking into account reasonable alternatives and based on proportionate evidence, and not consistent with national policy. Objects to site GB10: The site performs the Green Belt functions of preventing urban sprawl and preventing neighbouring towns from merging together; statements to the contrary are inaccurate. Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces; this would be undermined by the proposals. The site is covered by a minerals allocation, in a minerals plan running to 2026. This will make the site unattractive to developers, so its deliverability is questioned. Residents would be car reliant: the site is over 1km from West Byfleet railway station with significant upgrading needed to the route. Question the ability of the heavily congested Parvis Road to cope with additional traffic. There would be a severe impact on an already overcrowded railway service to London. The Infrastructure Report does not address provision of healthcare and or education for the increased population. Extremely close to the A245, M25 and mainline railway, so at risk of air and noise pollution, very difficult to mitigate against- contrary to NPPF para 170(e). No proper consideration of noise pollution which is already an issue for the area. The area suffers frequent and severe flooding after even a small amount of rain; no adequate assessment of river or surface water flood risk. Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no

unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The performance of the parcel including site GB10 against Green Belt purposes was assessed in the Green Belt Boundary Review (2015) and the site found suitable for removal from the Green Belt. The credibility of the Green Belt Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12.</p> <p>The relationship between the West Byfleet NDP and the Site Allocations DPD is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16.</p> <p>The issue of the Minerals Safeguarding Area on site GB10 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 17.</p> <p>It is true that only part of the site is within standard walking distance of West Byfleet District Centre and the station. However this level of proximity to services is still better than that for most other sites considered through the Green Belt Boundary Review. In addition, only slightly over half the total area of the site is considered to be developable, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is likely to limit development on the areas of the site furthest from the District Centre. The key requirements in policy GB10 include to 'improve sustainable transport infrastructure including pedestrian and cycle links and bus services to West Byfleet District Centre'. It is therefore not considered that the residents would be car reliant.</p> <p>The traffic implications of the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The DPD (allocation GB7) makes provision for the delivery of improvements around Woking Station and the nearby junction, contained in Network Rail's current strategic plan. These will improve capacity on routes to London, including at West Byfleet station.</p> <p>The implications of the proposals for infrastructure, including healthcare and education facilities, are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The implications of the proposals for air and noise pollution are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The implications of the proposals for flooding are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7. In particular, the DPD is informed by an up-to-date Strategic Flood Risk Assessment, to the satisfaction of the Environment Agency.</p> <p>The justification for allocating sites for Traveller pitches in the Green Belt, and other matters relating to this type of site, are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p>
Response Reference: U0001254
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06659/1
Name: Mr And Ms Roger And Maureen Nuttall
Number of Signatories: 2
Comment Type: OBJ
Site Reference:

Summary of Comment: Insufficient Public Consultation for many Woking Borough residents.

The WBC Regulation 19 Consultation Guidance Notes state that two rounds of formal public consultation were undertaken in 2015 and 2017, both requesting feedback on whether greenbelt sites could be used to meet some of the government housing requirements for the Woking Borough. In reality WBC consulted only a proportion of residents on this subject, e.g. some of the Residents Groups, and other specific groups in the area.

These groups generally responded that greenbelt land should not be used, but apparently were not advised that the preferred WBC plan was to build many very high residential tower blocks in the relatively small area of Woking Town Centre. There has been little contact or information from our three councillors over the years.

Many residents feel strongly about projects to build further very high towers dotted around the rest of the town centre. The town centre should be limited to 15 storeys and to use some additional greenbelt if necessary. These buildings will be far more appropriate in scale compared to existing buildings nearby. In addition the social problems relating to high building residents, especially for families with children, have been much researched, as have the cast shadows and cold wind effects at the bases of large towers.

Number of additional homes to be provided to meet Government demands

Within the Council itself there seems to be many different opinions with regard to number of new homes, and categories (low cost etc, ..) actually needed to satisfy Government requirements. The discussions sometimes relate to whether the homes are to be provided to meet the needs of existing Woking residents and their families, or whether we are attracting people from other areas who are impressed by the rail-link to London. According to Woking estate agents many flats and houses are already available in the Woking area, so given Woking's lack of land availability post- Goldsworth Park do we really need to build masses of new homes

Poor Presentation and Misleading Information

This document is very large and difficult to interrogate by residents. There have only been two occasions for residents to view the document in the Council Offices - the WBC presenters were helpful but generally were not familiar with individual high residential blocks planned for the centre of Woking by Thamesway and others.

The document contains information regarding the developments on individual sites which is incorrect, and which does not represent the current planning intent of WBC. For example Sections UA17 and UA18 are totally out of date and do not represent the Concord Complex Plan presented for planning approval some months ago. The entry includes many design requirements including the requirement that 'the development should make improvements to the quality of the public realm' and 'building elevations should respect adjoining properties'.

The same applies to UA6 - 45 additional dwellings. There is no mention of the immense Gateway project and the former BHS site bordering Church Street East and Commercial Way.

Car Parking Provision. The DPD makes references to minimising occupants' use of cars, and the WBC have separately mentioned alternative schemes for car sharing and hiring. However, many residents will still want the convenience of their own cars housed within the block they live in, to visit locations not covered by the fixed-system rail and bus links. Very soon well-designed electric cars and charging points will be readily available and these will be ideal for Town Centre use.

Provision of a Master Plan for future housing development.

Many residents are concerned that an overall Master Plan has not been developed. The document would provide design principles for the individual property developers, and provide Woking residents with an overall idea of the project. Such a plan would include financial arrangements, main design principles such as maximum residential heights, proportional mix of different types of flats, roads and cycling routes, block parking provision etc etc. A plan was used for the new Sheerwater development. It would be

<p>preferable for such a plan to be developed before further discussions take place with residents.</p> <p>These types of plans usually identify any strategic problems with a project, for example it is clear that the improvements to Woking Railway Station and Victoria Arch to increase the overcrowded Station's capacity, and flow of A320 through Woking should have been undertaken before the Victoria Square construction started .</p>
<p>Contributor Proposed Modification: None Stated.</p>
<p>Modification Reference: U0000396</p>
<p>Officer Response: With regards to comments about the public consultation see Section 9 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>On the matter of the development directed towards the Town Centre see Paragraph 1.6 and Section 24 of the Topic Paper. Whilst residents are encouraged to raise local concerns directly with their Ward Councillors, the Concern about the lack of contact from Councillors will be passed on the the relevant Members for their consideration. Whilst the Town Centre is suited for high density development, the Council is concerned to ensure that development is of high quality design.</p> <p>The justification to release Green Belt land for development is in Section 1 of the Topic Paper. The Core startegy contains CS11 Housing mix, to ensure there is a range of housing availble for the residents of Woking to meet their needs.</p> <p>The Council has Policies CS21 Design of the Core Strategy, the Design SPD for further guidance and Outlook, Amenity, Privacy and Daylight SPD to ensure all developments proposed will be designed to the highest standards.</p> <p>With regards to sites UA17 and UA18: Planning application reference PLAN/2018/0660 has not been granted Planning Permission and therefore limited weight can be afforded to it. If this is finalised, the DPD will be updated accordingly. Appendix 6 of the DPD provides an update on the status of sites since the previous iteration of the DPD (Regulation 18 draft).</p> <p>In terms of parking, the representation is correct, a key thrust of the transport policies of the Core Strategy and the NPPF are to influence a shift from car based travel to sustainable travel modes such as public transport, walking and cycling.</p> <p>The overall spatial strategy of the Core Strategy is to concentrate most new development at the main centres because they offer a range of key services and facilities to help minimise the need to travel and to encourage sustainable travel modes. Specific references are made to Policies CS1: A spatial strategy for Woking Borough and CS18: Transport and accessibility of the Core Strategy which clearly demonstrate the importance that the Council places on encouraging walking and cycling. In addition to the policies of the Core Strategy, a key objective of the Council's Parking Standards is to use parking provision as a tool to encourage walking and cycling, in particular, at locations where key services and facilities are readily available without undermining economic vitality.</p> <p>Currently the Council has 18 charging points within the town centre.</p> <p>As part of the Council's commitment to achieving an energy efficient transport system and to cut carbon emissions the Council has produced a Climate Change SPD which sets out the requirement for new developments to provide EV charging points, in line with Core Strategy Policy CS22: Sustainable construction.</p> <p>The representation for a master plan is noted. The benefits of masterplans is acknowledged. However, the Development Plan contains robust policies to help consider each application on its own merits, taking the wider context into account to ensure a coherent and well connected development across the Town Centre.</p> <p>Policy UA7 is safeguarded for essential infrastructure in the DPD which includes improvement to Victoria Arch and the railway station. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area.</p> <p>Overall, the Council is confident that the infrastructure delivery plan provides adequate</p>

information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 of the Topic Paper goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures will satisfactorily address any adverse impacts from cumulative development.
Response Reference: U0001441
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06480/1
Name: Mr Adrian O'Callaghan
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: DPD does not meet the requirements of Duty to Cooperate, is not justified, is not effective, is unsound, however it is consistent with national policy. Does not wish to participate in the public examination. Wishes to be informed of next stages. Lack of communication with people who will be impacted by proposed allocations. Concerns regarding impact on wildlife. Concerns about design of future developments, particularly tall buildings.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council is satisfied that it has done what it can within the available resources but has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. This is set out in detail in section 9 of the Regulation 19 Issues and Matters Topic Paper. Section 19 addresses the issue regarding impact on wildlife. Should a site come forward for development, the design will be assessed at the development management stage. It will be assessed against design policies set out in the Core Strategy to ensure that it is sympathetic and contributes positively to the surrounding area. For tall buildings, there is also supplementary planning guidance with detailed criteria for development proposals to be assessed against.
Response Reference: U0001146
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06586/1
Name: Octagon Developments Ltd
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Argues that GB10 does not meet the tests of soundness set out in the NPPF and should therefore be removed from the DPD. The site falls within the boundary of the West Byfleet Neighbourhood Development Plan (NDP) (2017) and forms part of the green belt designation. 28.9% of West Byfleet Neighbourhood Area is officially designated as Green Belt. Excluding Broadoaks, and land used for school buildings, the open space provided by Green Belt falls to 23% of the total neighbourhood area. The NDP provides that if half of the land owned by the West Hall Estate Company Ltd were removed from the Green Belt, this figure would reduce to 13%

which does not compare favourably to 63% of Woking Borough currently designated as Green Belt. West Byfleet's Green Belt is fundamental to the locally distinct character and should be retained.

One of the NDP objectives is to maintain, protect and enhance the distinctive character of West Byfleet by ensuring high quality design and construction. It is argued that 555 units developed on 14.8ha of land would detract from this objective. It is therefore likely that any future planning application would be contrary to the Development Plan.

The NDP places emphasis on protection and enhancement of green spaces and provision of access to open space. This would be significantly undermined by the release of GB10 for housing.

The deliverability and effectiveness of GB10 is questioned as it is covered by a minerals allocation to 2026.

GB10 is limited in terms of access and would require significant investment in order for it to be developed. Parvis Road is congested at peak times and significant assessment work would be required in advance of development.

The allocation suggests that access to the development could be provided through Green Belt land from Parvis Road with potential pedestrian access through Broadoaks to West Byfleet centre. If this access is not provided then the development would be over 1km from the railway and would require significant upgrade works and crossing facilities to be provided. Therefore GB10 does not appear to be a sustainable location, and would be reliant on private vehicles.

The northern boundary of the site is in close proximity to designated ancient woodland.

The protection afforded to this habitat by the NPPF is noted. The southern and eastern boundaries are adjacent and/or in close proximity to the River Wey and Godalming Navigation Wildlife Corridors which does not lend the site to housing development.

The NPPF states that policies should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution. Given GB10's proximity to the M25, any future development is at risk from noise and air pollution which would be difficult to mitigate. The allocation is therefore inconsistent with national policy.

GB10 is Grade 3 (Moderate to Good) Agricultural Land as identified by Natural England.

The loss of best and most versatile farmland is considered inconsistent with the NPPF.

An Appropriate Assessment would be required given the potential impact on the Thames Basin Heath SPA.

Individually, none of these issues would be insurmountable, but cumulatively they would make it difficult to achieve a viable planning consent within the plan period. Therefore the deliverability of the site is questionable. The effectiveness of GB10 is questioned and it is suggested that it does not pass the tests of soundness.

Delivering GB10 would also involve development that does not comply with the existing development plan and is inconsistent with national policy, as set out in the tests of soundness within the NPPF.

GB10 should be retained as Green Belt, and continue to act as a buffer for West Byfleet preventing significant urban sprawl.

Wishes to participate in the public examination.

Contributor Proposed Modification: GB10 should be removed from the DPD

Modification Reference: U0000152

Officer Response: Many of the issues raised in this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper.

Section 5 recognises that the proposed allocation of sites is not evenly spread throughout the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine

its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.

Section 16 addresses the consistency of the Site Allocations DPD with the West Byfleet Neighbourhood Plan.

Paragraph 6.8 addresses the robust policy framework for securing and protecting open space provision in the Borough.

Section 17 addresses the safeguarding of GB10 by Surrey County Council's Minerals Plan.

Paragraph 6.7 addresses transport infrastructure, as does Section 13. In particular Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the networks. Furthermore one of the key requirements of GB10 is that "the developer will contribute to the provision of essential transport infrastructure related to the mitigation of the impacts of the development of this site, in addition to the relevant Community Infrastructure Levy (CIL) contribution."

GB10 is considered to occupy a sustainable location. This is based on a robust evidence base as set out in Section 10.

Section 8 comprehensively addresses air quality and noise pollution. In particular, Paragraph 8.7 addresses the mitigation of any potential noise pollution at GB10.

Section 21 confirms that none of the proposed allocations would lead to unacceptable urban sprawl.

There are some site-specific issues that are addressed outside of the Regulation 19 Issues and Matters Topic paper.

Firstly, it is recognised that Ancient Woodland is protected by the NPPF. Furthermore Policy CS7 of the Core Strategy offers protection to land designated as such, and provides that "development adjacent to locally designated sites will not be permitted where it has an adverse impact on the integrity of the nature conservation interest that cannot be mitigated."

Secondly, whilst an Appropriate Assessment of the Site Allocations has been undertaken, it is recognised that an Appropriate Assessment of individual proposals would also be required during the Development Management process.

Due consideration has also been given to the existing Agricultural Land at GB10, and this is reflected in the key requirement for "engagement with Natural England to determine quality of Agricultural Land."

The recommendation to remove GB10 from the Site Allocations DPD is not supported. As provided in Paragraph 11.6, the Council is satisfied that there has been a thorough assessment of alternative sites to inform the preferred sites that are allocated and safeguarded in the Site Allocations DPD.

Response Reference: U0000986
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06461/1
Name: Mr And Mrs Gerry And Barbara O'Malley
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Travel to the doctor along Parvis Road will get even more difficult as a result of additional traffic from these developments. Can the doctors' lists (in Byfleet) accept all the new patients trying to register there?
Contributor Proposed Modification: None Stated

Modification Reference: NOMODS
Officer Response: The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13. The impact of the proposals on infrastructure, including doctors, is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6.
Response Reference: U0001706
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06669/1
Name: Mr David Orledge
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: The DPD does not meet the tests of soundness as it has not been positively prepared. It does not meet the requirements to be consistent with achieving sustainable development for the following reasons: 1. The Sustainability Appraisal does not assess the impact that additional housing (and consequent population) proposed for Byfleet and West Byfleet will have on key services e.g. school capacity, healthcare capacity, hospital capacity. Questions how mitigation will be provided to reduce impacts. 2. Although additional traffic on A245 has been modelled, concerned that review of traffic impact of proposed housing in the area has not been 'joined up'. Based on regular commuting experience along Parvis Road, 'some' queuing is inaccurate - a more accurate description would be 'regular and significant' queuing. Congestion on the A245 eastbound in peak periods is compounded by the impact of the junction between the A245 Byfleet Road and B365 Severn Hills Road, and by the junction between the A245 and Redhill Road - these traffic hotspots should be assessed in conjunction with each other, rather than individually. Would like to see a coordinated mitigation plan.
Contributor Proposed Modification: 1. Analysis of the impact of the proposed housing developments (contained within the DPD) on key local services, including local schools, health centres and the nearest NHS hospital (St Peters Hospital). 2. Re-running the analysis and proposed mitigation measures contained in the "Woking Local Plan - Potential Mitigation" document to provide a current, "joined up" analysis of the traffic impact at key points on the A245.

Modification Reference: U0000209
Officer Response: The Council has assessed the infrastructure needed to meet future development needs. This is described in detail in Section 6 of the Regulation 19 Issues and Matters Topic Paper. The various infrastructure requirements are highlighted in the evidence base, including transport studies and the Infrastructure Delivery Plan. These findings shaped the key requirements included in each of the Site Allocations DPD policies. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245

<p>will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>It should also be noted that in addition to the transport studies (described in Sections 10 and 13 of the Topic Paper), relevant planning proposals coming forward in the West Byfleet and Byfleet area will need to submit detailed transport assessments to identify any site specific impacts and appropriate mitigation measures - which may include transport infrastructure measures - to make the development acceptable (see paragraph 13.2). Before the 'Potential Mitigation Study' was produced, Woking Borough Council worked with Surrey County Council to undertake detailed strategic transport modelling based on the overall quantum of development envisaged in the Core Strategy, and the spatial distribution of proposed allocation sites. This extensive modelling work formed the evidence to identify the 'key locations' which the Potential Mitigation Study focussed on. In this regard, the Council is satisfied that a 'joined-up' analysis of traffic impacts has been conducted.</p>
<p>Response Reference: U0001681</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06562/1</p>
<p>Name: Mrs Sharon Osborn</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11</p>
<p>Summary of Comment: Green belt and flood plain should not be built on. West Hall is an important flood plain- if it is built on where will flooding go EA projections state Byfleet and Dartnell Park are under threat (and were severely flooded in 2013). Ref. ministers' comments on using the planning system to increase flood resilience. Development may harm wildlife and a nearby watercourse, and involve the felling of numerous trees which are home to precious wildlife. Concerned over the potential impacts of the proposed Traveller site. Roads are already heavily congested, especially during roadworks. The proposed amendment to prevent right turns out of the Seven Hills Road will not improve the situation, only divert traffic, e.g. down Brooklands Road. Need to consider the convergence of traffic from Brooklands Road and from Brooklands retail park/ The Heights. Health centre is already stretched, with impacts on social services and adult social care which are being cut back by SCC. This and schools in the area would be stretched further. Should revisit DPD in the light of September's new ONS household projections.</p>
<p>Contributor Proposed Modification: September's 'New Office for National Statistics household projections' should also be noted. It states that housing requirements will be less than previously expected. Due to this Guildford Borough Council issued a statement on the 31st October stating that in the light of the new projections they have realised that their housing requirements will be much less than expected and stated that there is no need to allocate the four new Guildford Green Belt sites. I urge Woking Borough Council to revisit their DPD in light of this new projection document. Woking and particularly the Byfleets is very built up already and our Green Belt spaces need to be protected. Furthermore, In a statement on your website you state "Protecting the Green Belt in the local area from overarching building programmes is essential as part of a wider policy of securing our environment for years to come on a local and national level." Please keep to your word and help us keep Woking Borough as green as possible!</p>

I oppose these plans for the reasons given above and urge you to reconsider your decision and listen to your residents.

Modification Reference: U0000181

Officer Response: The necessity of releasing land from the Green Belt for housing allocation is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.

Flood risk issues in relation to the site allocations are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7. In particular, there is no flood plain on site GB10. WBC is aware of surface water issues on the site and adjoining areas which will be dealt with through the design and layout of the development, as per the key requirements; only just over half the area of the site is considered to be developable area.

The impact of the proposals on wildlife and trees is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19.

Issues associated with the proposed Traveller sites are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 21.

The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.

The impact of the proposals on local infrastructure, including healthcare and education facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.

The implications of changing household projections for the housing requirement is addressed by the Regulation 19 Issues and Matters Topic Paper, see Paragraph 1.5.

Response Reference: U0001615

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06857/1

Name: Mr Cary Osborn

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Consultation on Surrey County Council's 'Vision for Surrey 2030' revealed that the whole Surrey population is concerned about development on the Green Belt. Why does the DPD propose a huge percentage of development in a single area, rather than share the pain across the Borough? A willing developer cannot be found for the West Byfleet village centre redevelopment- presumably concerned about the number of new flats in Woking, which has faster train links into London. Enough is enough.

The proposals could add 2,500 people to (as of 2001) approximately 12,000 in Byfleet and West Byfleet. But there is no proposal to increase doctors' surgeries, and probably no new schools or police officers. The health centre is already stretched, with long waits. Social services will be stretched further while SCC is cutting them back.

Traffic is already heavy during rush hour, generally stationary back to the Brooklands roundabout. The proposals are likely to add 2,000 cars; the solution to prevent right turns out of Seven Hills Road will only save a few seconds, and move queues from Painshill Road roundabout to Byfleet Road.

The proposal will eradicate the slim Green Belt margin between Byfleet and West Byfleet, leaving no allowance for the proposed HS4 Rail scheme and any potential M25 widening in future.

Air quality is already very poor and adding yet more vehicles is not going to help that issue.

Green Belt and flood plain should not be built on. What future problems might hundreds of extra properties create in such a densely populated area? If the land floods the villagers will be at risk.

Building so close to a watercourse and felling numerous trees has the potential to harm wildlife.

No independently verified evidence that WBC has exhausted Brownfield sites for Traveller development, which would be out of character with surrounding properties. Why is it proposed to place all of your required traveller pitches into a single site?

There are various criteria for the design of Traveller sites to achieve privacy, the safety of children near main roads and address the higher vulnerability of trailers and caravans to noise pollution. Parvis Road is a very busy 40mph road which already has its fair share of accidents.

Traveller sites in the Green Belt are considered inappropriate development.

The DPD should be revisited considering the new ONS household projections, with their lower housing requirements, as Guildford have.

A statement on the WBC states "Protecting the Green Belt in the local area from overarching building programmes is essential as part of a wider policy of securing our environment for years to come on a local and national level." Please keep to your word.

Contributor Proposed Modification: I urge Woking Borough Council to revisit their DPD considering this new projection document [September's 'New Office for National Statistics household projections']

Please keep to your word and help us keep Woking Borough as green as possible!

I oppose these plans for the reasons given above and urge you to reconsider your decision and listen to your residents.

Modification Reference: U0000281

Officer Response: The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 9.

WBC is confident that the site referred to in West Byfleet village centre can be developed within the plan period. Should the currently permitted scheme not be pursued, any revised scheme that comes forward after the Site Allocations DPD is adopted will have to be assessed against the requirements in policy UA44 of the DPD.

The impact of the proposals on community infrastructure in the area is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.

The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.

The proposals will retain a substantial proportion of Green Belt land between Byfleet and West Byfleet, to the east of site GB10 and also along much of the western edge of Byfleet. The margin between the two settlements will therefore remain, and its usefulness to the public will be increased by the establishment of the Byfleet SANG (site GB12) and by the provision of green infrastructure on land adjacent to site GB10.

The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who

<p>are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network. The impact of the proposals on air pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The impact of the proposals on flood risk is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The impact of the proposals on local wildlife is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 19.</p> <p>The justification for allocating sites for Traveller pitches in the Green Belt, and other matters relating to Traveller sites, are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3. In particular, site GB10 with 15 Gypsy/Traveller pitches will not meet the entire identified need for the Borough, which is for 22 pitches; the remainder of the need will be met on other sites.</p> <p>Sections 1 and 2 of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. Paragraph 1.5 gives clarity on how the latest housing need figures would not affect the Borough's housing requirement. In February 2019, the Government confirmed that the 2016-based household projections should not be used to calculate housing need.</p>
Response Reference: U0001335
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06872/1
Name: Mr Mrs S Owen
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05 GB10, GB11, GB12, GB13
<p>Summary of Comment: Local roads around the Broadoaks development cannot cope with current traffic levels, this will become worse with the additional traffic from Broadoaks but especially from the West Hall and High Road, Byfleet, developments.</p> <p>No proper consideration of noise pollution from the M25 affecting GB4 and GB5.</p> <p>Air quality on Parvis Road by the motorway bridge is higher than recommended levels, the proposals would increase this substantially.</p> <p>No consideration of M25 widening and HS4 Air.</p> <p>1/3 of GB5 is owned by St Mary's church as a graveyard extension, development or forced acquisition of this is inappropriate.</p> <p>Adequate assessments of flooding from both river and surface water have not been carried out.</p> <p>The reasons for the removal of the Pyrford greenbelt sites from this plan are also inadequate- could equally be applied to GB4, GB5 and GB10.</p> <p>The Infrastructure Report does not address provision of healthcare and or education for the increased population.</p> <p>2000 more houses are planned for than required, even before a likely reduction in housing need is announced. This is unnecessary overdevelopment on an area which cannot stand the increase. There is no need for Green Belt release.</p> <p>The land performs the Green Belt functions of preventing urban sprawl.</p> <p>Please keep Byfleet as a village.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS

Officer Response: The traffic implications of the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. Other sites proposed for development in the area were included in the traffic mitigation evidence base, and also provided to inform the planning of infrastructure by providers.

The pollution implications of the proposal are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.

The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network.

The issue of burial land on site GB5 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 15.

The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.

The reasoning behind the removal of the sites in the Green Belt in Pyrford that were consulted on at Regulation 19 stage is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 14, paragraphs 14.11 - 14.13.

The implications of the proposals for infrastructure are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.

The justification for the housing numbers being planned for- including the implications of changes in housing need calculations- and of the resulting need for Green Belt release, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.

The impact of the proposals on urban sprawl are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 21.

The Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that sufficient exceptional circumstances justification exists for the release of site GB10 from the Green Belt, based on its high potential to deliver sustainable development.

With regard to the local village character, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase Byfleet's population. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

Response Reference: U0001486

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06526/1

Name: Ms Lynda Parry
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
<p>Summary of Comment: Why target building on Byfleet's small area of Green Belt, rather than sharing around other parts of the Borough with more Green Belt Infrastructure in Byfleet/West Byfleet cannot support the proposed development. Doctors' surgeries covering the area are oversubscribed with three weeks' wait for appointments. The proposals could make this worse, with potentially fatal consequences. There are no NHS dentists in Byfleet.</p> <p>Infrastructure in Byfleet/West Byfleet cannot support the proposed development. Parvis Road and Oyster Lane are the only ways out of Byfleet, traffic on them is always heavy and almost always gridlocked at rush hour. Additional vehicle movements from the proposed development would increase noise, pollution and traffic.</p> <p>The nearest railway station has nowhere to park; commuters from the proposed developments would lead to additional on street parking or drop off trips, worsening traffic problems either way.</p> <p>On street parking makes it hard to navigate Rectory Road at present; this situation would be worsened by traffic from additional dwellings.</p> <p>Infrastructure in Byfleet/West Byfleet cannot support the proposed development. Byfleet is on a flood plain, I thought building on flood plains was to be avoided? Brewery Lane has surface water flooding every time it rains.</p> <p>Infrastructure in Byfleet/West Byfleet cannot support the proposed development. All schools in the area are oversubscribed. Where wil the children in the new dwellings be educated?</p> <p>Infrastructure in Byfleet/West Byfleet cannot support the proposed development. WBC should look at developing Sheer House and vacant areas in Sheerwater instead. WBC should improve life for existing residents rather than building so many new dwellings. Let other local councils take up some of the burden</p>
Contributor Proposed Modification: come on Woking stop building, look after your residents and let other local councils take up some of the burden.
Modification Reference: U0000170
<p>Officer Response: The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p> <p>The impact of the proposals on local infrastructure, including doctors, dentists and schools, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of the proposals on highway capacity is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The issue of flood risk in relation to the proposals is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The Site Allocations DPD already allocates land for housing development at Sheer House and the Sheerwater redevelopment area.</p> <p>Most of the Borough's housing need is internally generated, so housebuilding will help improve the quality of life of existing residents who are looking for a new home. The Infrastructure Delivery Plan also sets out proposed new infrastructure that should help improve life for residents in the area.</p> <p>Waverley Borough Council is already planning to meet a substantial proportion of Woking's unmet need for housing. Without this there would be even more pressure from developers to build on Woking's Green Belt.</p>
Response Reference: U0001710

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00529/3
Name: Mr Paul Parsons
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports the removal of Pyrford sites Aviary Road Field and Randall's Field.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06729/1
Name: Ms Lorraine Parsons
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports halting the development of the Aviary Road and Randall's fields.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06856/1
Name: Mr Kenneth Pearce
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD is unsound because GB10 should not be taken out of the Green Belt: Building on the site would be contrary to the West Byfleet Neighbourhood Plan's intention to protect green spaces. The effect of the proposals on infrastructure (roads, healthcare, schools, sewage etc), in combination with other sites planned in Byfleet and central West Byfleet, has not been adequately considered. The proposal will add to existing congestion on the A245, which is both a local and Woking-London route. Residents will travel by car to the facilities in central West Byfleet

(adding to severe parking problems there) and to work (unless places of employment are provided on the site.)
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The relationship of the proposals to the West Byfleet Neighbourhood Plan is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 16. The impact of the proposals on local infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6. Other sites proposed for development in the area were included in the traffic mitigation evidence base, and also provided to inform the planning of key infrastructure providers. The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13. It is true that only part of the site is within standard walking distance of West Byfleet District Centre and the station. However this level of proximity to services is still better than that for most other sites considered through the Green Belt Boundary Review. In addition, only slightly over half the total area of the site is proposed to be developed, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is likely to limit development on the areas of the site furthest from the District Centre. The key requirements in policy GB10 include to 'improve sustainable transport infrastructure including pedestrian and cycle links and bus services to West Byfleet District Centre'. It is therefore not considered that the residents would be entirely car reliant.
Response Reference: U0001405
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06612/1
Name: Mr Steve Peckham
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Objects to GB10. Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not, an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. My reasons for this assertion are detailed below: Believed that this Site was currently allocated as Greenbelt land and also as a concrete aggregate safeguarded site. Does not believe that there is a need to change this to the extent planned. Why is the burden placed on discrete areas rather than shared across land across the borough to reduce the impact on any one community. This Site would massively undermine the character of West Byfleet, this is legislated under NDP2017. This acts to preserve green space, so this proposal appears to contradict this - does that make it illegal Is the site suitable for development if it carries a minerals allocation Significant upgrading of Parvis Road would be required to allow access to the town and train station. Parvis Road cannot cope with increase in traffic from 550 vehicles and 15 traveller pitches.

The new development will adversely impact levels of soil, air, water or noise pollution. The site's proximity to the M25 and the A245 makes the risk much higher in the new development.

What provision is made for additional healthcare capacity, What provision is made for additional school capacity, Nothing is mentioned.

WBC's policy on Gypsies, Travellers and Travelling Showpeople states that greenbelt should only be used if urban sites cannot be identified. Does not believe that this test has been met. The proposed development of the Site does not provide the necessary infrastructure for travellers - safe access, parking, room for businesses, schools/doctors and it will greatly impact the character of the area. Expresses concern about Travellers' sites, including the number of pitches in West Byfleet relative to elsewhere in the Borough, and questions the Council's responsibility to provide Travellers' sites.

The Site is an area subject to frequent and severe flooding. Adequate assessments regarding flooding from both river and surface water have not been carried out.

Why has Martyrs Lane greenbelt been excluded from the allocation.

This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment. WBC has not focused on previously developed land in sustainable locations, which it is required to do.

Inadequate consideration has been given to alternative sites. Why is the burden not being spread around the borough.

This greenbelt provides a much needed country area for enjoyment by the community acting as a barrier to secure the identity of each village - no urban sprawl.

Sheer House and Broadoaks only serves to exacerbate a number of the points detailed above, in particular the inadequacy of appropriate infrastructure, including health, schools, water, sewage and roads.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

In regards to the mineral allocation see Section 17 and for the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.

In regards to development not being distributed equally see Section 5 of the Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Police capacity, water provision and waste management have all been considered in the IDP. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address adverse impacts from cumulative development in Byfleet and West Byfleet.

Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper. In regards to soil contamination, the Council will consult with the relevant organisations including Environment Agency and WBC Environmental Health department during the detailed planning application stage as well as require applicants to carry out prior assessments of the site, as set out in the site specific Key Requirements. This will

ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

The representation regarding unnecessary, excessive and over development; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper.

In regards to a lack of assessment to alternative sites and previously developed land, see Section 11 of the Topic Paper.

In terms of Green Belt land and residents amenity see Section 4 of the Topic Paper and for urban sprawl see Section 21. The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.
Response Reference: U0001366
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06612/2
Name: Mr Steve Peckham
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Considers that the DPD is not positively prepared, not justified, not effective and not consistent with national policy. Recognises the need for new houses. However the policy of building large blocks in single locations without appropriate infrastructure (e.g. roads, schools, and doctors) is not sensible. Expresses concerns about Travellers' sites in relation to GB10, including the number of sites in West Byfleet relative to elsewhere in the Borough, and questions the Council's responsibility for providing Travellers' sites. Does not wish to participate in the public examination. Does wish to be informed when the DPD progresses to the next stages.
Contributor Proposed Modification: If developments were located more widely in smaller blocks, the impact on communities and infrastructure would be reduced.
Modification Reference: U0000352
Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper. Section 11 confirms that a thorough assessment of sites has informed the Site Allocations DPD. Paragraph 11.4 is of particular relevance. It provides that, with the exception of sites that would yield fewer than 10 dwellings or 500 sqm of employment floorspace, all sites that the Council is aware of, and have a reasonable chance of coming forward within the plan period, have been appraised before selection for the DPD. Section 6 confirms that due consideration has been given to infrastructure. In particular, Paragraph 6.9 addresses education provision and Paragraph 6.12 addresses GP services provisions. Furthermore Paragraph 6.7 addresses transport infrastructure. So too does Section 13. Section 3 addresses the allocation of traveller pitches, demonstrating than an appropriate process has been followed to ensure the allocation of sustainable sites.
Response Reference: U0000988
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06754/1
Name: Ms Charmaine Peckham
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11, UA42

<p>Summary of Comment: Does not consider that the DPD passes the required test of soundness. In particular the DPD is not considered an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence nor is it consistent with national policy. Reasons for this assertion are detailed below, with reference to GB10.</p> <p>GB10 is allocated as Green Belt land and as a concrete aggregate safeguarded site. There is no need to change this to the extent planned.</p> <p>Why is the burden placed on discrete areas rather than shared across the borough?</p> <p>The site would undermine the character of West Byfleet, contrary to the Neighbourhood Development Plan. Is this illegal?</p> <p>Is the site suitable for development if it carries a minerals allocation?</p> <p>Significant upgrades to Parvis Road would be required to allow access to the town and train station.</p> <p>Parvis Road cannot support an increase in traffic from 550 vehicles and 150 traveller pitches.</p> <p>The new development will adversely impact levels of soil, air, water or noise pollution. The latter has not been given proper consideration.</p> <p>The site's proximity to the M25 and A245 poses higher risks to the development.</p> <p>No provision for additional healthcare or school capacity is mentioned.</p> <p>WBC's sequential approach to identifying land for Travellers' sites does not appear to have been followed.</p> <p>The proposed development does not provide the necessary infrastructure for Travellers (safe access, parking, room for businesses, schools/doctors)</p> <p>Expresses concern about Travellers' sites, including the number of pitches in West Byfleet relative to elsewhere in the Borough, and questions the Council's responsibility to provide Travellers' sites.</p> <p>The site is subject to frequent and severe flooding. Adequate assessments regarding river and surface water flooding have not been carried out.</p> <p>Why has Martyrs Lane been excluded from the DPD?</p> <p>The housing quantity is unnecessary, excessive and constitutes overdevelopment.</p> <p>WBC has not focused on PDL in sustainable locations as required.</p> <p>Inadequate consideration has been given to alternative sites.</p> <p>The Green Belt provides a much needed country area for enjoyment, acting as a barrier to secure the identity of each village, preventing urban sprawl.</p> <p>Sheer House and Broadoaks exacerbate the points detailed above, in particular the inadequacy of infrastructure, including health, schools, sewage and water.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Many of the issues raised by this representation have been addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 17 of the Regulation 19 Issues and Matters Topic Paper addresses the designation of GB10 as a mineral safeguarded area. Surrey County Council, the Minerals Planning Authority, have been consulted in the plan preparation process and have not raised an objection to the site's allocation on the grounds of the minerals allocation.</p> <p>Paragraph 5.1 of the Regulation 19 Issues and Matters Topic Paper recognises that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.</p> <p>Section 16 of the Regulation 19 Issues and Matters Topic Paper addresses the consistency of the DPD with the West Byfleet Neighbourhood Plan.</p>

Paragraph 13.3 of the Regulation 19 Issues and Matters Topic Paper confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed.

Section 8 of the Regulation 19 Issues and Matters Topic Paper comprehensively addresses air and noise pollution.

The key requirements for GB10 include inter alia that "historical contaminative uses may have led to soil and groundwater contamination on this former MOD land that will need to be considered during any development of the site, dependent on detailed proposals and consultation with [the] Environmental Health [section of the Council] and the Environment Agency." They also give due consideration to the M25 and A245, providing that "due to the proximity to significant traffic on the M25, the development would need to consider the impacts on noise and ensure mitigation measures are implemented to protect residential amenity. A Noise Impact Assessment would be required, to also include impacts from Parvis Road."

Paragraphs 6.9 and 6.12 of the Regulation 19 Issues and Matters Topic Paper address school and education provision respectively.

Section 3 of the Regulation 19 Issues and Matters Topic Paper sets out the sequential approach which the Council has taken to the allocation of Travellers' sites. Site specific requirements such as access, parking and business space would be addressed through the Development Management process.

Paragraph 3.4 of the Regulation 19 Issues and Matters Topic Paper sets out that the Council has carried out a Travellers Accommodation Assessment (TAA) to determine the scale of need in the area. A need for 19 pitches to be delivered between 2016 and 2027 has been identified. With the loss of Ten Acre Farm, the need is now 22 pitches. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet the identified need.

Paragraph 3.8 of the Regulation 19 Issues and Matters Topic Paper also provides that the Site Allocations DPD would not concentrate all the Traveller sites in Byfleet and West Byfleet. Taking into account the existing sites, most of the need is being met at Five Acres and Hatchington with a combined total contribution of 35 pitches. Gabriel's Cottage and Stable Yard are also in the south of the Borough.

Section 7 of the Regulation 19 Issues and Matters Topic Paper addresses the due consideration which has been given to the flood risk implications of the DPD. In particular Paragraph 7.5 provides that where relevant the key requirements of the proposed allocated sites set out conditions for the need for detailed flood risk assessment. This will ensure that the development of the site addresses any site specific issues relating to flood risk. Indeed the key requirements for GB10 include inter alia that "the site is within Flood Zone 1 but features a number of existing drainage channels meaning there is a risk of flooding. The site is also adjacent to Flood Zones 2 and 3 whilst a principle aquifer is located within the site. Consideration of sustainable drainage and flood attenuation within the landscape are potential options. Early engagement with the Environment Agency is required. Flood Risk from onsite and adjacent ordinary watercourses will need to be assessed and details submitted as part of a Flood Risk Assessment with any planning application."

It would be wrong to allocate the land to the East of Martyrs Lane for future development for the following reasons.

1. The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review

report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

2. The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.

3. The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt.

4. It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.

5. The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.

6. There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.

7. A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

The housing quantity is not considered to be excessive. As set out in Paragraph 1.4 of the Regulation 19 Issues and Matters Topic Paper, taking into account the housing completions since the adoption of the Core Strategy, land has to be identified to enable the delivery of about 2,830 new homes by 2027 and 22 pitches to meet the accommodation needs of Travellers. Paragraph 1.7 of the Regulation 19 Issues and Matters Topic Paper recognises that the Site Allocations DPD identifies a quantum of land within the urban area which may be sufficient to meet development needs over the plan period. There is nonetheless a need to release Green Belt. This is because, given the nature of brownfield sites, the difficulty associated their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density development at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

Paragraph 1.6 of the Regulation 19 Issues and Matters Topic Paper provides that the Core Strategy directs most new development to previously developed land in the Town, District and Local Centres, which offers the best access to a range of services and facilities. The Site Allocations DPD has been prepared in accordance with this strategic context.

Section 11 of the Regulation 19 Issues and Matters Topic Paper confirms that there has been a thorough assessment of alternative sites to inform the selection of preferred sites. In particular, Paragraph 11.2 provides that the Sustainability Appraisal Report is on the

<p>Council's website, and includes all the reasonable alternative sites that were appraised and why sites have either been selected or rejected.</p> <p>Paragraph 4.1 of the Regulation 19 Issues and Matters Topic Paper confirms that the Site Allocations DPD would lead to a reduction of the total amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensured through a number of studies that any land is released from the Green Belt will not undermine its overall purpose and integrity.</p> <p>Paragraph 4.2 of the Regulation 19 Issues and Matters Topic Paper confirms that while there is a loss of open space and Green Belt land, the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents, as set out in Core Strategy Policy CS17: Open Space, green infrastructure, sport and recreation.</p> <p>Section 21 of the Regulation 19 Issues and Matters Topic Paper confirms that the Green Belt Boundary Review assessed the parcels of Green Belt land against the purposes of the Green Belt, one of which is to check the unrestricted sprawl of large built up areas. None of the proposed allocations will lead to unacceptable urban sprawl.</p> <p>Sheer House and Broadoaks are included within the Site Allocations DPD as UA42 and GB11 respectively. Paragraph 6.2 confirms that the Council has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD. The definition of infrastructure is covered in the IDP and by Policy CS16: Infrastructure delivery of the Core Strategy is wide ranging and it includes education, transport, green infrastructure, sewerage and utilities.</p>
Response Reference: U0001353
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06521/1
Name: Mr Christopher Penabad
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
<p>Summary of Comment: The DPD should be reviewed in the light of September's ONS household projections and the fact that Guildford have revised their proposed allocations on this basis. Woking is already very densely developed and Green Belt spaces need to be protected.</p> <p>The Byfleet area is excessively affected by loss of Green Belt space.</p> <p>Object to the Byfleet proposals, and to recent applications at South of Murray's Lane and Boyds Farm, due to:</p> <p>Loss of amenity and adverse environmental impact.</p> <p>Air and noise pollution arising from increased density and resultant car traffic.</p>
<p>Contributor Proposed Modification: In light of the above I request as a resident and council tax payer that Woking Borough Council revisit their DPD in light of this new projection document. Woking is already extremely dense in terms of development and our Green Belt spaces need to be protected (as endorsed by Theresa May (UK PM)). I request you as our representing MP to listen to your constituents and ask Woking Borough Council to revisit this as a matter of urgency.</p>
Modification Reference: U0000148

<p>Officer Response: The necessity of releasing land from the Green Belt, for allocation and safeguarding for development, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. Paragraph 1.5 within this addresses the implications of changing household projections.</p> <p>The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p> <p>The impact of the proposals on amenity for local residents is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4.</p> <p>The impact of the proposals on air and noise pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>Other environmental impacts of the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 7, 19 and 21.</p> <p>The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p>
<p>Response Reference: U0001720</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06514/1</p>
<p>Name: Karen Penry</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10, GB11</p>
<p>Summary of Comment: Concerns regarding development of Green Belt land in West Byfleet. West Byfleet expected to take 40% of the borough's housing targets, in spite of it only representing 10% of the borough. There are alternative Green Belt sites that would be more suitable.</p> <p>Concerns regarding increased congestion on Parvis Road.</p> <p>Previous developments to improve Parvis Road have never materialised.</p> <p>Accidents have occurred on junction of Dartnell Avenue and Parvis Road.</p> <p>Concerns regarding pollution from increased traffic.</p> <p>Concerns regarding inadequate health and educational infrastructure.</p> <p>Plans need to be more thorough, and should not focus solely on meeting targets for the borough.</p>
<p>Contributor Proposed Modification: There are alternative Green Belt sites that would be more suitable.</p> <p>Plans need to be more thorough, and should not focus solely on meeting targets for the borough.</p>
<p>Modification Reference: U0000399</p>
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development, section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet.</p> <p>Section 6 addresses the issue regarding adequacy of infrastructure. Section 13 addresses the issue regarding road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.</p> <p>Section 8 addresses the issue regarding pollution.</p> <p>At the development management stage, planning applications will be subject to thorough analysis to ensure that schemes make positive contributions to the area in which they are situated.</p>

Response Reference: U0001375
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06879/1
Name: Jane And Mark Perry
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: With regards to the proposed development of land surrounding West Hall, Parvis Rd, West Byfleet, comprising 555 dwellings and 15 traveller pitches. Does not believe that the draft site allocation DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. My reasons for this assertion are detailed below:</p> <p>GREENBELT The site is currently designated green belt land and a concrete aggregate safeguard site. Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces. The site is covered by a minerals, in a minerals plan running to 2026. This will make the site unattractive to developers.</p> <p>TRAFFIC ISSUES Access to the site is over 1km from the nearest railway station and schools/health facilities, which will require residents to heavily rely on using their cars. Parvis Road would need significant upgrading to incorporate crossings etc, it is very difficult now to get out of Dartnell Park with the amount of traffic, let alone the extra congestion caused by 555 more dwellings and 15 traveller pitches, Parvis Road is often already at a standstill in peak times.</p> <p>NOISE AND AIR POLLUTION Extremely close to the A245 and M25, so at risk of air and noise pollution, very difficult to mitigate against- contrary to NPPF para 170(e). No proper consideration of noise pollution.</p> <p>INFRASTRUCTURE The Infrastructure Report does not address provision of healthcare and or education for the increased population.</p> <p>TRAVELLER PITCHES Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities. The proposed housing quantities and amount of travellers pitches is excessive for the area and will put a massive strain on an already built up area, and clearly constitutes over development. The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk. Inadequate reasons given for excluding Martyrs Lane Green Belt. This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment. Inadequate consideration of alternative sites, in particular PDL in sustainable locations.</p>

The site performs the Green Belt functions of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment.
The Broadoaks and Sheer House developments will exacerbate a number of these issues.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

In regards to the mineral allocation see Section 17 and for the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.

The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper. This section also explains why traveller pitches have been identified in the Byfleets area, rather than in alternative areas. The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.

- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. The representation regarding unnecessary, excessive and overdevelopment; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper.

The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.

It is argued that the Green Belt sites perform several Green Belt functions. It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes. It is acknowledged that land at GB10 made a greater contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Section 21 of the Topic Paper addresses concerns about urban sprawl.

The consideration of PDL and alternative sites is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 11.

Response Reference: U0001342

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06497/1

Name: Mr Richard Phillips

Number of Signatories: 1

Comment Type: OBJ

Site Reference:

Summary of Comment: DPD not legally compliant as the Council have no right to jeopardise Green Belt policy for housing development. Duty to Cooperate not met as WBC should not have considered such alteration of the Green Belt.

DPD is unsound on all counts since no residents have given the Council the right to give developers land grabbing rights. Attendance at the Examination in Public should not be necessary.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The release of Green Belt for housing development is legally compliant; this is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1. The Duty to Cooperate has been met, and indeed, has resulted in part of Woking's housing need being met outside the Borough; without this there would be more pressure from developers to release further Green Belt land for housing. The DPD is sound; the Council is elected by the people of Woking and has a duty to plan positively to meet Woking's housing needs. The DPD has also evolved with numerous in-built public consultations. Representations have been taken into account at each stage of the process.
Response Reference: U0000920
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05705/1
Name: Ms Linda Pitchford-Jones
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Objects to building on Green Belt land in Byfleet and West Byfleet. Concerns regarding the following: - Inadequate road, health and educational infrastructure; - Difficulty parking; - Building on Sacred Ground - Building on flood plain; - Traveller sites with regard to safety; - Air and noise pollution; - West Byfleet and Byfleet merging. Why is development being focused in an already congested area? Questions why there are more dwellings allocated to Byfleet and West Byfleet instead of the Town Centre.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses concerns regarding the release of Green Belt for development. Section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet. Section 6 addresses concerns regarding the adequacy of infrastructure, including roads, healthcare and schools. The Council has undertaken a number of studies, including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy, and the Site Allocations DPD. Section 3 addresses the issue regarding proposed sites for travellers in Byfleet and West Byfleet. There is no evidence to suggest that the provision of traveller accommodation has any direct correlation to the safety of the existing community or property. In any case, the Council will seek to ensure that traveller sites are appropriately managed.

<p>Section 15 addresses the matter regarding the allocation of Sacred Ground. Section 8 addresses the issue of pollution. The comment regarding the merging of West Byfleet and Byfleet is addressed in section 21 which covers the removal of Green Belt land leading to urban sprawl. The transport implications of development in the area is addressed in section 13 of the Issues and Matters Topic Paper. Parking issues would be considered in detail as part of the development management process. The Council sets specific requirements within its Parking Supplementary Planning Guidance and has a policy framework for car parking in Core Strategy policy CS18 on Transport. The policy aims to ensure development proposals provide appropriate infrastructure measures to mitigate any adverse effects of development traffic and other environmental and safety impacts. Transport Assessments will be required for development proposals to fully assess the impacts and identify appropriate mitigation measures. The Council has acknowledged concerns of local residents regarding flooding in particular in Byfleet and West Byfleet. The DPD takes due care to make sure that the risk of flooding is minimised. Section 7 of the Regulation 19 Issues and Matters Topic Paper covers this issue in greater detail.</p>
Response Reference: U0000967
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06620/1
Name: Ms Sue Platt
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Support all objections to the proposed development of housing on the Green Belt and Traveller sites in Byfleet and West Byfleet. The proposals will have a disastrous effect on Byfleet village and the surrounding environment, with: Increased traffic Additional pressure on basic infrastructure General loss of the green belt.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on local amenity and the environment is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 4, 7, 8, 13, 19 and 23.
Response Reference: U0001035
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06834/1
Name: Ms Judith Pollard
Number of Signatories: 1
Comment Type: OBJ

Site Reference: GB10
Summary of Comment: Concerned over proposals for West Hall, please reconsider them: Roads in the area are often gridlocked, this will only worsen with extra housing. Schools in the area have expanded to the maximum and are at full capacity; where will the additional children be educated Health Centre is working at full capacity, almost dangerous; appointments very hard to get.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on infrastructure, including schools and medical facilities, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.
Response Reference: U0001563
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05432/1
Name: Mr David Pope
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: DPD is unsound and not consistent with national policy since GB10 should not be removed from the Green Belt: The site was identified as Green Belt in the Neighbourhood Development Plan (2017) to protect the character of West Byfleet. West Byfleet suffers from very heavy traffic, especially when the M25 comes to a standstill. It would increase noise and pollution. The Healthcare system and Schools would not be able to cope with this proposal. The proposed Traveller pitches would have a great impact on the local area, and should also have a designated secure area.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The relationship between the Site Allocations DPD and the West Byfleet NDP is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16. The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on air and noise pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The impact of the proposals on local infrastructure, including medical and education facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.
Response Reference: U0001451
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06842/1

Name: Mr Hugh Pope
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: No comment on legal compliance and has the DPD been positively prepared. The DPD is not justified, is not effective and is not consistent with national policy. It is considered to be unsound. Does not wish to participate in the examination in public and wishes to be informed of the next stages.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council considers the DPD is sound and is expected to deliver the requirements of the Core Strategy. Please see Section 1 of the Regulation 19 Issues and Matters Topic Paper for more information.
Response Reference: U0001098
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06739/1
Name: Ms Shailie Post
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: DPD is unsound. It is not an appropriate strategy taking into account reasonable alternatives and based on evidence, nor is it consistent with national policy, due to: <ul style="list-style-type: none"> - Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces. - Questions the ability of the heavily congested Parvis Road to cope with additional traffic. - Extremely close to the A245 and M25, so at risk of air and noise pollution, very difficult to mitigate against- contrary to NPPF para 170(e). No proper consideration of noise pollution. - The Infrastructure Report does not address provision of healthcare and or education for the increased population. - Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities. - The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk. - This housing quantity is unnecessary, excessive and clearly constitutes overdevelopment. - Inadequate consideration of alternative sites, in particular PDL in sustainable locations. - The site performs the Green Belt functions of preventing urban sprawl, preventing neighbouring towns from merging together and assisting in safeguarding the countryside from encroachment.
Contributor Proposed Modification: Retain Green Belt designation and give due consideration to alternative, previously developed sites.

Modification Reference: U0000307
<p>Officer Response: The issues raised in the representation are comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Section 1 of the Topic Paper sets out why the Council believes it is justified to release the land from the Green Belt. Section 16 discusses how the West Byfleet Neighbourhood Development Plan has been taken into account.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.</p> <p>Section 3 responds to concerns about the assessment of land for Traveller pitches and how it will meet the criteria.</p> <p>The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.</p> <p>The representation regarding unnecessary, excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper. The Council conducted a thorough assessment of alternative, brownfield sites in-house.. This is set out in detail in section 11, particularly paragraph 11.7, of the Topic Paper.</p> <p>It is acknowledged that overall the great majority of the Green Belt around the Borough is contributing significantly to the purposes of Green Belt. However, the Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that land in Parcel 6 made very little or no contribution to Green Belt purposes (see page 21 of the report for full reasons). It is acknowledged that land at GB10 made some contribution to the purposes, but the Council believe that sufficient exceptional circumstances justification exists for its release from the Green Belt, based on its high potential to deliver sustainable development. Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl.</p>
Response Reference: U0001412
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06861/1
Name: Mr James Post
Number of Signatories: 1

Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: DPD is not sound: in particular, not an appropriate strategy taking into account the reasonable alternatives.</p> <p>The site is covered by the Green Belt designation in the West Byfleet Neighbourhood Plan. Any future application on the site would be contrary to the Neighbourhood Plan, so not compliant with NPPF para 47. The Neighbourhood Plan places great emphasis on the protection and enhancement of all existing green spaces, which would be significantly undermined by the proposal.</p> <p>Parvis Road is congested at peak times and its ability to cope with traffic arising from the proposals is questioned.</p> <p>The Infrastructure Report fails to make proper recommendations for school place provision.</p> <p>There are many additional reasons why this plan should be rejected.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The relationship of the Site Allocations DPD with the West Byfleet Neighbourhood Plan is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 16.</p> <p>The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13.</p> <p>The impact of the proposals on infrastructure, including education facilities, is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6.</p>
Response Reference: U0001411
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 02643/2
Name: Mrs Thelma Powell
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
<p>Summary of Comment: The erosion of green belt in GB7. Does not want to see Mayford joining up with Woking to make an urban sprawl.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: This representation regarding Mayford Green Belt and urban sprawl have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21.</p>
Response Reference: U0000909
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06524/1
Name: Ms Nicola Powell
Number of Signatories: 2
Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Object to development plans for green belt sites in Byfleet and West Byfleet. The area of green belt land surrounding the Byfleets is very small compared to that in the rest of Woking borough. These developments will have a highly detrimental effect on the community. I have just bought a house in the area and would never have done so had I been aware of these plans. Many residents are upset and hurt that the borough is being picked on.
Contributor Proposed Modification: Please reconsider these plans.
Modification Reference: U0000171
Officer Response: The necessity of removing Green Belt land to be allocated and safeguarded for development is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5. With regard to impact on the local community, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area, and indeed will help improve the lives of many local people who are looking for a new home. There is no doubt that the development of the sites will increase the population of Byfleet and West Byfleet. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined. Woking borough is not being picked on for additional housing; indeed, Waverley borough is planning for additional housebuilding to meet a substantial part of Woking's unmet housing need.
Response Reference: U0001711
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06505/1
Name: Mr P C Preston
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, GB18
Summary of Comment: Objects to Green Belt development sites in West Byfleet and Byfleet. Concerns regarding the following: - Increased traffic congestion, particularly on Parvis Road; - Over-population, London and the Southeast cannot accommodate anymore people; - Impact on quality of life of existing community.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 4 of the Regulation 19 Issues and Matters Topic Paper addresses the issue of detriment to general wellbeing and amenity of residents as a result of losing Green Belt land.

<p>Section 6 gives a general overview of infrastructure provision, including roads. Section 13 addresses concerns regarding increased congestion arising from new developments, including Parvis Road. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A320 Corridor Study and the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the networks.</p> <p>The Council acknowledges the concerns regarding overcrowding in the region. However, the Government has made commitments in various publications (such as the Housing White Paper 2017) aimed at increasing housing supply and home ownership, and in turn making housing more affordable for future generations. The South East of England is identified as an area where the housing shortage is most acute, with high demand and low supply. As per national policy, the Council has produced the Site Allocations DPD to allocate land to enable its housing requirements to be delivered. The full justification is set out in detail in Sections 1 and 2 of the Topic Paper.</p>
Response Reference: U0001066
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06609/1
Name: Mr James Pretty
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
<p>Summary of Comment: DPD is not legally compliant. DPD is sound and complies with Duty to Cooperate. The DPD is not legally compliant for the following reasons;</p> <ul style="list-style-type: none"> -Proposal of UA44 has been made without adequate consultation with neighbourhood residents or local organisations. This undermines WBC's Statement of Community Involvement and paragraph 157 of the National Planning Policy Framework which specifies that "Early and meaningful consultation with neighbourhood, local organisations and businesses are essential." -There is no assessment of the capacity of the site and it is omitted from the Sustainability Appraisal. -Error on page 360 where proposal UA44 is mistakenly referred to as "St Dunstans Church, White Rose Lane." <p>Proposes that UA44 is removed from the DPD in order to allow sufficient time to consult with local residents and organisations. A sustainability appraisal also needs to be carried out in order to ensure that development of the site will be carried out in a way that is sustainable and compliant with WBC's policies and strategies, including the Statement of Community Involvement.</p> <p>The error on page 360 needs to be amended. The document should also be corrected so that UA44 is not identified as St Dunstan's Church, White Rose Lane and incorrectly described as "likely to be completed" before the DPD is finalised.</p> <p>Does not wish to participate in oral examination. Wishes to be informed of next stages.</p>
<p>Contributor Proposed Modification: Proposes that UA44 is removed from the DPD in order to allow sufficient time to consult with local residents and organisations. A sustainability appraisal also needs to be carried out in order to ensure that development of the site will be carried out in a way that is sustainable and compliant with WBC's policies and strategies, including the Statement of Community Involvement. The error on page 360 needs to be ammended.</p>

The document should also be corrected so that UA44 is not identified as St Dunstan's Church, White Rose Lane and incorrectly described as "likely to be completed" before the DPD is finalised.
Modification Reference: U0000367
Officer Response: The Regulation 19 Consultation provides an opportunity for residents of the Borough to comment on the proposals at Woking Football Club. The Council is satisfied that it has done what it can within the available resources to engage local residents in the preparation of the DPD, and has gone beyond the statutory requirements to engage the community during the Regulation 19 consultation. This is set out in detail in Section 9 of the Regulation 19 Issues and Matters Topic Paper. There is no error on page 360 of the DPD, this page sets out the updates since the Regulation 18 consultation. The former St Dunstons Church site was previously included in the Site Allocations and was referenced as UA44, but has since been omitted as a development is underway on the site. The UA44 policy requires the developer of the site to reprovide the football stadium, it is for this reason that a capacity figure has not been included, as the quantum will be dependent on how the stadium element of the scheme manifests.
Response Reference: U0001675
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06831/1
Name: Mr Andrew Price
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB12
Summary of Comment: GB10 West Hall: The DPD is unsound. In particular it is not an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence. It is also not consistent with national policy. Proposal will add significantly to existing pollution in the area, from traffic during construction and operational phases, impacting local life expectancy. Proposal will remove a significant part of green belt which adds to local amenity. The site is in a strategic gap between West Byfleet and Byfleet, development will harm character of West Byfleet as a separate village. SHLAA site SHLAABR030 was ruled out since 'development of the site will lead to significant loss of woodland and potential habitat (Sustainability Appraisal, p. 44), the same applies to this site. Also a site has been rejected due to removing the strategic gap between Knaphill and Brookwood, but not here. SANG proposals will not compensate for green belt loss. Local infrastructure e.g. roads/schools is already under pressure, development will have a significant impact. No comment from NHS England on need to extend surgery. The land is flood plain, floods every winter and receives run off from adjacent properties, which are likely to flood as a result if development goes ahead. Development next to the Wey Navigation will further increase flood pressure. Development of this size not justified by Woking's birth rate, would only meet other areas' needs to the detriment of local residents. Traveller pitch proposals have not followed the correct process for allocation; there is no demand for this type of development in the area (need is already being met elsewhere in Woking); will have significant impact on visual amenity; insufficient allowance in policy for how it will integrate into the area. GB12 Flawed proposal:

Having a car park it will bring more traffic into the area.
Will remove necessary flood plain land
Will remove some of the natural amenity; proximity of the M25 will limit its appeal to recreational users.
GB18
Removing West Byfleet school playing fields from the green belt will leave them open for future development.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The impact of the proposals on pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.
The impact of Green Belt loss on local amenity is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 4.
The Green Belt Boundary Review comprehensively assessed the performance of land in respect of relevant Green Belt purposes and concluded that sufficient exceptional circumstances justification exists for the release of site GB10 from the Green Belt, based on its high potential to deliver sustainable development. The same was not true of sites lying between Knaphill and Brookwood. A significant green gap will be retained between site GB10 and the motorway, with public access to this area enhanced by the creation of the Byfleet SANG and possibly off-site green infrastructure provided as part of the development of GB10, and the majority of the Green Belt on the west side of Byfleet will also be retained.
SHLAA site SHLAABR030 (2014 SHLAA reference), Blackhorse Road and Heath House Road, Brookwood, is entirely covered in woodland, a large proportion of which would have to be cleared to deliver the required number of dwellings. By contrast there is enough non-wooded area within site GB10 to accommodate the proposed development, alongside substantial additional landscape planting, and potentially off-site Green Infrastructure on land to the east. This is reflected in various key requirements of the policy, in particular the requirement to 'Retain large areas of woodland and parkland setting and strengthen where possible.'
The impact of the proposals on infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.
The issue of flood risk in relation to the proposals is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7. Site GB10 is in Flood Zone 1, where development is encouraged in accordance with Policy CS9 of the Core Strategy.
Development of the site would be in accordance with the key requirements in the site policy, and with the NPPF, which states 'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere' (Paragraph 163).
Birth rate is only one factor in the assessment of housing need, as well as increasing life expectancy, migration (mainly from nearby areas), the needs of businesses for workers and the need for more affordable housing, among other factors.
The reasons behind the allocation of Gypsy and Traveller sites in this location are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3.
The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.
The use of land for a SANG need not have a negative impact on flood storage capacity. One of the key requirements for policy GB12 states that a lack of negative impact from the development on floodplain storage should be demonstrated in a Flood Risk Assessment. To be usable as a SANG, Policy GB12 would have to fulfil Natural England's SANG criteria, which require an area to be natural in appearance, and attractive to visitors; this will protect the site's amenity. The majority of the site is more than 100m from the

<p>motorway and any impact of road noise on its appeal could be reduced through landscape planting.</p> <p>If sites GB10 and/or GB11 are taken out of the Green Belt for development, the West Byfleet school playing fields cannot be retained in it, as they would then be a green 'island' and not part of a 'belt'. They would not be performing Green Belt functions in any meaningful way. They will continue to be protected under policy CS17 as Urban Open Space. The latter policy, as well as the NPPF policy on recreation sites (paragraph 97), is also highly restrictive of development on sites where it applies.</p>
Response Reference: U0001596
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05818/1
Name: Mr And Mrs J Pridden
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05
<p>Summary of Comment: Objects strongly to the plans for the new housing developments in Byfleet. The developments are on Green Belt and flood plains in an area which is prone to flooding.</p> <p>Byfleet has only 1 road out of the village, Parvis Road, which cannot take the additional traffic, it is already regularly gridlocked.</p> <p>The population of Byfleet has already grown through infilling and small developments and the roads are blocked with parked cars. Additionally, there is no medical facility in Byfleet although there are many older people, together with no secondary school for children. There are no exceptional circumstances that justify these developments.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Objection noted.</p> <p>Sections 1 and 2 of the Regulation 19 Issues and Matters Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough.</p> <p>The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. The Council has published an IDP to set out the nature and type of infrastructure that will be needed to support development and how this will be delivered. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning.</p> <p>Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed</p>

mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. The overall spatial strategy of the Core Strategy is to concentrate most new development at the main centres because they offer a range of key services and facilities to help minimise the need to travel and to encourage sustainable travel modes. Specific references are made to Policies CS1: A spatial strategy for Woking Borough and CS18: Transport and accessibility of the Core Strategy which clearly demonstrate the importance that the Council places on encouraging walking and cycling. In addition to the policies of the Core Strategy, a key objective of the Council's Parking Standards is to use parking provision as a tool to encourage walking and cycling, in particular, at locations where key services and facilities are readily available without undermining economic vitality.
Response Reference: U0001164
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05479/1
Name: Mr Bill Pugh
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, UA01
Summary of Comment: Inconceivable that there is room for more dwellings in Byfleet, it used to be lovely but is already overloaded and risks disappearing forever. The road system already cannot cope with traffic, it will come to a complete standstill.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: With regard to local character, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites, when and if they are allocated for development, will increase the population of the area. However, at the same time as they are allocated other factors will be taken into account appropriately, including the pressures on local infrastructure at that time, and any improvement that may be required. Overall therefore, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined by the safeguarding of these sites for future development. The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13
Response Reference: U0001569
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06474/1
Name: Ms Libby Punter
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Object to proposed green belt developments. There is already a serious pollution problem along the A245, that can be tasted and is probably causing illness.

<p>Even without problems there is a two hour traffic queue each rush hour. I often have to turn left to go right onto Parvis Road [from my home near the motorway bridge]. The traffic may cause cracks to appear on my house. No amount of sorting pinch points will resolve the current problems, let alone the traffic impacts of the houses at Broadoaks and the proposed Traveller site.</p> <p>The area floods, it is hard to get GP appointments or a place at local schools; central government seems bent on destroying our community of Byfleet. When is enough, enough.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The impact of the proposals on air pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The proposed mitigation measures in the A245 Mitigation Study are intended to mitigate the impact of the proposed development on traffic levels, rather than to solve existing issues on the network.</p> <p>The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p> <p>The impact of the proposals on local infrastructure, including schools and GPs, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The limits to proposed Green Belt release are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 14. The safeguarding of land for development after 2027 is intended to remove any need to review Green Belt boundaries again until at least 2040.</p>
<p>Response Reference: U0001654</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06795/1</p>
<p>Name: Mr And Ms Andy And Liz Puttock</p>
<p>Number of Signatories: 2</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB07</p>
<p>Summary of Comment: Objects to the loss of Green Belt land at GB7. The beautiful woodland area which is a central part of the proposed site has protected trees and contains wildlife. Object to the loss of outlook, privacy and well being provided by the woodlands.</p> <p>Objects to more development as this will impact the local infrastructure such as Secondary school, Sports Box and Athletic Track/Stadium site. The impact on traffic congestion in the area. Impact of noise and light pollution on the home and garden. If GB7 has to proceed, please keep the woodland around the site and directly to the rear of the existing houses around the site. This would at least provide some degree of privacy and greenery to the area.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Objection noted.</p> <p>The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will</p>

encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

The Core Strategy contains Policy CS21 Design and the Outlook, Amenity, Privacy and Daylight SPD. As part of the Development management process the case Officer will assess the impact of any scheme on outlook, amenity and privacy on the neighbouring properties.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Concerns raised regarding noise, light and air pollution are addressed in section 8 of the Topic Paper.

Response Reference: U0001201

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 02455/2

Name: Pyrford Green Belt Action Group

Number of Signatories: 1

Comment Type: OBJ

Site Reference: RG18GB12, RG18GB13, GB10

Summary of Comment: No Green Belt sites should be safeguarded for development- this contradicts Core Strategy Objective 6 on protecting the integrity of the Green Belt. Green Belt is a finite resource, so its development is inherently unsustainable and contrary to the objectives of the NPPF, and to the Government's commitment to protect Green Belts in the Housing White Paper (2017). Instead, more opportunities should be taken to increase housing density and develop brownfield sites. WBC has no democratic mandate for the town to grow at a faster rate than London. The focus of planning should be on changes to the mix of dwellings required.

Sites previously proposed for safeguarding in Pyrford

The Sustainability Appraisal Report (appendices 12 and 13) contain statements on the suitability of Land Rear of Lovelace Drive (site SHLAAPYR003 or 'GB11') and Land Rear of Aviary Road (site SHLAAPYR004) which are erroneous and/or otherwise unsound. The former proposal to remove them from the Green Belt was an unsafe decision based on

inadequate evidence and could not be justified as a decision capable of enduring in the long term.

Site SHLAAPYR003 should not have been proposed by the Green Belt Review for removal from the Green Belt. The review found that the site served two critical Green Belt purposes, and was only 18th out of 31 sites for sustainability of location. The site was only selected for removal as a result of its availability. Site availability is not a sound means / relevant consideration for determining which sites should be released from the Green Belt. It undermines the methodology based on the importance of the land for Green Belt purposes according to the NPPF, and indicates disregard for the site ranking system in the Green Belt Review. Although the site has since been excluded from the SADPD, this flawed evidence has not been put right, leaving the site vulnerable.

Site SHLAAPYR004 was not even supported by the Green Belt Review for removal from the Green Belt. Its former inclusion as a safeguarded site was not transparent, rational or supported by any evidence. Although the site has since been excluded from the SADPD, this flaw has not been put right, leaving the site vulnerable.

The fields are of environmental value as recognised by the Sustainability Appraisal and Green Belt Review. Both fields are in an environmentally sensitive area, and house large winter flocks of farmland birds (including as an important site for the declining reed bunting) and protected mammals in the field margins. Development would cause net loss of biodiversity. This loss (specifically of farmland) would not be mitigated by upgrading any alternative natural greenspace.

Development would have an impact on both sites' character and result in the loss of sensitive landscape features. The area is protected by policy CS24 as an Escarpment and Rising Ground of Landscape Importance. The fields contribute to the 'rural feel' identified by the Surrey LCA for this area. SHLAAPYR003 is surrounded by mature tree and shrub belts which substantially screen the urban edge of Woking and are protected by a TPO. SHLAAPYR004 is open, on top of the slope of the Wey Valley and with connecting views of the escarpment, river valley beyond and the Surrey Hills AONB. The sites form part of a relatively narrow but continuous stretch of countryside between the town and the river valley (a Biodiversity Opportunity Area). This area of countryside is not blighted by golf courses, rare for this part of Surrey. The sites are important for containing the southern edge of Woking and providing a strong landscape context for Pyrford village.

The fields provide an important setting for heritage assets including Pyrford Court and Gardens, Aviary Road Conservation Area, Pyrford Village Conservation Area and Pyrford Common SNCI (including the deer park pale for Woking Palace), and others. Purpose 4 of the Green Belt should have been included in the Green Belt review; although Woking is not formally considered a historic town, historic assets should still have been assessed in combination with other important local considerations. Pyrford is a historic village. The Green Belt Review consistently neglected to consider important historic assets. Pyrford provides a rural and historic gateway into modern Woking, the damage development would cause cannot be simply resolved by mitigation.

Rights of way in the area are of special importance- the rural and open character, with ancient footpaths offering views of the North Downs, draws walkers, cyclists and equestrians from all over the county. The importance of this is recognised by the Natural Woking Strategy.

Higher density housing, as recommended by the Housing White Paper, would be inappropriate due to the surrounding Conservation Areas. Development of these sites would be more likely to be of large executive homes, not meeting the need for affordable housing.

The community wishes to keep the fields in the Green Belt, as reflected by the Pyrford Neighbourhood Plan and two petitions of 700 and 900 signatures respectively. Nearly all points raised by residents in the Regulation 18 Consultation were dismissed with the phrase 'No further modification is proposed as a result of this representation', while the Council listens to landowners and developers.

Roads in the area are already busy and the B367/Upshot Lane junction is an accident cluster. There are many developments in the pipeline that will already increase traffic. Increased traffic resulting from the proposed sites would be inconvenient and increase noise and air pollution. Changes to the local roads are impossible without harming the essential character of the village: verges on the B367 are protected by the Neighbourhood Plan, and a roundabout at the priority junction would result in significant tree loss and landscape/heritage impact. Creating safe road access to either site would also require substantial tree loss and (for access from Upshot Lane) land take. Relieving traffic pinch-points in Pyrford village would merely encourage further through traffic to use the route.

Public transport is limited, the sites are distant from railway stations and no attention has been paid to cycle routes or safety.

The nearest health centre, dental surgeries and opticians are in West Byfleet and there is no pharmacy in Pyrford. Unclear if health practitioners would cope with the additional population.

The local school and pre-school nurseries are heavily oversubscribed, there would be no school places for the additional population.

The fields have not been examined for agricultural grade but are probably grade 3a, and are currently being productively farmed. Climate change and political and economic uncertainties underscore the need to keep such land intact. It was bizarre for the Green Belt Review to rule out considering Agricultural Land Classification as a major constraint; this has fed through to subsequent evaluations.

Site GB10 (West Hall)

Object to the proposed development on site GB10, on farmland whose loss cannot be mitigated. The orchard at West Hall is part of Britain's agricultural heritage, as the site where the Byfleet Seedling apple was developed in 1915.

Dodds Lane adjacent to the site is an ancient footpath and part of the Venus Cycle Trail. Health services, schools and roads would be unable to cope with the proposed development.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The necessity of removing land from the Green Belt and safeguarding it for future development is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 2. Core Strategy Objective 6 on the Green Belt sits alongside Core Strategy Objective 3 on providing a range of homes, which feeds into Core Strategy policies CS1 and CS10, both of which state the intention to review the Green Belt. The Housing White Paper (2017) makes an allowance for Green Belt boundaries be amended in exceptional circumstances (page 29); WBC believes these apply to Woking.

The role of democratically elected councillors in the Local Plan production process is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 24.

Meeting the mix of dwellings required is addressed by the existing policy CS11: Housing Mix. As part of the development plan, this policy will be applied to proposals on all the sites allocated for housing development in the SADPD, taking into account the specific context.

Support welcomed on the decision to remove the two safeguarding sites in Pyrford from the Local Plan.

The methodology of the Green Belt Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12. The adequacy of the evidence base for the SADPD more generally is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 10.

The impact of the proposals on traffic levels is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.

<p>The impact of the proposals on infrastructure more generally, including health and school facilities, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The Agricultural Land Classification data, obtained from Natural England, was taken into account both in the Green Belt Boundary Review and the Sustainability Appraisal (SA). The SA Report identified parts of the site to be Grade 3 Agricultural Land, however, Natural England data does not subdivide this into Grade 3a/3b. Further survey work would therefore be required. As a result, this is reflected in a key requirement within policy GB10 requiring developers to engage with Natural England to determine the agricultural quality to inform proposals coming forward. Whilst it is agreed that agricultural land is important for sustainable food production, the agricultural land constraint on this site is not considered to be significant, and can be accommodated in proposals with appropriate layout, design and mitigation measures.</p> <p>The significance of the orchard at West Hall is acknowledged (it is designated as a Traditional Orchard on the Priority Habitats Inventory) and a minor modification is proposed to highlight this designation in the policy.</p>
<p>Response Reference: U0001760</p>
<p>Officer Proposed Modification: Add 'traditional orchard' to the list of assets to be protected by key requirements, Policy GB10 bullet point 5. Should read as follows: "Retain large areas of woodland, traditional orchard, and parkland setting and strengthen where possible".</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 03021/2</p>
<p>Name: Pyrford Neighbourhood Forum</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: SUPP</p>
<p>Site Reference: RG18GB12, RG18GB13</p>
<p>Summary of Comment: Noted that proposals for the Regulation 18 consultation in June-July 2015 have been restructured and that the Pyrford sites, GB12 and GB13, in the nomenclature of Regulation 18 proposals, have now been removed from the current Regulation 19 proposals.</p> <p>The Forum cannot comment on the validity of the process WBC are following but we believe this Regulation 19 DPD to be a significant improvement on Regulation 18 proposals. Current Regulation 19 DPD proposals recognise the validity of our objections at the preliminary Regulation 18 consultation held in 2015.</p> <p>1. Process for withdrawing sites from Green Belt was flawed.</p> <p>WBC commissioned the Peter Brett Associates Green Belt Review to identify land that could reasonably be taken out of Green Belt for development. After considering both sites in Pyrford one site (behind Aviary Road) was clearly rejected as inappropriate for development and the other was ranked for inclusion when, if the heritage value had been properly assessed, it should also have been rejected.</p> <p>2. Process for Selecting Sites for Development was flawed</p> <p>In the Regulation 18 consultation, both Pyrford sites were selected as sites safeguarded for development after 2027. This was despite the recommendation of WBC consultants that one site should be kept in Green Belt and without an updated Boroughwide Landscape Character Assessment. If the latter had been available there is no doubt the second Pyrford site would not have been selected for inclusion in proposals.</p> <p>3. Safeguarded Development after 2027 over-provided.</p> <p>Our understanding is that 'safeguarding' is an appropriate way to mitigate against plans not maturing as expected and to provide a future reserve for possible housing needs. There is no legal requirement to do so but it is encouraged. However, land for</p>

approximately 1200 dwellings was proposed and this was an excessively high proportion of all the land required.

Overprovision of sites safeguarded for development after 2027 meant GB12 and GB13 were selected for proposals contained in the Regulation 18 DPD. Whilst the process for selecting sites was clearly laid out in the DPD, tracking through the process to the conclusions drawn was difficult and beset with anomalies that were unexplained. For example, GB12 was consistently evaluated as unsuitable in the Green Belt Review that is the basis for including GB12 and GB13 in the DPD, until at the end it is recommended on grounds of availability. Similarly GB13 was consistently judged unsuitable in the Green Belt Review and was not recommended as an area to take out of the Green Belt. However, it suddenly reappeared 18 months after the Green Belt Review was delivered and on the eve of the DPD publication. Such decisions were inadequately justified and can only be described as anomalies of selection.

4. Impact of development on Pyrford sites is very damaging.

The Pyrford sites are open farmland, actively farmed with a variety of crops. In the last two years the value and productivity has increased significantly. In addition the site north of Upshot Lane includes the high spot on the Pyrford Escarpment that offers uninterrupted views across Ripley to the Surrey Hills.

Development of these sites will ruin a key area of Pyrford and blight views out from the Pyrford Escarpment and Rising Ground of Landscape Importance (as recognised in the Woking BC 1999 proposals). In addition houses on the high ground above St Nicholas Church will disturb the setting of what is an important conservation site around the Grade 1 listed church.

Our neighbouring Forum Area, West Byfleet is scheduled to lose a substantial amount of remaining Green Belt by 2027 with no viable SANG provision and the retention of Green Belt in Pyrford is essential to provide for green space as required by the NPPF.

5. The Infrastructure is Inadequate to Support Proposed Development

The Pyrford sites are bounded by narrow 'B' roads (B367 and Pyrford Common Road) that extend into the notoriously busy B382/A245 between Old Woking in one direction and Byfleet in the other. These roads are all currently very congested commuter 'rat runs' in the morning and evening, represent main routes for accessing Woking and West Byfleet mainline stations and are also unavoidable when delivering and collecting schoolchildren twice a day.

Against this background development plans for West Byfleet will simply exacerbate the situation.

In addition, there are grave concerns about the ability of medical and bus services to support additional housing in the area.

In conclusion, then, Pyrford Neighbourhood Forum see the removal of sites GB12 and GB13 from the Regulation 18 proposals as a very positive step that improves the viability of the Regulation 19 proposals and renders the DPD more robust. In doing so the revised plan preserves Pyrford's heritage, protects valuable farm land and above all preserves the unique character and setting of Pyrford that is enjoyed by so many from across the Borough and beyond.

Reserves the right to appear at the Examination in Public against the late appearance of changes to current proposals that impact the unique character and setting of our community in Pyrford.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Support noted

Response Reference: SUPPOR

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06501/1
Name: Mrs Nicola Quibell
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB18
<p>Summary of Comment: DPD is not legally compliant, positively prepared, justified or effective. DPD is unsound. Wishes to be informed of next stages. There has not been sufficient consultation with the Neighbourhood Forum. Concerns regarding the following: - Inadequate road (particularly Parvis Road), health and educational infrastructure; - Removal of flood plains from West Hall; - Removal of playing fields and associated impact on pollution. What consideration has been given to other community infrastructure needs? Have brownfield sites been considered?</p>
<p>Contributor Proposed Modification: Proposes modifications in the form of a report on consultations with the Neighbourhood Forum and how it takes into account the Neighbourhood Plan. Further consideration to environmental impact on school children and capacity of infrastructure is needed.</p>
Modification Reference: U0000412
<p>Officer Response: Section 1 paragraphs 1.6-1.7 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding development of Green Belt land over brownfield land. Section 6 addresses the issue regarding adequacy of infrastructure, including health, education and community. Section 13 specifically covers road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 7 addresses the issue regarding flooding in Byfleet and West Byfleet. Section 8 addresses the issue regarding pollution. The School Playing Fields site (GB18) has been identified to be released from the Green Belt to ensure a defensible Green Belt boundary. This site has been designated as open space to serve the school and is protected by Policy CS17 of the Core Strategy. It is not identified for development. Section 4 addresses the loss of open space and Green Belt land. Furthermore, a vast majority of the allocated sites, particularly those allocated for housing development in the Green Belt, have site specific requirements to provide sufficient green infrastructure which aids mitigation of air pollution. Section 9 addresses the issue regarding the sufficiency of the Regulation 19 Consultation. Specifically, paragraph 9.1, which highlights that Neighbourhood Forums were presented to. Section 16 specifically addresses conflicts with the objectives and policies of the West Byfleet Neighbourhood Plan.</p>
Response Reference: U0001253
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 02119/2
Name: Ms Wendy Quintal
Number of Signatories: 1

Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: No comment on legal compliance and no modification proposed. No comment on duty to cooperate. Considers the DPD was not positively prepared, not justified, not effective and not consistent with national policy and Unsound. Upshot Lane Development - believes WBC have made the right decision to drop the Upshot Lane fields from the Site Allocation proposals and are pleased that WBC recognise the validity of objections made at the preliminary Regulation 18 consultation held in June and July 2015 1) The Upshot Lane fields contribute very significantly to the semi-rural setting and character of Pyrford as a whole and if they were built upon the character and setting of the conservation area around St Nicholas Church would suffer enormously. 2) Traffic through Pyrford is currently dangerously high for the narrow roads and traffic from a further 500 houses on Upshot Lane would be unsupportable. Proposes that Brown field land should be prioritised for development such as Wisley Airfield. Woodland areas and farm fields should be preserved to ensure the rural feel of Woking borough is maintained. Does not wish to participate in public examination and wishes to be informed of the next stages of the DPD.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted for the removal of Pyrford Sites in the Regulation 19 DPD Consultation. Wisley air field falls within Guildford Borough council boundary. Woking Borough Council did look at alternatives sites which has been addressed in Section 11 of the Regulation 19 Issues and Matters Topic Paper. The justification to release Green Belt land for development has been comprehensively addressed in Section 1 and the impact of the reduction of Green Belt land on residents see Section 4 and impact on woodlands and fields see Section 19 of the Regulation 19 Issues and Matters Topic Paper.
Response Reference: U0001192
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02251/2
Name: Mr Justin Quintal
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports WBC's decision to drop the Upshot Land fields from the SA DPD. Pleased that the Council recognise the validity of objections made at Reg 18 stage consultation. The fields contribute significantly to the semi-rural setting and character, which is important to the preservation of the conservation area around St Nicholas Church. Traffic from additional development would be unsupportable and dangerous on already narrow, traffic ridden roads.
Contributor Proposed Modification:
Modification Reference:
Officer Response: Support and comments noted. The heritage and landscape value of the sites are part of the reason for the Council retaining them in the Green Belt. Further

detail can be found in the Council's Regulation 19 Issues and Matters Topic Paper, paragraphs 14.11 to 14.13.
Response Reference: U0001283
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06499/1
Name: Mr Peter Quinton
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Object to proposed Green Belt development in Byfleet and West Byfleet due to: The importance of open spaces to health and wellbeing, and the relative lack of Green Belt in the ward. Potential for brownfield and other non-Green Belt sites should be thoroughly explored first. Disproportionate allocation of dwellings and traveller sites to this ward, when it has the least green belt area. Suggest no development is proposed in Pyrford for political reasons. Inadequate road infrastructure, already congested. The impact of development in combination with an increase in delivery vehicles will lead to traffic chaos, affecting the travel of local residents, emergency services, and air pollution levels. It is unclear where children on the proposed developments would go to school. Inadequate and old sewer infrastructure. History of flooding in the area. Building on a greenbelt will restrict drainage, increase the likelihood of flooding and multiply the number of areas affected. When so many objections have been made about proposed traveller's sites I am amazed that the council is still pursuing this course of action, particularly on a greenbelt site.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of Green Belt loss on the health and wellbeing of local people is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 4. The potential for housing on alternative, especially brownfield sites, is addressed by the Regulation 19 Issues and Matters Topic Paper, Sections 1 and 11. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 5. The role of Councillors in the Site Allocations process is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 24. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 13. The impact of the proposals on air pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 8. The impact of the proposals on infrastructure (including schools and sewers) is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 6. Flood risk issues in relation to the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, Section 7. The necessity of allocating Green Belt land for a Travellers' site is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 3.
Response Reference: U0001667
Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):**Contributor Reference:** 06257/1**Name:** Ms Susan Randall**Number of Signatories:** 1**Comment Type:** OBJ**Site Reference:** GB10

Summary of Comment: DPD is unsound (in particular, not an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence, and inconsistent with national policy), since GB10 should not be taken out of the Green Belt: Object to removing 80% of West Byfleet's Green Belt area to build houses. The proposal would be contrary to the West Byfleet NDP and therefore not comply with planning law as defined under NPPF para 47.

Traffic on Parvis Road has risen greatly since a decision in 1997- signed off by the Secretary of State- that no more development should occur since the road could not cope with more traffic. Why should WBC therefore be proposing so many houses, the road would be at a standstill.

Contracticts NPPF para 170(e). Increased housing and traffic would lead to risk to residents from noise, water and air pollution. The site is next to the M25 where noise and air pollution are already high.

Medical, school and sewage infrastructure are already overloaded, could not cope with the proposed additional houses.

Totally unacceptable to propose Traveller pitches on a Green Belt area.

The site is a floodplain, known for severe flooding which has also spread to Dartnell Park. I do not see that the Council has fulfilled its obligations in respect of taking flood risk into account in the planning process, directing new development away from areas at risk of flooding and involving the Environment Agency in applications in flood risk areas.

In combination with the proposals at Sheer House and Broadoaks, the proposal appears to be an overdevelopment of the area. WBC needs to research previously developed sites in more sustainable locations.

Contributor Proposed Modification: None Stated**Modification Reference:** NOMODS

Officer Response: The concentration of Green Belt loss in West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 5.

The relationship of the SADPD to the West Byfleet NDP is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 16.

The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 13.

The impact of the proposals on air and noise pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 8.

The potential for water pollution to arise from site GB10 is addressed by the Sustainability Appraisal, see Appendix 2, page 264. The policy includes key requirements relating to the potential for groundwater contamination, the watercourses and aquifer on the site, Sustainable Drainage Systems and other drainage infrastructure. Development of the site would also be assessed against the existing policies CS9: Flooding and Water Management and DM6: Air and Water Quality.

The impact of the proposals on local infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 6.

The need to allocate Traveller Pitches in the Green Belt, and the process by which this conclusion has been reached, is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 3.

<p>The issue of flood risk in relation to the site allocations is addressed in the Regulation 19 Issues and Matters Topic Paper, Section 7. The consideration of alternative sites, including brownfield sites, is addressed in the Regulation 19 Issues and Matters Topic Paper, Sections 1 and 11.</p>
Response Reference: U0001519
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04323/1
Name: Mr Malcolm Rapps
Number of Signatories: 1
Comment Type: OBJ
Site Reference: RG18GB12, RG18GB13, GB10, GB18
Summary of Comment: Supports the omission of Pyrford Green Belt allocations. Objects to the release of Green Belt land, particularly GB18. Concerns regarding the development of playing fields (GB18) and associated impact on health from loss of recreational land and introduction of a pub. Concerns regarding traveller pitches on GB10.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt for development. Section 5 specifically addresses the loss of Green Belt in Byfleet and West Byfleet. Section 3 addresses the issue regarding travellers. The pub in the park proposal is beyond the remit of the DPD. Nevertheless, it has been confirmed that this proposal would no longer be pursued by the developer. Proposed site GB18 is allocated for open space to be protected by policy CS17 of the Core Strategy. The proposal to remove the site from the Green Belt would also allow a defensible Green Belt boundary to be drawn. As stated in the DPD, this land would not be developed. It is existing open space associated with an educational use. Accordingly it is allocated for continued use as open space and will be designated as Urban Open Space (Policy CS17) to serve the schools.
Response Reference: U0001554
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00869/2
Name: Mr Frank Ray
Number of Signatories: 1
Comment Type: SUPP
Site Reference:
Summary of Comment: Consider the DPD to be sound, positively prepared, justified, effective and consistent with national policy.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06636/1
Name: Mrs E Redknap
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, UA01, UA42, UA43
Summary of Comment: Object to housing and Traveller pitch proposals in the Byfleets- this is unacceptable and should be halted immediately: Our infrastructure is totally inadequate to cope with the increase proposed. The pollution level is bound to rise.
Contributor Proposed Modification: this proposal ... should be halted immediately.
Modification Reference: U0000292
Officer Response: The capacity of infrastructure to cope with the proposed development is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 6. The effect on pollution levels of the proposed development is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 8.
Response Reference: U0001136
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06673/1
Name: Ms Joanne Reed
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Strongly objects to the proposed development of green belt land and the implementation of traveller pitches. There is very little green belt for residents to enjoy. It is vital that this green space is retained for our future generations. The area is already congested and there appears to be a lack of supporting infrastructure. The GP surgeries are at bursting point, the roads are grip locked, and the schools are at max capacity and the police is over stretched. Why are all the plans to release green belt centred around our village. Woking borough council appear to have complete disregard to the needs and views of its residents as despite 90% formally objected development of Sheer house was approved. Hopes that this will not be the case here. Residents do not want this and you need to listen to the voices of the community and respect them. No to the extra housing and certainly no to legalised traveller pitches.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Objection noted. In regards to reduction in Green Belt land and its benefits to the residents and future generations, please see Section 4 and in regards to the loss of Green Belt in Byfleet see Section 5 of the the Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team,

<p>and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Police capacity has been taken into account in the Infrastructure Capacity Study and Delivery Plan. This can be viewed on the Council website Woking2027.info. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 of the Issues and Matters Topic Paper goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>The Sheer house Planning application was approved at Planning Committee and was subject to a separate consultation exercise. The Committee report would have taken into account all of the representation received in examining the merits of the application. The need for housing and releasing the Green Belt and the need for Travellers Pitches has been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper. See Section 1 and Section 3.</p>
<p>Response Reference: U0000903</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06786/1</p>
<p>Name: Ms Kathryn Reeves</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: Objects to GB10. Considers that the DPD does not pass the test of soundness. In particular the DPD is not an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. Nor is it consistent with national policy. Reasons for this assertion are detailed below:</p> <ol style="list-style-type: none"> 1. Parvis Road suffers from congestion during peak times, and does not have capacity to serve an additional 550 houses. Planned mitigation at Seven Hills Road will be insufficient. 2. Infrastructure is struggling to support the current population and could not support increased residential development. New schools and GPs would need to be built as West Byfleet's healthcare system is over capacity, and schools are full. 3. Byfleet and West Byfleet are subject to flooding. GB10 has experienced severe flooding from the River Wey, and is therefore a vulnerable location for 500+ houses. 4. The number of houses proposed by GB10, combined with permissions granted at Broadoaks and Sheer House, represents significant overdevelopment.
<p>Contributor Proposed Modification: Urges Woking Borough Council to consider alternative sites which could be suitable for some or all of this proposed housing</p>
<p>Modification Reference: U0000198</p>
<p>Officer Response: This representation has been comprehensively addressed by the Regulation 19 Issues and Matters Topic Paper.</p> <p>Regarding Parvis Road, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. More generally, Paragraph 6.7 provides that the County Council as Highways Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.</p> <p>Section 6 comprehensively addresses infrastructure, and Paragraph 6.9 and 6.12 address education and GP provision respectively.</p>

<p>Section 7 addresses the consideration that has been given to flooding, and Paragraph 7.7 confirms that the DPD takes due care to make sure that the risk of flooding is minimised in Byfleet and West Byfleet.</p> <p>The Council does not consider the indicative number of houses proposed in West Byfleet to constitute overdevelopment. Paragraph 5.1 recognises that while the proposed allocation of sites for development is not evenly spread across the Borough, this could not be achieved due to the uneven distribution of constraints and theneed to ensure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. Indeed, Section 11 confirms that a thorough assessment of reasonable alternatives had been conducted.</p>
Response Reference: U0001049
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06864/1
Name: Mr Michael Reilly
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Object to GB10 due to:</p> <p>The scale of the proposed development and its impact on the surrounding area, infrastructure especially. The A245 is congested and, between Brooklands and Painshill, above capacity. The proposal, espically in combination with Broadoaks and Sheer House, would increase traffic unacceptably, reducing residents' quality of life. The plan offers no credible proposal to address this.</p> <p>The land is low-lying and frequently waterlogged, especially in winter. How would the proposed development address flood control, especially in light of forecasts of more severe weather as a result of climate change?</p>
Contributor Proposed Modification: the plan in its current form is unacceptable and should be withdraw for further consideration.
Modification Reference: U0000263
<p>Officer Response: The issue of the general scale of development proposed for West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. The impact of the proposals on local infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. Other sites proposed for development in the area, including Broadoaks and Sheer House were included in the traffic mitigation evidence base.</p> <p>The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p>
Response Reference: U0001488
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06695/1
Name: Mr Mark Rennie
Number of Signatories: 2
Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11, GB18
<p>Summary of Comment: Objects around the proposal to release green belt land in west Byfleet and the surrounding areas.</p> <p>Understands that there is great pressure to increase the number of houses to meet demand, the use of green field sites that are at the heart of the community irreversibly affecting schools, parks and open spaces. These spaces affect the quality of life not only of the current residence but any future residence as well and needs to be protected ensure quality of life.</p> <p>The infrastructure requirements needed for any expansion of the local community has not been fully considered to accommodate any increase in health care and educational facilities to adhere to our statutory rights.</p> <p>West Byfleet School would lose its field under the plans, while the size of the school would increase and as a user of the West Byfleet Health Centre which is already over capacity.</p> <p>The proposal will have an adverse impact on current and future residence, the environment and local infrastructure.</p>

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

<p>Officer Response: Objection noted.</p> <p>The release of Green Belt Land for housing and the impact of the loss of Green Belt land on residents wellbeing has been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper. See Section 1 and 4.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD.</p> <p>The representation regarding GB18 West Byfleet School and loss of its fields is incorrect. The field will not be built upon but taken out of the Green Belt and designated as Urban open Space to serve the school. Its designation as Urban Open Space will be protected by policy CS17 of the Core Strategy.</p> <p>The Council will make sure that the development of any land it safeguards will avoid or mitigate impacts to the environment as far as possible. The Development Plan for the area has several planning policies that aim to protect and enhance the environment of the Borough, particularly policies CS7 Biodiversity and nature conservation, CS8 Thames Basin Heaths Special Protection Areas, CS17 Open space, green infrastructure, sport and recreation and CS24 Woking's landscape and townscape.</p>

Response Reference: U0001080

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06657/1

Name: Mr Paul Reynoldson

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

<p>Summary of Comment: Objects to the proposed development plan document for the Woking borough for green belt development sites up to 2027. The main objection I have is in relation to the West Hall site off the Parvis road which has been allocated for up to 555 dwellings in addition to 15 new traveller pitches. Realises the need for additional housing provision within the borough but clearly allocating green belt land for such a large scale development is in contravention of current planning policy which seeks to protect the green belt where alternative brownfield solutions are available.</p> <p>The added pressure a development of this size would have on already stressed infrastructure, namely Parvis Road. Also the impact of Broadoaks and West Byfleet centre. The traffic assessments undertaken as part of the applications for these sites will bear testament to this.</p> <p>The West Hall site should not even be considered because of the fact it is green belt, adjacent to historic protected ancient woodland, is environmentally important and the only access into the site will be from the busiest road in the entire area.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Objection noted.</p> <p>The release of Green Belt land for housing and for Travellers has been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper. See Section 1 and Section 3.</p> <p>In regards to the impact on road infrastructure including Parvis Road, see Section 13 and in regards to impact on woodlands and environment see Section 19 in the Regulation 19 Issues and Matters Topic Paper.</p>
<p>Response Reference: U0001083</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06516/1</p>
<p>Name: Anthony Rich</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11</p>
<p>Summary of Comment: WBC should not consider building on green belt land around Byfleet and West Byfleet. Development opposed due to:</p> <p>Air pollution from traffic in construction and operational phases.</p> <p>Insufficient road infrastructure to support increased traffic.</p> <p>Noise pollution.</p> <p>Environmental impact.</p>
<p>Contributor Proposed Modification: I thought Woking would be trying to improve/ support Byfleet/ West Byfleet in regards to the following -</p> <ol style="list-style-type: none"> 1. Improved infrastructure 2. Improved green spaces 3. Planting of trees in the local area 4. Improved local parks
<p>Modification Reference: U0000115</p>
<p>Officer Response: The impact of the proposals on air and noise pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p>

The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. Other elements of the environmental impact of the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 4, 7, 19 and 23.
Response Reference: U0001575
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06314/1
Name: Mr David Robbins
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: The DPD should reflect the current status of the allocated sites and show a cogent connection between the need for housing, how that need will be met and how the desired housing mix will be delivered.</p> <p>The DPD does not make clear that WBC intends to develop at least ten 30-storey residential tower blocks within the town centre which would be entirely out of character and out of scale. There has not been appropriate public consultation in this regard. The stated rationale is that such an approach would avoid development in the Green Belt and the reasoning for this rationale is that the Council received a very significant number of objections to Green Belt development. This is in spite of Council's position that the loss of these Green Belt sites would not damage the overall efficacy of the remaining substantial area of Green Belt. No member of the public was asked whether they would prefer high-rise town centre development or well-designed housing on Green Belt sites. These points can be demonstrated as follows:</p> <p>UA17 and UA18 are allocated for limited office development despite the fact that Thameswey, a wholly owned subsidiary of WBC, has submitted a planning application in August 2018 for a 34-storey block of 174 flats. In addition a further application has been submitted for a 34 storey block of 293 flats at the BHS site. Furthermore WBC has entered into a development partnership with Coplan Limited for development of the Woking Gateway on sites adjacent to the High Street. The proposed towers are likely to supply a large number of flats. Given these current proposals, which are underway or in the pipeline, this DPD is an inaccurate reflection of long-term development.</p> <p>UA5 has been identified as a redevelopment site for residential units, but the building has already been converted into flats.</p> <p>Although Woking centre does not have many significant buildings, Christ Church is fine listed church of simple late Victorian design, and adjacent 34 storey towers at Concord/Griffin House and the BHS site would be out of scale.</p> <p>Regulation 18 sites GB10 and GB11 are deliverable and could both provide a mix of housing, when added to the flatted development in the town centre envisaged in Woking's Core Strategy. Two Councillors came to a view that both of these sites were critical to the green belt, although the Council's Planning Officers came to the opposite view, in concurrence with the original Green Belt Boundary Review. The reasons were that the northern boundary of GB10 was peculiar even though it followed the line of the Hook Heath scarp, which has been preserved for many years by planning policy, and that development of GB11 would spoil the setting of Pyrford Court heritage assets, although that building is not visible from the site or vice versa. GB11 is also bound by roads and existing residential estates so the resultant Green Belt boundary would be very defensible. In conclusion the DPD is flawed in that the Council's strategy for intensive high rise development in the town centre is hidden by the lack of information on sites already committed for such development. A further flaw is that the DPD fails to identify sufficient</p>

Green Belt sites for lower density family housing and affordable housing to provide the necessary housing mix. It is suggested that WBC consider a comprehensive town centre master plan and reassess Green Belt options.

Contributor Proposed Modification: WBC should look again at its proposals both in relation to setting out a proper comprehensive master plan for the town centre and to include a reassessment of the Green Belt options.

Modification Reference: U0000160

Officer Response: The Council considers that the DPD shows a cogent connection between housing need and delivery.

As set out in Paragraph 1.3 of the Regulation 19 Issues and Matters Topic Paper, the Core Strategy makes provision for inter alia 4,964 net additional dwellings, with an affordable housing provision target of 35% between 2010 and 2027. Between 1 April 2010 and 31 March 2018, the Council's development monitoring records indicate delivery of 2134 homes. The Site Allocations DPD identifies a sufficient quantum of land for the delivery of the remaining housing need to 2027. This includes a sufficient cushion to allow for non-implementation. The expectation is that the development of the sites will reflect the housing mix needed in the area in accordance with policy CS11 of the Core Strategy. As set out in Paragraph 1.4 of the Regulation 19 Issues and Matters Topic Paper, the Site Allocations DPD should be judged on whether it has identified a sufficient deliverable range of sites in sustainable locations in the context of the spatial strategy of the Core Strategy to meet the development needs of the Borough. The Council is confident that the DPD achieves this objective. However, in identifying deliverable sites, the Site Allocations DPD does not seek to set out detailed design matters, including building heights. These will be determined on a case-by-case basis through the Development Management process, during which appropriate consultation will be conducted. There are robust policies to ensure that development is of high quality standard, and reflects the character of the area. Policy CS21 is a good example.

The Council's overarching spatial strategy is established in the Core Strategy. Policy CS1 provides that most new development will be directed to previously developed land in the town, district and local centres. It also provides that "in the town centre, well designed, high density development that could include tall buildings and which enhances its image will be encouraged, but without compromising on its character and appearance and that of nearby areas." Furthermore, Policy CS1 identifies that between 2022 and 2027 the Green Belt and Woking Town Centre are identified as broad locations for growth, subject to the findings of the Green Belt boundary review which will ensure that the overall purpose and integrity of the Green Belt is maintained. Extensive consultation was carried out during the preparation of the Core Strategy DPD, at the Issues and Options stage, as well as the Regulation 18 and 19 stages.

UA17 and UA18 are proposed for office development in accordance with the Council's evidence base. An application for mixed-use redevelopment of the sites, including office and residential uses, has been submitted and is currently under consideration. However, without prejudice to the application, a decision has not yet been made. Therefore, it would be premature for the Council, in preparing the Site Allocations DPD, to substantively alter the proposed allocations for UA17 and UA18.

The BHS/British Heart Foundation site was assessed as part of the Council's SHLAA (2017), which concluded that it was deliverable in 11-15 years, which is beyond the plan period. As set out in Paragraph 11.7 of the Regulation 19 Issues and Matters Topic Paper, the SHLAA is considered a robust and credible evidence base. While an application has been submitted for redevelopment of the site, it has not yet been determined. Therefore it would be premature to substantively alter the Site Allocations DPD in light of this application. If the application is approved, the DPD will take that into account.

As yet an application has not been submitted for the Woking Gateway site, which is proposed for allocation as UA6. The indicative yield for this site (50 net additional dwellings, 400sqm of office floorspace and retail floorspace) is considered robust, and informed by a credible evidence base. Furthermore, it is noted that the yields provided in the Site Allocations DPD are indicative; actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. Densities could go up or down depending on the nature of the scheme. While there is an extant prior approval for conversion of office to residential use at UA5, it is noted that the scheme is not substantially complete. Therefore its inclusion in the Site Allocations DPD is considered appropriate. Regarding Christ Church, it is noted that CS20 provides a robust policy context for the determination of applications with respect to heritage and conservation. In particular, it provides that "new development must respect and enhance the character and appearance of the area in which it is proposed whilst making the best use of the land available." Furthermore it is noted that CS17 and CS18 both include the following key requirements respectively: "design of development to have regard to Grade II listed building and its setting" and "design of development to have regard to the adjacent Grade II listed building." Paragraph 14.11 to 14.13 of the Regulation 19 Issues and Matters Topic Paper sets out the reasons for the removal of Regulation 18 sites GB10 and GB11 from the Site Allocations DPD. Paragraph 1.8 of the Regulation 19 Issues and Matters Topic Paper confirms that the proposed Green Belt development will help to provide the nature and type of family homes for which the SHMA demonstrates a clear need.

Response Reference: U0001178

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06697/1

Name: Mr John Roberts

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. The reasons for this is the lost of vast amount of green areas, which is not Environmentally Friendly, loss of children play area when Childhood Obesity has never been higher. The permanant Travellers pitches which will increase over time.

However, the primary area of contention for this objection is the complete lack of Infrastructure to support this proposed expansion of 555 houses at West Hall and around our village, Gridlock rush-hour traffic, will happen all through the days of the week. Major pollution due to increases of transport and Builders development activities. Lack of Drainage and Sewerage Systems. Inadequate Electrical capacity and Telecomms capacity. Major disruption whilst this development continues for some years. This of course, will happen in conjunction with the West Byfleet's major redevelopment of the Commercial Centre of West Byfleet.

Note we are not a Town, we are a village. Woking Borough Council has not thought through the extended implications of further development in this area and its consequences over the coming years.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Sections 1 and 2 of the Regulation 19 Issues and Matters Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. The representation in regards to the loss of Green Belt and residents wellbeing has been addressed in Section 4 of the Topic Paper. The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. The IDP included electrical and telecoms provision as set out in paragraphs 13.23 and 13.123 of the document. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. In addition, development impacts such as the impact of construction and construction traffic as well as the impact on existing services, facilities and infrastructure will be fully considered at the Development Management stage. The issue of air pollution has been addressed in Section 8 of the Topic Paper. The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.
Response Reference: U0001166
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06758/1
Name: Mr Matthew Roberts
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: DPD is not positively prepared, justified or effective. West Byfleet does not have the infrastructure e.g. to cope with additional housing. Please keep informed of next stages of DPD's progress.
Contributor Proposed Modification:
Modification Reference:
Officer Response: The Council is confident that the DPD is positively prepared, justified and effective, as detailed in its Regulation 19 Issues and Matters Topic Paper. Assessment and delivery of adequate infrastructure provision to support the proposed development is comprehensively detailed in section 6 of this paper.
Response Reference: U0001173
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06876/1
Name: Mr Justin Robinson
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Opposes the proposals owing to: Lack of extra school places, doctors and other facilities. Traffic Byfleet being a Flood plain, this could affect people's houses. Wildlife/Trees Pollution Overall effect on this small village.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The impact of the proposals on local infrastructure, including medical and education facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 6. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 13. The impact of the proposals on flood risk issues is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 7. The impact of the proposals on wildlife and trees is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 19. The impact of the proposals on pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 8. With regard to the overall effect on the area, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. If and when sites GB4 and GB5 are allocated for development after 2027, there is no doubt that their development would increase the population of Byfleet. However, without wishing to make undue predictions about the nature of planning policies that will be adopted in Woking in future, if they are similar to current policies development will be required to be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development.
Response Reference: U0001454
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06794/1
Name: Mrs Adeline Roche
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Does not consider the draft Site Allocations DPD is legally compliant. Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not, an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. My reasons for this assertion are detailed below:

Risk of noise and air pollution
 The area is currently green belt
 The village already struggles with traffic so would not cope with increased traffic
 Whilst the village is under development, we don't have sufficient retail units/business to serve all these new residents
 Infrastructure- how local schools will cope and cater for the planned influx has not been included in the proposal
 WBC's policy on Gypsies, Travellers and Travelling Showpeople states that a sequential approach should be taken when identifying suitable sites to home travellers, with sites in the urban area being considered before those in the Greenbelt. Only a demonstrated lack of any deliverable sites in the urban area could then provide very special circumstances necessary to allocate sites in the Greenbelt.
 The proposed development of the Site falls short on a number of criteria that must also be taken into consideration when determining the allocation of land for Gypsies, Travellers:
 site should have safe access from the highway and adequate parking provision and turning areas
 site should have adequate amenity for its intended occupiers including space for related business activities
 site should not have unacceptable impact on the visual amenity and character of the area
 site should have adequate infrastructure and on site utilities to service the number of pitches proposed and should have a safe and reasonable access to schools and other local facilities.
 No modification proposed. Considers the DPD to have met the requirement of the Duty to Cooperate. Considers the DPD has not been positively prepared, is not justified, is not the DPD effective and not consistent with national policy. Considers the DPD to be unsound.
 No modification proposed.
 Does not wish to participate in the examination and does to be informed when the Site Allocations DPD progresses to the next stage.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.
 Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.
 Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for retail/business, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. The Core strategy makes provision for the delivery of 28,000 sqm of additional office space and 93,900 sqm of additional retail space. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.
 The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.

Response Reference: U0001199

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04327/1
Name: Mrs C Rocke
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Objects to release of Green Belt designation adjacent to Hoe Valley School (GB7). Would be wrong to loose the special aspect of the school by surrounding it with housing. The wooded copse to the south of the site provides: - a buffer between Mayford and Woking; - an area of wildlife and trees with TPO status that merit the retention of this special area; - a sound buffer against the speakers of the athletics stadium.

Contributor Proposed Modification: Retain the woodland south of the school at GB7.
Modification Reference: U0000304
Officer Response: The land adjacent to Egley Road has always been allocated for mixed use development, including a secondary school and residential development. Section 19 of the Regulation 19 Issues and Matters Topic Paper describes how the Council is committed to conserving and protecting existing biodiversity assets of sites, and enhancing green infrastructure as part of development schemes coming forward. Based on further information received about the woodland to the south of site GB7, the Council believes it is reasonable to modify the policy to protect this area from built development. The Council is also making modifications to ensure a visual gap between Mayford and the rest of the urban area. This modification was published for Regulation 19 consultation.

Response Reference: U0001404
Officer Proposed Modification: Add a new key requirement under third bullet point on trees and tree belts to read as follows: "The wooded area to the south of the site which is covered by an area TPO should not be developed. For any future development of the site, the Council's Arboricultural Officer should be consulted regarding the protection and conservation of this area of the site". The area should be excluded for the purposes of estimating housing yield, and the indicative yield should therefore be reduced to 118 dwellings per hectare. Amend third paragraph of reasoned justification to read 118 dwellings.
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06494/1
Name: Winn Rose
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: I do not want any building on green belt land, in particular traveller pitches across the road from my home.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The necessity of releasing land from the Green Belt for housing allocation and Gypsy and Traveller site allocation is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 3 respectively.

Response Reference: U0001691
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02213/2
Name: Mr David Rousham
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Supports the removal of Regulation 18 sites GB12 and GB13 from the DPD. Objections to these sites that the representor considers valid are: 1. These sites contribute very significantly to the semi-rural setting and character of Pyrford. Development would very negatively impact the character and setting of the conservation area around St Nicholas Church. 2. The amount of land safeguarded for development beyond 2027 is excessive and the requirement should be reevaluated. 3. Traffic in Pyrford is dangerously high given the narrow roads. The traffic impact of an additional 500 houses on Upshot Lane would be unsupportable, especially at Church Hill and the water meadows, where there is a high level of car accidents. 4. Local community services are heavily congested. The cricket club and scout group are heavily over-subscribed.
Contributor Proposed Modification: None stated
Modification Reference: U0000139
Officer Response: Support for the removal of Regulation 18 sites GB12 and GB13 from the Site Allocations DPD is noted.
Response Reference: U0000962
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06677/1
Name: Mr David Routley
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: No comment on legal compliance. No modification proposed. No comment on duty to cooperate. Does not consider the DPD is justified, not effective, not consistent with national policy and unsound. No comment on is the DPD positively prepared. Site GB10 should be disallowed in favour of maintaining green belt and not permit the development of 555 and 15 dwellings due to the environmental impact, health, traffic and infrastructure considerations that will certainly arise with the resulting 50 percent increase of housing in total considering the adjacent Broadoaks development. This level of concentrated housing is excessive to the area. The Council should consider alternative sites. No modification proposed. Wishes to participate in examination on soundness and wishes to be informed of the next stages of the DPD.
Contributor Proposed Modification: None Stated

Modification Reference: NOMODS
Officer Response: Objection is noted. The Council will make sure that the development of any land it safeguards will avoid or mitigate adverse impacts to the environment as far as possible. The Development Plan for the area has several planning policies that aim to protect and enhance the environment of the Borough, particularly policies CS7 Biodiversity and nature conservation, CS8 Thames Basin Heaths Special Protection Areas, CS17 Open space, green infrastructure, sport and recreation and CS24 Woking's landscape and townscape. The site GB10 does not contain environmental constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect features of environmental value, within and in close proximity to any other development sites. The Regulation 19 Issues and Matters Topic Paper has comprehensively addressed several concerns raised in the representation, including the reduction of Green belt and its health benefits (Section 4 of the Topic Paper); traffic congestion (Section 13); Infrastructure provision (Section 6) and considering alternative sites (Section 11). Section 5 of the Topic Paper discusses the proportion of Green Belt developed in Byfleet and West Byfleet. The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.
Response Reference: U0000901
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06884/1
Name: Liesel Roux
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Objection to GB10. Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. Traffic issues: Parvis road already has long delays on most days in the peak hours with existing residents. No allocation has been made to upgrade local roads or any impact studies done to see the effect this will have on the area. Traffic will come to a complete standstill if 555 more houses are built. There is not enough public transport. Safety of children catching school bus on Parvis road. There are no safe crossings and pavements are narrow. This will not be safe for children and families that use this road. Dartnell Avenue is used to bypass the traffic. Many children walk or cycle down Dartnell Avenue. Putting their safety at great risk. These drivers have no consideration for speed limits and residents. There are no pavements to use and the Council ignores these issues. Noise pollution-the area already has to contend with the pollution from the M25 and the impact of this amount of homes and people will be significant. We will also be losing green

belt land. There has been so much said in the press about preserving our green spaces and how important our green spaces are to the environment. This site is also part of the area covered by the West Byfleet Neighbourhood Development Plan that is meant to protect the unique character of our dear town. These plans are most certainly contrary to these objectives.

Infrastructure: Local schools have no space to expand and are already at capacity , there is no provision for the 555 family's. GP surgeries are already not coping with the work load and again no extra provision will be made for 555 more families. Again, straining the already overloaded NHS. Broadoaks and the New Sheer house development over the next few years will impact on local services. Sewage and utility services already don't cope.

In conclusion, strongly object to this proposal and hope the planning committee reviewing this application will take the time to fully consider the considerable impact this proposal will have on our community and environment.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

In terms of lack of public transport and impact of neighbouring roads, the Council is aware the sites proposed will need site specific requirements. The exact nature of these sites specific requirements will be identified through the development management process and informed by a transport assessment. For example potential issues of GB10 to be addressed include bus stop provision and direct access to this and also infrastructure improvements to connect pedestrian and cycle networks. The IDP also considered public transport, waster water and utility service provision that has to be provided to support development.

In regards to the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.

Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper. In terms of loss of Green Belt land an impact on environment see Section 4 and 19.

The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.

Response Reference: U0001344

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06153/1
Name: Mr Glyn Rowlands
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
<p>Summary of Comment: Green belt land has already been released surreptitiously for development in this area, now further land is being released for financial gain, to the further detriment of the local environment and quality of life. The perpetual removal of Green Belt in this area cannot be justified.</p> <p>The plan will produce monofunctional, car-dependent communities and merge villages with Woking town; does not match my understanding of WBC's idea to build high rise town centre dwellings and protect the green belt. The village and its rural lifestyle would be lost. Local infrastructure (including doctors, hospitals, roads and social/elderly care) is already overburdened with long waits and traffic queues causing pollution. The plans will further impact this.</p>
<p>Contributor Proposed Modification: I would, therefore, urge that DPD regulation 19(GB7) remains part of greenbelt exempt from development.</p>
Modification Reference: U0000276
<p>Officer Response: Assume reference to previous green belt release refers to the construction of the Hoe Valley School and associated sports facilities within the Green Belt at Egley Road. The application for this development was considered as part of the Development Management process, with regard to the Borough's statutory development plan at the time of the application (in 2015). This part of the site has been implemented and the school opened in September 2018. On balance, the merits of the proposal and need for a school were among a number of considerations that demonstrated very special circumstances for development in this Green Belt location. Following approval by the Council, the application was referred to the Secretary of State for consideration, but was not called in, meaning the Secretary of State did not consider it necessary to determine the application for the Council. The Council went through the correct planning procedure and consultation with regard to this application.</p> <p>The justification for removing sites from the Green Belt for housing allocation, and for safeguarding land in the Green Belt for future allocation, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2 respectively. The removal of Green Belt for safeguarding is intended to ensure that no more revisions to the Green Belt boundary are required until 2040 at the earliest, to ensure the enduring permanence of the Green Belt boundary.</p> <p>The site performed well, compared to other Green Belt sites, in terms of access to services in the Green Belt Boundary Review and Sustainability Appraisal due in part to its close proximity to Mayford Neighbourhood Centre and reasonable accessibility to Woking Town Centre, including by bus. The site is also adjacent to a new secondary school and sports centre.</p> <p>The Council's strategy for housing provision and distribution, including both high-density town centre development and a limited amount of Green Belt release, is set out in Policies CS1, CS6 and CS10 of the Core Strategy.</p> <p>The importance of protecting Mayford's separate village identity is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 20.</p> <p>The impact of the proposals on local infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p>
Response Reference: U0001247
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>

Wishes to Attend Examination (T = Tick):**Contributor Reference:** 04942/1**Name:** Royal Mail Group Ltd**Number of Signatories:** 1**Comment Type:** OBJ**Site Reference:** UA33**Summary of Comment:** Considers the DPD to be legally compliant, including with Duty to Cooperate.

Does not consider the DPD to be sound. The evidence base informing the DPD has not been positively prepared and has failed to appropriately test the scale of development achievable on the site. It fails to maximise the potential of the site. The evidence cannot be considered robust or credible and therefore the plan is not sound.

Wish to attend at examination dealing with matters of legal compliance and soundness, in particular relating to UA33.

Contributor Proposed Modification: Royal Mail has been pro-actively working with the Council to understand the scale of development achievable on the site. This work has informed the suggested modifications to allocation UA33 - the agent has supplied a tracked change version of policy UA33. Site should be allocated for redevelopment of up to 175 dwellings, with a tall building of up to 21 storeys at the junction of White Rose Lane and Oriental Road. Relocation of Royal Mail would be a pre-requisite of the development. Key requirements include:

- the building height should step down from the tallest 21 storey building towards neighbouring properties.

Reasoned justification amendments include:

"...in terms of providing high density residential development, with the tallest element situated at the junction of White Rose Lane with Oriental Road".

Rather than yielding 88 dwellings, 175 dwellings could be achieved.

The site is in single ownership and is available subject to relocation of the existing "occupier".

Modification Reference: U0000340**Officer Response:** The representation has been addressed in Section 18 of the Regulation 19 Issues and Matters Topic Paper. The proposed densities, including that of site UA33, reflect the ranges provided in policy CS10 of the Core Strategy (which in turn are based on the character of the area and on exemplar sites). It is emphasised that the estimation of potential development yield of each allocated site has been informed by a comprehensive, up-to-date and robust evidence base - in particular the Strategic Housing Land Availability Assessment - and this is explained in more detail in Section 10 of the Topic Paper. Estimates provide an indication of the potential amount of new development the Council anticipates a site could deliver. However, the development achievable on a site, and its detailed design, will ultimately be determined once a planning application is submitted and determined. In this regard, the estimated yields are indicative to only serve as a guide to inform development proposals. The maximum potential of the site will therefore be thoroughly assessed at pre-application or planning application stage - there is scope for densities to go up or down depending on the nature of the scheme. The reasoned justification of UA33 refers to 'at least' 88 dwellings, which therefore does not rule out a higher yield being presented by a development proposal.

The proposed modifications to include a higher yield and 21 storey building are therefore considered to be too prescriptive, and if implemented would not be consistent with the overall approach taken in the DPD of providing indicative yields, consistent with policy CS10 of the Core Strategy. This is also true of the proposed modifications regarding the

detailed design of the development. The minor modifications which amend references to the Royal Mail and existing use are considered to be acceptable.
Response Reference: U0001244
Officer Proposed Modification: Amend first bullet point of policy UA33 to read 'relocation of Royal Mail would be a pre-requisite of the development'. Under Delivery arrangements, modify the final bullet point to read 'the site is in single ownership and is available subject to relocation of the existing occupier'.
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06751/1
Name: Runnymede Borough Council
Number of Signatories: 1
Comment Type: COMM
Site Reference:
<p>Summary of Comment: Below are Runnymede Borough Council's (RBC) comments on the Regulation 19 consultation.</p> <p>RBC are concerned about the approach WBC has taken to its Core Strategy Review, as set out in a letter dated 17 October 2018); this includes failure to engage with neighbouring and nearby local authorities during the review under the Duty to Cooperate, the robustness of the review (in particular the failure to review and build on existing evidence) and the resultant approach to reviewing the Core Strategy housing target in a positive way.</p> <p>Nonetheless, RBC recognises that the annual housing target of 292 dwellings per annum between 2010 and 2017 remains unchanged. It is noted that in Woking, 2134 homes have been delivered in the plan period to date, leaving a remainder of 2830 homes to be delivered. The DPD anticipates delivery of a further 3155 homes over the plan period. Including a 5% buffer, this would appear to be sufficient homes to meet the Core Strategy target.</p> <p>This is welcomed, but the housing target is constrained and unmet need in the Guildford, Waverley and Woking Housing Market Area is of concern to RBC. It is unclear whether all unmet needs from Woking will be met in the HMA and, if not, what the implications could be for other neighbouring and nearby Local Authorities.</p> <p>The examination of RBC's local plan is underway, and the Inspector's feedback from the stage 1 hearings is awaited. Interested parties continue to express concerns about unmet needs in the Runnymede-Spelthorne Housing Market Area, especially given that Spelthorne still needs to collate evidence to confirm if it can meet its identified housing needs in full. RBC has confirmed that it is committed to reviewing its Local Plan if it becomes apparent that there is unmet need within the HMA. Given this position, and Runnymede's constraints, it is presently considered highly unlikely that RBC could meet any of Woking's unmet need.</p> <p>On other housing matters, the Council notes that proposed housing allocations, including the Sheerwater regeneration scheme, and developments in Byfleet and West Byfleet are near Runnymede's boundary. Given the cumulative quantum of development, RBC wishes to keep potential impacts under review, particularly in relation to highway matters, through the Duty to Cooperate in to allow for mitigations measures to be collaboratively developed. RBC is pleased that WBC is intending to oversupply traveller pitches. There is a requirement for 22 pitches up to 2027, however land has been identified for 27 pitches. RBC is unable to identify 100% of the pitches to meet its identified needs up to 2030, and would therefore welcome discussion under the Duty to Cooperate to discuss whether WBC can assist with unmet needs. This could be part of a wider meeting to review the Runnymede-Woking Statement of Common Ground.</p>

RBC has enjoyed positive joint working with WBC and other partners during the development of the A320 feasibility study, and looks forward to continued positive work as mitigation proposals are developed to support growth along this corridor.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: It is appropriate and necessary for the Site Allocations DPD to facilitate the delivery of the requirements of the Core Strategy. The Woking Core Strategy and the Site Allocations DPD are two distinct and separate development plan documents but with clear interrelationships. They have distinct purposes, processes and timescales for their preparation that should not be conflated. The purposes and timing for the preparation of these documents are set out in the current and previous Local Development Schemes with no ambiguity. Runnymede, Waverley and Guildford Borough Councils had all made representations during the review of the Core Strategy which were taken into account by the Council before the review was approved. It would therefore be unreasonable to use the Site Allocations DPD as another means to revisit this matter. Woking Borough Council therefore has an up to date Core Strategy to provide a sound strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the National Planning Policy Framework (NPPF) was reviewed in October 2018. The NPPF requires plans to be reviewed at least once every five years. It will be unreasonable and indeed burdensome to expect the Council to review its Core Strategy again within six months of its latest review. That is certainly not what the NPPF had intended, and obviously that will not provide the necessary certainty that developers, the general public and anyone who has an interest in investing in the Borough need. It is important to highlight that the fact a Core Strategy is 5 years old does not automatically makes it out of date.

Regulation 8(4) of the Town and Country (Local Plan) (England) Regulations 2012 (as amended) requires policies contained in a local plan to be consistent with the adopted development plan. Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) (the Act) emphasises this by stating that in preparing a local development document the local planning authority must have regard to any other local development document which has been adopted by the authority. Section 15 of the Act requires the Council to prepare a Local Development Scheme (LDS) which must specify which development plan documents they wish to prepare and the timetable for preparing them. The Council has published an up to date LDS (October 2018). The LDS identifies the Site Allocations DPD as a development plan document that the Council wishes to prepare. It specifies the overall purpose of the Site Allocations DPD to identify and allocate sites for development. In particular, to identify sufficient employment and housing land and infrastructure to cover the period up to 2027, in accordance with requirements, vision and spatial strategy set out in the Core Strategy. Given that the Council has an up to date Core Strategy, it is imperative and necessary that the Site Allocations DPD is prepared to be consistent with its requirements. Not to have done so would be contrary to the Act, the Regulations and the requirements of the Core Strategy.

The Government has prescribed that unless special circumstances would justify, local authorities should use the standard method to calculate local housing need. It has also prescribed the steps to follow in calculating the need, and in particular, it requires the Council to use the most recent growth projections. At the time the Council carried out the review of the Core Strategy, the most recent growth projections was the 2016 household projections. To have used any other data at the time would have been inconsistent with national guidance. The Council recognises that since the review, the Government has requested use of the 2014 household projections instead of the 2016 projection to calculate housing need. The implications of this have already been covered in the review of the Core Strategy.

<p>Regarding Woking's unmet housing need, it is emphasised that this is being met in the Housing Market Area by the Guildford and Waverley Local Plans. In this regard, as per Paragraph 1.14 of the Regulation 19 Issues and Matters Topic Paper, the DPD should be judged on whether it has identified a sufficient range of sites in sustainable locations in the context of the spatial strategy of the Core Strategy to meet the development needs of the Borough. Woking, Guildford and Waverley Borough Councils have agreed a Statement of Common Ground (October 2016) which sets out that "there is a strong commitment to continue to explore how unmet needs within the HMA may be accommodated, once the housing requirements from Guildford and Waverley have been confirmed."</p> <p>it is noted that this strategic issue is beyond the remit of the Site Allocations DPD which, as per Paragraph 1.4 of the Regulation 19 Issues and Matters Topic Paper, should be judged on whether it has identified a sufficient range of sites in sustainable locations in the context of the spatial strategy of the Core Strategy to meet the development needs of the Borough. Nonetheless the Statement of Common Ground (October 2016) sets out that "there is a strong commitment to continue to explore how unmet needs within the HMA may be accommodated, once the housing requirements from Guildford and Waverley have been confirmed."</p> <p>Under the Duty to Cooperate the Council will continue to work with relevant parties, including Runnymede Borough Council, to ensure that there is adequate transport infrastructure to support growth and mitigate the impacts of development.</p> <p>At this stage, Woking is unable to meet Runnymede's unmet need for traveller pitches, but is happy to engage in a discussion in this regard.</p>
Response Reference: U0001528
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04902/1
Name: Mr Simon Ruston
Number of Signatories: 1
Comment Type: SUPP
Site Reference: SA1
Summary of Comment: Supports the Traveller pitch delivery strategy and inclusion of the following sites in the DPD, as set out in Table 9, p19 and Policy SA1: - Land to the south of Murrays Lane - 4 pitches; - Stable Yard, Guildford Road - 1 pitch; - Land south of Gabriel Cottage, Blanchards Hill - 1 pitch Urges inclusion of Boyd's Farm site, for two pitches.
Contributor Proposed Modification: We would strongly urge that, in addition to the sites set out in SA1, the site 'Boyd's Farm', which is north of Murrays Lane and adjacent to the Land to the south of Murray's Lane, is included as part of the Site Allocations approach to grant permission in principle for permanent use as a Travellers' site (we would suggest for 2 pitches).
Modification Reference: U0000316
Officer Response: Support is noted. The Green Belt Boundary Review (GBBR) describes in paragraph 6.4.1 how a sequential approach should be used to identify suitable Travellers sites for allocation. Priority is given to safeguarding existing sites to prevent their loss to other uses and increase the identified pitch requirement for the Borough, and then full planning permission should be granted for existing sites with temporary permission. Thirdly, sites should be allocated within or adjacent to the urban area - potential new sites within the urban area and then potential new sites within urban extensions recommended for Green Belt release.

<p>Fourthly, sites should be allocated within the Green Belt through intensification of existing sites and then potential new or expanded sites.</p> <p>A recent planning application for the change of use of the land referred to as Boyds Farm to 2no Traveller pitches and associated works was refused for both permanent and temporary permission, due to the harm caused to the Green Belt and conflicts with various policies of the Development Plan and NPPF. As part of its sequential approach to site selection, the Council has identified existing operational sites with temporary planning permissions and supports the principle for the permanent use of the sites for Travellers accommodation subject to detailed requirements being met. The Council is confident it has identified sufficient sites to meet identified need; evidence in the Sustainability Appraisal Report and the GBBR does not provide any justifiable case why alternative sites in the Green Belt should be allocated in addition to the proposed site allocations. The sequential approach and evidence base is set out in detail in Section 3 of the Council's Regulation 19 Issues and Matters Topic Paper.</p>
Response Reference: U0001362
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06719/1
Name: Rutland Ltd
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA07, UA28
<p>Summary of Comment: Considers the DPD to be unsound regarding sites UA7 for the following reasons.</p> <p>The plan recognises the need to plan for Essential infrastructure (transport) and Policy UA7 does this in part by allocating land for transport infrastructure in the vicinity of the station. However, the Plan does not make provision for another much needed community transport facility, namely a new garage and facilities for the Bustler Service (Woking Community Transport). This therefore makes the Plan unsound.</p> <p>The site identified on the attached plan (site of the former Robin Hood PH) is available for this purpose and should be allocated for a mixed use development comprising a new garage and facilities for the Bustler Service (Woking Community Transport) and residential flats (approx 70 units).</p> <p>In view of the importance and pressing need to provide a base for a new Bustler garage for the benefit of the wider community there are therefore exceptional circumstances why the site should at this late stage be allocated for these purposes, either as a new designated site or as an enlarged allocation under Policy UA7 which simialrly deals with transport infrastructure.</p> <p>The plan needs to make provision for the transport needs of the community and the lack of suitable facilities for the Bustler service makes the Plan unsound.</p> <p>Policy UA7 deals with transport infrastructure and could be amended to refer to the above site as well, or alternatively the site could be a new allocation in the emerging Plan.</p> <p>Considers the DPD to be unsound regarding sites U28 for the following reasons.</p> <p>The site of 5A Monument Way as identified in the plan below presently comprises an empty factory building, last used for industrial purposes some years ago although latterly used for storage purposes for a temporary period. The site has remained vacant for the past two years or so. There is a two-storey building of about 440sqm on site which is outworn, derelict and an eyesore.</p> <p>A significant proportion of this site is needed to construct the new link road. The subsequent redevelopment for business use of the remaining part of the site (ie that part</p>

not required for road building purposes) is too small to generate sufficient funding to construct the new road link.

Accordingly, if this important road infrastructure project is to be realised, the remaining part of the site should be developed for purposes that will fund the new road link. Developing this part of the site for residential purposes could provide in the order of 35-40 much needed 1 and 2 bedroom flats which could be affordable and thus meet other important objectives in the emerging Plan, namely to provide a significant number of new affordable homes in the Sheerwater area.

Furthermore, located on the extreme periphery of the Monument Way West Industrial Estate, its redevelopment for a new road link and affordable housing will not prejudice the overall aims of the employment strategy or materially impact upon the adjacent B1(C) use, which by definition is a use appropriate in a residential area and thus introducing residential units nearby would not likely to prejudice their future redevelopment for similar business uses.

The Plan should be amended to refer to the site of Unit 5A Monument Way being allocated for a new road link and affordable housing as part of Policy UA28.

Wishes to participate at the oral examination and to be informed on the progress of the DPD for both sites.

Contributor Proposed Modification: UA7 - The plan needs to make provision for the transport needs of the community and the lack of suitable facilities for the Bustler service makes the Plan unsound.

Policy UA7 deals with transport infrastructure and could be amended to refer to the above site as well, or alternatively the site could be a new allocation in the emerging Plan.

UA28 - The Plan should be amended to refer to the site of Unit 5A Monument Way being allocated for a new road link and affordable housing as part of Policy UA28.

Modification Reference: U0000424

Officer Response: The Council has an up to date Core Strategy to set the strategic policy context for the preparation of the Site Allocations DPD. Policy CS1 directs most new development to previously developed land in the town, district and local centres which offers the best access to a range of services and facilities.

Section 19 of the Planning and Compulsory Purchase Act (2004) and Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) expects the Site Allocations DPD to take into account the requirements of the Core Strategy. It is critical that the Site Allocations DPD is prepared in the context of the above requirements. The preparation of the Site Allocations DPD is informed by a number of evidence based studies such as the Green Belt boundary review, which is prescribed by policy and the Strategic Land Availability Study (SHLAA) which is prescribed by national policy. All the sites that are either allocated or safeguarded are justified by the available evidence. The Council has also carried out a Sustainability Appraisal of reasonable alternative sites urban and Green Belt sites to demonstrate that the allocated and safeguarded sites are the most sustainable when judged against all the other alternatives.

The Council considers the wording for UA7 to be appropriate and will deliver the transport infrastructure required for the Core Strategy and supported by robust evidence. The site former Robin Hood Pub was rejected by the SHLAA for the following reasons physical constraints due to the escarpment and heritage constraints being Locally Listed. The Site Allocations DPD does not deal with individual companies or operations, but focuses on uses. The Council recommends that the operators of the Bustler Bus engage with the potential developers of the site to secure this.

In terms of UA28, any such planning application would be determined on its own merits, including any application of incorporating residential uses by the applicant. However, the proposed development is located within a designated Employment Area 'Monument Way West Industrial Estate'. Policy CS15 of the Core Strategy safeguards land within employment areas for B uses. The Council does not intend to modify this policy to include

residential use. The Council considers the wording for the Policy is appropriate and reflects the requirements of the Core Strategy for warehouse floorspace. It would be simplistic and bad planning for the Site Allocations DPD to allocate further land for development to meet Woking's objectively assessed housing need up to 2027. It is highlighted that it is not the purpose of the Site Allocations DPD to determine the housing requirement for the Borough. That is the distinct purpose of the Core Strategy. Paragraph 20 of the NPPF clarifies the role of strategic policies. Strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement of the natural, built and historic environment. It would be wrong to expect non-strategic policies in the Site Allocations DPD to be performing the role of the Core Strategy by planning for a higher housing requirement.

The development requirements of the Core Strategy, including the housing requirement have been identified in an integrated manner and justified by a significant body of evidence base studies. These include an Infrastructure Delivery Plan, Employment Land Review and an Employment Topic Paper. The studies have informed the necessary scale and type of infrastructure and economic growth necessary to support and align with the expected quantum of housing growth. To allocate land to meet the objectively assessed need up to 2027 without due regard and a corresponding review of office floorspace, warehouse floorspace, retail floorspace and the necessary infrastructure to align with the revised housing requirement would at best be irresponsible, overly simplistic and ill conceived. It would undermine the overall purpose of the plan-led system to plan in a holistic manner and would also undermine the sustainable development of the Borough, which is the overall aim of national policy.

Response Reference: U0001427

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06575/1

Name: Mrs Rachel Rutter

Number of Signatories: 1

Comment Type: OBJ

Site Reference:

Summary of Comment: Objects to the DPD.
In particular the West Byfleet and Byfleet recommendations.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The Regulation 19 Issues and Matters Topic Paper addresses concerns raised regarding the Site Allocations DPD. Section 5 specifically covers development in Byfleet and West Byfleet.

Response Reference: U0001560

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06584/1

Name: Mr Iain Rutter

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05

<p>Summary of Comment: Object to proposed housing developments in Byfleet: Green belt land should be protected from urban sprawl and its impact on wildlife, air quality and quality of life. Byfleet has a history of flooding, green areas should be preserved as flood plain for extreme weather events. Local roads are already at saturation point at peak times, extra traffic will harm local business and the community. Public services such as schools and healthcare are already strained and can ill afford further pressure.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The risk of urban sprawl is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 21. The necessity for the release of Green Belt land for housing is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. The impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. The impact of the proposals on air quality is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The impact of the proposals on local quality of life is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. The issue of flood risk in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The impact of the proposals on public services is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p>
<p>Response Reference: U0001606</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06768/1</p>
<p>Name: Mr And Mrs Ryan</p>
<p>Number of Signatories: 2</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB07, GB08</p>
<p>Summary of Comment: The Council can not justify building on more Green belt land. There is already very weak infrastructure, traffic and pollution. Questions the safety of development with regard to proximity to Barnsbury school. Flood issues and potential raised water table, as the land would have absorbed rain water. Flood defences have already been put in place to deal with existing development on the other side of Egley Road - questions how it will be managed this side. Wildlife - no consideration given to wildlife in the area.</p>
<p>Contributor Proposed Modification:</p>
<p>Modification Reference:</p>
<p>Officer Response: This representation is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1, 6, 7, 8 and 19.</p>
<p>Response Reference: U0001095</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

Contributor Reference: 06878/1
Name: Mrs Jennifer Ryan
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
<p>Summary of Comment: DPD not legally compliant or sound (consistent with national policy), since under the LDS and SCI, site UA44 should have been part of the consultation and consulted on publicly but it was not.</p> <p>Site UA44 needs a full Sustainability Appraisal, especially in regards to Sustainability Objectives 5 and 15. Access to the area is already heavily congested during peak times and local amenities (in particular shops) are not a reasonable walking distance.</p> <p>The density of the development should be in line with the general characteristics of the local area.</p>
<p>Contributor Proposed Modification: The site UA44 needs to be consulted on publicly. The site needs a full and comprehensive Sustainability appraisal especially in regards to Sustainability Objectives 5 and 15. Access to the area is already heavily congested during peak times and local amenities (in particular shops) are not a reasonable walking distance.</p> <p>The density of the development should be in line with the general characteristics of the local area.</p> <p>Local residents should be consulted on the development.</p> <p>The site should be removed from the DPD as it was not consulted on and the Sustainability Appraisal is inadequate.</p> <p>In addition Loop Road Recreation Ground should be designated as an urban open space to protect it for local residents.</p>
Modification Reference: U0000257
<p>Officer Response: The fact that site UA44 was not included in the Regulation 18 consultation does not diminish the compliance of the DPD with the law or with national or local policy. The site was included in the Regulation 19 document and fully consulted on at that stage.</p> <p>Site UA44 has been subject to a full sustainability appraisal; see the Site Allocations DPD Sustainability Appraisal, in particular Appendix 1 pages 873-887. The site is within easy walking distance of local shops and services in Westfield Neighbourhood Centre, and is also just over 500m from Kingfield Local Centre within 1km of the town centre.</p> <p>The policy for site UA44 requires the density of development to maximise the efficient use of the site without compromising the general character of the area, and that the scale of the development not detract from the general character and appearance of surrounding streets. The exact density of any development on this site will be determined at planning application stage, having regard to these policies.</p>
Response Reference: U0001453
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 02508/2
Name: Mr Akeel Sachak
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13

Summary of Comment: WBC have made the right decision to drop the Upshot Lane fields from the SADPD. Pleased that WBC recognise the validity of objections made in 2015, that including the fields would: Very significantly undermine the character of Pyrford and the setting of the Pyrford Conservation Area; Exacerbate the already dangerously high level of traffic on Pyrford's narrow roads; Add to an already excessive amount of land safeguarded for development beyond 2027.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06845/1
Name: Katie Saker
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Object to the proposal: Totally opposed to building on Green Belt Traffic is already appalling in this area.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The justification of very special circumstances which require developing land that is currently in the Green Belt is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1. The impact of the proposals on traffic congestion is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.
Response Reference: U0001401
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06476/1
Name: Mr Christian Schramm
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
Summary of Comment: Concerned about plans to build more than 1,000 flats on site UA44. The site hasn't been consulted on and must be removed. The anticipated dwelling mix does not meet the needs of young families, but is pure profiteering. The population increase would be disproportional, overloading road capacity. The project would devalue current residents' quality of life. Wishes to participate in examination.
Contributor Proposed Modification: Please remove the Westfield Site completely from the DPD as it hasn't been consulted on at any time.
Modification Reference: U0000155

<p>Officer Response: Although there was a proposal to include a capacity of 992 dwellings for site UA44, the Council agreed that this should be removed prior to the publication of the Site Allocations DPD for Regulation 19 consultation. The policy for site UA44 gives no indicative dwelling number, but states 'Density of development should maximise the efficient use of the site without compromising the general character of the area', alongside many other requirements.</p> <p>There is no requirement for every individual allocated site to undergo two rounds of public consultation. If there were it would cause great expense for Local Planning Authorities to introduce sites after Regulation 18 stage, for example in response to comments received during the Regulation 18 consultation. Site UA44 has undergone full and adequate public consultation at Regulation 19 stage.</p> <p>In terms of dwelling mix, the policy UA44 states that the 'development should provide a range of housing sizes as set out in Core Strategy Policy CS11: Housing mix'. The latter policy requires developers to refer to the dwelling mix need identified in the latest Strategic Housing Market Assessment (SHMA). This dwelling mix need does incorporate the need for family housing. To comply with the policy, any development would therefore have to pay at least indirect regard to the need for family housing.</p> <p>As set out above, it is not possible to assess the size of population increase anticipated at this site from policy UA44. However, the overall impact of the SADPD proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The impact of the SADPD proposals on local infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. In general, the impact of the proposals on the quality of life of current residents should be limited by the key requirements of the policy and the application of existing Local Plan policies to any development on the site.</p>
<p>Response Reference: U0001641</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick): T</p>

<p>Contributor Reference: 06588/1</p>
<p>Name: Mr Peter Thomas Ashton Scott</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: Does not wish to speak at examination. Wishes to be informed of next stages. DPD is not unsound. Objects to the release of GB10 from the Green Belt. The Green Belt prevents urban sprawl. Concerns about the merging of West Byfleet and Byfleet, to only be separated by the M25. GB10 acts as a buffer from noise and air pollution, it is not suitable for housing due to close proximity to M25 and A245. With the development of Sheer House and Broadoaks, existing infrastructure will become significantly strained. The development of GB10 will exacerbate this further.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 6 addresses the issue regarding the adequacy of infrastructure. Section 13 specifically addresses road infrastructure. Transport assessments have covered the impacts of cumulative development and have identified appropriate mitigation methods for potential traffic hotspots.</p>

Section 8 addresses the issue regarding pollution. Section 21 addresses the issue regarding urban sprawl.
Response Reference: U0001649
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05027/1
Name: Mr And Mrs David And Johanna Seear
Number of Signatories: 2
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: It is considered that the DPD is not legally compliant, not sound, and does not comply with the Duty to Cooperate.</p> <p>Wishes to participate in the public examination to explain why there is no valid reason for not allocating their site (The Brambles) for residential development.</p> <p>Wishes to be informed when the DPD progresses to the next stages.</p> <p>The respondent is proposing that The Brambles is available for immediate development; has a strong connection with the urban area and is already surrounding by non-agricultural and mid-density residential development. Its proximity to the village and district centre with good access to public transport and a wide range of services and facilities means that its development would meet government objectives or promoting sustainable patterns of development. An initial assessment indicate that it could achieve 39 units, including a mix of starter homes, affordable homes and family homes.</p> <p>Woking Borough Council's planning policy is considered to be at odds with itself. WBC is choosing to build large estates in the Green Belt and high-rise blocks in the town centre rather than considering smaller in-fill sites ideal for affordable housing. These would require almost no changes to infrastructure.</p> <p>Peter Brett Associates argue that The Brambles is perfect for immediate development. The NPPF provides that, where it is necessary to release Green Belt land, first consideration should be given to land that has been previously developed and/or is well-served by public transport. GB10 meets neither criteria. The Brambles meets both.</p> <p>The Brambles should not have been included within Parcel 8 in the Green Belt Boundary Review as it is a residential dwelling with no right of way across it. Whilst the review did not recommend the release of Parcel 8 as a whole from the Green Belt, it is considered to provide strong evidence that the area covered by The Brambles does not serve the Green Belt purposes as it is fragmented in nature, has 'weak' landscape character and is 'blurred' by the range of existing land uses present.</p> <p>Unlike Broadoaks and West Hall, the site is not governed by access to Parvis Road. It is also noted that West Hall is behind the defensible Green Belt boundary, and only has 3 culverts which will be insufficient to remove excess water run-off. Broadoaks is also behind the defensible Green Belt boundary and will only deliver 52 affordable dwellings. Woking have made no provisions for the average citizen of Pyrford to downsize into. The proposal does not reflect the Pyrford Neighbourhood Plan.</p> <p>In the appended submission to the 2017 SHLAA, the respondent also notes that Woking's annual housing target of 292 should be seen as a minimum, not a maximum. Secondly it is noted that the Borough Council should review its "housing delivery intentions" over time; it is not apparent that this formal review requirement has been met. Whether the MHCLG figure of 409 dpa or the West Surrey SHMA figure of 517 dpa is used as Woking's housing requirement, it is clear that the need will be much higher than the current target, which is based on outdated evidence and methodologies. In this document, it is also noted that a balanced portfolio of sites is required to ensure delivery throughout the lifetime of the</p>

development plan. Given that the Brambles does require significant infrastructure improvements, it can be delivered in the short-term.
Contributor Proposed Modification: The Brambles should be identified as a site allocation for delivery within the plan period to 2027.
Modification Reference: U0000293
<p>Officer Response: Woking Borough Council's Core Strategy sets out a spatial strategy for the Borough. Policy CS1 sets out that most new development will be directed to previously developed land in the town, district and local centres, with Woking Town Centre and the Green Belt identified as broad directions for future growth in the period 2022-2027. The Core Strategy was considered sound at public examination, and having been reviewed, is considered up-to-date and therefore suitable to inform the preparation of the Site Allocations.</p> <p>Although the Council seeks to deliver development according to this spatial strategy, consideration has nonetheless been given to a range of sites within the Borough. Paragraph 11.4 of the Regulation 19 Issues and Matters Topic Paper confirms that, with the exception of sites that would yield fewer than 10 dwellings of 500sqm of employment floorspace, every site with a realistic prospect of coming forward during the plan period that the Council is aware of has been appraised before preferred sites were selected for the DPD. This includes The Brambles.</p> <p>The SHLAA (2017) concluded that the Brambles "is within the Green Belt, and so cannot be considered to be in a suitable location for residential development unless it is removed from the Green Belt and allocated for this use through the Site Allocations development plan document. The Green Belt boundary review (GBBR) does not identify this location as having any potential to be removed from the Green Belt for residential development." To do so would damage the integrity of the Green Belt. On this basis, it would not be appropriate for the site to be included in the Site Allocations DPD.</p> <p>Section 12 of the Regulation 19 Issues and Matters Topic Paper confirms that the Green Belt Boundary Review adopted the right approach to assessing sites. As Paragraph 12.3 provides, the Green Belt Boundary Review not only considered large land parcels against the purpose of the Green Belt, but also considered specific sites within land parcels where relevant.</p> <p>The need for houses to downsize into would be addressed by Policy CS11 of the Core Strategy regarding housing mix. This provides that "all residential proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs as evidenced in the latest Strategic Housing Market Assessment in order to create sustainable and balanced communities."</p> <p>The requirement to review the Core Strategy, wherein the annual housing requirement of 292 is contained, has been met. The Core Strategy was reviewed in October 2018, and it was concluded that no modifications were required. The Core Strategy, including the housing requirement, is therefore sufficiently up to date to inform the preparation of the Site Allocations DPD.</p> <p>The Council therefore considers that it would not be appropriate to allocate The Brambles site for residential development.</p>
Response Reference: U0001179
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T
Contributor Reference: 06735/1
Name: Ms Jane Sevenoaks
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44

Summary of Comment: The Site Allocations DPD is not legally compliant. The Core Strategy states 'it sets out a robust defence for the protection of the physical and natural environment and the heritage assets of the Borough'. There are gaps in the defence detailed in the Sustainability Appraisal report, sections 7 to 11 in respect of Site UA44 Woking Football Club, SHLAAH0E001 and extended site SHLAAH0E011.

This is the text taken as is from e-form: 'Trends: one AQMA (increasing trend), and an air quality "hot spot" at Constitution Hill area. Light pollution is not currently considered to be an issue in the Borough. b.New development generates significant / increases existing traffic congestion / changes traffic volumes. c.Development that would fragment the connectivity and integrity of the Borough's wildlife network. Light pollution from new development that would disturb wildlife corridors (sever corridor function) or designated habitats/species. d.Development which fails to take opportunities for additional tree planting to create / enhance GI. existing GI corridor / linked assets. e.Development that leads to loss of individual GI assets on existing corridors in the strategic GI network. f. Unsympathetic development in and around landscape features and development which has a negative effect on long distance views / vistas / landmarks or character of landscape features.'

Considers that the DPD has not met the Duty to Cooperate, as the Westfield sites (UA44) were not part of the consultation as described in the Local Development Scheme in preparation during 2013 or 2014, or in the draft Site Allocations DPD consultations in June-July 2015. The new proposal for a high density 994 dwelling development was not consulted on publically so is not legal or sound to include in the DPD or on the Proposals Map.

The DPD is not positively prepared, justified, effective, consistent with national policy nor is it sound.

The DPD is not positively prepared as the risk assessment 3.8 fails to adequately address the inclusion of a new proposed site allocation at a late date without due consultation.

It is not justified - proportionate evidence cannot be justified when duty to fully consult has not been undertaken. Paper exercises are not sound, bold statements are not backed up with evidence. Trends (AQMA) and air quality 'hot spot' at Constitution Hill. Light pollution is not currently considered an issue in the Borough.

The site was not publicly consulted on and fails to address environmental sustainability, heritage and assets of the area, air, light and noise pollution.

Proposes a modification to remove site UA44 from the DPD, due to failings in consultation procedures and sustainability appraisal.

Wishes to be kept informed as the SA DPD progresses to the next stage.

Contributor Proposed Modification: Remove site UA44 from the DPD, due to failings in consultation procedures and sustainability appraisal.

Modification Reference: U0000240

Officer Response: The Site Allocations DPD is considered to be legally compliant with regard to relevant planning regulations and legislation, and the NPPF. This issue about evidence base at this site is addressed in the Council's Regulation 19 Issues and Matters Topic Paper, section 10. There is considered to be adequate evidence to support the inclusion of the site in Sustainability Appraisal report and the SHLAA.

The issues raised about air quality, traffic congestion, wildlife corridors and green infrastructure are covered in sections 6, 8 and 13 of the the Council's Regulation 19 Issues and Matters Topic Paper. Opportunities for Green Infrastructure and tree planting and enhancements of GI are set out in the key requirements of Policy UA44 and also in more detail in the Council's Development Management Policies DPD Green Spaces Policies, which apply to all development in the Borough.

The respondent is correct that the density of 994 dwelling development has not been consulted on as it is not included in the Site Allocations DPD. It was included in the version of the document that went to the Council meeting on 18 October 2018 but Council agreed to remove this figure from the document. It will be for any development that comes

forward through a planning application to demonstrate that any particularly high density is appropriate with regard to the Borough's Development Plan and national guidance. Any scheme will be subject to its own, separate consultation process. Further details of the Woking football club site are set out in Council meeting reports from July 2018 which are accessible to the public and available on the Council's website. To summarise, the Council has entered into a Development Agreement with GolDev. GolDev is currently working up a detailed planning proposal, with the intention to submit a planning application later this year. The planning merits of the scheme and how the development addresses environmental sustainability, heritage and assets of the area, air, light and noise pollution will be determined by the Council's Planning Committee in accordance with the Development Plan, which includes the Development Management Policies DPD (as referred to above) and Site Allocations DPD.

The Woking Football Club site (UA44) will be retained in the Site Allocations DPD in order to enable an opportunity to redevelop the site to provide a replacement football stadium as well as residential, commercial retail development. A mixed use scheme is considered to be suitable due to the site's sustainable location. Any proposed redevelopment will be required to demonstrate a satisfactory relationship between the proposed uses on the site. In particular, issues regarding residential amenity, outlook and overlooking as well as pedestrian and vehicular movement through and around the site should be comprehensively addressed.

Response Reference: U0001623

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06523/1

Name: Mrs Victoria Seymour

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05

Summary of Comment: Why are proposals mainly in Byfleet rather than other areas, e.g. Pyrford? Is it for political reasons?

Green Belt land is irreplaceable. Brownfield sites should be considered.

This summer I and my family have seen bats, stag beetle, slow worm, adder and owls on site GB5. What will happen to the wildlife? I understood that certain species' habitats were protected.

Where will my children play if the park is lost? Loss of a park will lead to more child obesity and strain on the NHS.

I have stipulated my wishes to be buried in St Mary's Church. Where will burials be carried out if the current site is full and the field that I believe is reserved for this purpose, is developed?

Schools, doctors and traffic. Byfleet road currently suffers congestion and has pot holes. Byfleet village is a strong and special community and is our home. If any of the proposed development is to be carried out on the Murrays lane, Rectory lane and High road there will be a fight on your hands.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.

The role of Councillors in the production of the SADPD is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 24.

<p>The necessity of removing land from the Green Belt for safeguarding for future development needs is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 2.</p> <p>The consideration of alternative brownfield sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 11.</p> <p>The impact of the proposals on wildlife is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 19. In addition, the central portion of site GB5 is protected by a Tree Preservation Order.</p> <p>The impact of the proposals on recreational opportunities for local people is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. If and when site GB5 is allocated for development, the allocation policy will be informed by the information available at that time, including on the importance of existing land uses on the site.</p> <p>The issue of burial land on site GB5 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 15.</p> <p>The impact of the proposals on infrastructure, including schools, doctors and traffic, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 6 and 13.</p> <p>With regard to impact on the local community, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area, and indeed will help improve the lives of many local people who are looking for a new home. There is no doubt that the development of the sites will increase the population of Byfleet. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the time the site is allocated. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.</p>
Response Reference: U0001716
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06741/2
Name: SGN
Number of Signatories: 1
Comment Type: COMM
Site Reference:
<p>Summary of Comment: Southern Gas Network (SGN) has carried out a high level assessment of the impact of proposed development and can comment as below. Taking into account the information supplied, SGN has analysed the network covering Woking Borough and can confirm that no large scale reinforcements are likely to be required as a result of proposed developments.</p> <p>Where required, SGN will look to manage the provision of any off-site infrastructure improvements, in line with the overall development growth and/or timescales provided. The full extent of works will depend on the nature and location of the requested load(s), potentially requiring Low Pressure reinforcement in addition to that required for the IPMP networks, and will only become clear once a developer's request has been received. As this is a high level assessment and response, the information provided is indicative only. SGN's principal statutory obligations relevant to the development of the gas network arise from the Gas Act 1986 (as amended). Sections 9 (1) and (2) are highlighted in</p>

<p>particular. In light of these provisions, SGN would not develop firm extension or reinforcement proposals until receipt of confirmed developer requests.</p> <p>As SGN is the owner and operator of significant gas infrastructure within the Woking area, and due to the nature of their licence holder obligations:</p> <ol style="list-style-type: none"> 1. Should alterations to existing assets be required to allow development to proceed, such alterations are required to be funded by a developer. 2. Should major alterations or diversions to such infrastructure be required to allow development to proceed, this may have a significant impact on the timing of development and as such any diversion requirements should be established early in the detailed planning process. <p>SGN therefore request that where the Council are in discussion with developers via the Local Plan, early notification requirements are highlighted.</p> <p>Additionally, SGN are aware of advance being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, SGN would highlight the benefits of locating these facilities near existing gas infrastructure. Where the Council are in discussion with developers via the Local Plan, SGN advises that early notification requirements are highlighted.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The comments are noted, in particular the conclusion of the high level assessment that large scale reinforcements are unlikely to be required by the proposed developments.
Response Reference: U0000999
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00096/3
Name: Mr Robert Shatwell
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Objects to building on the Green Belt and open green space. Concerns regarding increased congestion on the A245 and associated pollution. No consideration has been given to using brownfield sites and no professional survey carried out.</p> <p>Concerns regarding traveller sites. 75% proposed for Byfleet is disproportionate and should be distributed throughout the borough.</p> <p>Concerns about potential clashes with local population.</p> <p>No consideration given to wildlife, despite protection being given under The Wildlife and Countryside Act.</p> <p>Lack of public transport resulting in more car usage.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic paper addresses the justification for releasing Green Belt land for development, and paragraph 1.6 addresses the matter raised regarding brownfield land. Section 4 addresses the loss of Green Belt and associated matter of detriment to the amenity of local residents. Section 3 addresses the matter regarding the disproportionate distribution of traveller pitches in Byfleet and West Byfleet. The overall aim of the Government is to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way</p>

<p>of life of Travellers while respecting the interests of the settled community. The Council believes that the proposed allocations achieve this aim but recognises there could be other measures to facilitate social cohesion between the settled community and Travellers.</p> <p>Section 8 addresses the issue regarding increased level of air pollution, with paragraph 8.4 covering the associated traffic congestion aspect.</p> <p>Section 13 addresses the issue of increased levels of congestion as a result of new development. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the corridor. In addition to this, various transport assessments have been carried out to inform the DPD, to ensure that development impacts are minimised and the Borough is served by an effective sustainable transport system. There is significant scope to influence a shift in the mode of travel from car-based journeys to public transport and cycling.</p> <p>Section 19 addresses the impact on local habitats.</p>
Response Reference: U0001001
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00096/5
Name: Mr Robert Shatwell
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA07, UA44
<p>Summary of Comment: DPD is not legally compliant, sound and does not comply with Duty to Cooperate.</p> <p>Reasons why the DPD is non compliant and unsound are as follows;</p> <p>Under UA7 there is no mention of development of Guildford Road. However, consultation information was released elsewhere which detailed the proposals for Guildford Road, Victoria Arch and Station Approach. In this, it is clear that the property of the representor will be demolished, and a deadline for public comment was stated. The representor was not notified about this information, and was therefore unable to make a comment in time. The map issued with this consultation is of too smaller scale to make out any detail. The map given with the DPD shows that Guildford Road is outside the area of proposed development.</p> <p>There is no mention of the relocation of David Lloyd.</p> <p>The Football Club should apply for planning permission on their own behalf.</p> <p>Proposed modifications are as follows;</p> <p>Planning documents are long and have been difficult to understand in terms of jargon. To make documents legally compliant, they must contain less jargon and be made easy for the public to understand. The maps should also be of a more detailed scale.</p> <p>WBC should ensure that all residents and businesses affected by any development are notified in good time so that representations can be made. Furthermore, information should be made available to a wider audience.</p> <p>There should be greater flexibility with closing dates for consultation representation submissions.</p> <p>In terms of Duty to Cooperate, records from executive council meeting of 18th October 2018 shows that the council failed to consult with neighbouring authorities prior to deciding on the review. The review should make clear that Woking will not have an unmet need to be met by neighbouring authorities. There needs to be a review of the evidence base.</p> <p>The core strategy is over five years and the review is therefore overdue.</p> <p>Has attached a supplementary report of the core strategy review.</p>

Wishes to participate in oral examination for the following reason;
"I believe it is the only way that the full facts of these matters will come out. I would wish to produce relevant council documents in support of my assertions.
I also believe that many other residents feel as I do that the council have not acted in an open and honest manner and I would wish to represent any that do not feel able to address the inspector."
Wishes to be informed of next stages.

Contributor Proposed Modification: Proposed modifications are as follows;
Planning documents are long and have been difficult to understand in terms of jargon. To make documents legally compliant, they must contain less jargon and be made easy for the public to understand. The maps should also be of a more detailed scale.
WBC should ensure that all residents and businesses affected by any development are notified in good time so that representations can be made. Furthermore, information should be made available to a wider audience.
There should be greater flexibility with closing dates for consultation representation submissions.
In terms of Duty to Cooperate, records from executive council meeting of 18th October 2018 shows that the council failed to consult with neighbouring authorities prior to deciding on the review. The review should make clear that Woking will not have an unmet need to be met by neighbouring authorities. There needs to be a review of the evidence base.
The core strategy is over five years and the review is therefore overdue.

Modification Reference: U0000408

Officer Response: The consultation for the road layout south of Victoria Arch is separate to the consultation for the Site Allocations DPD. The details of policy UA7 is the infrastructure that is planned to support the delivery of the Site Allocations DPD. In parallel to this process, the Council has put in a bid to secure significant funding for major transport improvements in the vicinity of the Victoria Arch. If the bid is successful, the delivery of the improvements will be subjected to its own normal consultation process, to give residents and businesses the opportunity to comment on the scheme. If any consequential amendments are needed in the DPD if the bid is successful, the Council will take the appropriate steps to do so. Any individual or business that could be affected by the proposed transport improvements will be appropriately consulted as a separate process.

The matter about the legibility of the map in the DPD is noted. The Council is continuously working to improve the presentation of the DPD and the comments will be taken into account.

Any negotiation for the relocation of David Lloyd is a separate matter for the Council. If a relocation is confirmed and approved for development then the DPD will be amended in due course to reflect that confirmation.

The Site Allocations DPD only sets out to identify land for development. The allocation establishes the in-principle use of the land for the proposed uses. This is distinct from the development management process, which will determine any application that would come forward. Any scheme that comes forward will be determined on its own merits.

The Core Strategy has been reviewed and it was deemed that no modifications were needed. It was for this reason that there was no requirement under the Duty to Cooperate for the Council to consult with the neighbouring authorities on this matter, and this is stated in the Supplementary Report to Council on 18 October 2018. Under the Duty to Cooperate the Waverley Borough Local Plan Part 1 has committed to meet 50% of Woking's unmet housing need. The Examination of the Guildford Local Plan has completed. The Inspector has recommended that any residual unmet need coming from Woking should be met by Guildford through their housing land supply. The position on Woking housing need is addressed in the review of the Woking Core Strategy. Using the 2014 base data, Woking's housing need is 409 against its requirement of 292 dwellings

per year. There would therefore be an unmet need arising from Woking based on up-to-date recommended data.
Response Reference: U0001320
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 00377/2
Name: Mr Antony Shephard
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Objects to development of Green Belt sites in West Byfleet. The accumulation of development consisting of the redevelopment of West Byfleet Centre, Broadoaks and West Hall will put a strain on the area. Concerns regarding the following: <ul style="list-style-type: none"> - Inadequate road infrastructure, particularly Parvis Road; - Inadequate health and educational infrastructure; - Traveller pitches.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet. Section 3 addresses the issue regarding traveller pitches. Section 6 addresses the issue regarding the adequacy of infrastructure. Section 13 specifically addresses the issue regarding road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Transport assessments have covered the impacts of cumulative development and have identified potential traffic hotspots where mitigation might be required. These will be addressed as part of strategic infrastructure or site specific measures, e.g. mitigation on the back of planning applications.
Response Reference: U0001696
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): F

Contributor Reference: 00378/2
Name: Mrs Margaret Mary Shephard
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Objects to development of Green Belt sites in West Byfleet. The accumulation of development consisting of the redevelopment of West Byfleet Centre, Broadoaks and West Hall will put a strain on the area. Concerns regarding the following: <ul style="list-style-type: none"> - Inadequate road infrastructure, particularly Parvis Road; - Inadequate health and educational infrastructure; - Traveller pitches.
Contributor Proposed Modification: None Stated

Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 5 specifically addresses the loss of Green Belt land in Byfleet and West Byfleet. Section 3 addresses the issue regarding traveller pitches. Section 6 addresses the issue regarding the adequacy of infrastructure. Section 13 specifically addresses the issue regarding road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Transport assessments have covered the impacts of cumulative development and have identified potential traffic hotspots where mitigation might be required. These will be addressed as part of strategic infrastructure or site specific measures, e.g. mitigation on the back of planning applications.
Response Reference: U0001700
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02452/2
Name: Mrs Sandra Simkin
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07, GB08, GB09, GB18, UA07, UA22, UA36, UA42, UA44
Summary of Comment: Concerned about the content and cavalier manner in which proposals have been put together in the DPD. The reference numbers in the plan have changed since the Regulation 18 consultation in 2015, to deliberately confuse the public. The Council views its residents with contempt and has built in this barrier to make responding more difficult. The Core Strategy is the local plan for the Borough and framework for all future planning proposals. From this strategy came the Reg 18 document in 2015, which went way beyond the remit of the Core Strategy, as it included swathes of Green Belt land protected by the NPPF. Green Belt proposal for the school at Egley Road was planned against Green Belt regulation, without the community having the right to comment, because it was 'special measures'. The Council twisted regulations to get through a proposal which they knew would not sit well with the local community. Regulation 19 site proposals stray even further from the agreed planning process, and totally new proposals have appeared that were not previously included: UA22, UA36 and UA44. It is reprehensible that the Council has shovelled them in now, with no prior consultation or forewarning. UA42 - causing distress to shopkeepers at 1-11 Guildford Road. This row of shops was not included in the section [Regulation] 18 UA42 site proposal. The proposed road widening and major rebuilding is not documented in the strategy or Regulation 19 document. UA7, which refers to the railway flyover and station/bus interchange, makes no mention of 1-11 Guilford Road or of widening Victoria Arch or constructing a new railway arch. In essence there has never been a planning recommendation to remove the shops at 1-11 Guildford Road for road widening, and it is reprehensible that the Council has announced this development without having consulted with residents and shopkeepers. GB7 - development would join the village of Mayford to the town. It was agreed at full Council that GB7 would be removed from the DPD but it is still there. The escarpment on Egley Road has archaeological value (early settlements significant to Woking's history).

GB8's land has been sold to the Council on a leasehold basis, so can not be developed for housing, but is being safeguarded for development from 2027-40, presumably in the hope that Wyevalle will sell them the freehold at a later stage.

GB9 - any housing built will add to the already congested A320 traffic. There is also a problem of access to GB9, via a single track road bridge over a weak railway bridge on Hook Hill Road.

Concerned about the paucity of SANG allocations, required to counter developments that remove open spaces from communities. The requirement on the communities of the Byfleets' to have to adopt the SA DPD for the open space at GB18 to be allocated as SANG land, is coercion.

Retail - planning is on the wrong track, inappropriate and written for the 1980s, by including so many retail units when retail is collapsing and people increasingly shop online.

So many proposals are included for high rise development, in the plan period to 2027. To fulfil these proposals the town centre will be closed down completely, as it has a very small footprint and is constrained by the railway and the canal. Victoria Square has already caused major disruption in the town centre.

There is an absence of planning, no overarching design guidance and no landscape planning consideration. Jeremy Clarkson described Woking as the 'worst town in Britain' and the proposals to put high rise buildings in wherever they can fit will worsen this and make a 'gigantic high rise mess'. There is a lack of competence in town planning shown by the Planning Policy team.

Shoppers are put off by high parking charges, rats and disruption caused by development, and are going elsewhere to shop and use cinemas and theatres.

Contributor Proposed Modification:

Modification Reference:

Officer Response: The CS is a key part of the Borough's Development Plan, which provides the strategic planning policy context for the preparation of other Development Plan Documents. The Site Allocations DPD is one of the CS main delivery documents, needed to implement the development requirements, vision and spatial strategy outlined in the CS. It identifies specific sites for housing, employment and infrastructure to enable the delivery of the Core Strategy.

The justification for the release of Green Belt land for development, is explained in the introduction and sections 1 and 3 of the Council's Regulation 19 Issues and Matters Topic Paper.

The application for the Hoe Valley school and associated sports facilities at Egley Road were considered as part of the Development Management process, with regard to the Borough's statutory development plan at the time of the application (in 2015). This part of the site has been implemented and the school opened in September 2018. On balance, the merits of the proposal and need for a school were among a number of considerations that demonstrated very special circumstances for development in this Green Belt location. Following approval by the Council, the application was referred to the Secretary of State for consideration, but was not called in, meaning the Secretary of State did not consider it necessary to determine the application for the Council. The Council went through the correct planning process and consultation with regard to this application.

Sites that have appeared for the first time in the DPD at the Regulation 19 stage have been included due to evolving evidence and updating of development information during the DPD's preparation. This includes evidence gathered from previous consultation exercises undertaken during the preparation of the DPD. With regard to the sites mentioned (UA22 Ian Allan Motors, 63-65 High Street, Old Woking; UA36 Land at Bradfield Close and 7 York Road Woking; and Woking Football Club, Westfield Avenue) the sites have either become available or were put forward during the Regulation 18 consultation in 2015, and have been assessed as suitable for inclusion in the DPD

through the Council's Strategic Housing Land Availability Assessment and Sustainability Appraisal. Further information on the evidence base supporting the DPD can be found in section 10 of the Council's Regulation 19 Issues and Matters Topic Paper.

The current (Regulation 19) consultation gives the public and stakeholders an opportunity to comment on these sites, as it does for sites UA7 and UA42 and for any representations to be taken into account during the DPD examination. It should be noted that the proposals referred to as UA7 are part of a wider and separate proposal at Guildford Road, Victoria Road and Station Approach to change the road layout south of Victoria Arch and alleviate traffic congestion, that the Council is working on in partnership with Surrey County Council (the Highways Authority). This has been subject to consultation, which ended on 24 October 2018, and will inform and support the allocation at UA7. The scheme is detailed further on Woking Council's website, under Major developments.

GB7 continues to make a meaningful contribution to future housing provision, but in doing so making sure to designate an area of local separation in the northern part of the site to provide a visual gap between Mayford and the rest of the urban area. This wording has duly been included in the policy, and is shown by a hatched area on the location plan in the SA DPD and on the updated (Oct 2018) Proposals Map. The escarpment and archaeological value of the site are addressed in the key requirements of Policy GB7, and in the relevant Core Strategy policies.

GB8 - comment noted. Details and key requirements for the development of this safeguarded site will be set out as part of the review of the Core Strategy and/or Site Allocations DPD, to be informed by up to date evidence at the time.

SANG allocations - sufficient sites are identified as SANG land to mitigate the impacts of residential development and provide open space/ green infrastructure. The site GB18 is taken out of the Green Belt and allocated for open space as, due to other Green Belt boundary changes and allocations in the DPD, the site would be left as an island of Green Belt, which would not provide a defensible boundary to the Green Belt. The Green Belt boundary review also highlights that GB18 makes no contribution to Green Belt purposes. The new open space designation will ensure it is protected by policy CS17 of the Core Strategy.

Retail - the plans to deliver retail as part of various town centre allocations (including Victoria Square, which is no longer an allocation due to its commencement) seek to deliver the objectives and development requirement of the Core Strategy. The Council's policy on and management of retail and town centre development is flexible and responsive to the changing retail environment. The need for retail space is supported by evidence, recognising that the way retail space is used will continue to evolve due to market signals.

Design - The point on the lack of overarching design guidance is noted. The Council is working to ensure high quality design in development, with its approach to design in set out in Core Strategy Policy CS21 and further detailed in the adopted Design SPD, which includes more detailed guidance on tall buildings. Development proposals are required to take account of this guidance, with particular points relating to site specifics outlined in the allocations' key requirements. Independent design reviews will also be undertaken on specific major sites as appropriate, through the Design Panel set up by the Council. The Council does not accept that it is the worst town in Britain.

Response Reference: U0001113
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06001/1
Name: Mr Andrew Simon
Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB18

Summary of Comment: Wishes to speak at examination and be kept informed when the SA DPD progresses to the next stage.

The DPD is unsound, not legally compliant or consistent with national policy. It is not an appropriate strategy accounting for reasonable alternatives and based on proportionate evidence.

The process has been unsound and unfair because:

- bureaucratic, use of planning and legal jargon and the large volume of information mean it is difficult and unreasonable for residents to digest, understand and meaningfully respond.
- many residents objected to draft plans for Green Belt development as part of Regulation 18 consultation in 2015. These should be taken forward and considered, and it is unfair to dismiss them as part of a new process.
- The previous Regulation 18 consultation did not include travellers pitches at West Hall, so the process is unsound and flawed, as different representations would have potentially been made with a potentially different outcome for the DPD.
- The proposals do not reflect the spirit and content of the West Byfleet Neighbourhood Plan, which promotes green space, the nature of the village and the health and well-being of residents. The proposals will materially change and negatively impact these aspects. In this respect the proposals are not positively prepared as they do not objectively consider the needs of the community and are not in accordance with NPPF para 47.
- a disproportionate and unfair burden is put on Green Belt in the Byfleets to deliver development, contrary to NPPF para 35, thus crippling the functioning of the village and making the plans undeliverable.

Impacts on the environment and well-being of residents:

- Biodiversity, particularly herons and red kites, which nest in West Hall woods, will be reduced.
 - Air quality - concerns, already high pollution levels due to traffic on M25 and A245 will be worsened. Cumulative impacts on air quality created by GB10, GB4, GB5 allocations on top of existing development have not yet been considered. Contrary to NPPF para 170(e).
 - sustainability appraisal states development should contribute to the health and well-being of the community. The proposals fail to achieve this as they: cause distress and panic to community during the planning process; remove green space used for relaxation, exercise and enjoyment; contribute to air pollution; reduce access to health services (as per below).
- Infrastructure and amenities:
- no firm plans to invest in local education, health or transport infrastructure. CIL funds from development are not guaranteed to be used in areas directly affected, and will not be of the scale of infrastructure required e.g. new school, GP surgery, widening of A245 and bridge over M25.
 - estimates numbers of additional cars, residents and children, requiring provision at medical centre (2,500 new patients) and local schools (1,250 school places), and road capacity.

Details the limits of schools, healthcare and roads to provide adequate provision to meet need, and so the congestion, lack of school places and space at GP practices makes the DPD unviable and undeliverable, and therefore unsound. Expects full plans of the required infrastructure and timing of delivery.

Need for housing - the evidence put forward is not current or correct, so Green Belt release can not be justified and the DPD is unsound:

WBC are using outdated need figures, and should take account of the ONS 2016 figures, which reduce projected housing need and therefore the requirement to allocate development in the Green Belt.

Green Belt development can not be justified because the plans do not take account of the amount of development from windfall sites, particularly Woking Football Club.

SHLAA mentioned in the SA DPD is the 2014 version, rather than the latest 2017 versions, and therefore the DPD is using outdated information.
DPD is not deliverable and not effective:
- proposed travellers pitches at West Hall are not deliverable as developers will not participate. Proposed houses will fail to sell if they are next to travellers pitches.
- flooding - parts of GB10, GB4 and GB5 are known to flood, which is not given adequate consideration or detailed mitigation proposals.
-the site is covered by a SCC minerals allocation, in a minerals plan running to 2026. This will make the site unattractive to developers, so its deliverability is questioned.
Full consideration has not been given to brownfield sites through an independent review, similar in scale to the Green Belt Review. Brownfield and PDL should first be considered. Also not clear enough justification given for excluding the Martyrs Lane Green Belt site. The purpose of the Green Belt has been unduly dismissed, and core purposes of the Green Belt have been wrongly assessed with regard to West Hall.

GB18 - removing school fields from the Green Belt - understands the reason for removing these are to avoid a small parcel of Green Belt being isolated in the urban area but does not understand the issue with this. The school grounds should be given enduring and absolute protection from any development to ensure fit and proper education for future generations.

Contributor Proposed Modification:

Modification Reference:

Officer Response: The Council is confident that the DPD is sound, legally compliant, consistent with national policy and an appropriate strategy accounting for reasonable alternatives and based on proportionate evidence. This is detailed in its Regulation 19 Issues and Matters Topic Paper and evidence to demonstrate this will be considered by the Inspector at public examination.
The point about the bureaucratic nature, use of planning jargon and large volumes of information is noted, but is necessary to inform a document of this nature. Unfortunately it would be difficult to present an appropriate, justified strategy accounting for reasonable alternatives and accounting for proportionate evidence without a large array of supporting, background documents and assessments. It is fair and transparent that the Council makes this information, which is technical in nature, available for the public to view. The option of producing a short, summary version of the SA DPD was considered, but was not taken forward due to the local level detail and specificity in the allocations being of use and value to the Council and the documents' audience. A summary document would necessarily gloss over large amounts of useful information contained in the DPD. To tackle the issue raised, Officers ran a number of consultation events and were available on the phone and by email to enable members of the public to ask questions, discuss or clarify information presented. These events and methods of contact were widely publicised. This is detailed further in section 9 of the Council's Regulation 19 Issues and Matters Topic Paper.
The responses to the Regulation 18 consultation have been considered and have fed into the preparation and development of the plan to the Regulation 19 stage. The inclusion of changes to the DPD, including travellers pitches at West Hall is not flawed but is part of the development of the plan, which must respond to the latest available site information and evidence. Responses to these issues will be duly considered at the current (Regulation 19) stage of consultation.
With regard to the proposals not reflecting the spirit and content of the West Byfleet Neighbourhood Plan, please refer to section 16 of the Council's Regulation 19 Issues and Matters Topic Paper.
With regard to the comment on the disproportionate and unfair burden put on the Green Belt in the Byfleets, please refer to sections 4 and 5 of the Council's Regulation 19 Issues

and Matters Topic Paper. The provision of local infrastructure to support the proposed development means that the Council is confident that the negative impacts of future development in terms of service provision and transport are minimised (see section of the Council's Regulation 19 Issues and Matters Topic Paper) and make the plans deliverable. Regarding biodiversity please see section 19 of the Council's Regulation 19 Issues and Matters Topic Paper, and on air quality and traffic congestion please see sections 8 and 13.

Regarding need for housing, and use of differing need figures, please refer to paragraph 1.5 of the Council's Regulation 19 Issues and Matters Topic Paper.

Flooding is covered in section 7 of the Council's Regulation 19 Issues and Matters Topic Paper, and Surrey County Council's Mineral Allocation in section 17.

Full consideration has been given to brownfield sites through the evidence detailed in sections 10 and 11 of the Council's Regulation 19 Issues and Matters Topic Paper.

The contribution that West Hall makes to the purposes of the Green Belt have had to be balanced with a number of sustainability criteria, as assessed in the Sustainability Appraisal, and informed by numerous other evidence sources including the need for housing (see section 10 of the Council's Regulation 19 Issues and Matters Topic Paper). While the site may perform some Green Belt purposes, the GBBR is clear to recommend its release from the area to meet development requirements of the Core Strategy.

On GB18, the creation of an island of Green Belt (due to other Green Belt alterations and allocations set out in the DPD) at the site would not sit well with guidance on altering and defining Green Belt boundaries set out in NPPF para 136 and 139. It would not be logical, readily recognisable (in terms of Green Belt purposes) or have permanence in the long term, in enduring beyond the plan period. The reasoned justification of policy GB18 makes it clear that the land would not be developed - it will continue to be an open space associated with an educational use, and will be designated as Urban Open Space on the Proposals Map to serve the school. Urban Open Space is afforded protection by policy CS17 of the Core Strategy.

Response Reference: U0001395

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06036/1

Name: Mrs Nina Simon

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10, GB18

Summary of Comment: SADPD is unsound. Not clear to me if it is legally compliant and unsure if it complies with the Duty to Cooperate.

Removal of GB10 from greenbelt is not justified, does not comply with the NPPF.

Exceptional circumstances to justify Green Belt release do not exist as the plan is already scheduled to deliver adequate housing in this period, and there are alternatives.

The proposals will go against the Neighbourhood Development Plan and so not comply with NPPF para 47.

GB10 provides a barrier between the villages of Byfleet and West Byfleet and performs all five purposes of Green Belt.

The village/community feel of West Byfleet (people speaking to each other, knowing most of their neighbours and looking out for them) will be harmed by such an out-of-proportion expansion.

GB10 is a visual amenity as viewed from the Wey Canal and Dodds Lane as well as a habitat for wildlife, which would be negatively impacted by these proposals.

GB10 proposals not sustainable as it is too far from the station and schools for people to use public transport or walk. Not sound to assume people will walk everywhere- the proposed houses will have 2 cars on average, people in Dartnell Park (across road from GB10) drive to the village centre.

Adding hundreds of cars will make it unsafe to turn onto Parvis Road from Dartnell Park. The A245 is heavily congested and a bottleneck due to the shortage of alternative accesses to West Byfleet. Consider the impact of traffic from GB10 in combination with that from Broadoaks, the Sheerwater regeneration project (including the new recreational facilities which will attract traffic from the Brooklands side of the A245), Sheer House and the significantly increasing school traffic to the expanding West Byfleet schools. School parents from other areas are starting to park in Dartnell Park, due to A245 congestion and a lack of parking spaces in the village centre.

It is also not sustainable as the infrastructure does not exist to support this level of expansion to the village population, especially considering the expected dwellings at Broadoaks and Sheer House. The schools are full, even though recently expanded, so there would be nowhere for new children to attend school. The medical centre is also at or beyond capacity already.

GB10 allocation is not effective given the constraints, including the mineral allocation plan. The removal of trees will reduce absorption of motorway and A245 road noise, increasing noise pollution for existing residents. Noise and particulate pollution from sitting traffic is terrible; the proposals will make this worse. Already too noisy to have a conversation while walking along the A245.

Sequential approach not demonstrated for Traveller pitches in the Green Belt.

An unreasonably high proportion of West Byfleet's Green Belt would be lost- almost a complete loss. Misleading to quote the proportion of the Borough's Green Belt to be lost. Wish to participate in the oral examination since some residents should provide information about the impacts, which are lost in the myriad of documents and processes. Would like to contest elements of the evidence provided which are not sound or conclusive.

Contributor Proposed Modification: that GB10 and GB18 are removed from the green belt allocations due to the fact that including GB10 would make the DPD unsound as the DPD would not then meet the 5 tests of soundness.

Modification Reference: U0000300

Officer Response: The necessity of releasing of Green Belt land for the delivery of housing is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1. The consideration of alternative sites is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 11.

The relationship between sites GB10/GB18 and the West Byfleet NDP is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 16.

The performance of the parcel including site GB10 against Green Belt purposes was assessed in the Green Belt Boundary Review (GBBR) (2015) and the site found suitable for removal from the Green Belt. The appropriateness of the GBBR is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12.

The Council does not consider that the proposal will harm the existing community of West Byfleet. The Sustainability Appraisal found that the development of site GB10 would have a positive impact on the objective of 'supporting strong, vibrant and healthy communities', by (in summary) helping to meet local housing need (including with 50% affordable housing), its location within walking distance of key facilities, and the proposal to use significant parts of the site for open space for leisure and recreation, which would benefit the wider community.

The impact of the proposals on visual amenity and on biodiversity is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 4 and 19 respectively.

<p>It is true that only part of the site is within standard walking distance of West Byfleet District Centre and the station. However this level of proximity to services is still better than that for most other sites considered through the GBBR. In addition, only slightly over half the total area of the site is considered to be developable, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is potentially likely to limit development on the areas of the site furthest from the District Centre. The key requirements in policy GB10 include to 'improve sustainable transport infrastructure including pedestrian and cycle links and bus services to West Byfleet District Centre'. It is therefore not considered that the residents would be car reliant.</p> <p>The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. The Broadoaks, Sheerwater, Sheer House and school developments have been taken into account in the preparation of the Council's evidence base.</p> <p>The effect of the proposals on local infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The effect of the mineral allocation on GB10 is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 17.</p> <p>The effect of the proposals on noise pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The sequential approach to the allocation of Traveller pitches is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p> <p>The concentration of Green Belt loss in West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p>
Response Reference: U0001005
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06606/4
Name: Ms Joanne Simpson MBE
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: The DPD is unsound, not an appropriate strategy, justified, effective, or consistent with national policy.</p> <p>Questions the ability of the heavily congested Parvis Road to cope with additional traffic. The site is Green Belt and a concrete aggregate safeguarded site.</p> <p>Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces, which will be lost if this development goes ahead, contrary to the plan.</p> <p>There is no provision for healthcare and schooling for additional residents. Existing services are already strained.</p> <p>Travellers - existing urban sites should be considered before encroaching on Green Belt land.</p> <p>Green Belt function and assessment - inaccurate statements are given. The site performs Green Belt functions in preventing urban sprawl, concrete aggregation, preventing merging for neighbouring towns and preventing loss of countryside.</p> <p>Requests that the proposal at Sheerwater House in West Byfleet centre is sorted, as businesses have closed and the site is falling into decay with problems of youth vandalism, gangs etc</p>

Contributor Proposed Modification:
Modification Reference:
Officer Response: This representation is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1, 3, 6, 16, 17, 21. The Council is satisfied that its evidence base on the Green Belt, in the Green Belt Boundary Review, is adequately robust, comprehensive and able to withstand scrutiny. Regarding Sheer House in West Byfleet, the redevelopment of the site is being facilitated by its allocation in the Site Allocations DPD Policy UA42. However a parallel Development Management process is underway where an outline planning permission is in place to redevelop the site. It is expected that a reserved matters application will be submitted in due course to include further details of delivery of development at the site.
Response Reference: U0001096
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06130/1
Name: Mr Dharma Sivarajasingham
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11, GB18
Summary of Comment: The DPD is legally non-compliant. The statement that 1.93% of Green belt is lost is incorrect: 57% of that loss is in West Byfleet, which is to lose 60% of its Green Belt. This is very significant for West Byfleet, vandalism on an unacceptable scale. The DPD is unsound because GB10 should not be taken out of the Green Belt: The land at West Hall performs all the Green Belt purposes, other than preserving the special character of historic towns. More detail required on how the land in GB10 will be used. If the site area is 29.33ha but developable area is 14.8ha plus 4.7ha for public open space/green infrastructure, the remaining 9.83ha of the site (including the 'large areas of woodland and parkland setting' the policy proposes to retain) should remain in the Green Belt or at least be designated as Local Green Space, as at GB18. Otherwise further development could be brought forward; residents will suspect this is WBC's intention. The site boundary seems defined by land ownership rather than making the best use of land. Clearly defined boundaries should be created by extending the site up to the road to West Hall Care Home in the east, and removing a green corridor including Tins Wood and Dodd's Wood on the west, which should be left as Green Belt (connected to the main Green Belt at its southern end) or at least designated as Local Green Space. This protection for green space will be needed since the proposed density means the homes on the site will have little garden space. I cannot recall any consultation over any possible changes to the size and shape of the site. The further use of Green Belt for highways, implied by the statement 'Access... could be provided through Green Belt land from Parvis Road', is absurd and unsound, and does not accord with NPPF para 138.f. In the statement 'the retention of the northern part of the parcel within the Green Belt', the meaning of 'parcel' and the extent of the land referred to is unclear. There is no detailed traffic modelling covering the flows that would arise from this development. Look forward to more detailed proposals on A245 mitigation options. Changes to site numbering between the previous consultation documents, much of the evidence base, and the current consultation documents, is confusing for residents.

Local policy has changed since Core Strategy adoption, to promote higher densities in urban areas. WBC is using its powers under NPPF para 119 to buy land and increase housing density. This policy should be included in the SADPD, lowering or removing the need for Green Belt development (more research is needed on the impact it will have). Not taking it into account contradicts NPPF para 67.

Densification as at the Sheerwater Regeneration Scheme could be replicated elsewhere the Borough, creating many more homes on existing residential land. This policy is not in the Core Strategy and has not been taken into account, contradicting NPPF para 67.

Paragraph 5.74 of the Core Strategy states that the SADPD ; -“will specify the mix of dwellings that will be expected to be provided on specific sites”. I can find no such information for GB10.

Paragraph 5.128 of the Core Strategy states that the Council will keep the Broadoaks site (GB11) under review when preparing the SADPD. This has only been done partially; the SADPD does not take into account the resolution to approve (pending S106) of 254 homes and an 80 bed care home there.

The Council acknowledges more care home beds are required but has no policy on how to take them into account; each such bed will probably release a home for occupation, so should be treated as perhaps 75% of a dwelling.

The number of dwellings built and permitted and expected in West Byfleet District Centre since 2010 is at least 305- compared to the 170 stated in the Core Strategy. Not clear whether infrastructure providers have been asked whether there is capacity for this increase, or that between the allocated and expected number at Broadoaks. Proposals for GB10 are not sound when the effects of existing and committed development have not been modelled, and the proposals fail to take into account existing proposals.

Only when the impacts of forthcoming developments in West Byfleet, and of the Council's densification policies, have been fully analysed should a strategic decision to release land from the Green Belt for housing be taken.

Why is phasing required for GB10 Surely only if infrastructure is not ready. Why does WBC not give a timescale If timescales are not known how can infrastructure providers be asked about capacity

Is phasing legally enforceable Once GB10 is removed from the Green Belt, it will be far more viable to develop than the Broadoaks or Sheer House sites, and WBC will be unable to refuse permission on it after 2022. As a result the (more sustainable) Broadoaks and Sheer House sites may be left derelict or built out more slowly- breaching NPPF para 59.

If windfall sites are also under-utilised or fail to come forward as a result, that would contravene NPPF para 68. WBC have failed to properly assess the economic viability of other housing schemes in the Neighbourhood Area against the proposal.

WBC must respect and adhere to the Neighbourhood Plan; GB10 is in breach of this plan. The West Byfleet Neighbourhood Forum has applied NPPF para 17 in supporting development at Broadoaks, and now wishes under the same paragraph to recommend that GB10 remain in the Green Belt. The Forum does not think WBC have done a robust enough study of the size and shape of GB10 or of the impact of new homes at GB11 and Sheer House.

NPPF para 65 makes clear that authorities should set out a housing requirement for designated neighbourhood areas as well as their whole area. WBC have failed to do this. Under NPPF para 66 this letter is the formal request for WBC to provide an indicative number to the Forum.

The proposal is about satisfying the needs of the Borough, not of West Byfleet, for which a 50% growth in the number of dwellings from 2013 to 2027 is not sustainable.

The field adjacent to the Long Walk on GB10's southern boundary is prone to flooding, see the Neighbourhood Fom website for photographs. The proposals therefore contradict NPPF para 158.

The Regulation 19 consultation period seems to short to consider such a significant matter.

I look forward to discussing the proposals further with the Inspector at the Examination.

The suggestions at the beginning of this letter about a reshaping of GB10 are a recognition that in the longer term more new homes will need to be provided in West Byfleet. The Forum is ready to consult with residents and amend its Plan to incorporate continued growth in our community but only at a pace which is sustainable locally.

Contributor Proposed Modification: The Leader of the Council, David Bittleston constantly reiterates in public that higher densities of housing in urban areas of the Borough can be achieved. Not enough research has been done by WBC into this and whether it means that the supply of new homes will be sufficient from these uses of land to prevent the need to release land from the Green Belt. This change has not been taken into account by planners and should be.

WBC is undertaking a "Regeneration of Sheerwater" a local village. WBC will provide the details. They are using compulsory purchase powers to buy and demolish many homes replacing them with much higher density housing. If this can be done here it can be replicated elsewhere in the Borough and would create many more homes on land already used for homes. This is a policy which is not in the Core Strategy meaning that it is not being taken into account by planners. It should be in the Core Strategy and it should be taken into consideration.

Housing density needs to be a strategic policy. Paragraph 118d of the NPPF makes clear the need to develop under-utilised land. WBC is using its powers under paragraph 119 of the NPPF to buy land and increase the density of homes in the Borough. This policy should be formally incorporated into the SADPD.

WBC should and must respect and adhere to the neighbourhood plan accepted overwhelmingly by the residents through a referendum.

Paragraph 65 of the NPPF makes clear that authorities should set out a housing requirement for designated neighbourhood areas as well as their whole area. WBC have failed to do this.

Under paragraph 66 of the NPPF this letter is the formal request for WBC to provide an indicative number to the Forum.

Modification Reference: U0000294

Officer Response: The concentration of Green Belt loss in West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.

The performance of the parcel including site GB10 against Green Belt purposes was assessed in the Green Belt Boundary Review (GBBR) (2015) and the site found suitable for removal from the Green Belt. The appropriateness of the GBBR is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12. Section 4.2 of the GBBR describes how the sites were sourced: the Council undertook a 'Call for sites' exercise and sites were also identified which were promoted as part of the 2011 SHLAA review. Table 4.3 of the GBBR sets out the estimated site yields and development areas which were put forward after an extensive review of site suitability. Although approximately 30ha at GB10 was recommended for removal from the Green Belt, the GBBR emphasised that only parts of the wider site area could accommodate development. The entire site is, however, allocated for release from the Green Belt in accordance with recommendations in Section 7 of the GBBR for a new Green Belt boundary. This was not defined by land ownership but rather the need to rationalise the Green Belt boundary and ensure it is permanent, clear and enduring in accordance with the NPPF. A series of key requirements have been included in the policy to ensure as much of the landscape setting is conserved as possible - it is not the intention of the Council that the entire of the wider site is developed in the future. Areas of green infrastructure and landscape features will be protected by various policies of the Development Plan, including policies CS7, CS17 and DM1. It would be inappropriate at this stage to designate areas of the site as Local Green Space. Once the site has been developed, it would be possible for a revision of the Local Plan or West Byfleet Neighbourhood Plan to seek the designation of public green areas within the site

as Local Green Space in accordance with criteria in the NPPF (without prejudice to the result of such an attempt).

The proposed removal of land along the north-western boundary of GB10 from the allocation, and its retention in the Green Belt, would result in the creation of an isolated patch of urban area surrounded by Green Belt. It would focus development on the areas of the site further from West Byfleet district centre and railway station; make the creation of a link with the Broadoaks site more difficult; and push the developable area towards the outer edge of the site, potentially increasing the visual impact of the development on the surrounding countryside. The addition to the site of two additional fields to the north-east would mean a substantial further reduction in the remaining gap between West Byfleet and Byfleet, including as perceived from Parvis Road. Both these proposed changes would be contrary to the recommendations of the Green Belt Boundary Review. The policy as it stands ensures that the development of the site includes significant green infrastructure to service the development and make sure the development provides a better transition between the urban area and the green belt.

Since the site was consulted on at the Regulation 18 consultation in 2015, the site boundary and stated developable area have remained the same; the indicative number of standard dwellings proposed has reduced from 592 to 555, while a proposal for 15 Traveller pitches has been added. There is no requirement for separate consultation on this change prior to Regulation 19 stage.

The suggested idea of access through Green Belt land from Parvis Road was recommended by the Green Belt Boundary Review.

Agree that the statement 'northern part of the parcel' is unclear. Clarification is proposed to indicate that this refers to the land outside the site, to its north-east. The 'parcel' refers to the broader area of land assessed in the early stages of the Green Belt Boundary Review.

The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.

Appreciate the confusion caused by changes in site numbering. However, this is inevitable given that the DPD continues to evolve with changes made to reflect evidence and newly emerging information. The Regulation 19 document is produced as the version the Council intends to submit to the Secretary of State, so needs to have an internally consistent numbering system. Care has been taken to ensure that site names remain consistent where possible.

The necessity of Green Belt development in the context of high density development taking place in the urban area is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1. The opportunity for further densification is addressed in Section 18.

Policy CS11 of the Core Strategy states that proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs as evidenced in the latest SHMA. It would be more appropriate for proposals to be governed by the need at the time of the planning application, taking into account local context.

The Council does intend to keep the Broadoaks site (GB11) under review, and has proposed a modification to the reasoned justification to take account of the recent planning approval (PLAN/2018/0359).

Care homes are indeed taken into account when calculating the Housing Delivery Test. However, given the factors set out in the Regulation 19 Issues and Matters Topic Paper, Section 1, this will in any event not affect the necessity for Green Belt development.

The relationship of the proposals to infrastructure provision is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.

The timing for release of Green Belt land is prescribed by Policies CS1 and CS6 of the Core Strategy. They require land to be released from the Green Belt to meet housing need between 2022 and 2027. This is necessary to ensure that most new development is focused on previously developed land in the urban area which offers the best access to a range of facilities and services, in line with the objective of sustainable development.

Policy SA1 of the SADPD is drafted to be in general conformity with this objective. The Site Allocations DPD clearly demonstrates that sufficient land has been identified on previously developed land in the urban area (and also at Broadoaks, which already has planning permission) to meet development needs up to 2022. Therefore, the phasing of West Hall will improve the relative attractiveness to developers of sites such as Broadoaks and Sheer House.

The relationship of the SADPD to the West Byfleet Neighbourhood Plan is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16.

The requirement to set out a housing requirement for neighbourhood areas in NPPF paragraph 65 only relates to situations where the authority is establishing a housing requirement figure for their whole area. In Woking this was last done in the production of the Core Strategy in 2012 and reviewed in 2018. When WBC next comes to establish a new housing requirement figure for the Borough, it will work with the Neighbourhood Forum to consider having a housing requirement figure for the West Byfleet Neighbourhood Area, in accordance with the NPPF. This could potentially require the review of the West Byfleet Neighbourhood Plan.

The relationship of the proposals to issues of flood risk is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 7.

The adequacy of the Regulation 19 consultation period is addressed by the Regulation 19 Issues and Matters Topic Paper, Section 9

Welcome comments about the proposed further development of the West Byfleet Neighbourhood Plan.

Response Reference: U0000950

Officer Proposed Modification: Amend key requirement within policy GB10 on p280 to read as follows: "Access to the development could be provided through Green Belt land from Parvis Road, with a potential pedestrian access through Broadoaks which would give a more direct route into West Byfleet town centre and its services and facilities. The retention of the northern part of the parcel, adjacent to the boundary of the site within Green Belt, would help to avoid perception of development narrowing the Green Belt separation between Byfleet and West Byfleet..."

Delete the next key requirement: 'Taking into account biodiversity and flooding constraints, form new Green Belt boundary along edge of development to retained wedge of land adjacent M25 and retaining land to the north of the development within the Green Belt'.

Amend second paragraph of reasoned justification of policy GB11 to read: "There is extensive planning history associated with this site. Most recently, in February 2019, planning permission has been granted for the part-demolition of existing structures on the site, and the erection of new market and affordable dwellings, a care home, an office building and retirement apartments (PLAN/2018/0359). At present, no works have taken place on site to implement this permission. Prior to this, a planning application (PLAN/2015/0987) for change of use from B1 to D1 (secondary school) alongside residential development was withdrawn. Permission was granted in 2011 for change of use of block C from Offices to flexible office and data centre use (PLAN/2011/1127), and in 1998 permission was granted, and part implemented, for B1-use employment development, which included a substantial package of A245 highways works (appeal decision PLAN/1998/0340). DELETE all of paragraph 7 of the reasoned justification referring to the planning permission for change of use from B1 to D1.

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06898/1

Name: SJR KMN Woking LLP
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA02
<p>Summary of Comment: These representations are submitted on behalf of SJR KMN Woking LLP which is developing the site adjacent to UA2 (Kings Court/Thomson House) for an 8-storey office building (B1a) which will provide 9,274sqm of floorspace. Given the time that has elapsed since the publication of the Core Strategy, a more positive approach to the preparation of the Site Allocations DPD would have been to prepare a new Local Plan, with a new and up to date evidence base. It is noted that some evidence is out of date, for instance the Employment Land Review (2010) and would benefit from an update according with emerging housing need. This is considered an insufficiently positive approach; the NPPF sets out a need for regular review of evidence and policy. It is agreed that UA2 is appropriate for development and occupies a highly sustainable location. However, a more appropriate use would be purely for employment. This is supported by the evidence base which demonstrates a considerable loss of employment land to residential uses, and through permitted development rights. The Employment Land Review (2010) shows a considerable loss of B1 floorspace based on figures between September 1999 and (presumably) 2010 when the document was published. There were a total of 66 permissions resulting in a potential loss of 35,666sqm of B1 floorspace. There were additional, but less significant, losses of B2 and B8 floorspace over this same period. The Employment Topic Paper (October 2018) notes that between April 2010 and March 2018, there was a loss of nearly 20,000sqm of B1 floorspace. In terms of committed floorspace, there was a commitment of -27,383sqm at March 2018. Therefore at 31/3/2018, there is an outstanding floorspace requirement of 109,496sqm of which the B1a office is 106,773sqm. Table 10 of the emerging plan shows a deficit in the B1 use class of -11,189sqm. This is an ineffective approach to addressing the evidence base, and one that is clearly unsound. The most appropriate way to ensure delivery is to make firm allocations to address the outstanding requirements. This approach would meet the test of soundness. There is considerable scope to provide a comprehensive B1a scheme at UA2 to respond effectively to the evidence base. The respondent is currently implementing an office scheme on the adjacent site. This is an attractive location for employment uses, but less so residential purposes where amenity may be impacted particularly adversely by noise. It is noted that the West Surrey SHMA shows that the highest need for future residential development is three and four-bedroom dwellings; less than 10% of forecast need for market housing is estimated as being for 1-bedroom accommodation. Despite this the Council's proposed allocations appear to be largely urban redevelopments, many of which will provide small units. A more effective approach to deliver the evidenced need would be to allocate some additional sites for family homes, if necessary through appropriate release of Green Belt. It is also noted that policy UA2 contains unnecessary duplication. The NPPF sets out that "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development." It also provides that planning policies should meet the identified needs over the plan period. Wishes to be represented at the examination.</p>
<p>Contributor Proposed Modification: UA2 should be a simplified policy which allocates Trizancia House/Woodstead House for B1 use only, rather than a mixed B1/residential allocation. This would respond more effectively to the Council's employment land evidence base, which shows a shortfall of availability of B1 uses over the plan period.</p>

Less than 10% of forecast need for market housing is estimated as being for 1-bedroom accommodation. However the Council is largely allocating urban redevelopments with smaller units. A more effective approach would be to allocate some additional sites for family homes, if necessary by making appropriate Green Belt releases.

Modification Reference: U0000186

Officer Response: The Council has an up to date Core Strategy to set the strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. In accordance with Section 6 of the Core Strategy, the Council is committed to the comprehensive delivery of the requirements of the Core Strategy and the preparation of the Site Allocations DPD is a key means to achieving this objective.

Section 19 of the Planning and Compulsory Purchase Act (2004) and Part 4 of the Town and Country Planning (Local Planning) England Regulations (2012) (as amended) expect the Site Allocations DPD to take into account the requirements of the Core Strategy. It is critical that the Site Allocations DPD is prepared in the context of the above requirements. Paragraph 10.2 of the Regulation 19 Issues and Matters Topic Paper provides that the Council is satisfied that the depth and breadth of evidence used to support the preparation of the Site Allocations DPD was sufficiently comprehensive, robust and will be able to withstand scrutiny at the Site Allocations DPD Examination. In this respect, it is noted the Council's Employment Topic Paper (October 2018) is considered an up-to-date evidence base which concluded that the Council is confident it can meet its development requirements for employment uses, and carry forward the economic objectives of the Core Strategy.

The Employment Topic paper recognises that the employment assessment demonstrates that through the redevelopment and intensification of existing employment sites, the potential additional office floorspace stands at 98,307 sqm (net). This does not meet the outstanding office floorspace to be delivered (106,773 sqm), with a deficit of 8,466 sqm. However the paper goes on to note that the office floorspace proposed in the Site Allocations DPD is based on modest assumptions for the level of new floorspace that could be accommodated, and the outcomes can be considered the minimum that could be achieved. A density multiplier based on other employment sites within the Borough (which are generally less intensely developed) has been applied to more complex sites. However, sites may be capable of greater intensity of development, particularly in the well connected town centre, if additional storeys can be incorporated and/or layouts of buildings are changed to increase the level of floorspace and enable redevelopment that maximises the use of land taking into account the context of the locality of the site. Therefore, certain sites could come forward with a significantly higher level of floorspace than anticipated through the Site Allocations DPD assessment if detailed design, masterplanning and site viability assessment demonstrates a higher floorspace could be achieved in a sustainable manner.

Another key factor is that the Council is embarking on significant improvement to transport infrastructure in the town centre, and is currently working towards a funding bid to enable these improvements to be delivered. Together with other town centre improvements, which will help to make the centre a more attractive business environment, this infrastructure investment will enable a higher density of development than previously envisaged. Employment capacity figures will be monitored and kept under review as development and the plan period progresses over time.

It is also noted that some of the sites identified for allocation to provide employment floorspace may currently have outstanding approval for alternative use or Prior Approval for the change of use of the office use into residential use, which will be counted within the commitments figure. It is noted that the implementation rate for prior approvals stands at 39%. Therefore it is not unreasonable to assume that alternative employment generating schemes could come forward on these sites before the implementation of a prior approval.

<p>The SHLAA (2017) found that UA2 is a suitable location for residential development as part of a mixed use scheme which retains commercial floorspace on the lower floors. As set out in the Regulation 19 Issues and Matters Topic Paragraph 11.7, the SHLAA is considered robust and adequate to inform the DPD. It is based on a tried and tested methodology that has been commended by the Secretary of State.</p> <p>It is further noted that the key requirements of UA2 include inter alia that "due to the proximity of roads, the development would need to consider the impacts on noise and air quality and ensure mitigation measures are implemented to protect residential amenity." Regarding housing mix, Paragraph 1.8 of the Regulation 19 Issues and Matters Topic Paper provides that the proposed housing in the Green Belt will help to provide the nature and type of family homes that the community also needs. Most of the housing that will be delivered in the urban area is likely to be high density flatted accommodation. The SHMA demonstrates a clear need for family homes, which the proposed Green Belt sites will help to meet. Moreover, Core Strategy Policy CS11 provides that "all residential proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs as evidenced in the latest Strategic Housing Market Assessment in order to create sustainable and balanced communities."</p>
Response Reference: U0001364
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06784/1
Name: Ms Ellie Slade
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
<p>Summary of Comment: As a resident of Byfleet for 50 years, strongly objects to releasing the majority of remaining Green Belt in the village.</p> <p>Byfleet has the least amount of Green Belt in comparison to other areas of the Borough. There is an unfair proportion of development allocated to Byfleet. Huge areas elsewhere could be used e.g. Pyrford. The Martyrs Lane site would have minimal impacts on the area as it is not as densely populated. Byfleet already suffers from the M25 cutting it off from the rest of the Borough; from flooding (which will increase if the Green Belt is concreted over); and from traffic - Byfleet is gridlocked daily in both directions, especially Parvis Road. Roads cannot be widened due to physical boundaries. Medical facilities and schools will be overstretched with over 1000 new properties built in the area.</p> <p>The Council cannot take possession of church-owned land to be used as a burial ground.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The concerns raised in the representation are comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Section 5 responds to concerns regarding disproportionate allocations in the West Byfleet and Byfleet area.</p> <p>The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:</p> <ul style="list-style-type: none"> - The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the

Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.

- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;

- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.

- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.

- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.

- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. The concern regarding vulnerability of the sites to flooding is addressed in section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2; when the site is allocated for development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

Section 13 of the Topic Paper goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work

<p>with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. The cumulative development proposed in West Byfleet and Byfleet was taken into account in the IDP and in the transport studies, and the Council is confident that a combination of both strategic and site specific measures will be sufficient to minimise both cumulative and site specific impacts of development. The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper.</p>
<p>Response Reference: U0001508</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 05833/1</p>
<p>Name: Mr Mark Slater</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB05</p>
<p>Summary of Comment: Opposes proposals to release Greenbelt land in Byfleet, which is the most densely populated part of the Borough. Greenbelt land should be protected. Its development will amount to overdevelopment. Additional dwellings will exacerbate congestion on Parvis Road. Proposed traffic calming measures are laughable and will not work. Facilities such as primary and secondary schools, and GP surgeries are over-subscribed and are under immense pressure. Simply increasing the intake of these existing facilities rather than provided new ones will not work. Removal of Greenbelt will reduce water runoff. Despite Environment Agency advice, this area is vulnerable to flooding which development proposals (even if including water permeable surfaces) will exacerbate. Lack of due consideration for other suitable sites e.g. Martyrs Lane and Pyrford sites. The road access around Martyrs Lane is far superior to e.g. Parvis Road, which has highest pollution in the Borough. Wealthy residents of Pyrford have influenced removal of these sites. Other brownfield sites should be assessed more rigorously before considering Greenbelt land. Woking should consider reducing housing targets as per Guildford Council. Land ownership details have not been considered properly e.g. St Mary's Church burial ground is protected.</p>
<p>Contributor Proposed Modification: The Council should seek to reduce housing targets. The Council should conduct a thorough assessment of brownfield sites.</p>
<p>Modification Reference: U0000259</p>
<p>Officer Response: The Council accepts that the proposed development will generate additional traffic. Sections 9 and 13 of the Regulation 19 Issues and Matters Topic Paper describe how the Council have addressed this concern, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. It should be noted that key requirements in the site allocation policies require the submission of detailed transport assessments and travel plans with any planning application, which will identify any site specific impacts and additional measures</p>

to mitigate them. In consultation with Surrey County Council and the Highways Authority, these assessments will contribute to the decision-making at development management stage.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD.

Comments regarding flooding are noted - a full response is provided in Section 7 of the Topic Paper, including how the development of sites should not exacerbate flood risk elsewhere.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

<p>Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pырford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. Paragraph 1.5 of the Topic Paper gives clarity on how the latest housing need figures would not affect the Borough's housing requirement. In February 2019, the Government confirmed that the 2016-based household projections should not be used to calculate housing need. The 2014-based data is to be used.</p> <p>The concern regarding the land ownership of GB5 is fully addressed in section 15 of the Council's Regulation 19 Issues and Matters Topic Paper.</p> <p>The Council sympathises with the comments regarding the value of local Green Belt land, but believes that very special circumstances justification exists for the release of a very small portion to meet future development needs. This is set out in Section 1 of the Topic Paper, and Section 5. Before considering development on Green Belt land, the Council conducted a thorough assessment of sites on previously developed land - this is set out in detail in Section 11 of the Topic Paper.</p>
<p>Response Reference: U0001538</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06791/1</p>
<p>Name: Ms Shellie Slater</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10</p>
<p>Summary of Comment: Objects to release of Greenbelt land at sites GB4, GB5 and GB10 for development.</p> <p>Infrastructure cannot absorb needs of 1000 new homes. Roads are congested daily, including A245 and shortcut through High Road. There are significant traffic jams, compounded by rush hour of cars arriving/exiting businesses at Brooklands. This will not be ameliorated by new traffic lights.</p> <p>Green areas within walking distance of homes should be retained to preserve sense of 'village', with its community and quality of life. Losing areas for walking will impact on health and mental wellbeing, especially within the context of increasingly technological, high-paced, developed world. This is backed up by evidence - green space can decrease anxiety and treat mood disorders.</p> <p>Loss of green space will reduce habitats for wildlife. Local birds and wildlife need pockets of green land - not just in protected areas like Wisley.</p> <p>Redevelopment of brownfield sites, such as disused office blocks, should be prioritised. The 2017 Government paper 'Fixing our Broken Housing Market' emphasises that local authorities examine all other reasonable options for meeting housing requirements before amending Green Belt boundaries, which should only be done in exceptional circumstances. Developing Byfleet's Green Belt is not exceptional. The Council has not thoroughly considered all other options.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The issues raised in the representation are comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work</p>

with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. Key requirements for allocated sites - and which are likely to be included with any safeguarded site policies - require detailed transport assessments to be submitted with any planning application. These assessments, with feedback from Surrey County Council, may identify further mitigation measures on the road network in order to make development proposals acceptable.

It is recognised that the local community highly value their local green spaces, for both recreational benefits and as habitats for wildlife. The Council has responded to concerns about a reduction in green space in Sections 4, 5 and 19 of the Topic Paper.

The Council has conducted an in-depth assessment of brownfield sites across the Borough - this is set out in detail in Section 11 of the Topic Paper.

It is agreed that Green Belt boundaries should only be altered in exceptional circumstances. Sections 1 and 2 of the Topic Paper explain why the Council believe these circumstances exist.

Response Reference: U0001518

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06698/1

Name: Ms Emma Slaymaker

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Would not like to speak at the examination of the SADPD and wishes to be informed when the SADPD progresses to the next stages.

Site GB10

Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy framework (NPPF) 2018. In particular, the DPD is not an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy.

The infrastructure of West Byfleet is not able to cope with the additional development proposed on this land. The DPD outlines a long list of obstacles to be overcome prior to development: these are serious challenges and it seems unlikely they will be overcome and that this site will therefore be able to provide the housing that is needed. This makes it a poor choice because, when the land that can be released is limited, why choose a plot that is so challenging to develop.

Parvis Road is already congested and the addition of this number of dwellings will worsen that congestion. Mitigation of this is not simply the case of providing a new intersection since the problems extend outside of West Byfleet in both directions. Only a vague reference to this is made in the DPD.

The West Byfleet Infant and Junior schools have been expanded and are already at their new capacity. The nature of the site implies family dwellings, which will place a

considerable burden on the schools. It is hard to see how they could be further increased in size and there is no primary school on the other side of West Byfleet to take the children who would be displaced from the catchment if this development goes ahead.

The health centre is overstretched already, the types of housing being planned for West Byfleet will bring in people in the age groups that place the highest burden on medical services (the youngest and oldest) and there is no plan, or obligation within the DPD for ensuring the health needs of an expanded population can be met.

Flood mitigation, drainage and sewerage are likely to prove inadequate and this will deter developers.

The site is within the West Byfleet Neighbourhood Development Plan (NDP2017) Green Belt and development in that area is therefore contrary to the plan and not compliant with planning law (NPPF paragraph 47). this would not change with its release from Green Belt, again making it an unattractive prospect for developers.

The site is close to the M25 and is therefore likely to suffer from noise pollution and poor air quality. The possibility of soil pollution is also raised in the DPD. This will deter developers and is not consistent with the residential requirements set out in National policies.

The development in the centre of West Byfleet, which raises many of the same infrastructure concerns but is in most ways a more sound proposal, has failed to find investors. If that cannot succeed then the proposed plot at GB10 with its additional problems is unlikely to provide any housing at all and that is the sole justification for releasing it.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

The representation of a lack of infrastructure including schools and health care have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 6.

Whilst policy GB10 contains a list of key requirements, the Council is confident that these would not adversely impact the deliverability of development. The promoters of the site are also confident that any challenges can be addressed and a high quality of development can be delivered.

The Council will make sure that the development of any land it safeguards will avoid or mitigate impacts to the environment as far as possible. The Development Plan for the area has several planning policies that aim to protect and enhance the environment of the Borough, particularly policies CS7 Biodiversity and nature conservation, CS8 Thames Basin Heaths Special Protection Areas, CS17 Open space, green infrastructure, sport and recreation and CS24 Woking's landscape and townscape. The Site GB10 does not contain environmental constraints that would make development entirely unacceptable and or that could not be mitigated. The Core Strategy and the Development Management Policies DPD includes robust policies to protect features of environmental value, within and in close proximity to any development sites.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that

<p>the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>In terms of noise and air pollution see Section 8 and flood risk implications see Section 7 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>GB10 has been identified as an area with historical contamination uses. One of the key requirements of policy GB10 is to ensure the developer will undertake a contamination investigation and submit full details to the Planning Authority in accordance with the Development Management Policies DM8.</p> <p>In regards to the West Byfleet Neighbourhood Plan, the Core Strategy clearly specifies that Green Belt will need to be released to deliver the development aspirations and requirements of the Council. West Hall has been identified in the context of this broad strategic framework, taking account of a breadth of evidence that is robust and comprehensive. This evidence justifies the allocation of this site, and others put forward in the DPD. As stated in the NPPF, Neighbourhood Plans should support and be in conformity with the delivery of strategic policies contained in local plans or other spatial development strategies.</p> <p>In regards to non implementation of brownfield sites, see Paragraph 1.7 in the Topic Paper.</p>
Response Reference: U0001079
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00303/2
Name: Mr Jeff Smeeton
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: The DPD is unsound with regard to para 35 of the NPPF as it is not an appropriate strategy, based on proportionate evidence not is it consistent with national policy.</p> <p>Green Belt - should be protected from development as it is what makes Surrey so attractive. Focus should be on brownfield sites, on which there has been inadequate assessment and consideration. This area is Green Belt and prevents urban sprawl and provides space for wildlife.</p> <p>Infrastructure - there is a lack of adequate education provision, and there is no consideration of this and the impact from proposed development. Traffic, transport, social problems and overcrowding will worsen. There should be clear explanation on school places and play space.</p> <p>Travellers/ travelling showpeople/ gypsies - extension of the site. Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. There will be a detrimental impact on the character of West Byfleet, a lovely community that will change visually and in terms of safety.</p> <p>Air, noise and water pollution - overall disasterous and unacceptable impact. Levels are already close to national policy levels, particulary at peak times.</p> <p>The proposals are excessive and contrary to the Neighbourhood Development Plan, and therefore NPPF para 47.</p>
Contributor Proposed Modification:
Modification Reference:
Officer Response: This representation is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 1-4, 6, 8, 10-11, 16, 19 and 21.
Response Reference: U0001172

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06797/1

Name: Ms Shareen Smeeton

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10, GB11

Summary of Comment: Objects to the proposed development of West Hall Green Belt land for the 555 homes and 15 traveller's pitches together with the additional homes proposed at Broad Oaks and Sheer House.

An additional circa 1000 homes to the town of West Byfleet is just unfathomable and the no consideration has been made for how this will affect the town and it's infrastructure. Such as the roads and additional cars, the schools and additional pupils which are already over subscribed, public transport, parking spaces availability, green space, health services which are already over-subscribed and too busy not being able to cope with the population that exists.

West Byfleet is a small town and the residents wish for it to stay that way. And why are you proposing to build on Green belt land, In a world where we are battling against climate change and at risk of eliminating our own race, you are only fuelling it with these proposals. Green belt land is very precious and important to help us all live. If there are no trees, how will we breathe, If there is no green space, how will we play, If we cant do these things it will impact our health and our mental health.

Concerns regarding travellers pitches. There is no infrastructure in place to support the travellers and that is one of the shortfalls of your proposal. And what about accommodating their caravans and transport. Where is the adequate road space to do this.

Impact on community due to the increase pollution (noise and air), more problems for the infrastructure, more pressure on the national services (police, health, transport etc), eradicating green belt land, making the town unsafe to live in. This is no future for our children - it will make life difficult for young children walking to school, restrictive and dangerous.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. The IDP took in to account public transport, police and parking spaces, this can be found on the Council website. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

<p>The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.</p> <p>The concerns regarding loss of Green Belt land and wellbeing has been addressed in Section 4 of the Topic Paper. The Council has taken into account the current and future impacts of Climate change as part of the Sustainability Appraisal of the Site Allocations DPD. The Council has robust policies such as Policy CS22 and CS23 of the Core Strategy to make sure that development meets high environmental standards. It also has a and has a Climate Change SPD which provides guidance to developers about how to achieve climate change requirements. This can be found on the Council website.</p> <p>The representation regarding Traveller pitches has been addressed in Section 3 of the Topic Paper.</p> <p>Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.</p>
<p>Response Reference: U0001202</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06456/1</p>
<p>Name: Mr Philip Smith</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: COMM</p>
<p>Site Reference:</p>
<p>Summary of Comment: Site Allocations DPD is not sound. No comment on legal compliance or Duty to Cooperate. The Site Allocations document does not match what is actually happening on the ground and it does not meet the objectives set out in the Sustainability Appraisal. Two examples of inconsistency a) UA5 and UA6 refer to the same location as the already announced Woking Gateway Project. The council has appointed Coplan to move the project forward. The project is meant to supply circa 476 dwellings but this DPD allocations document provides for 158 plus 50 dwellings only and makes no reference to the 34 storeys expected. b) Consultation has already happened for the former BHS site on Commercial Way but this site makes no appearance in this document. The developments in the town centre are not sound in that they are not meeting the needs of the community at an affordable price (objective 1) or facilitating the improved health and well being of the population. The section on demographics (section 7.8 in the sustainability report says: The number of people in all age groups is set to increase... with the exception of the 15-29 age group... The steepest increase is for those over retirement age. Yet the core strategy is high rise which is tolerated by only one demographic - the young professionals and definitely not by older citizens. In the pipeline are 1015 high rise dwellings (Victoria Square, St Dunstons and Woking Gateway) yet these are targeted at the only demographic not expected to grow. No attempt has been made to explore the mental health impact of high rise developments (objective 2 - well being) yet there is a growing body of research showing that stress, anxiety and isolation are all features of this. With regard to environmental sustainability the choice of high rise concrete and steel structures is also not ruled out and the energy efficiency standards set BREEAM level 4 are too low to meet a sustainability target. It is well known that high rise buildings are less energy efficient than low rise because of the embedded carbon in the manufacturing processes as well as other factors.</p>

Only one location in Byfleet has been identified for the growing elderly population. More needs to be done to identify town centre sites which would be suitable for the older demographics who do not all want to be shut away in parkland care homes.

Contributor Proposed Modification: More needs to be done to identify town centre sites which would be suitable for the older demographics who do not all want to be shut away in parkland care homes.

The plan should recognise the weaknesses it has in that high rise and retail development will not find local demand and move to mid rise and potentially free up retail sites for such development. This will make the plan more sound.

The BHS site should be included and the inconsistency with the Woking Gateway proposal be corrected.

More genuinely affordable (objective 1) properties need to be provided for. High rise developments also require greater income levels to pay for the increased unit costs that are a feature of that style of development.

Modification Reference: U0000397

Officer Response: The Site Allocations DPD sets out to allocate land for development in order to ensure that provision targets for uses such as housing are delivered. Within the Site Allocation policies, site yields are stated. It is always emphasised that the proposed densities are indicative, based on ranges provided in policy CS10 of the Core Strategy (which are in turn based on the character of the area and on exemplar sites) and actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. Densities could go up or down depending on the nature of the scheme, and this will be managed at pre-application/planning application stage. The UA5 allocation The Cornerstone, The Broadway and Elizabeth House and is not related to the Gateway scheme, however UA6 is the site where this scheme is proposed. Although the UA6 allocation states an indicative yield of 50 dwellings, the appropriateness of the Gateway scheme which proposes a considerably higher yield than this will be assessed when a planning application is submitted.

The BHS site was not included in the DPD as the site was identified in the Strategic Housing Land Availability Assessment (SHLAA) as becoming available outside the plan period.

Development proposals on sites coming forward in the Town Centre will need to demonstrate that they meet the requirements of policy CS12 on Affordable housing, which seeks all new residential development to contribute towards the provision of affordable housing; and demonstrate that the mix of dwelling types and sizes being proposed address the nature of local needs as evidenced in the latest Strategic Housing Market Assessment (policy CS11). Even higher-density housing can incorporate a mix of 1-bed, 2-bed and 3/4-bed dwellings, which can meet the needs of families or even older generations. However, the Council recognises that there is a need for family homes, and homes for the elderly, which cannot be entirely met by higher-density flatted accommodation in the main urban centres. This is why the Site Allocations DPD provides a range of sites, including on land released from the Green Belt: development of which will contribute towards needs of a range of cohorts including families and the elderly. Policy CS13 provides in-principle support for elderly people accommodation: the Council will support the development of specialist accommodation for older people and vulnerable groups in suitable locations, which may include any of the sites allocated for residential uses. Where the market justifies any proposal for specialist accommodation on land allocated for residential uses, the application would not be refused in principle.

As highlighted, the Sustainability Appraisal appraises sites' contribution towards facilitating the health and wellbeing of the population and reducing inequalities in health. The appraisal focused on whether development of the site would support the provision of key health services; help improve the health of the community e.g. encourage healthy lifestyles; reduce health inequalities; and improve accessibility to leisure and open space for informal and/or formal recreation. Objective 4 of the Sustainability Appraisal

framework also assessed whether development of the sites would address issues of deprivation; help improve social inclusion and promote safe communities. Sites were also appraised for their ability to provide or improve access to local community services and key facilities. There is scope for all of the allocated sites - including those in the Town Centre - to meet these objectives.

Indicative densities in the DPD will not necessarily lead to tall buildings in the Town Centre, although it is recognised that tall buildings may be supported if they are well designed and can be justified in the context. The Council has robust planning policies such as policy CS21 on Design, supported by extensive guidance such as the Design SPD and Outlook, Amenity, Privacy and Daylight SPD, to ensure that development coming forward is of high quality design. Policy CS21 on Design sets out several criteria which any development proposal coming forward for high-density schemes in the Town Centre will be expected to meet. Many of the criteria aim to result in a positive social effect through design; and can result in mental health benefits stemming from access to green infrastructure; access to amenity and communal spaces; making optimal use of daylight inside and in exterior spaces; mitigating the impacts of light and noise pollution; and creating a safe and secure environment.

Policy CS22 of the Core Strategy 'Sustainable construction' requires new residential development to achieve a 19% improvement on Building Regulations to ensure energy efficient buildings are delivered. Policy CS22 also requires development to consider the use of sustainable construction techniques that promote the reuse and recycling of building materials. Higher density developments in the Town Centre can also take advantage of the district heating network available, which offers an efficient supply of heat and power (unless it can be demonstrated that a better alternative for reducing carbon emissions from the development can be achieved). It is also important to recognise that these schemes will be situated in sustainable locations, within close proximity to amenities and public transport services, which reduces the need to travel by car.

Response Reference: U0001421

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06513/1

Name: Mr Alan Smith

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05

Summary of Comment: A permanent solution to flooding issues in Byfleet is needed before any development takes place.

Objects to building on Green Belt.

Use of brownfield land should be prioritised before considering other sites.

Contributor Proposed Modification: A permanent solution to flooding issues in Byfleet is needed before any development takes place.

Use of brownfield land should be prioritised before considering other sites.

Modification Reference: U0000405

Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development, and associated brownfield aspect.

Section 7 addresses the issue regarding flooding in Byfleet and West Byfleet.

Response Reference: U0001374

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06672/1
Name: Mr Mat Smith
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: No comment on legal compliance. No modifications proposed. No comment on duty to cooperate. The DPD has not been positively prepared, is not justified, not effective, no comment on soundness. Does not wish to participate at examination. Wishes to be informed of DPD progression.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council considers the DPD will deliver the requirements of the Core Strategy. Please see Section 1 and 2 of the Regulation 19 Issues and Matters Topic Paper for more information.
Response Reference: U0001157
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06733/1
Name: Mr And Mrs Smith
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11, UA42
Summary of Comment: Understands the need for housing but it is sadly and unfairly all directed toward West Byfleet and Byfleet. St John's and Knaphill are missing from the document and Martyrs Lane has been removed from proposed development with no reason? Housing should be shared across all wards of the Borough rather than nearly all going in Byfleet and West Byfleet. Parvis Road is already congested and there are huge flooding issues, which seem to have been ignored. It is morally wrong to approve housing to be built on this land with full knowledge that it could flood. Development will bring more noise, pollution and crime. It is also morally wrong to build housing at such close proximity to the M25 in full knowledge of the high levels of pollution. Concerned about schools and doctors surgeries, which are not mentioned. The impact on local infrastructure - Roads, Doctors, Schools and Sewage will be devastating. Parvis Road is already at maximum capacity and the added congestion will bring chaos. Very sad to lose the last local pockets of green space, which are wildlife habitats- the local ecosystem will be devastated. Large traveller sites don't work and should not be considered. This is a village, respondent moved here for the beautiful surroundings, and is stressed and worried to know that it will be destroyed.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, particularly in sections 4 to 6. It is acknowledged that new development will lead to change in the area, however the density of the development being put forward at sites GB10 and GB11 is reflective of current densities in the area and will need to be sensitively designed. The sites will contain areas of public open space and green infrastructure, which in the case of GB10 will be substantial, to help provide a good transition between the urban area and the Green Belt,

<p>and to minimise the loss of the green feel of the area. These points are set out in the key requirements of Policy GB10 and GB11.</p> <p>Section 7 of the Topic Paper responds to concerns about flooding; section 8 of the Topic Paper responds to concerns about pollution; section 13 responds to concerns about congestion.</p> <p>The Government's Good Practice Guidance on Designing Gypsy and Traveller Sites states in states para 4.7 that 'experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage' and on the back of this suggests that sites should consist of up to 15 pitches unless there is clear evidence to suggest that larger sites are preferred by the Gypsy or Traveller community. The guidance also notes that smaller sites, of 3-4 pitches, can also be successful, particularly where designed for one extended family. This guidance, together with conversations with Gypsy and Traveller groups in the Borough, and the need identified for such sites in the Borough, provide background support to the size of sites put forward in the DPD. Further detail about the need to release Green Belt land to meet the accommodation needs of Gypsies and Travellers can be found in section 3 of the Council's Regulation 19 Issues and Matters Topic Paper.</p>
Response Reference: U0001576
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06771/1
Name: Mrs Christina Smith
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
<p>Summary of Comment: Does not consider the DPD to be legally compliant, sound or compliant with the Duty to Cooperate. It is not an appropriate strategy, taking account of all reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy.</p> <p>Infrastructure is already under severe pressure. Development at West Hall and Broadoaks must not go ahead, as the proposals will worsen the situation with regard to:</p> <ol style="list-style-type: none"> 1. Traffic on the A245 - already at a standstill at peak times. 2. Environment - in particular air, noise, soil and water pollution, with regard to the new level of traffic, and compliance with NPPF para 170e. 3. School places oversubscribed. No room for already expanded West Byfleet Infant and Junior School to further expand. 4. Doctor's practices oversubscribed. The Infrastructure Report fails to address this important issue. 5. Water -Waste Management- the area is prone to flooding and there is a lack of assessment of flood risk. 6. Water - Existing flooding - river and surface. Risk of pollution to the Wey Navigation and River Wey, an area of significant beauty. No flood alleviation schemes have yet been agreed to deal with demand placed on the waterways. 7. Traveller pitches and plan process. There is a failure in the plan process where a disproportionate allocation of traveller pitches is put in Byfleet and West Byfleet compared to the Borough as a whole. Adds the issue of overdevelopment. WBC have not considered urban areas rather than developing Green Belt areas. There are no special circumstances demonstrated to justify this aspect of development in the area. <p>States that as the proposals are unacceptable, no modifications to strengthen compliance or soundness should be agreed.</p> <p>Wishes to be informed of the next stages of the DPD's progress.</p>

Contributor Proposed Modification:
Modification Reference:
Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, particularly sections 1, 3 to 8 and 13.
Response Reference: U0001436
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06773/1
Name: Mr Bruce Smith
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
<p>Summary of Comment: Does not consider the DPD to be legally compliant, sound or compliant with the Duty to Cooperate. It is not an appropriate strategy, taking account of all reasonable alternatives and based on proportionate evidence, nor is it consistent with national policy.</p> <p>Infrastructure is already under severe pressure. Development at West Hall and Broadoaks must not go ahead, as the proposals will worsen the situation with regard to:</p> <ol style="list-style-type: none"> 1. Traffic on the A245 - already at a standstill at peak times. 2. Environment - in particular air, noise, soil and water pollution, with regard to the new level of traffic, and compliance with NPPF para 170e. 3. School places oversubscribed. No room for already expanded West Byfleet Infant and Junior School to further expand. 4. Doctor's practices oversubscribed. The Infrastructure Report fails to address this important issue. 5. Water -Waste Management- the area is prone to flooding and there is a lack of assessment of flood risk. 6. Water - Existing flooding - river and surface. Risk of pollution to teh Wey Navigation and River Wey, an area of significant beauty. No flood alleviation schemes have yet been agreed to deal with demand placed on the waterways. 7. Traveller pitches and plan process. There is a failure in the plan process where a disproportionate allocation of traveller pitches is put in Byfleet and West Byfleet compared to the Borough as a whole. Adds the issue of overdevelopment. WBC have not considered urban areas rather than developing Green Belt areas. There are no special circumstances demonstrated to justify this aspect of development in the area. <p>States that as the proposals are unacceptable, no modifications to strengthen compliance or soundness should be agreed.</p> <p>Wishes to be informed of the next stages of the DPD's progress.</p>
Contributor Proposed Modification:
Modification Reference:
Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, particularly sections 1, 3 to 8 and 13.
Response Reference: U0001435
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06752/1

Name: Mr Richard Snape
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: GB10 is unsound and should be removed from the DPD for the following reasons: West Hall forms a separation protecting urban sprawl of Byfleet and West Byfleet; It forms a natural open space along the corridor of the River Wey; Surrounding road infrastructure is over capacity, causing traffic to back up through neighbouring towns, further development will exacerbate this issue; There are no satisfactory proposals for the mitigation of inadequate infrastructure, which will be exacerbated by other development such as West Byfleet Centre and Broadoaks.
Contributor Proposed Modification: GB10 is unsound and should be removed from the DPD.
Modification Reference: U0000364
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt for development. Section 5 specifically addresses the loss of Green Belt in Byfleet and West Byfleet. Section 6 addresses the issue regarding the adequacy of infrastructure. Section 13 specifically addresses road infrastructure. Transport assessments have covered the impacts of cumulative development and have identified appropriate mitigation methods for potential traffic hotspots. Section 21 addresses the issue regarding urban sprawl. Within the GB10 Policy there are Key Requirements which any development of the site must address, these include preserving and enhancing the natural landscape. Relevant Key Requirements include the following; - Any development here will need to include significant elements of Green Infrastructure, having regard to the landscape's particular sensitivity to change (GBBR, paragraph 3.5.12); - Development to integrate approximately 4.7 ha of public open space and green infrastructure within the site; - Retain large areas of woodland and parkland setting and strengthen where possible; - Development will need to be sensitively designed to create a strong landscape edge, in particular along the southern section of the site that is adjacent to the Wey Navigation; - Retain protected trees (TPO) and tree belts and strengthen with planting to enhance the sites landscape character; - Biodiversity improvements – the design solution should build in wildlife features/corridors.
Response Reference: U0001687
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06053/1
Name: Mrs Lotte Snowden
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: No comment on legal compliance. It could be made more legally compliant by keeping GB7 as the vitally important green break between Mayford and Woking and leaving it in the greenbelt as it performs a very important green belt function.

Modification proposed. It could be made more compliant by keeping GB7 as the vitally important green break between Mayford and Woking and leaving it in the greenbelt as it performs a very important green belt function.

No comment on duty to cooperate. It has not met its duty to cooperate as GB7 as the vitally important green break between Mayford and Woking and leaving it in the greenbelt as it performs a very important green belt function and it has not given due weight to this. Does not consider the DPD has been positively prepared, is not justified, not effective, unsound and not consistent with national policy.

Would not like to attend examination and wishes to be informed of the next stages of the DPD.

Site GB7 in Mayford is a critical and highly valued section of Greenbelt. It is the only site in Mayford that performs all of the required green belt purposes. It prevents the urban sprawl of Woking swallowing up the historic village of Mayford therefore preserving the character of the historic settlement of Mayford. The Village has been separated from Woking since before the doomsday book. The North End of GB7 also contains an area of high Archaeological importance, one of the few that exist in the entire borough.

The site contains significant biodiversity in the form of wildlife habitats and heavily wooded areas. Policy CS7 of the adopted core strategy tell us the commitment the council has given to protect and preserve these biodiversity assets. The Biodiversity on this site is a significant asset to the village of Mayford, especially due to the loss of much wildlife and habitats due to development on the greenbelt.

Does not feel that enough assurances were written into the regulation 19 documents to assure that all trees and habitats on the site will be preserved. Any development on this site would bring problems on top of problems for the traffic infrastructure of Mayford, Air Pollution and the Character of the Village that has already suffered dramatically with the mass development built and currently approved on its green belt.

Contributor Proposed Modification: Keep GB7 in the Green Belt.

Modification Reference: U0000384

Officer Response: The representation regarding Mayford Green Belt, Mayford character and visual gap have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21.

GB7 does contain High Archaeological to the north of the site. One of the requirements of the DPD is to ensure the developer will undertake an archaeological investigation and submit full details to the Planning Authority in accordance with Core Strategy Policy CS20. The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife

Trust or Natural England based on existing biodiversity features that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess any site specific ecological issues. In regards to traffic, infrastructure and air pollution these issues have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 13, Section 6 and Section 8.
Response Reference: U0000905
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06665/1
Name: Mr John Snowden
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
<p>Summary of Comment: No comment on legal compliance.</p> <p>It could be made more legally compliant by keeping GB7 as the vitally important green break between Mayford and Woking and leaving it in the greenbelt as it performs a very important green belt function.</p> <p>Modification proposed. It could be made more compliant by keeping GB7 as the vitally important green break between Mayford and Woking and leaving it in the greenbelt as it performs a very important green belt function.</p> <p>No comment on duty to cooperate. It has not met its duty to cooperate as GB7 as the vitally important green break between Mayford and Woking and leaving it in the greenbelt as it performs a very important green belt function and it has not given due weight to this. Does not consider the DPD has been positively prepared, is not justified, not effective, unsound and not consistent with national policy.</p> <p>Would not like to attend examination and wishes to be informed of the next stages of the DPD.</p> <p>Site GB7 in Mayford is a critical and highly valued section of Greenbelt. It is the only site in Mayford that performs all of the required green belt purposes. It prevents the urban sprawl of Woking swallowing up the historic village of Mayford therefore preserving the character of the historic settlement of Mayford. The Village has been separated from Woking since before the doomsday book. The North End of GB7 also contains an area of high Archaeological importance, one of the few that exist in the entire borough.</p> <p>The site contains significant biodiversity in the form of wildlife habitats and heavily wooded areas. Policy CS7 of the adopted core strategy tell us the commitment the council has given to protect and preserve these biodiversity assets. The Biodiversity on this site is a significant asset to the village of Mayford, especially due to the loss of much wildlife and habitats due to development on the greenbelt.</p> <p>Does not feel that enough assurances were written into the regulation 19 documents to assure that all trees and habitats on the site will be preserved. Any development on this site would bring problems on top of problems for the traffic infrastructure of Mayford, Air Pollution and the Character of the Village that has already suffered dramatically with the mass development built and currently approved on its green belt.</p>
Contributor Proposed Modification: Keep GB7 within the Green Belt
Modification Reference: U0000385

<p>Officer Response: The representation regarding Mayford Green Belt, Mayford character and visual gap have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21.</p> <p>The area of High Archaeological potential to the north of the site is acknowledged. One of the requirements of the DPD is to ensure the developer will undertake an archaeological investigation and submit full details to the Planning Authority in accordance with Core Strategy Policy CS20.</p> <p>The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the proposed development on the site.</p> <p>In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess any site specific ecological issues.</p> <p>In regards to traffic, infrastructure and air pollution these issues have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 13, Section 6 and Section 8.</p>
<p>Response Reference: U0000907</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06823/1</p>
<p>Name: South Ridge Development LLP</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: UA26, UA31</p>
<p>Summary of Comment: UA26 is in two separate ownerships and will not be brought forward as one development. UA31 should be extended to incorporate 101-107 Chertsey Road, which are in the same ownership.</p> <p>UA31 reference to re-provision of the youth facility should be removed:</p> <p>No part of the development plan currently seeks an improved facility, as stated in this policy. The use at UA31 ceased over three years ago. The services previously provided at this site were relocated elsewhere, including the Maybury Centre, 175m from site UA31, which provided an enhanced environment for this service. Therefore the site has already met the requirements of CS19 through the fulfilment of bullet point 2.</p> <p>UA26:</p> <p>With reference to 101-107 Chertsey Road, the allocation should not seek the re-provision of any office floorspace (currently states 'no net loss of office floorspace'). The current development plan does not set any 'no net loss' test. The current offices here have not</p>

<p>been tenanted since December 2016 and no viable enquiries have come since from potential tenants. The construction of new speculative offices and significant vacancies among older secondary office stock are encouraging many owners of secondary stock to convert their buildings to residential (including the remainder of UA26, prior approval pending). Options for 101-107 Chertsey Road include comprehensive redevelopment to optimise the potential of the site, or a permitted development scheme. The latter is likely to be the more viable option if office use is sought.</p> <p>UA26: The draft allocation should refer to the Parking Standards SPD which allows for parking provision below minimum standards in the own Centre. UA31 has the same characteristics. Planning consultants, rights of light surveyors and architects have already been instructed. The site is seen as a key early site in the South Ridge joint venture between SCC and Places for People.</p>
<p>Contributor Proposed Modification: The relevant site allocations should be amended so that UA31 is extended to include 101-107 Chertsey Road. UA31 should be amended to remove all references to the re-provision of what are now historic uses. Not seeking re-provision of any office floorspace at 101-107 Chertsey Road Allocation at 101-107 Chertsey Road should refer to the adopted Parking Standards SPD. This states that 'on site provision below minimum standards will be considered for developments within Woking town centre'.</p>
<p>Modification Reference: U0000190</p>
<p>Officer Response: Policies UA26 and UA31 already note the potential for development to come forward on both sites together. It is considered that this already provides the flexibility required for the sites to come forward together as a single proposal. WBC would not however wish to require such a combined development. Should a change in circumstances lead to the sites coming forward separately, this would also be acceptable. The types of development required on sites UA26 and UA31 reflect the importance of these sustainable locations to delivering on the requirements for various types of development set out in the Core Strategy. The Employment Topic Paper (2018) sets out the current position on need for office space. The Infrastructure Delivery Plan (2018), page 141, notes the role of site UA31 in meeting expected increased demand for community facilities in the area. The quanta of each type of development in the supporting text are indicative. Any proposal for a combined development (potentially including both sites UA26 and UA31) that included a different configuration of uses across the sites, or different quanta of development altogether, could come forward as a planning application but would need to be justified by material considerations that indicate that the development plan should not be followed in that particular case. With regard to parking, the policies for both sites include the key requirement 'Appropriate and adequate provision of car and cycle parking in accordance with the adopted car and cycle parking standards but that takes into account the site's sustainable location...' WBC considers that this addresses the respondent's concerns.</p>
<p>Response Reference: U0001767</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06500/2</p>
<p>Name: Mr Michael Spears</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>

Site Reference: GB10
<p>Summary of Comment: DPD is legally compliant and complies with Duty to Cooperate. DPD is unsound.</p> <p>Has cited comments from Surrey County Council transport planning officer, with regard to Woking Green Belt Review. Representor does not think these comments justify the release of GB10, and that the site should have a no change status.</p> <p>Has cited Transport for Surrey Future Development Impacts on Highway Network (2011). A245 identified as a high flow corridor.</p> <p>Traffic on Parvis Road experiences heavy congestion at peak times (7- 9.30am and 4pm). During the day it can take up to 15 minutes to enter the traffic.</p> <p>Concerns regarding proposed traffic lights and toucan crossing alongside Broadoaks Plan. Traffic impacts of development on GB10 need to be addressed, as the amount of dwellings proposed and associated cars will not be able to feed onto Parvis Road.</p> <p>Particular concern for increase in young families taking children to school at peak times, generating more congestion.</p> <p>Access to the new developments is key.</p> <p>Proposes a feeder road running around the rear of GB11 into Broadoaks/Dodds Crescent and into West Byfleet.</p> <p>Not against more housing in West Byfleet, but the Parvis Road issue must be addressed.</p> <p>Wishes to be informed of next stages.</p> <p>Wishes to participate at oral examination for the following reason;</p> <p>Feels very strongly about the effects of development on Parvis Road.</p>
Contributor Proposed Modification: Proposes a feeder road running around the rear of GB11 into Broadoaks/Dodds Crescent and into West Byfleet.
Modification Reference: U0000485
<p>Officer Response: Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses the adequacy of infrastructure. Section 13 specifically addresses road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.</p> <p>Within the GB10 Policy there are key requirements for developer contributions to address potential transport issues.</p> <p>The Council is satisfied that the transport evidence used in supporting the DPD is robust. The evidence accepts that development will have transport impacts in the local area, including the A245. However, the County council is also clear that those impacts can be mitigated. Since the County Councils transport assessment, further work had been undertaken to identify the measures of mitigation that might be necessary to address transport impacts along the A245 corridor. The Council is confident that when implemented those impacts will be minimised to an acceptable level.</p>
Response Reference: U0001751
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T
Contributor Reference: 02605/2
Name: Sport England
Number of Signatories: 1
Comment Type: COMM
Site Reference:
<p>Summary of Comment: No proposals to modify the DPD.</p> <p>DPD is consistent with national policy and is sound.</p> <p>Does not wish to participate in examination.</p> <p>Wishes to be informed of next stages.</p>

Having reviewed the DPD, Sport England does not consider that any proposed site allocations affect or prejudice use of existing playing field or major sports facilities. On that basis, Sport England does not wish to raise an objection to the DPD. If however it turns out that a site(s) may be affected then Sport England would object to the proposed loss unless suitable replacement provision is made available as set out in para 97 of the NPPF and/or Sport England's own planning objectives and playing fields policy.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Comment Noted.
Response Reference: U0001561
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 00715/2
Name: Mr Peter Spreckley
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB09, GB10, GB11
Summary of Comment: Given the intended use of GB9 as open space, there is no need to remove it from the Green Belt. The argument given on "defensible Green Belt boundary" seems to be based on drawing a neat line on the map, rather than a consideration of what needs defending, namely in this case the escarpment. The removal of land north of GB9 from the Green Belt should be given proper prominence if it is to be carried out- not half-hidden in the supporting text to GB9. Support the decision not to safeguard land north of Saunders Lane for development
Contributor Proposed Modification: Retain GB9 and "20g" within the Green Belt. Doing so will avoid taking land unnecessarily from the Green Belt.
Modification Reference: U0000134
Officer Response: The idea of a 'defensible boundary' for the Green Belt is based not on the presence of valuable landscape features but on the need to draw the boundary along 'physical features that are readily recognisable and likely to be permanent'. Hook Hill Lane is considered to fall into this category. Therefore, although it is true that- other things being equal- open space could be left in the Green Belt, in this case the need to draw a defensible boundary (whilst allocating development on site GB7) justifies removing this open space from the Green Belt. Agree that an area of land north of site GB9 and south of Allen House Park (known as 'Parcel 20g') needs more detailed treatment in the DPD. Officers are proposing a modification to provide further protection from development to Parcel 20g within the plan period. This modification will extend site GB9 northwards to include this parcel, to make it part of the safeguarded land. This means that while it will be released from the Green Belt upon adoption of the plan, it will not be released for development until 2027, through a review of the Core Strategy and/or Site Allocations DPD. This parcel includes residential properties and for this reason a distinction will be made, using a hatched area on the site plan, to show that this area is not intended for Green Infrastructure. Until 2027, development at any part of the site will have to comply with the Green Belt policies in the development plan. A specific policy and key requirements to guide development at the site, noting the distinction in the amended proposed hatched area (parcel 20g) will be developed and determined as part of the review of the Core Strategy and/or the Site Allocations DPD. Support welcomed on sites north of Saunders Lane.
Response Reference: U0001695

<p>Officer Proposed Modification: Extend site GB9 northwards to include site WGB020g, to make it part of the safeguarded land. Amend maps on pages 273 and 274 accordingly, and amend Proposals Map. Amend second paragraph of policy GB9 to read: "This site will only be released for development as part of the review of the Core Strategy and/or the Site Allocations DPD. The northern part of the site, which is hatched on the Location Plan, is not intended for the purposes of Green Infrastructure as it contains residential properties. Until the site is released for development between 2027 and 2040, any development of the site will have to comply with the Green Belt policies of the development plan." Replace last paragraph of the RJ with: "The entire site, including the area hatched on the Location Plan, is safeguarded for future green infrastructure needs between 2027 and 2040, in accordance with Policy SA1. However, it is acknowledge that the hatched area of the site contains residential properties that will not be developed as Green Infrastructure. This part of the site is included as part of the safeguarding policy to ensure a defensible Green Belt boundary. Until between 2027 and 2040 when the site is intended to be released for development, it is expected that the development of any part of the site will have to comply with the Green Belt policies of the development plan. A specific policy and key requirements to guide the development of any part of the site will be determined as part of the review of the Core Strategy and/or the Site Allocations DPD." Insert a new bullet point under the heading 'Safeguarded Sites' in policy SA1 to refer to 'Land adjacent to Hook Hill Lane, Hook Heath, Woking (Proposal Site GB9).</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 06704/1</p>
<p>Name: Ms And Mr Alison And Raymond Adams And Standage</p>
<p>Number of Signatories: 2</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05</p>
<p>Summary of Comment: Unaware of plans until informed by Residents Association, so can only submit brief comments. Particularly concerned and appalled about proposals GB4 and GB5, including: - Contribution to existing extreme levels of traffic on environment and health, adding to noise from M25. - Lack of local primary schools and healthcare facilities to accommodate development - already oversubscribed and under pressure. - Vulnerability to flooding. Echo the views submitted by the Byfleet, West Byfleet and Pyrford Residents Association in response to this consultation.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Section 9 of the Council's Regulation 19 Issues and Matters Topic Paper describes how the Council has conducted the Regulation 19 consultation, including where the consultation was advertised. The Council accepts that the proposed development will generate traffic - a detailed response to this is provided in Section 13 of the Topic Paper, including the mitigation measures proposed to support future development. Section 8 of the Topic Paper sets out the Council's response regarding air and noise pollution. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides</p>

<p>adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>Section 7 describes how flood risk has been comprehensively assessed, and how flood risk assessments will be required with planning applications for any schemes coming forward.</p> <p>The Council has provided a detailed response to the Residents Association representation, which address the concerns raised in the representation.</p> <p>The representors have been added to the LDF Consultation Database to ensure they are informed of future policy activity.</p>
Response Reference: U0001392
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06465/1
Name: Mr Vaughan Starkey
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
Summary of Comment: Object to GB4, GB5 and GB10. Local school, medical and transport infrastructure will not cope with the additional pressure. The sites are currently a partial buffer from air pollution from the M25. The dwellings to be built would suffer even more from such air and noise pollution.
Contributor Proposed Modification: Reject these proposals and preserve what little is left of our Greenbelt for the sake of the people they represent and serve.
Modification Reference: U0000176
Officer Response: The impact of the proposals on local infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact on traffic congestion in particular is addressed by Section 13 of the same document. The issue of air pollution in relation to the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The necessity of releasing land from the Green Belt for allocation and safeguarding for future development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2.
Response Reference: U0001635
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04109/1
Name: Mrs Susan Stedman
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Woking Borough Council is not concerned about the Green Belt around Mayford and the Welfare of its residents. Stop building on green Belt Land. This

<p>piece of land keeps a little track of green between Woking and Mayford for nature and wildlife and prevents urban sprawl. There has been enough loss of the Green Belt around this village and no more should be lost.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>The representation regarding Mayford Green Belt and urban sprawl have been addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21.</p> <p>In regards to the loss of Green Belt and residents wellbeing see Section 4 of the Topic Paper.</p> <p>The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.</p> <p>In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to discover the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England based on existing biodiversity features that could not be addressed. Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess any site specific ecological issues.</p> <p>The Council does not accept that it is not concerned about the Green Belt. It has robust policies to protect Green Belt land, e.g. policy CS6 of the Core Strategy. Nevertheless, the Council has to balance the need to protect the Green Belt with the need to provide housing and other development needs. Most of the proposed development will be focussed in the urban area, but Green Belt land will be needed to meet the total number and type of houses needed in the Borough.</p>
<p>Response Reference: U0001159</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06281/1</p>
<p>Name: Mr Rod Steel</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: Would not like to speak at the examination. Wishes to be informed when the SADPD progresses to the next stages. The SADPD is unsound because GB10 should be taken out of Green Belt. The Draft Site Allocations DPD does not pass the requirements of para 35 of NPPF 2018. It is not an appropriate strategy, nor consistent with national policy.</p>

There are major traffic problems on Parvis Road, which is already congested. It is inconsistent with the West Byfleet Neighbourhood Development Plan. There are no provision for increased healthcare requirements, additional school places. Would cause severe pollution due to M25 and A245 proximity. The proposed Traveller site does not meet the planning criteria. The site is subject to frequent severe flooding. No clear reasons for excluding Martyrs Lane greenbelt from the allocation. Overdevelopment with Sheer House and Broadoaks are already putting excessive demands on the infrastructure.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection to GB10 noted.

Section 6 of the Regulation 19 Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

In regards to the West Byfleet Neighbourhood Plan see Section 16 of the Regulation 19 Issues and Matters Topic Paper.

The impact of the proposed development on noise and air pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.

The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.

- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.

Response Reference: U0001163

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): F

Contributor Reference: 01526/5

Name: Mr Mark Stevens

Number of Signatories: 1

Comment Type: SUPP

Site Reference:

Summary of Comment: The DPD is sound, positively prepared, justified, effective and consistent with national policy.
No modifications proposed.
Wishes to be informed of next stages.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Support noted

Response Reference: SUPPOR

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 04147/1

Name: Mr And Mrs Robert And June Stonard

Number of Signatories: 2

Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Green Belt land at GB7 should be retained. It acts as a buffer between Mayford and Woking to prevent urban sprawl. Mayford has always been separated from Woking since the Domesday - it is a historic village with its own character and much beautiful wildlife. This would be destroyed should the Green Belt status be removed, for current and future generations. Since the Hoe Valley School opened traffic has increased. Future development would contribute further to this chaos.
Contributor Proposed Modification: Retain land at GB7 as Green Belt.
Modification Reference: U0000320
Officer Response: A comprehensive response to the issues raised is provided in Sections 1, 2, 13, 19, 20 and 21 of the Council's Regulation 19 Issues and Matters Topic Paper.
Response Reference: U0001384
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06778/1
Name: Mr Richard Stringfellow
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The DPD does not pass the tests of soundness - GB10 should not be released from the Green Belt. The DPD is not an appropriate strategy when taking into account the reasonable alternatives. GB10 is safeguarded for concrete aggregate. It falls under West Byfleet Neighbourhood Plan (NDP2017) which aims to maintain and protect the character of West Byfleet. Any planning permission for GB10 development would breach planning law as per paragraph 47 of the NPPF. Collective development at Broadoaks and Sheer House will increase traffic on Parvis Road and others, and cause an increase in local pollution levels. This will be exacerbated by adding pedestrian crossings on Parvis Road in order to comply with NDP2017. Provision of school places has not been adequately reviewed in the IDP. Disruption of classrooms with a change of pupils in relation of Traveller pitches. Area is subject to frequent and severe flooding - a flood assessment is required to assess impact on floodplain local to West Byfleet and Pyrford. The IDP does not address healthcare sufficiently. Removal of Greenbelt alongside M25 will expose existing and developed dwellings to noise and pollution, in direct contravention of para170(e) of the NPPF. This will also impact on the two children's nurseries in the locality, and impact the distinct appeal of open green space offered by these nurseries. The urban area should be considered for appropriate Gypsy, Traveller and Showpeople sites before the Greenbelt. This has not been clearly demonstrated. Pitches at GB10 will not meet the criteria set out in the Council's policy - these have not been considered sufficiently. Has very serious concerns. The voice of the local community has not been credited. Does not wish to speak at the Examination. Wishes to be informed of next stages.
Contributor Proposed Modification: Site GB10 should not be taken out of the Green Belt.
Modification Reference: U0000473

Officer Response: Several issues raised in the representation have been addressed in the Regulation 19 Issues and Matters Topic Paper.

Section 1 sets out in detail the justification for releasing Green Belt land to meet future development requirements. Section 17 addresses concerns about being a safeguarded Surrey County Council site.

Section 16 addresses comments regarding the West Byfleet Neighbourhood Plan; and Section 5 responds to concerns about the loss of Green Belt in West Byfleet specifically. The evidence base takes into account the cumulative impacts of future development in West Byfleet, including impacts on infrastructure. This is explained in detail in Section 6 of the Topic Paper. The Council provides infrastructure providers with maps and lists of proposal sites, who then in turn assess future infrastructure needs having regard to the total amount of development in each area. Section 13 addresses concerns raised about traffic and congestion, including that on the A245. And Section 8 goes on to describe how air and noise pollution have been taken into account. Section 8.4 sets out how policies in the Development Management Policies DPD would seek appropriate schemes of mitigation to minimise any adverse impacts, including from noise and air pollution, which would be considered in detail at any planning application stage.

Section 6 sets out in detail how the Council has assessed infrastructure to support future development, including schools and medical facilities. The Council continues to work with Surrey County Council to identify needs for future school places - and where these needs can be accommodated - and to work with the public health bodies regarding healthcare provision to meet future development needs.

Section 7 addresses concerns regarding flooding of the site. The Council believes assessments are robust, as set out in detail in Section 10.3.

Section 19 explains how any future development proposal would take into account trees and woodland of value, and how planning policies are in place to ensure any future schemes maximise the green infrastructure potential of development sites. The Council is aware of the landscape sensitivity of the site and have introduced various key requirements into policy GB10 to ensure valuable green infrastructure assets - including trees acting as a barrier to noise and pollution from the M25 - will be conserved. Section 4.2 of the Topic Paper also provides details about how loss of open space and Green Belt will be addressed. A large wedge of Green Belt will be retained to the east of the site, along with its trees, green space and woodland. It is therefore not foreseen that the local nurseries will be adversely impacted.

Section 3 of the Topic Paper describes how alternative Traveller sites were assessed. Paragraphs 3.10 to 3.12 describe how criteria for Traveller Pitches will be taken into account.

The concerns put forward by all residents are given full consideration by the Council, and will also be made available to an independent Inspector at the Examination in Public. Section 10 of the Topic Paper provides further details on the consultation process.

The Sustainability Appraisal assessed site GB10 as having moderate accessibility to services and facilities. Although it is within walking distance of several community facilities, it is acknowledged that the site is beyond walking distance to the railway station. Development of the site at such a scale would bring an opportunity to improve accessibility to the District Centre through improved footpaths, cycle links and public transport services. In recognition of this, a key requirement that development must address includes contributing to the provision of essential transport infrastructure. The exact nature of these site specific requirements will be identified through the development management process and be informed by a Transport Assessment at planning application stage. Any development would also be assessed against policy CS18 of the Core Strategy which seeks to promote sustainable transport modes such as public transport, walking and cycling, and reduce reliance on private car.

Concerns regarding traveller sites have been addressed comprehensively in Section 3 of the Regulation 19 Issues and Matters Topic Paper.

<p>With regards to the density of the site: the Council takes the view that the proposed anticipated densities are reasonable and broadly in line with the Core Strategy. It is always emphasised that the proposed densities are indicative, based on ranges provided in policy CS10 of the Core Strategy. Actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. Green Belt sites will contribute towards the provision of family homes that cannot be met by high density flatted development. The indicative density reflects the desire to provide family homes to meet needs.</p> <p>Section 3.11 sets out in detail the reasons why land to the east of Martyrs Lane was rejected for safeguarding.</p>
Response Reference: U0001506
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06778/2
Name: Mr Richard Stringfellow
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
<p>Summary of Comment: Agrees with the exclusion of the sites in Pyrford (fields by Upshot lane) from the plan. Pleased to see that WBC recognise the validity of objections made to consultation in summer 2015.</p> <p>To include the fields would:</p> <ol style="list-style-type: none"> 1. Significantly alter the character of Pyrford. The fields contribute to the semi-rural settling of the village and to the conservation area around St Nicholas church, 2. Have a damaging effect on transport, congestion and pollution, with resulting effects on the health and safety of children. <p>Hopes that significance of the fields are understood and continue to be protected by WBC.</p>
Contributor Proposed Modification:
Modification Reference:
Officer Response: Support and comments noted. The heritage and landscape value of the sites are part of the reason for the Council retaining them in the Green Belt. Further detail can be found in the Council's Regulation 19 Issues and Matters Topic Paper, paragraphs 14.11 to 14.13.
Response Reference: U0001430
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04960/1
Name: Surrey County Council
Number of Signatories: 1
Comment Type: COMM
Site Reference: GB01, GB02, GB03, GB04, Gb05, GB06, GB07, GB08, GB09, GB10, GB11, GB12, GB13, GB14, GB15, GB16, GB17, GB18, UA01, UA02, UA03, UA04, UA05, UA06, UA07, UA08, UA09, UA10, UA11, UA12, UA13, UA14, UA15, UA16, UA17, UA18, UA19, UA20, UA21, UA22, UA23, UA24, UA2
Summary of Comment: Our response to the previous Regulation 18 consultation, set out in our letter dated 30 July 2015, still reflect the views of the county council.

Highways and Transport: The Strategic Transport Assessment undertaken by the county council identifies the need to look in more detail at the A245 and B367 corridors and the potential impacts in neighbouring boroughs. It is noted that the DPD includes site specific requirements for detailed transport assessments to be carried out and for appropriate mitigation measures to be identified where it is necessary to make development acceptable. The delivery of any such mitigation must be funded by the developer.

Heritage: Our heritage officer recommends that archaeological assessments be carried at site UA44 (Woking Football Club); site GB4 (Land south of Parvis Road and High Road, Byfleet); site GB5 (Land to the south of Rectory Lane). At Byfleet GB14 (Westfield Common), he recommends that an archaeological assessment, including a topographic survey and site walkover by a qualified landscape specialist, be carried out, because little is known archaeologically about this site.

Minerals and Waste Planning: As the Minerals and Waste Planning Authority (MWPA), we have specific concerns related to the safeguarding of the Woking Rail Aggregates Depot. UA34 is in the safeguarded aggregate depot. Residential development would threaten operation of the depot, which is vital strategic infrastructure. The Goods Yard needs to be safeguarded to ensure continued efficient running of the depot. The Surrey Minerals Plan Core Strategy DPD (2011) Policy MC6 safeguards rail aggregates depots, and Policy MC16 specifically identifies the need to safeguard the Woking depot. Further to this, the supporting text to Policy MC6 states at para 5.6 that the MWPA may also advise that development should not be permitted if it would constrain the effective operation of existing sites. Residential development could restrict the operation of the depot and increase the risk of complaints in respect of the existing lawful activities. In accordance with paragraph 182 of the NPPF, policy must ensure that suitable mitigation can feasibly be delivered to safeguard the future operation of the depot.

Policy UA34 does respond to the MWPA's concerns. In principle we support the policy objectives which seek to achieve both additional town centre housing and ensure the ongoing efficient operation of the aggregate rail depot. However, minor changes need to be made to wording. Modifications have been proposed for site UA34.

Development and Infrastructure Sites in the urban area, also identifies the following sites, all of which are within the consultation zone for the aggregates depot: UA6, UA10, UA11, UA13 and UA36. SCC as the MWPA and as set out in The Surrey Minerals Plan Core Strategy DPD (2011) Policy MC6, would want to continue to be consulted on any proposal at these sites, to ensure development doesn't prejudice the working of the existing aggregate depot.

Surface Water Flooding: Our Flood Risk & Network Resilience team have carried out a surface water risk review for the proposed development sites. This identifies the potential surface water issues that will need to be managed when development takes place.

UA1- No water risk. No wetspots.

UA2- Small patches of risk during 1 in 1000 events. Risk of 1 in 30 on neighbouring site at Chester House to the east. 1 in 100 on Chertsey Road and on slip road off A320 to the north. No wetspots.

UA3- Large part of the site (25%) at risk from 1 in 30 event. Chertsey Road to the east is predicted to flood during 1 in 100 events. No wetspots.

UA4- Small patch at risk from 1 in 1000. Commercial Way is predicted to flood at 1 in 100 event at the junction with Chapel Street. No wetspots.

UA5- Risk from 1 in 1000 in the centre. No wetspots.

UA6- Small area at risk from 1 in 1000 on site. Risk from 1 in 100 event to the north. No wetspots.

UA7- Small patches of SW risk through the site but no major flow routes. Guildford Road under the railway shows risk during 1 in 30 events. Small low points across the site showing risk during 1 in 30 events will need to be considered. No wetspots.

UA8- Risk from a 1 in 30 event to west of site on Poole Road. No wetspots.

UA9- Risk from 1 in 100 events on 5% of the site and on Wilbury Road, Vale Farm Road and Goldsworth Road. 60% of the site at risk during 1 in 1000 event. No wetspots.

UA10- Risk from 1 in 1000 events on Victoria Way and Church Street West. No wetspots.

UA11- Goldworth Road to the south at risk from a 1 in 30 event. No wetspots.

UA12- Church Street West is at risk from 1 in 1000 event. No wetspots.

UA13- Risk of 1 in 1000 on the site. To the north and east of the site Goldsworth Road and Victoria Arch at risk from 1 in 30 events. Historic Wetspot to the north of the site on Goldsworth Road.

UA14- Cherry Street poses a SW risk during 1 in 30 events. Poole Road to the north west shows a risk at 1 in 100 events. Historic wetspot in the middle of the site on Cherry Street.

UA15- North eastern corner along Church Street East and Chertsey Road is at risk to a 1 in 30 event. No wetspots.

UA16- Chertsey Road at risk from flooding during 1 in 30 events and 1 in 100 along whole western boundary. A small section of the site is also at predicted risk during 1 in 1000 events. No wetspots.

UA17- Predicted risk during 1 in 1000 event on West Street and Christchurch Way. No wetspots.

UA18- Small areas at risk from 1 in 1000 events on the site. Church Street East to the south is predicted to flood during 1 in 100 events. No wetspots.

UA19- 1 in 100 risk on Horsell Moor and Lockfield Drive to north and south respectively. Small part of the site (5%) at risk from 1 in 1000. Historic wetspot to the northwest along Horsell Moor.

UA20- None on west site. On east site small area (5%) of risk during 1 in 30 event. No wetspots.

UA21- 20% of site at risk from 1 in 1000 event. No wetspots.

UA22- No predicted risk on site. Predicted risk of flooding during 1 in 30 events on Priors Croft to the north and 1 in 1000 on High Street to the south. No wetspots.

UA23- No water risk. No wetspots.

UA24- Risk from 1 in 1000 event on the eastern edge. Risk from 1 in 30 event on Kingsfield Road. No wetspots.

UA25- Large sections (15%) at risk from 1 in 30 events. 1 on the east site which shows flow route from the eastern boundary to the recreation ground. Another flow route is from Spencer Close and Dartmouth avenue through the School to the eastern boundary. 30 % of the site at risk during 1 in 1000 events. No wetspots.

UA26- Risk from 1 in 1000 event on 25% of site. Chertsey Road predicted to flood during 1 in 100 events. No wetspots.

UA27- Parts of the site at risk from 1 in 30 events (5%). Albert Drive is predicted to flood during 1 in 30 events to the south west and at 1 in 100 north towards Bateson Way. No wetspots.

UA28- Large patch at risk from 1 in 30 at Scandia House, Boundary Business Centre and on Monument Way West. 1 in 30 risk along Boundary Road and Walton Terrace. 40% of site at risk from a 1 in 1000 event. Current wetspot on Walton Terrace and Boundary Road.

UA29- Risk from 1 in 1000 event on 15% of the site and along Grove Road and Walton Road. No wetspots.

UA30- 5% of site at risk from 1 in 1000 event. Flooding predicted to occur during 1 in 30 events at the eastern corner and from 1 in 1000 events along the southern boundary. No wetspots.

UA31- Risk from 1 in 1000 event on the eastern corner boundary of the site. No wetspots.

UA32- Large area at risk from 1 in 30 at the northern end of the site. Just south of the site is another car park which is at risk from 1 in 30. This would be a consideration when developing the site. Two patches are at risk from 1 in 100 events on the southern boundary. No wetspots.

UA33- Patch of site (10%) at risk from 1 in 100 event. Risk from 1 in 1000 events along the northern boundary on Oriental Road. No wetspots.

UA34- Risk from 1 in 100 events across the site mainly along the railway to the north of the site. Guildford Road on the eastern corner is at risk from 1 in 100 events as is Bradfield Close to the south. No wetspots.

UA35- Risk from 1 in 1000 events in taches of the site (10%). No wetspots.

UA36- N/A

UA37- No water risk. No wetspots.

UA38- No water risk. Historic wetspot along Heathside Crescent.

UA39- St John's Hill road to the south of the site is at risk from 1 in 100 events. No wetspots.

UA40- Risk from 1 in 100 along the northern boundary, 1 in 30 in places due to ditch that runs along it. Patch on the northern tip to 1 in 100. Historic wetspot along Camphill Industrial Estate.

UA41- 25% of site at risk from in 1 in 30, 33% of site at risk from 1 in 100, 100% of site at risk from 1 in 1000. No wetspots.

UA42- A small patch at risk from 1 in 30 and one of 1 in 100. 20% of site is at risk from 1 in 1000. A major flow route flows from south to north to the west of the site which is predicted to affect the site during a 1 in 1000 event.

UA43- Camphill Road and Stoop Court at risk from 1 in 30 events along the boundaries east and west of the site. No wetspots.

UA44- Westfield Avenue is at risk from 1 in 30 along the western boundary. The site has patches of 1 in 100 and 1 in 1000. Historic wetspot along Westfield Avenue.

GB1- Small area of 1 in 1000 SW risk on the site. 1 in 30 risk along the northern boundary on Brookwood Lye Road.

GB2- Northern part of the site (25%) at risk from a 1 in 1000 year event. Section of Brookwood Lye Road north of the site at risk from a 1 in 30 event. No wetspots.

GB3- One flow route across the middle of the site and site is predicted during 1 in 1000 events with patches at risk during 1 in 30 and 1 in 100. A ditch runs from the centre to the western boundary and then turns a runs parallel to the southern corner. There are a number of patches across the site at site that pond during 1 in 30 events. Surface water proportionally isn't large for the size of the site but due to its size there are many risks across it. (Hazard map attached in Appendix). No wetspots.

GB4- Small patch of the site shows a 1 in 100 risk, with slightly bigger (10% of the site) patches at risk form 1 in 100. No wetspots.

GB5- Negligible risk, small 1 in 1000 patch on the site. Some historic wetspots to the south east of the site on Sanway road and Sanway Close.

GB6- 20% of the site is at risk from 1 in 30 events. Historic wetspot down Woodham Road.

GB7- a) Fairly large section (estimated 10%) of site at risk of 1in 30 event to the north east corner of the site. Also at risk to a 1 in 30 event on along western boundary on the rail tracks at to the east on Egley Road. No wetspots.
 b) South eastern corner of the site is predicted to be at risk during 1 in 30 events. The south western side is also at risk during 1 in 100 events. The railway on the western boundary of site is predicted to flood during 1 in 30 events as is Egley Road on the eastern boundary. No wetspots.

GB8- 1 in 30 SW risk in the centre with 1 in 1000 risk along much of the southern boundary of the site. Historic wetspot on junction of Egley Road and Drakes Way to the east of the site.

GB9- Hook Hill Lane shows risk during 1 in 30 as does the railway line on the eastern edge. Low point at the junction between the two posing a risk of pooling. Historic wetspot along Hook Hill Lane.

GB10- Small patches at risk to a 1 in 1000 event. Risk of 1 in 30 just to south because of a watercourse just beyond the boundary. No wetspots.

GB11- A patch of 1 in 100 SW risk on the east site and in the middle due to a water feature. Patches of 1 in 1000 across the site 10% of site). 1 in 30 in sections and 1 in 100 along the rest of the northern boundary on Parvis Road. No wetspots.

GB12- A few small patches at risk from 1 in 1000 events mainly along ditches to the south of the site. No wetspots.

GB13- Site follows a major route which is at risk during 1 in 30 events from north to south of the site. Another smaller flow route flows in to the site from the west and joins in the southern section. The site has a very high risk from surface water flooding and it would be a major risk with development on this site. No wetspots.

GB14- Many patches of risk during 1 in 30 events as water flows through a number of channels from south to north of the site. There are also evidence of a number of areas where water will pool through 1 in 30, 1 in 100, 1 in 1000 events. No wetspots.

GB15- Small risk along River Wey with areas at risk from 1 in 30 and 1 in 100 just north of the boundary. Small patches at risk from 1 in 30 and 1 in 100 to the southern end of the site. No wetspots.

GB16- Northern edge has predicted risk during 1 in 100 events. Half the site shows a risk during 1 in 1000 events. No wetspots.

GB17- High risk along the northern boundary due to Hoe Stream but not for much of the site with a few patches at risk from 1 in 1000 events. No wetspots.

GB18- Eastern boundary at risk during a 1 in 30 event and from 1 in 100 along Parvis Road to the south. Risk from 1 in 1000 around the school to the west side of the site. No wetspots.

Contributor Proposed Modification: Our heritage officer recommends that archaeological assessments be carried at site UA44 (Woking Football Club); site GB4 (Land south of Parvis Road and High Road, Byfleet); site GB5 (Land to the south of Rectory Lane). At Byfleet GB14 (Westfield Common), he recommends that an archaeological assessment, including a topographic survey and site walkover by a qualified landscape specialist, be carried out, because little is known archaeologically about this site.

Modifications are as follows:

First bullet: The design of development achieves a satisfactory relationship between the proposed residential development and the existing rail aggregate depot in order to ensure that the future efficient operation of the aggregate depot is safeguarded.

Penultimate bullet last sentence: The developer must engage with Surrey County Council as Minerals Planning Authority (MPA) to ensure Minerals Plan Safeguarding Policy is addressed. The MPA will need to be satisfied, in consultation with the site operator, that future development would not prejudice, directly or indirectly, the efficient operational requirements of the site. (Highlight importance by moving this bullet to logically follow on from the above - i.e as the second bullet)

Reasoned justification (second paragraph): The site is however subject to policy restriction. The land and adjacent land is safeguarded as a rail aggregate depot in the Surrey Minerals Plan 2011 (Policy MC6 and MC16). The existing depot would need to be retained and its efficient future operation safeguarded, whilst ensuring access is maintained or improved. Surrey County Council (Minerals Planning Authority) would strongly resist any development that would be likely to prejudice the future efficient operation of the depot. The relocation of the depot to an equivalent alternative site on the rail network is not a realistic option.

SCC as the MWPA and as set out in The Surrey Minerals Plan Core Strategy DPD (2011) Policy MC6, would want to continue to be consulted on any proposal at these sites, to ensure development doesn't prejudice the working of the existing aggregate depot.

Modification Reference: U0000370

Officer Response: The transport assessment carried out by the County Council has identified the need to mitigate development impacts on the A245. It had been agreed that detailed transport assessment will be undertaken to also identify any site specific impacts that might be necessary for development to address. The council has a mechanism through CIL and section 106 agreement to help secure developer contributions towards those measures of mitigation. Since the Regulation 18 consultation was published, the

County Council has undertaken further works to identify measures of mitigation that might be necessary to address the development impacts. These measures would provide the necessary basis and evidence to request for developer contributions to enable their delivery.

The Council will update the Key Requirements in the Site Allocations DPD to include an archaeological assessment of sites UA44 and GB14. Site GB4 and GB5 are safeguarded sites, and therefore as a matter of principle do not have specific policy requirements at this stage. They will be set out as part of the future reviewed Core Strategy and/or the Site Allocations DPD, taking into account up to date evidence and policy context at the time. Agree with the principle of amending policy UA34 to strengthen the protection for the depot's operations.

The proposed requirements for policies UA6, UA10, UA11, UA13 and UA36 are not necessary, since this consultation mechanism is already in place for developments within the minerals infrastructure consultation zone.

The Council has carried out the appropriate assessments to inform the Site Allocations DPD in relation to flooding. Where necessary, key requirements to mitigate flooding have been included within the proposed allocations. Flooding will also be assessed in greater detail for any proposal which will come forward for any of the sites.

Response Reference: U0001764

Officer Proposed Modification: Add a key requirement to policies UA44 and GB14 to read: "An archaeological assessment will need to be undertaken and submitted to the Local Planning Authority in accordance with Core Strategy Policy CS20".

Amend key requirements of policy UA34 to read: - Development to ensure a satisfactory relationship between the proposed residential development and the existing safeguarded rail aggregates depot, as identified in the Surrey Minerals Plan, to ensure its effective operation; - Engage with Surrey County Council as the Minerals Planning Authority/MPA to ensure the Surrey Minerals Plan is taken into account in any decision for the future development of the site. The MPA will need to be satisfied that future development would not prevent, directly or indirectly, the minerals function and operational requirements of the site; - Detailed transport assessment to determine site specific transport mitigation measures. The transport assessment should take account of proposed developments and existing activities in the vicinity of the site. Surrey County Council as the Highways Authority for the area should be consulted to ensure that a satisfactory access is achieved for the development of the site and the adjoining uses.

Wishes to Attend Examination (T = Tick):

Contributor Reference: 02277/2

Name: Surrey Wildlife Trust and Surrey Nature Partnership

Number of Signatories: 1

Comment Type: COMM

Site Reference: GB01, GB02, GB03, GB06, GB07, GB10, GB12, GB13, GB14, GB15, GB16, GB17

Summary of Comment: These comments are submitted on behalf of Surrey Wildlife Trust and Surrey Nature Partnership as the government-mandated Local Nature Partnership for Surrey.

Regarding consistency with national policy, it is noted that the DPD shows some slight mismatches with current emphasis and terminology (for example in the NPPF and Biodiversity 2020: A strategy for England's wildlife and ecosystem services), in the area of policy requirements for conserving and enhancing the natural environment.

The original NPPF set out the requirement for planning to achieve sustainability, including contributing to the protection and enhancement of the natural environment. In particular, it provided that impacts on biodiversity should be minimised and net gains in biodiversity should be provided where possible. The 2018 revision of the NPPF removed 'where

possible', suggesting that an even greater obligatory requirement for measurable biodiversity enhancements is now appropriate. Conceptually, 'Biodiversity Net Gain' is developing very rapidly and will soon become definitively quantifiable with use of a standardised methodology (the 'Net Gain Metric') on which Government is currently consulting.

Surrey Wildlife Trust remains a prominent and leading member of the Surrey Nature Partnership, but the various workstreams of the partnership are essentially owned and referable to that body.

The near-universal key requirement for "proportionate on-site measures to support the creation, protection, enhancement and management of local biodiversity and Green Infrastructure" is welcomed.

The universal key requirement for all full/part residential developments for "a contribution towards Strategic Access Management and Monitoring to mitigate the impacts of residential development of the site on the Thames Basin Heath Special Protection Area" is noted.

Generic attention to SuDS in relation to flood management and water quality is noted. It is welcome that Surrey Wildlife Trust's previous comments during the Regulation 18 consultation are reflected in the key requirements for UA24 and UA40.

The key requirements for sensitivity in respect to the adjacent SNCI in the case of GB1 and GB2 are welcome.

GB3 does not mention the site's designation as an SNCI or its presence in the Biodiversity Opportunity Area TBH02 Colony Bog, Bagshot Heath & Deepcut Heaths or its biodiversity and nature conservation management plan.

The key requirement in GB6 recognising the presence of a BOA is welcome. However it is noted that Surrey Nature Partnership not Surrey Wildlife Trust is the relevant consultee.

GB7 does not mention the site's proximity to Mayford Meadows SNCI/LNR within BOA 504 River Wey and tributaries in the context of a key requirement for sensitivity under future development scenarios.

A number of the multiple key requirements of GB10 are welcome, although the allocation might benefit from consolidation providing clearer guidance to the development sector, and expressing the reference to biodiversity enhancements/improvements in the context of biodiversity net gain.

It is very welcome to see Surrey Wildlife Trust's previous comments under the Regulation 18 consultation reflected in the requirements and constraining issues around SANG provision.

Realising the aims of Woking's BOAs is especially relevant to the strategic planning of new accessible GI, as opportunities for achieving the BOA objectives in respect of priority habitat restoration and creation occur comparatively infrequently. Although Natural England has in the past discouraged the development of significant biodiversity interests within SANGs (as it saw these as potentially conflicting with a primary aim of maximising access), Natural England are now reversing this position faced with their parallel obligations to the outcomes of the current England Biodiversity Strategy Biodiversity 2020. The reflection of Surrey Wildlife Trust's previous comments in Policy GB12 are welcome. It is noted that while here, and at other SANG/new GI public access sites, provision of boardwalks and raised paths is a logical solution to enable year round access, this will need to be carefully planned in order not to compromise existing biodiversity interest or the full potential of habitat restoration/creation opportunities.

Regarding GB13, many of the comments above apply equally here. The relevant BOA in this instance is TBH02: Colony Bog, Bagshot Heath and Deepcut Heaths), with the addition that there is also an SNCI present. Access will require expert planning in order not to compromise existing biodiversity interest of the full potential of habitat restoration/creation opportunities. Surrey Wildlife Trust should be substituted with Surrey Nature Partnership.

Policy GB14 includes inconsistent key requirements and requires consolidation.

Regarding GB15 and GB16, the reflection of Surrey Wildlife Trust's previous comments is welcome. Comments above regarding the provision of boardwalks/raised paths to ensure year-round use are relevant here too.

Regarding GB17, the reflection of Surrey Wildlife Trust's previous comments is welcome. There is a very clear and obvious opportunity for the country park to incorporate achievement of BOA objectives for Priority habitat restoration/creation. Surrey Wildlife Trust should be substituted with Surrey Nature Partnership and it is considered that environmental requirements could be consolidated to provide clearer guidance with reference to biodiversity enhancements as achieving 'net gain.'

Appendix 1 might additionally include some of the references mentioned above, for example Biodiversity Opportunity Areas: The basis for realising Surrey's ecological network (SNP, 2015), Biodiversity Net Gain: Good practice principles for development (CIEEM, CIRIA, IEMA, 2016). The latest revision of Biodiversity & Planning in Surrey is November 2018.

Appendix 7 might usefully include entries for such terms as Biodiversity Opportunity Areas and Sites of Nature Conservation Importance.

Contributor Proposed Modification: GB3: As there is no mention of the site's designation as an SNCI, its presence in BOA TBH02 Colony Bog, Bagshot Heath and Deepcut Heaths, or its biodiversity and nature conservation management plan, a new and consolidating key requirement for the consideration of biodiversity is therefore advisable to ensure that any infrastructure developments do not conflict with, but do support aims and objectives of both the BOA and the management plan.

GB6: The requirement to consult Surrey Wildlife Trust should be replaced with a requirement to consult Surrey Nature Partnership

GB10: The key requirements could benefit from consolidation expressing the reference to biodiversity enhancements/improvements in the context of Biodiversity Net Gain.

GB14: Corrective and consolidating revision is required regarding the extent of Westfield Common SNCI.

GB15-16: All recommendations to consult Surrey Wildlife Trust must be substituted with the Surrey Nature Partnership and further, when referring to SNCI - the Surrey Local Sites Partnership. The various separate but related environmental constraints are consolidated to provide clearer guidance whilst also referring to biodiversity enhancements as achieving a 'net gain.'

GB17: Surrey Wildlife Trust must be substituted with Surrey Nature Partnership. The various environmental requirements could be consolidated to provide clearer and coherent guidance, with reference to biodiversity enhancements as achieving a 'net gain.'

Appendix 1: This might include such references as Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (SNP 2015), Biodiversity Net Gain: Good practice principles for development (CIEEM, CIRIA, IEMA, 2016). The latest revision of Biodiversity & Planning in Surrey is November 2018.

Appendix 7: This might include entries for such terms as Biodiversity Opportunity Areas and Sites of Nature Conservation Importance.

Modification Reference: U0000172

Officer Response: It is noted that Surrey Nature Partnership is the government-mandated Local Nature Partnership for Surrey.

Support for the outlined key requirements is noted.

It is noted that GB3 does not reference the site's overlap with the SNCI and BOA or the Brookwood Cemetery Habitat Management Plan prepared by Surrey Wildlife Trust. This is proposed to be addressed via a modification.

It is noted that GB7 does not reference the site's proximity to the SNCI and BOA.

It is noted that GB13 does not reference the site's overlap with an SNCI. There is a key requirement for action to be taken to contribute to the enhancement of the BOA.

It is noted that GB14 includes two inconsistent key requirements. This is proposed to be addressed via a modification, clarifying that the site falls entirely within an SNCI.

Comments regarding Appendices 1 and 7 are noted and proposed to be addressed via a modification.

Response Reference: U0001769

Officer Proposed Modification: It is proposed to add the following wording to the reasoned justification for Policy GB7: "the site is adjacent to an SNCI, and slightly overlaps with Biodiversity Opportunity Area R04: River Wey & tributaries. Any works or development on site should have regard to these designations."

It is proposed to add the following wording to the reasoned justification for Policy GB13: "part of the site falls within an SNCI, and any works or development on site should have regard to these designations."

It is proposed to add the following wording to the reasoned justification for Policy GB3: "Part of the site falls within an SNCI, and the entirety of the site falls within Biodiversity Opportunity Area TBH04: Ash, Brookwood and Whitmoor Heaths. Any works or development on site should have regard to these designations as well as the Brookwood Cemetery Habitat Management Plan prepared by Surrey Wildlife Trust."

It is proposed to replace requirements to consult Surrey Wildlife Trust with requirements to consult Surrey Nature Partnership (GB6; GB12; GB14; GB15; GB16; and GB17). Where the consultation pertains to an SNCI, an additional key requirement should be included to consult Surrey Local Sites Partnership (this applies to GB13; GB14; GB15; GB16; and GB17.)

It is proposed to amend the following key requirement for GB14: "The entire site is an SNCI - appropriate measures in place to conserve nature to conserve nature conservation interest found in this area. Surrey Wildlife Trust should be consulted to ensure conservation interests are safeguarded. A Management Plan has been prepared for Westfield Common that identifies management priorities for the next five years. Surrey Wildlife Trust will manage the implementation of the plan on behalf of the Borough Council. The work program will be reviewed annually as works progress and information evolves." This would instead read: "The entire site is an SNCI - appropriate measures in place to conserve nature conservation interest found in the area. Surrey Local Sites Partnership should be consulted to ensure conservation interests are safeguarded. A Management Plan has been prepared for Westfield Common that identifies management priorities for the next five years. Surrey Wildlife Trust will manage the implementation of the plan on behalf of the Borough Council. The work program will be reviewed annually as works progress and information evolves. Certain works will require the consent of DEFRA. Car parks and circular walks will in particular require careful consideration. The designation of this site for SANG will need to ensure that increased recreation by people and dogs do not adversely affect the nature conservation interest."

It is proposed to remove the key requirement "part of the site is designated at a local level as the Westfield Common Site of Nature Conservation Importance. Certain works will require the consent of DEFRA. Car parks and circular walks will in particular require careful consideration. The designation of this site for SANG will need to ensure that increased recreation by people and dogs do not adversely affect the nature conservation interest."

It is proposed to add the following references to Appendix 1: Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (SNP 2015), Biodiversity Net Gain: Good practice principles for development (CIEEM, CIRIA, IEMA, 2016) and Biodiversity and Planning in Surrey - November 2018 (Surrey Nature Partnership, 2018).

It is proposed to add the following definitions to Appendix 7:

Biodiversity Opportunity Areas: a broad landscape designation that encompasses a spatial concentration of important wildlife conservation sites, and represents a wider area where improved habitat management, restoration and re-creation will be most effective to benefit recovery of declining wildlife species. They are therefore the basis for achieving a coherent and resilient ecological network in Surrey.

Sites of Nature Conservation Importance (SNCI): Surrey's 'Local Wildlife Sites', a non-statutory site designation affording protection through appropriately-applied planning policy to sites selected for their important wildlife habitats and/or species populations, that can be close to or of equivalent quality to statutory-protected Sites of Special Scientific Interest (SSSI).

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06693/1

Name: Ms Fleur Syrett

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11, GB12

Summary of Comment: Concerned about these proposals, one of the main functions of the Green Belt is to prevent urban sprawl. Byfleet is a historic village named in the Domesday Book and also the home of the former royal palace, Byfleet Manor. As a historic village it should be preserved and not merged with West Byfleet. The greenbelt is required to maintain this and its development would go against the greenbelt function currently being performed.

Being so close to the M25, the Green belt is also required to protect residents from the damaging effects of air and noise pollution. Over the last 120 years, the level of carbon dioxide in the atmosphere has increased massively. If we keep removing our green spaces and adding more cars and houses to the equation, the effects will be devastating. Most of the land that WBC proposes to release from the Green belt is in Byfleet or West Byfleet. It is not fair or feasible to plan all these new developments in such a small area of the borough. We already have 250+ houses plus a new care home being built at Broadoaks, GB11, on the A245 and there are plans for 255 homes in a high-rise development at Sheer House in West Byfleet, but plans to improve the infrastructure to cope with this increase in the population appear to be minimal.

Suspects that the reasons for this overdevelopment of The Byfleets are political, recent Surrey CC by-election Conservative candidate leaflet stated that this was due to the failure of independent Councillors.

Considers that this DPD is unsound for the following reasons:

The document has been changed considerably since it was approved by a majority of councillors on 18th October. Expected all documentation to be finalised before being presented to a council meeting and certainly before the public consultation began.

The Office of National Statistics has recently revised its household projections, showing that fewer new housing is required than recently believed. Guildford council has recently asked the Planning Inspector to reduce their house building target to prevent them having to release land from the Green belt. Does not believe these new projections have been taken into account in the DPD.

Overdevelopment - WBC say there are plans to build 5000 homes over the next 10 years. This is a surplus of 2000 over the number required, even before taking the new ONS projections into account. Some 650 houses that have been built since the previous draft DPD was published have not been taken into account.

Land ownership - Does not believe that enough research has been done into ownership of some of the green belt land in question. Approximately one third of GB5, and the part that will be required for a new road, was bequeathed to the Church. On the subject of Cemeteries, the Infrastructure document says that WBC will maximise capacity within existing facilities to meet growth. Our existing cemetery is nearly full and the nearest one is nearly 10 miles away so I don't understand how that can be achieved without using this burial land. Currently, access to the remainder of GB5 is on a dangerous bend.

Flooding - Byfleet is essentially an island, surrounded by the River Wey and regularly floods. Adequate assessments regarding flooding from both river and surface water have

not been carried out. GB4 floods regularly, GB5 is also partly in the flood zone and GB10 is an area subject to frequent severe flooding. The 2015 River Wey Strategic Flood Risk Assessment identifies Woking and Byfleet as the area at second highest risk from surface water flooding in Surrey. It also states that flooding in Byfleet is likely to increase due to climate change and estimates need to be increased. This despite the fact that the consultants seem to have completely missed the fact that Byfleet suffered from very severe flooding in the year 2000. Local Planning departments seem to have a poor record when it comes to mitigating the flood risk when approving new developments. Viscount Gardens and Dunfee Way flooded in November 2000, along with much of Byfleet, within a few years of being built. Some new houses near Plough Bridge flooded in 2013 before their building had even been completed.

West Hall GB10 is a concrete aggregate safeguarded site. This Site falls within the boundary of the West Byfleet Neighbourhood Development Plan (NDP2017) and forms part of their Greenbelt designation. One of the objectives of the NDP2017 is to maintain, enhance and protect the distinctive and special character of West Byfleet. Any future application for Planning Permission on the Site would be contrary to the NDP2017 and therefore not compliant with Planning Law as defined in the NPPF paragraph 47. The NDP2017 places great emphasis on the protection and enhancement of all existing green spaces which would be significantly undermined if the Site was released from the Greenbelt for housing. The Site is covered by a minerals allocation which will still exist if the Site is released from the Greenbelt - the minerals plan runs from 2011 to 2026 and the site allocations DPD to 2027. As a result of the timings running in parallel the minerals allocation hanging over the Site would not make this site an attractive prospect for residential development and therefore the "deliverability" of the allocation is questioned.

HS4 Air - No consideration has been given to the fact GB4 and GB5 plus the Byfleet SANG area are all potential sites for HS4 Air. This National Transport infrastructure project and the compromising impact these proposals from WBC could have on this, have been completely omitted from this document and from WBC's assessments. Although the latest scheme has just been rejected by the DfT, the plan to link Gatwick and Heathrow by a high speed railway has emerged regularly over the last few years and is likely to re-emerge sooner rather than later, especially if Heathrow's 3rd runway is to eventually materialise.

M25 - No consideration has been given to possible future widening of the M25. GB4, GB5 and the Byfleet area of SANG run alongside one of the busiest stretches of the M25. No allowance has been made for potential motorway widening at a future date.

Pollution - A few years ago, the pollution sensors on the A245 showed the highest pollution readings in Woking. In 2016 the sensor was repositioned to a location away from the A245 which resulted in lower readings. These lower readings are however, misleading and give an inaccurate picture of true pollution levels in Byfleet and West Byfleet on the A245. Increased traffic numbers will further impact on the pollution levels. Developments at GB4, GB5 and GB10 will all increase traffic and therefore pollution levels on the A245. No proper consideration has been given to noise pollution for locations GB4 and GB5 which sit alongside the M25. GB10 is also close to the M25. Households along the A245 also suffer badly from noise pollution and this will only be exacerbated by the extra traffic. Infrastructure - the infrastructure report is lengthy but vague at best. Suggested improvements to the A245, which is already heavily congested, are totally inadequate. This road is our main route to the A3 and the M25 and is already struggling, even without 1500+ additional cars.

Health - we have one health centre in West Byfleet accommodating three GP practices which are already heavily over-subscribed as acknowledged in the infrastructure report. The average of patients per GP is 2,056 when the national average is just 1,364. Per practice, the average is 9,933 against a national average of 7,685. This is higher than the Woking average of 8,645. Our nearest walk-in centre in Weybridge burnt down two years ago and has not been replaced. Currently, the nearest one is in Woking which covers a

huge area. The infrastructure report completely fails to address how and where adequate healthcare could be provided for an increased population.
Education - The infrastructure report fails to make adequate provision for school places. Our local primary schools have already been expanded and are oversubscribed, as are our nearest senior schools. The infrastructure report mentions the new Hoe Valley school - this is the other side of Woking and Byfleet is not within its catchment area - nor is it ever likely to be. Neither WBC nor SCC appears to have the funds to build additional schools.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

The performance of Parcel 6 which includes the Byfleet sites against Green Belt purposes was assessed in the Green Belt Boundary Review (2015) and the site was found suitable for removal from the Green Belt. The credibility of the Green Belt Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12.

Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl. In regards to air and noise pollution see Section 8 in the Regulation 19 Issues and Matters Topic Paper. The Environmental Health section of the Council monitor air pollution. The movement of the of the kerbside monitoring tube was due to the recommendation of the air quality consultant, which wanted the tube closer to homes, to be more reflective of what residents living along the road were exposed to.

The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5. The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.

In regards to the representation referring to Councillors and lack of due process see Section 24 in the Regulation 19 Issues and Matters Topic Paper. It is emphasised that the allocations of sites and the safeguarded sites are all informed by evidence rather than the future of any Councillor.

The release of the Green Belt for development and housing projections has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

In regards to GB5 and land ownership see Section 15 of the Regulation 19 Issues and Matters Topic Paper.

Issues of flood risk are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.

In regards to GB10 and the West Byfleet Neighbourhood Plan and minerals plan see Sections 16 and 17 of the Regulation 19 Issues and Matters Topic Paper.

The representation is correct, there are no current Government plans for HS4. GB4 and GB5 are safeguarded sites and the key requirements for developing the sites will be set out as part of the review of the Core Strategy or Site Allocations DPD and any up to date information at the time.

The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work

with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Response Reference: U0001092

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06694/1

Name: Mr Paul Syrett

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11, GB12

Summary of Comment: Concerned about these proposals, one of the main functions of the Green Belt is to prevent urban sprawl. Byfleet is a historic village named in the Domesday Book and also the home of the former royal palace, Byfleet Manor. As a historic village it should be preserved and not merged with West Byfleet. The greenbelt is required to maintain this and its development would go against the greenbelt function currently being performed.

Being so close to the M25, the Green belt is also required to protect residents from the damaging effects of air and noise pollution. Over the last 120 years, the level of carbon dioxide in the atmosphere has increased massively. If we keep removing our green spaces and adding more cars and houses to the equation, the effects will be devastating. Most of the land that WBC proposes to release from the Green belt is in Byfleet or West Byfleet. It is not fair or feasible to plan all these new developments in such a small area of the borough. We already have 250 plus houses plus a new care home being built at Broadoaks, GB11, on the A245 and there are plans for 255 homes in a high-rise development at Sheer House in West Byfleet, but plans to improve the infrastructure to cope with this increase in the population appear to be minimal.

Suspects that the reasons for this overdevelopment of The Byfleets are political, recent Surrey CC by-election Conservative candidate leaflet stated that this was due to the failure of independent Councillors.

Considers that this DPD is unsound for the following reasons:

The document has been changed considerably since it was approved by a majority of councillors on 18th October. Expected all documentation to be finalised before being presented to a council meeting and certainly before the public consultation began.

The Office of National Statistics has recently revised its household projections, showing that fewer new housing is required than recently believed. Guildford council has recently asked the Planning Inspector to reduce their house building target to prevent them having to release land from the Green belt. Does not believe these new projections have been taken into account in the DPD.

Overdevelopment - WBC say there are plans to build 5000 homes over the next 10 years. This is a surplus of 2000 over the number required, even before taking the new ONS projections into account. Some 650 houses that have been built since the previous draft DPD was published have not been taken into account.

Land ownership - Does not believe that enough research has been done into ownership of some of the green belt land in question. Approximately one third of GB5, and the part that will be required for a new road, was bequeathed to the Church. On the subject of Cemeteries, the Infrastructure document says that WBC will maximise capacity within existing facilities to meet growth. Our existing cemetery is nearly full and the nearest one is nearly 10 miles away so I don't understand how that can be achieved without using this burial land. Currently, access to the remainder of GB5 is on a dangerous bend.

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HS4 Air - No consideration has been given to the fact GB4 and GB5 plus the Byfleet SANG area are all potential sites for HS4 Air. This National Transport infrastructure project and the compromising impact these proposals from WBC could have on this, have been completely omitted from this document and from WBC's assessments. Although the latest scheme has just been rejected by the DfT, the plan to link Gatwick and Heathrow by a high speed railway has emerged regularly over the last few years and is likely to re-emerge sooner rather than later, especially if Heathrow's 3rd runway is to eventually materialise.

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Infrastructure - the infrastructure report is lengthy but vague at best. Suggested improvements to the A245, which is already heavily congested, are totally inadequate.

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Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Objection noted.

The performance of Parcel 6 which includes the Byfleet sites against Green Belt purposes was assessed in the Green Belt Boundary Review (2015) and the site was found suitable for removal from the Green Belt. The credibility of the Green Belt Boundary Review is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 12.

Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR; and section 21 of the Topic Paper addresses concerns about urban sprawl. In regards to air and noise pollution see Section 8 in the Regulation 19 Issues and Matters Topic Paper. The Environmental Health section of the Council monitors air pollution. The movement of the of the kerbside monitoring tube was due to the recommendation of the air quality consultant, which wanted the tube closer to homes, to be more reflective of what residents living along the road were exposed to.

The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5. The Broadoaks and Sheer House developments have been taken into account in the production of the Local Plan evidence base and in communications with Duty to Cooperate partners responsible for infrastructure delivery.

In regards to the representation referring to Councillors and lack of due process see Section 24 in the Regulation 19 Issues and Matters Topic Paper. It should be emphasised that the allocation and safeguarding of sites was informed by evidence rather than the future of any Councillor.

The release of the Green Belt for development and housing projections has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

In regards to GB5 and land ownership see Section 15 of the Regulation 19 Issues and Matters Topic Paper.

Issues of flood risk are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7.

In regards to GB10 and the West Byfleet Neighbourhood Plan and minerals plan see Sections 16 and 17 of the Regulation 19 Issues and Matters Topic Paper.

The representation is correct, there are no current Government plans for HS4. GB4 and GB5 are safeguarded sites and the key requirements for developing the sites will be set out as part of the review of the Core Strategy and any up to date information at the time. The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would

not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

Response Reference: U0001088

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06710/1

Name: Mr Geoff Syrett

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11, GB12

Summary of Comment: As a Byfleet residents, extremely concerned with proposals. The DPD is unsound because:

- The DPD has changed considerably since it was approved at the Council meeting in October 2018 - all documentation should have been finalised prior to Council meeting so public could comment on the correct document.
- The DPD does not consider reduced ONS housing projections and is therefore using inaccurate housing targets. There are 5000 houses planned over the next 10 years - a surplus of 2000 even before a likely reduction in housing need is announced. If housing need is already met or in fact exceeded, there is no justifiable reason or exceptional circumstance to release any Greenbelt for development. Some 650 houses that have been built since the previous DPD was drafted have not been taken into account.
- Inadequate research into land ownership - a third of site GB5 is owned by St Mary's Church and is registered as burial land. Safe access to the remainder of the site would lead to a forced acquisition of this bequeathed land, which would be entirely inappropriate. In order to meet burial needs identified in the IDP, this land should be retained.
- GB4 is prone to flooding as are areas to the north and south of the site. GB5 is also part flood zone. GB10 is also subject to frequent and severe flooding. Photos have been provided showing severe flooding in year 2000. Development would lead to additional flood issues and increase flood risk to neighbouring properties. Flood assessments from both river and surface water in Byfleet have not been carried out adequately. The 2015 River Wey Strategic Flood Risk Assessment identifies Woking and Byfleet as the area at second highest risk from surface water flooding in Surrey; and that flooding in Byfleet is likely to increase due to climate change. Mitigating flood risks in new development tend to be ineffective e.g. Viscount Gardens and Dunfee Way flooded in 2000, as well as new houses near Plough Bridge in 2013.

- GB10 is safeguarded for concrete aggregates. The deliverability of the site is therefore questioned.
- Inaccurate statements regarding the greenbelt function of GB4, GB5 and GB10 - these sites provide an area of green space between Byfleet and West Byfleet and successfully prevent urban sprawl; the level of development proposed will merge the two villages together, conflicting with this Greenbelt purpose; and the sites as Greenbelt preserve the setting and special character of historic towns (Byfleet is a historic village named in the Domesday Book and also home of former royal palace Byfleet Manor). Site GB10 falls within West Byfleet Neighbourhood Plan area - development here would contradict aims to maintain, enhance and protect special character of West Byfleet, and to protect and enhance existing green spaces.
- Removing green spaces and increased traffic will increase pollution levels. Green Belt protects residents from damaging effects of air and noise pollution from M25. A245 suffers from high pollution levels already.
- Disproportionate amount of new development proposed for such a small area. Cumulative effect of over 250 houses plus care home at Broadoaks, 255 homes at Sheer House, and other proposed sites will strain infrastructure. Overdevelopment of the Byfleets is political - our Councillors have not been able to engage constructively with the process.
- No consideration given to National Transport Infrastructure project HS4 Air which includes land at sites GB4, GB5 and Byfleet SANG area. Although the project has been rejected by DfT, the plan to link Gatwick and Heathrow by a high speed railway is likely to re-emerge.
- No consideration given to possible future widening of M25;
- The IDP lacks sufficient detail and infrastructure provision will be wholly inadequate to support such an increase in population e.g. the traffic flow improvements on the A245 are unlikely to be even moderately successful in managing 1500+ extra cars; healthcare services are already overstretched with 1 health centre in West Byfleet serving both villages, with no mention of new facilities; both West Byfleet School and St Mary's School have undergone expansion with insufficient space for any further buildings or classes - the IDP does not make proper recommendations for school place provision.

Contributor Proposed Modification: Green Belt land should be preserved to uphold purposes of the Green Belt, and to accord with aims and policies of West Byfleet Neighbourhood Plan.

Modification Reference: U0000322

Officer Response: The Green Belt Boundary Review (GBBR) was carried out to assess the most suitable areas for removal from the Green Belt based on several factors, including their relative contribution to the five purposes of Green Belt. The proposed safeguarded sites in Byfleet were in a parcel which was considered to be one of the most suitable for removal from the Green Belt due to its slight/negligible importance to Green Belt purposes. Sections 1 and 2 of the Council's Regulation 19 Issues and Matters Topic Paper describe the justification for release and safeguarding of land from the Green Belt in more detail. The specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR because by definition, Woking and its villages are not classified as historic towns. It is acknowledged that Woking has a variety of heritage assets, and its villages have historic character, and there are sufficient and robust planning policies to preserve and/or enhance these assets. The proximity to the M25 is acknowledged. Section 8 of the Topic Paper addresses concerns about air and noise pollution. The concern about disproportionate development in Byfleet and West Byfleet is addressed in Section 5 of the Topic Paper. The selection of sites for allocation and safeguarding are based on robust evidence - as described in Section 10 of the Topic Paper.

Section 6 sets out how the Council has assessed the capacity of infrastructure to support proposed development.

1. Changes had to be made to the DPD to take into account representations from the previous round of consultation; up-to-date evidence; and recommendations made at the Council meeting in October 2018. The DPD was finalised before Regulation 19 consultation began, and all consultation documents highlighted where the latest version could be accessed.

2. The Council is aware of the latest household projections. Paragraph 1.5 of the Topic Paper addresses this issue. In February 2019, the Government confirmed that the 2014 projections should be used to assess housing need.

3. The concerns about overdevelopment are addressed in paragraphs 1.7 and 1.8 of the Topic Paper, including why a surplus of sites should be allocated to meet development needs.

4. The issue regarding ownership of land is addressed in Section 15 of the Topic Paper. Access arrangements are to be determined as part of the development management process, once the configuration and layout of sites is designed. For all sites that have been identified, the Council is confident that suitable and safe access can be achieved.

5. The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

6. The representation regarding the allocation of GB10 for minerals is addressed in Section 17 of the Topic Paper; and Section 16 responds to the concerns regarding the West Byfleet Neighbourhood Development Plan.

7. The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

8. The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network.

9. The Council provides a comprehensive response to concerns about air and noise pollution in Section 8 of the Topic Paper.

10, 11 and 12. Section 6 of the Topic Paper responds to concerns about infrastructure provision, including that of healthcare facilities and education services. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery

plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD.
Response Reference: U0001386
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06744/1
Name: Mr Fiona Syrett
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
<p>Summary of Comment: As a Byfleet residents, extremely concerned with proposals. The DPD is unsound because:</p> <ul style="list-style-type: none"> - The DPD has changed considerably since it was approved at the Council meeting in October 2018 - all documentation should have been finalised prior to Council meeting so public could comment on the correct document. - The DPD does not consider reduced ONS housing projections and is therefore using inaccurate housing targets. There are 5000 houses planned over the next 10 years - a surplus of 2000 even before a likely reduction in housing need is announced. If housing need is already met or in fact exceeded, there is no justifiable reason or exceptional circumstance to release any Greenbelt for development. Some 650 houses that have been built since the previous DPD was drafted have not been taken into account. - Inadequate research into land ownership - a third of site GB5 is owned by St Mary's Church and is registered as burial land. Safe access to the remainder of the site would lead to a forced acquisition of this bequeathed land, which would be entirely inappropriate. In order to meet burial needs identified in the IDP, this land should be retained. - GB4 is prone to flooding as are areas to the north and south of the site. GB5 is also part flood zone. GB10 is also subject to frequent and severe flooding. Photos have been provided showing severe flooding in year 2000. Development would lead to additional flood issues and increase flood risk to neighbouring properties. Flood assessments from both river and surface water in Byfleet have not been carried out adequately. The 2015 River Wey Strategic Flood Risk Assessment identifies Woking and Byfleet as the area at second highest risk from surface water flooding in Surrey; and that flooding in Byfleet is likely to increase due to climate change. Mitigating flood risks in new development tend to be ineffective e.g. Viscount Gardens and Dunfee Way flooded in 2000, as well as new houses near Plough Bridge in 2013. - GB10 is safeguarded for concrete aggregates. The deliverability of the site is therefore questioned. - Inaccurate statements regarding the greenbelt function of GB4, GB5 and GB10 - these sites provide an area of green space between Byfleet and West Byfleet and successfully prevent urban sprawl; the level of development proposed will merge the two villages together, conflicting with this Greenbelt purpose; and the sites as Greenbelt preserve the setting and special character of historic towns (Byfleet is a historic village named in the Domesday Book and also home of former royal palace Byfleet Manor). Site GB10 falls within West Byfleet Neighbourhood Plan area - development here would contradict aims to maintain, enhance and protect special character of West Byfleet, and to protect and enhance existing green spaces. - Removing green spaces and increased traffic will increase pollution levels. Green Belt protects residents from damaging effects of air and noise pollution from M25. A245 suffers from high pollution levels already.

- Disproportionate amount of new development proposed for such as small area. Cumulative effect of over 250 houses plus care home at Broadoaks, 255 homes at Sheer House, and other proposed sites will strain infrastructure. Overdevelopment of the Byfleets is political - our Councillors have not been able to engage constructively with the process.
- No consideration given to National Transport Infrastructure project HS4 Air which includes land at sites GB4, GB5 and Byfleet SANG area. Although the project has been rejected by DfT, the plan to link Gatwith and Heathrow by a high speed railway is likely to re-emerge.
- No consideration given to possible future widening of M25;
- The IDP lacks sufficient detail and infrastructure provision will be wholly inadequate to support such an increase in population e.g. the traffic flow improvements on the A245 are unlikely to be even moderately successful in managing 1500+ extra cars; healthcare services are already overstretched with 1 health centre in West Byfleet serving both villages, with no mention of new facilities; both West Byfleet School and St Mary's School have undergone expansion with insufficient space for any further buildings or classes - the IDP does not make proper recommendations for school place provision.

Contributor Proposed Modification: Green Belt land should be preserved to uphold purposes of the Green Belt, and to accord with aims and policies of West Byfleet Neighbourhood Plan.

Modification Reference: U0000303

Officer Response: The Green Belt Boundary Review (GBBR) was carried out to assess the most suitable areas for removal from the Green Belt based on several factors, including their relative contribution to the five purposes of Green Belt. The proposed safeguarded sites in Byfleet were in a parcel which was considered to be one of the most suitable for removal from the Green Belt due to its slight/negligible importance to Green Belt purposes. Sections 1 and 2 of the Council's Regulation 19 Issues and Matters Topic Paper describe the justification for release and safeguarding of land from the Green Belt in more detail. The specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the GBBR because by definition, Woking and its villages are not classified as historic towns. It is acknowledged that Woking has a variety of heritage assets, and its villages have historic character, and there are sufficient and robust planning policies to preserve and/or enhance these assets. The proximity to the M25 is acknowledged. Section 8 of the Topic Paper addresses concerns about air and noise pollution.

The concern about disproportionate development in Byfleet and West Byfleet is addressed in Section 5 of the Topic Paper. The selection of sites for allocation and safeguarding are based on robust evidence - as described in Section 10 of the Topic Paper.

Section 6 sets out how the Council has assessed the capacity of infrastructure to support proposed development.

1. Changes had to be made to the DPD to take into account representations from the previous round of consultation; up-to-date evidence; and recommendations made at the Council meeting in October 2018. The DPD was finalised before Regulation 19 consultation began, and all consultation documents highlighted where the latest version could be accessed.

2. The Council is aware of the latest household projections. Paragraph 1.5 of the Topic Paper addresses this issue. In February 2019, the Government confirmed that the 2014 projections should be used to assess housing need.

3. The concerns about overdevelopment are addressed in paragraphs 1.7 and 1.8 of the Topic Paper, including why a surplus of sites should be allocated to meet development needs.

4. The issue regarding ownership of land is addressed in Section 15 of the Topic Paper. Access arrangements are to be determined as part of the development management

process, once the configuration and layout of sites is designed. For all sites that have been identified, the Council is confident that suitable and safe access can be achieved.

5. The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

6. The representation regarding the allocation of GB10 for minerals is addressed in Section 17 of the Topic Paper; and Section 16 responds to the concerns regarding the West Byfleet Neighbourhood Development Plan.

7. The Council is aware of the HS4Air proposals. However, this is not considered to affect or constrain the allocation or safeguarding of sites in the Byfleet and West Byfleet area. It has recently been announced that the Department for Transport has rejected the scheme as it did not meet the criteria set out in the Department's call for ideas.

8. The Council is aware of Highways England's M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network.

9. The Council provides a comprehensive response to concerns about air and noise pollution in Section 8 of the Topic Paper.

10, 11 and 12. Section 6 of the Topic Paper responds to concerns about infrastructure provision, including that of healthcare facilities and education services. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD.

Response Reference: U0001399
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06914/1
Name: Mr Mark Takla
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Does not wish to speak at the public examination.

<p>Wishes to be informed when the DPD progresses to the next stages. Considers that the DPD is unsound as GB10 should not be removed from the Green Belt as:</p> <ol style="list-style-type: none"> 1. Parvis Road is already too congested and more traffic will add to pollution. 2. The local infrastructure, i.e. schools and doctors, cannot support such additional development.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: These issues are addressed by the Regulation 19 Issues and Matters Topic Paper. Regarding the A245, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. More generally, Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse impacts of the DPD to enable development to be acceptable in transport terms. Regarding pollution, Section 8 addresses the air quality implications of the Site Allocations DPD. In particular, Paragraph 8.4 addresses potential implications for air quality arising from increased traffic associated with development. Infrastructure is comprehensively addressed by Section 6. In particular, Paragraph 6.9 addresses education provision and Paragraph 6.12 addresses GP provision.</p>
Response Reference: U0001144
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06455/1
Name: Mr Matt Tarrant
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: The DPD has not been positively prepared, is not justified, is not effective, and is not consistent with national policy. It is considered to be unsound. Wishes to participate in the examination in public. Wishes to be informed of next stages.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Representation noted.
Response Reference: U0000892
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06455/2
Name: Mr Matt Tarrant
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
<p>Summary of Comment: Objects to GB4, GB5 and GB10. Infrastructure should be proposed before large housing developments. Parvis Road already suffers heavy traffic congestion, especially with any kind of roadworks here or around New Haw station. Smart lights system would only make a minor</p>

<p>improvement. The road should be made a dual carriageway before new development is proposed, and this is impractical due to the narrow section towards the lights and the motorway bridge.</p> <p>Cars trying to enter and exit site GB10 in both directions would cause further tailbacks and probably accidents.</p> <p>Access to GB4 would add another junction to Parvis Road, dangerous due to the angle of the bridge and current traffic levels.</p> <p>Byfleet has no doctors' surgery and no substantial car park at the railway station; a playground was recently removed after having been in disrepair for many years, tennis court is derelict. Unfair that the area lacks investment but is expected to lose its green belt, which has a recreational function. Residents feel that the area has been selected for development since it is less affluent than others.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The impact of the proposals on infrastructure more generally is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The impact of Green Belt loss on the amenity and recreation opportunities of local residents is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4.</p> <p>The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p>
<p>Response Reference: U0001786</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06579/1</p>
<p>Name: Mr John Taylor</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: UA43</p>
<p>Summary of Comment: Proposals do not take into account the Camphill Club: Interfering with the club could severely damage the local community, which has a dearth of meeting facilities. The club hosts meetings and functions, including Woking Rugby Club, and provides entertainment and social intercourse for OAPs, disabled persons and charitable events at very low cost. It is the West Byfleet ex-servicemens' mutual aid society, and a living war memorial; moving them out could be considered desecration. The club takes care of the wildlife in its demised area.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The key requirements for site UA43: Camphill Club and Scout Hut include 'Re-provision of the existing community facilities on site as part of any redevelopment scheme'. WBC considers that this requirement should allow the continued operation of the Camphill Club and the benefits that it provides to the local community, whilst also delivering much needed housing.</p> <p>Other key requirements of policy UA43 include 'The development should retain any trees of amenity value and protected trees (Tree Preservation Order)', and 'Proportionate on-site measures to support the creation, protection, enhancement and management of local biodiversity and Green Infrastructure'. Along with existing requirements in borough-wide</p>

planning policies, it is considered that this will adequately protect wildlife interest on the site. Most of the site currently comprises hard surfaces.
Response Reference: U0001631
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06580/1
Name: Taylor Wimpey UK Ltd
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07, GB09, SA1
<p>Summary of Comment: Wishes to participate in oral examination and to be kept informed as the DPD progresses.</p> <p>The various issues raised in part 2 (particularly), 3 and 4 of Taylor Wimpey's response support the argument and representations on site GB9, GB7 and Policy SA1, detailed below. The response and its summary should be read and understood as a whole.</p> <p>SA1 - The approach to safeguarding for longer term development needs. The need to safeguard land to enable a long term strategic view, to meet future development needs beyond the plan period, to provide longer term certainty on development locations, is referenced in the DPD (pages 4, 15, 232 and 237). This also allows for the establishment of a strong, defensible Green Belt boundary that will endure in the long term. However only 3 safeguarded sites remain at Reg 19, down from 7 (estimated potential capacity of 1,074 dwellings) at the Reg 18 stage. The main reason for concern is that the evidence base has not changed since 2015. Members have not called into question the credibility of the 2014 GBR, yet on two occasions have overturned officer recommendations on the identification of (previously safeguarded) sites, supported by the GBR. This has resulted in an approach that lacks logic and has created significant flaws in the overall approach of the SA DPD. The safeguarding approach put forward is therefore not justified.</p> <p>GB9 - supports the proposal to release the site from Green Belt, but is concerned about the allocated use solely for Green Infrastructure. There is a good sustainable development case to provide an element of residential development on this site, in a way to avoid significant environmental, landscape and visual harm.</p> <p>Makes a detailed case for including an element of residential development, of about 100 family homes, in terms of compliance with the positively written CS24 Escarpment and Rising Ground of Landscape Importance. There is nothing in this policy that precludes built development - there are varying topographies and varied areas of landscape within the designation. Contends that residential development could be accommodated within significant areas of open space and extensive landscaping. Proposes that about 60% of the site could come forward as publically accessible open space for the benefit of new and existing residents. Comprehensive and robust assessment is provided in the representor's Landscape and Visual Appraisal and Green Belt Review.</p> <p>Notes the impact of the construction of the Hoe Valley School on representor's site at GB7, which has impacted on the openness of the Green Belt in the area and on longer distance views towards the escarpment slopes.</p> <p>The Council has failed to take account of landscape and Green Belt evidence provided by Officers, and also does not account for the wider benefits of some residential development coming forward on the site, including:</p> <ul style="list-style-type: none"> - the inclusion of approx. 100 dwellings providing financial viability to ensure the DPD's objectives for ensuring significant areas of publically accessible green infrastructure on the site could be achieved

- 100 dwellings would greatly benefit Woking's housing supply, particularly with regard for family housing, where there is considerable local need and demand. This should be afforded considerable weight.
- sites that focus delivery on family homes, as GB9 could, are generally better places to focus significant levels of affordable housing (AH), including much needed affordable family homes. Landowner is committed to providing policy compliant levels of AH on site.
- proposal maximises the level of green infrastructure alongside residential development. The landscaping and public access proposed would maximise public enjoyment of views from the upper slopes at the north of the site
- highlights proposed improved pedestrian infrastructure at Hook Hill Lane, which is currently unsafe, that could be delivered with development, including a signal controlled pedestrian and cyclist crossing
- range of economic and financial benefits from CIL and S106 that would come with development.

Timing of the site coming forward

Does not accept that the site needs to be safeguarded, which needlessly holds back delivery until after 2027. It should be brought forward and allocated in association with site GB7. The site is available as soon as it is required, could be delivered within the first 5 year period following the DPD's adoption, and would contribute to the existing shortfall of deliverable housing land in the Western Surrey HMA.

Despite this, sees logic to safeguarding, only if adjacent sites to the west were to be re-instated for safeguarding for residential development beyond 2027. If the delivery of homes/ green infrastructure at GB9 were again associated with wider south Woking residential proposals, there could be potential to pursue an equalisation agreement to secure integrated and comprehensive delivery of a wider scheme.

Reviews/ rehearses the principles of allocation (evidence and justification) with regard to sustainability; Green Belt; and Landscape and Visual Impact.

GB7

Objects to the amended policy wording, inserted following the Council meeting on 18 Oct 2018 "The northern part of the site which is hatched on the location plan is designated as an area of local separation to provide a visual gap between Mayford and the rest of the urban area. This part of the site is not for built development". Amendment not been through prior scrutiny or debate at the LDF working group. No evidence or justification to support this amendment and proposed area of local separation. This, and the hatching on accompanying plans, should be deleted.

Contributor Proposed Modification: SA1 - calls for the re-instatement of sites previously safeguarded (at Reg 18) and updating of the 2014 GBR to provide a full and comprehensive review that is not constrained to meet a specific, pre-ordained, level of housing delivery.

GB9 - the site should include residential (approx. 100 dwellings) as well as Green Infrastructure, the latter would cover over 60% of the site area. Details given in supporting evidence.

GB7 - the amended policy wording, inserted following the Council meeting on 18 Oct 2018 that calls for an area of local separation to provide a visual gap between Mayford and the rest of the urban area at the north of the site, and hatching to show this on accompanying plans, should be deleted.

Modification Reference: U0000416

Officer Response: SA1

It is acknowledged that the Green Belt boundary review report (which is agreed is unchanged) has recommended that the following sites could be released from the Green Belt to meet future development needs of the Borough:

- o Land to the north east of Saunders Lane, Mayford (GB10);

o Land to the north west of Saunders Lane, Mayford (GB11);
o Land rear of 79 - 95 Lovelace Drive, Teggs Lane, Pyrford (GB12); and
These sites, in addition to 'Land east of Upshot Land and south of Aviary Road, Pyrford' (GB13) were identified in the draft Site Allocations DPD to be safeguarded to meet future development needs beyond the plan period between 2027 and 2040. This was published for Regulation 18 consultation between June and July 2015. The Council has considered the representations received during this consultation and has also reviewed all the available evidence and the policy context for safeguarding the sites, and has come to the conclusion that very special circumstances justification does not exist to safeguard the sites for the following reasons:

o All the sites would give rise to a certain level of harm to the sustainability objectives of the Sustainability Framework used for the Sustainability appraisal. In particular, it is noted that GB 9, 10 and GB13 are all within the designated "Escarpment of Rising Ground of Landscape Importance" which policy CS24 Core Strategy specifically identifies as a "key landscape" to be "conserved" and where possible "enhanced". Furthermore, whilst GB11 is not within the Escarpment designation, it is adjacent to the Escarpment and forms part of an important rural landscape setting to the southerly boundary with the urban area of Woking it is consider to also be protected by policy CS24. Moreover, GB11 together with GB13 form part of the setting of the Registered Park and Garden at Pyrford Court and the Aviary Road Conservation Area (both designated heritage assets). In their present open and rural form these sites make an important contribution towards the respective heritage significance of those designated heritage assets. Paragraph 193 NPPF requires "great weight" to be attached to the conservation of designated heritage assets. The Council is therefore of the view that exceptional circumstances do not exist so as to justify the release of proposal sites GB 9, 10 and 11 from the Green Belt because the use of those sites for residential development would: (i) conflict with policy CS24 Core Strategy and thus not be in accordance with the development plan's strategy for sustainable development contrary paragraph 139(a) of the NPPF, (ii) fail to protect or enhance a valued landscape in accordance with paragraph 170(a) of the NPPF, (iii) in the case of GB11 GB13, fail to conserve designated heritage assets and (iii), result in the permanent loss of Green Belt land assessed within the Green Belt Review as performing variously a "critical" and "major" role to check urban sprawl and a "critical" and "major" role towards safeguarding the countryside from encroachment Moreover, contrary to Policy CS6 of the Core Strategy, it is considered that the development of GB9, GB10, GB11 and GB13 would individually and certainly collectively, critically undermine the overall purpose and integrity of the Woking Green Belt.

The decision to determine whether very special circumstances justification exist to safeguard the sites is a matter of planning judgment. It is clear from the above reasons that the decision of the Council is well informed by the careful consideration of all the available evidence and defensible. For this reason, the call for the previously safeguarded sites to be re-instated in the plan is not considered appropriate.

GB9

The Council does not think that very special circumstances justification exist for the allocation or safeguarding of this site for residential development. The proposed allocation of the site will be contrary to evidence contained in the Council's Green Belt boundary review report. Furthermore, the development of the site will give rise to a significant level of harm to the integrity of the Escarpment of Rising Ground of Landscape Importance which Policy CS24 of the Core Strategy seeks to protect. Policy CS1 of the Core Strategy directs the Council to undertake a Green Belt boundary review to make sure that any land that is taken out from the Green Belt to meet future development needs does not undermine its overall purpose and integrity. The Green Belt boundary review is clear with its recommendation not to allocate the site for housing because of the potential adverse impacts of the integrity of the escarpment and the landscape setting of the town. The site is recommended to be released from the Green Belt and be used for the purposes of Green Infrastructure. This recommendation is followed through in the Site Allocations

DPD. It is acknowledged that the representations include a lot of material to demonstrate why the site could be sustainably developed. The Council is of the view that none of them is significant enough to outweigh the in principle harm that the development of the site could cause to the integrity of the escarpment. The fact that the Site Allocations DPD no longer seeks to promote the safeguarding of Sites GB10 and GB11 in the Regulation 18 version of the DPD does not justify the use of the site for housing or make the harm its development would cause any less.

It is noted, as claimed by a number of the representations that Green Infrastructure could be an acceptable use of Green Belt land, and as such the site could be retained within the Green Belt and still perform a green infrastructure function. In identifying land within the Green Belt to meet future development needs, the NPPF provides advice on the important need to ensure a defensible Green Belt boundary. The release of the land from the Green Belt will help achieve this important objective.

The Site Allocations DPD allocates sufficient land in sustainable locations in accordance with the spatial strategy of the Core strategy to meet the development requirements of the Core Strategy. Given that the Green Belt boundary review is clear to demonstrate that there is no further scope to release any more Green Belt land for housing including this site without damage to its overall purpose, very special circumstances justification will not exist to allocate the site for housing.

On the timing of the site's delivery, bringing the site forward for delivery prior to 2027 would be at odds with the spatial strategy for the Core Strategy. The timing for the release of Green Belt land is prescribed by Policies CS1 and CS6 of the Core Strategy. They require land to be released from the Green Belt to meet housing need between 2022 and 2027 (noting that this site is safeguarded for Green Infrastructure and it is not accepted that there is justification to safeguard the site for residential development). This is necessary to ensure that most new development is focused on previously development land in the urban area which offers the best access to a range of services and facilities, in line with the objective of sustainable development. Policy SA1 of the Site Allocations DPD is drafted to be in general conformity with this objective. The Site Allocations DPD clearly demonstrates that sufficient land has been identified on previously developed land in the urban area to meet development needs up to 2022. The request to remove the time restrictions on the release of Green Belt land is therefore not justified and unacceptable. With regard to GB9's proposed Green Infrastructure allocation, the need for such a use is not expected until the period from 2027 to 2040. Any development for this or any other purpose that comes forward before 2027 will have to comply with the Green Belt policies in the development plan.

GB7

The designated area of local separation was proposed and agreed upon by the Council at its meeting on 18 October 2018. The visual gap and local separation between Woking and Mayford is an issue of great local concern, linked to preservation of the identity and character of Mayford village, as highlighted in Policy CS6 of the Core Strategy. This concept is not new to the policy for this site, as at Regulation 18 stage, a visual break (of open space/ playing fields) was included at the southern end of the site under the Policy's key requirements. However, development of the school has focused a greater degree of development at the southern end of the site, justified through the planning application and agreed by the Council. The decision was not called in by the Secretary of State. This key policy requirement has been amended in terms of its location, in light of the school development, and also strengthened (by the Council) through a designated area on the site plan and Proposals Map.

Response Reference: U0001755

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06580/2
Name: Taylor Wimpey UK Ltd
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Duty to Cooperate (D to C) - despite the DPD making reference to 'sustained' and 'continual' engagement with relevant organisations and bodies however the D to C Topic Paper does not show reasonable evidence of this and does not meet NPPF para 27's requirements. Very concerned that Woking's neighbouring planning authorities have objected to the approach that the Council has taken on strategic planning matters, and also that the D to C Statement simply rebuts these Boroughs concerns. The D to C has therefore not been met and the Council needs to publish evidence of how it can be met, and specifically to how in partnership, the housing needs in the Western Surrey HMA will be addressed.
Contributor Proposed Modification: The Council needs to publish evidence of how it meets the Duty to Cooperate, specifically regarding how, in partnership, the housing needs in the Western Surrey HMA will be addressed.
Modification Reference: U0000415
Officer Response: There has been continual engagement with the relevant Duty to Cooperate bodies throughout the preparation of the plan. This has been at the early stages (2012-2014), at Regulation 18 consultation (2015), the land east of Martyrs Lane consultation (2017) and Regulation 19 (2018). In terms of the strategic planning matters that neighbouring Borough's are concerned about, these are contained in the Council's adopted Core Strategy (2012). The Core Strategy was reviewed in accordance with the NPPF (2018) and the Council (in Oct 2018) decided that there was no immediate need to modify it, meaning that the Core Strategy remains the necessary strategic policy framework to manage development across the Borough, and to provide the basis of the Site Allocations DPD, one of its delivery documents. Given that the Council did not embark on a modification of the Core Strategy as a result of the review, the requirements of the Duty to Cooperate would not have been engaged. The purpose and scope of the Core Strategy and Site Allocations DPD should not be conflated; it is not the role of the Site Allocations DPD to set the housing requirement for the Borough. The Council will continue to work with neighbouring Boroughs on strategic matters, as and when it begins a review of the Core Strategy, to ensure compliance with the 2018 NPPF and NPG, and to show how housing need across the HMA can be met. In terms of the Site Allocations, the Statement of Common Ground was agreed prior to the revised guidance but this, and together with the evidence presented in the Duty to Cooperate Statement (an updated version of which will be published as part of the submission documents), is considered to demonstrate effective and on-going joint working and engagement with local residents and key stakeholders in the preparation of the DPD. The Duty to Cooperate Statement will clearly show that the Duty to Cooperate has been met. The representation compares what was published as a response to representations by the Duty to Cooperate bodies with a Duty to Cooperate statement, which is yet to be published. That is a mis-reading of the available information. On meeting housing need in the HMA, it should be noted that the Independent examination of Waverley's Local Plan in 2017 concluded that while Waverley must modify their annual housing requirement to take account of half of Woking's unmet housing need, the Duty to Cooperate had been met. The Inspector's report for Guildford's Local Plan, which was independently examined in June-July 2018, has been published and it

concludes that the Duty to Cooperate has been met. It also requires the Guildford Local Plan to meet Woking's residual unmet need.
Response Reference: U0001298
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06580/3
Name: Taylor Wimpey UK Ltd
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: The Sustainability Appraisal (linking to P15 of the SA DPD) is unsound and not legally compliant. The process is unsound for two key reasons:</p> <ol style="list-style-type: none"> 1. The use of Green Belt within Sustainability Appraisal Criteria against Objective 10 Natural Historic and Cultural Assets 2. Inaccurate use of evidence base for the Council's appraisal leading to incorrect sustainability appraisal conclusions. <p>Previous reps made previously in Feb 2017 regarding to the Sustainability Appraisal report accompanying Land East of Martyrs Lane consultation.</p> <p>With regard to point 1, the Council's approach is unsound as the Green Belt designation is used to inform a negative score for site GB9 against the Natural Historic and Cultural Assets objective (10), despite having been identified in the GBR as suitable for release from the Green Belt. This is inappropriate, and gives detail of case law evidence in support of this.</p> <p>There are inaccuracies in the evidence base informing the Sustainability Appraisal, resulting in inaccurate conclusions. Updates to the site, from just Green Infrastructure use, to Green Infrastructure and residential development have not been sufficiently updated from Regulation 18 to Regulation 19 to enable objective assessment and show how the strategy takes into account reasonable alternatives, and is justified in terms of the tests of soundness. This is linked to the exclusion of other previous (at Reg 18) safeguarded sites, which gives a different context to that which informed the 2014 GBR.</p> <p>Turley have provided an independent Sustainability Appraisal at Appendix 3.</p>
Contributor Proposed Modification: The Sustainability Appraisal should be updated in relation to the latest evidence, to remedy the highlighted deficiencies.
Modification Reference: U0000414
<p>Officer Response: 1. Objective 10 of the Sustainability Appraisal - it is agreed that Green Belt is a policy designation and not an environmental or landscape constraint. Green Belt is not used in its own right in Objective 10. However, some sites that were considered or recommended for release from Green Belt in the Green Belt boundary review contain landscape and environmental constraints, notably the Escarpment or Rising Ground of Landscape Importance, identified as a key landscape to be conserved and where possible, enhanced in Policy CS24 of the Core Strategy. The Sustainability Appraisal is clear that a number of Green Belt sites assessed could have negative impacts by reason of their landscape impacts. The Sustainability Appraisal is sound and legally compliant with regard to this representation.</p> <p>It should also be noted that with regard to site GB9, the Green Belt boundary review is clear in its recommendation not to allocate the site for housing because of the potential adverse impacts of the integrity of the escarpment and the landscape setting of the town. The site is recommended to be released from the Green Belt, to be used for the purposes of Green Infrastructure. This recommendation is reflected in the Sustainability Appraisal, and followed through in the Site Allocations DPD. While the representation includes a lot of material to demonstrate why the site could be sustainably developed, the Council is of</p>

<p>the view that none of this material or reasoning is significant enough to outweigh the in principle harm that the development of the site could cause to the integrity of the escarpment.</p> <p>2. The point raised by the representor relates to the updated 2017 SHLAA, that: It is not considered that there would be any negative environmental conditions experienced by prospective residents, subject to a Noise Assessment of the adjacent railway line and the implementation of mitigation measures if necessary.</p> <p>This is a point relating to future residents, and is not the same issue as overall assessment provided by the Sustainability Appraisal or the Green Belt boundary review's recommendations. Additionally, the changes to the Plan to not take forward sites that were previously (at Regulation 18) safeguarded for long term development needs does not change the overall assessment of this site. The proposed safeguarded use of GB9 is therefore considered to be sound, and is supported by relevant and up to date evidence.</p>
<p>Response Reference: U0001777</p>
<p>Officer Proposed Modification: The points highlighted do not necessitate an update of the Sustainability Appraisal with regard to the latest evidence.</p>
<p>Wishes to Attend Examination (T = Tick): T</p>

<p>Contributor Reference: 06580/4</p>
<p>Name: Taylor Wimpey UK Ltd</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference:</p>
<p>Summary of Comment: Wishes to participate in oral examination and to be kept informed as the DPD progresses.</p> <p>The DPD is not legally compliant, sound or compliant with the Duty to Cooperate. Purpose of the DPD - page 4.</p> <p>The DPD is not legally compliant, sound or compliant with the Duty to Cooperate. The intended purpose of the document is not appropriate or sufficient at the present time. Due to the time period since adoption of the Core Strategy, its development targets, particularly with regard to Green Belt review and potential release, are now out of date. This is due to the publication of a revised NPPF in July 2018, publication of numerous population and household projection updates and sustained worsening housing affordability in the Borough.</p> <p>The NPPF sets out that strategic policies cover a period of 15 years. If adopted in 2019 as proposed, the policies in the CS will have less than 8 years left. While the Council claims it takes a long term view in the DPD, the amount of land safeguarded for residential development beyond 2027 would deliver only 270 dwellings, less than one year's housing land supply, even at the current low annual target.</p> <p>The Core Strategy no longer provides an up to date strategic basis on which to adopt a 'subserving' DPD.</p> <p>Housing need appraisal - reviews the current standard housing need method and changing market signals across the Western Surrey HMA. The constrained Core Strategy requirement continues to impact population levels and household growth. Contends that affordability of housing in Woking has worsened since the adoption of the Core Strategy, to a greater extent than in Guildford and Waverley. The Council's assertion that need or demand for housing in Woking and across the HMA is easing is unjustified and not credible. Points to issues in terms of meeting Woking's unmet need in Guildford, which considers itself to be equally constrained.</p> <p>Highlights the 'acute need for housing' highlighted in the LSS on the A3 Corridor Sub-Area, and the issue of finding solutions to unmet housing need in the HMA. Therefore raises great concern about the lack of review of housing targets in the Borough's Core</p>

Strategy, and its impact on the Green Belt Review, which only set out to identify sufficient parcels of land to meet those requirements. This is not considered sufficient up to date evidence that no further sites within the Borough can be found to provide for housing growth. The decision not to take forward larger Green Belt sites for safeguarding (which totalled 1,074 dwellings in the 2015 draft DPD) worsens the situation in terms of meeting future housing need and conflicts with the Council's own Green Belt Review and other evidence.

Specific housing types - the Council is failing to address need for sufficient family homes and for local affordable housing. Provides evidence on the poor delivery of affordable housing in the Borough since 2012. Identification of suitable sites in the Green Belt, is needed to help meet this need, and Taylor Wimpey's site at GB9 would provide a suitable and valuable opportunity to deliver family homes and significant levels of affordable housing, consistent with national policy.

Further detail on housing need are provided in Appendix 2. Meeting the housing needs of Woking - a technical critique.

Comments on further aspects of the DPD

Page 16 how sites will bring forward the development planning by the Core Strategy, with regard to the assessment of housing need and demographic trends, should be revised to be consistent with national policy.

Page 19 Custom and self build housing - text at top of page (on all residential site allocations contributing to the pool of housing development land, on the open market, see rep), is not supported by any detailed site allocation proposal, or by evidence to show local need for this type of housing. Also no viability evidence to support the proposed approach. This statement is unjustified and should either be removed or appropriately revised.

Contributor Proposed Modification: Page 16, with regard to the assessment of housing need and demographic trends, should be revised to be consistent with national policy. Page 19 Custom and self build housing - text at top of page should either be removed or appropriately revised

Modification Reference: U0000428

Officer Response: The purpose of the the Site Allocations DPD is clearly set out in the Core Strategy, and it is to identify specific sites to enable the delivery of the Core Strategy. The timeframes for delivery of Local Development Documents is set in the Council's Local Development Scheme and is considered appropriate, reasonable and realistic at the present time. It is not the role of the Site Allocations DPD to retrofit any perceived differences in the Core Strategy or determine the housing requirement for the Borough. That is the distinct purpose of the Core Strategy. Paragraph 20 of the NPPF clarifies the role of strategic policies. Strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement of the natural, built and historic environment. It would be wrong to expect non-strategic policies in the Site Allocations DPD to be performing the role of the Core Strategy by planning for a higher housing requirement.

It should be noted that the Core Strategy, including its housing requirement, has been reviewed in accordance with the revised National Planning Policy Framework (2018), Planning Policy Guidance and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended by the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017. The Council has undertaken a thorough review and concluded that there is no immediate need to modify it either in part or as a whole. Consequently, the Core Strategy continues to be considered up to date in providing the necessary strategic policy framework for managing development across the Borough.

With regard to the timing of adoption, the SA DPD has been delivered as swiftly as feasible. The long term view put forward through safeguarding is about ensuring the enduring permanence of the Green Belt, and the Council needs to be sure that sites put forward to be safeguarded to meet future development need between 2027 and 2040 have a very special circumstances justification for the release of land from the Green Belt, taking account of the need to promote sustainable patterns of development. While the Green Belt Boundary Review recommended three sites that could be released from the Green Belt to meet future development need, in Mayford and Pyrford, which were included in the Regulation 18 version of the DPD (GB10, GB11 and GB12) alongside a further site in Pyrford (GB13), representations received at that stage and a review of the available evidence and policy context for safeguarding sites have led to conclusion that a very special circumstances justification does not exist to safeguard these sites. This is due to harm to sustainability objectives of the Sustainability appraisal. In particular, it is noted that GB9, 10 and GB13 are all within the designated "Escarpment of Rising Ground of Landscape Importance" which policy CS24 Core Strategy specifically identifies as a "key landscape" to be "conserved" and where possible "enhanced". Furthermore, whilst GB12 is not within the Escarpment designation, it is adjacent to the Escarpment and forms part of an important rural landscape setting to the southerly boundary with the urban area of Woking it is considered to also be protected by policy CS24. Moreover, GB12 together with GB13 form part of the setting of the Registered Park and Garden at Pyrford Court and the Aviary Road Conservation Area (both designated heritage assets). In their present open and rural form these sites make an important contribution towards the respective heritage significance of those designated heritage assets. Paragraph 193 NPPF requires "great weight" to be attached to the conservation of designated heritage assets. The Council is therefore of the view that exceptional circumstances do not exist to justify the release of proposal sites GB10, 11 and 12 from the Green Belt because the use of those sites for residential development would: (i) conflict with policy CS24 Core Strategy and thus not be in accordance with the development plan's strategy for sustainable development contrary paragraph 139(a) of the NPPF, (ii) fail to protect or enhance a valued landscape in accordance with paragraph 170(a) of the NPPF, (iii) in the case of GB12 and GB13, fail to conserve designated heritage assets and (iii), result in the permanent loss of Green Belt land assessed within the Green Belt Review as performing variously a "critical" and "major" role to check urban sprawl and a "critical" and "major" role towards safeguarding the countryside from encroachment. Moreover, contrary to Policy CS6 of the Core Strategy, it is considered that the development of GB10, 11 and 12 and GB13 would individually and certainly collectively, critically undermine the overall purpose and integrity of the Woking Green Belt.

The decision to determine whether very special circumstances justification exist to safeguard the sites is a matter of planning judgment. It is clear from the above reasons that the decision of the Council is well informed by the careful consideration of all the available evidence and defensible.

As stated in the representation, housing need beyond the plan period is still to be determined, at the point of reviewing the Council's Core Strategy. While the number of homes put forward through the remaining safeguarded sites may appear low, the Council believes the Town Centre and the other main centres will continue to play a key role in future land supply. The housing requirement (within the next plan period), and the supply of land will be confirmed based on up to date evidence of housing supply and delivery at that time. Following its recent review in line with the revised NPPF, the Council is confident that the Core Strategy continues to provide an up to date strategic policy framework for the SA DPD to be based upon.

Regarding the point about the constrained Core Strategy housing requirement and affordable housing, there are various factors to consider. The Council's LDF Economic Viability Assessment (2010) supports the Core Strategy affordable housing targets, and the Site Allocations DPD in terms of site delivery, and shows overall positive viability for the delivery of affordable housing across the Borough. Flexibility is however

recommended, and incorporated into Policy CS12: Affordable Housing, which forms a robust and sound policy framework for affordable housing, which includes targets. It contains criteria to assess the proportion of affordable housing to be provided on a specific site, and detail about exceptional circumstances that must be demonstrated, justified by site specific viability assessments, for the Council to accept affordable housing provision below the set target. While it is acknowledged that overall affordable housing delivery has been lower (an average of 18% in the 8 years since 2010) than the Council's target, this has been justified on site by site basis, in line with Policy CS12, and financial payments have also been received to provide affordable housing on alternative sites. Development coming forward through the Site Allocations DPD will be subjected to CS12, and allocation policies contain specific key requirements on affordable housing, with Green Belt sites set to provide a contribution to affordable housing in accordance with CS12, of 50% to be provided on site.

Similarly the Core Strategy sets the policy basis for residential development, including sites allocated within the DPD to provide a mix of housing types in line with the latest (2015) Strategic Housing Market Assessment. The Council will work with developers through the Development Management process to ensure that an appropriate mix of units are developed on sites.

The Council is aware that sites recommended for removal from the Green Belt and allocated for housing may provide a particular opportunity for development of family homes and affordable housing. The (Green Belt release) allocations put forward in the DPD are underpinned by the Green Belt Boundary Review and Sustainability Appraisal. The DPD allocates sufficient land in sustainable locations in accordance with the spatial strategy of the Core Strategy to meet the development requirements. Given that the Green Belt Boundary review is clear to demonstrate that there is no further scope to release any more Green Belt land for housing including this site without damage to its overall purpose, very special circumstances justification will not exist to allocate GB9 site for housing. While acknowledging the positive impact residential development could have in terms of housing supply, put forward in the representation, development at site GB9 would have considerable negative impacts on environmental objectives in the Sustainability Appraisal, including a significant level of harm to the integrity of the Escarpment of Rising Ground of Landscape Importance which Policy CS24 of the Core Strategy seeks to protect. The evidence in the Green Belt boundary review is clear in its recommendation not to allocate the site for housing because of the potential adverse impacts of the integrity of the escarpment and the landscape setting of the town. Further detail specific to site GB9 can be found in the response to that part of the representation.

On housing need in the HMA, the Council has worked with both Guildford and Waverley Borough Councils to ensure that housing need across the HMA is met. The Council has an agreed Statement of Common Ground with these two Boroughs on the issue. The Council has also worked with partners and authorities in the wider area (local boroughs outside the HMA, Surrey County Council and the Local Enterprise Partnership). Waverley's Local Plan makes provision for half of Woking's unmet housing need.

Guildford Local Plan identifies surplus land to deliver nearly 4,000 homes above Guildford's own housing requirement of 10,678, which ensures the Plan is robust in terms of any slippage or non-delivery. While a specific figure is not prescribed to meet Woking's remaining unmet need, it gives 'enough headroom to provide for the anticipated level of unmet need from Woking' (Inspectors Report on Guildford Local Plan, 27 Mar 2019). In this respect, the adoption of up to date Local Plans across the Housing Market Area shows there is potential, albeit with the appropriate delivery mechanisms, for Woking's unmet housing need to be met across the Housing Market Area.

It should also be noted that the Site Allocations DPD allocates land to deliver more homes than the housing requirement (which is a minimum). This ensures that (at least) the housing requirement is delivered and caters for any non-implementation. It should also be noted that delivery in the Borough in the six years since the Core Strategy's adoption in

2012 has averaged 356 units per year, showing that housing delivery has not been constrained by the (minimum) requirement.

Regarding the representation on page 16, the SA DPD sets out that:
The Core Strategy sets out the development planned in Woking Borough 2010-2027. National planning policy requires the Council to identify and allocate sufficient sites to deliver this growth and infrastructure.

The respondent contends that:
This is not considered to be an accurate interpretation of current national policy. Paragraph 60 of the NPPF states that:
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.

The response relates back to the role and purpose of the Site Allocations DPD, detailed above. The Site Allocations DPD is a delivery document to the Core Strategy, and it is not its role to determine the housing requirement for the Borough, which is the distinct purpose of the Core Strategy. Paragraph 20 of the NPPF clarifies the role of strategic policies. It would be wrong to expect non-strategic policies in the Site Allocations DPD to be performing the role of the Core Strategy by planning for a revised housing requirement. Page 16 of the DPD is intended to set the context for the DPD, in terms of data on housing supply over the plan period, and housing delivery (completions).

On page 19, the final representation is on custom and self build housing, and the DPD states that all residential site allocations contribute to the pool of development land that may be suitable for self build. The Self-build and custom housebuilding Act 2015 (as amended) sets out the Government policy objectives for self-build and custom housebuilding. There is no doubt about the Government's commitment to promote this type of house building to boost the supply and variety of new homes, and the Council has to play its part to deliver that. Policy DM12 (Self-build and custom-build houses) of the Development Management Policies DPD offers in-principle support for self-build and custom housebuilding in suitable location. The Strategic Housing Land Availability Assessment and the Site Allocations DPD are a useful source of information to help both prospective applicants and developers identify suitable sites to meet the need for this type of home. The proposed allocations in the DPD are all in sustainable locations that could be suitable for this purpose if there is the market for it and developer and applicants wish to bring that forward. The bullet point on page 19 of the DPD is therefore appropriate in this context by sign-posting to the proposed allocations as potential useful source of land supply which applicants and developers could consider. The Council has published a Self-build and Custom Housebuilding Guidance Note. This can be accessed by this link: <http://www.woking2027.info/supplementary/selfbuild>. The Guidance Note sets out some of the various means by which self-build and custom housebuilding could be delivered, including the role of the Site Allocations DPD as potential source of land supply. It is therefore appropriate for the Site Allocations DPD to continue to retain the reference and to highlight this as a source of land supply. There is no need for a separate viability assessment to be undertaken to inform this objective. The Core Strategy and the delivery of typical sites across the Borough for C3 homes is informed by comprehensive viability assessments, which are all part of the evidence base to support the preparation of the Site Allocations DPD. It is stressed that the Site Allocations DPD is only one of many sources of land supply to help deliver this type of homes. A number of current provision is being delivered on the back of windfall sites and there are no viability concerns to date. This is evidenced by the number of self-build exemptions that are claimed through CIL.

The Council has published a self-build and custom housebuilding register which demonstrates a clear evidence of need for this type of homes. Given the current source of

<p>delivery of self-build homes, mainly through windfall sites, and the implementation of the policy is at an early stage, the Council has not sought at this stage to allocate specific sites for this purpose, but will support in principle any scheme that comes forward subject to all other development plan policies being met. This approach will be closely monitored and if future lessons and evidence require the allocation of specific allocations, this will be addressed as part of the future review of the Core Strategy and/or the Site Allocations DPD.</p>
<p>Response Reference: U0001766</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick): T</p>
<p>Contributor Reference: 06005/1</p>
<p>Name: Mr Julian Temple</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB05</p>
<p>Summary of Comment: DPD is legally compliant and complies with the Duty to Cooperate, but is not sound. Objects to GB5 allocation. Objects to the release of site from Green Belt designation. GB5 includes land that is designated as future burial ground, which may be used before any proposals for housing are submitted. Concerns regarding the following: - Does not sufficiently take into account noise and air pollution arising from the nearby M25; - Inadequate flood mitigation methods; - Inadequate road infrastructure to mitigate traffic congestion; - Inadequate assessments undertaken regarding the above issues; - Insufficient mitigation of general over-development.</p>
<p>Contributor Proposed Modification: -Revise the map showing GB5 to accurately reflect the existing land ownership and delete the idea of building houses over a designated burial ground; -Commission and publish some up to date local statistics on existing noise and pollution levels from the M25; -Reconsider the Green Belt issues again; -Implement effective measures to reduce flood risks and traffic congestion and also to improve local infrastructure BEFORE committing to development of GB5 (& of the other sites in Byfleet and West Byfleet too).</p>
<p>Modification Reference: U0000368</p>
<p>Officer Response: Section 1 and 2 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of GB5 for development. Section 7 addresses the issue regarding flooding. Section 8 addresses the issue regarding pollution. Section 10 addresses the issue regarding inadequate assessments to support the Site Allocations DPD. Section 13 addresses the issue regarding road infrastructure. Section 15 addresses the issue regarding the burial land at GB5. With regard to the issue of over-development, it is anticipated that the site will potentially yield 135 dwellings at approximately 45 dwellings per hectare, which is considered an appropriate scale of development at this location. Density requirements at this stage are indicative. Actual densities will be determined at the planning application stage based on the individual merits of the scheme that will come forward.</p>

Response Reference: U0001659
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06315/1
Name: Thakeham Homes
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Considers that the DPD is not legally compliant, is not sound and fails to comply with the Duty to Cooperate.</p> <p>Considers that the housing allocations in the DPD are not sufficient in quantum and scale, are therefore not compatible with the Adopted Core Strategy and have not been drafted in the spirit of the NPPF.</p> <p>The NPPF requires councils to support the Government's objective of 'significantly boosting the supply of homes'. Paragraph 67 affirms the importance of the plan-led system and the need for Local Plans to deliver the full, objectively assessed housing needs of their areas.</p> <p>Woking's Core Strategy sets an annual housing requirement of 292 dwellings per annum, which is below objectively assessed housing need due to local constraints. However, in September 2017, DCLG published its consultation on the new standardised methodology for calculating OAN. Woking's need was calculated as 409 units per annum, not taking into consideration unmet need with the HMA. It is therefore considered that additional sites be identified for housing within the DPD to ensure that while a new Local Plan is being progressed, the Site Allocations DPD provides sufficient flexibility to deliver the level of housing required within the borough.</p> <p>The NPPF states that in order for a site to be allocated in a Local Plan, it must stand a reasonable chance of becoming available. In accordance with paragraph 66 of the NPPF, to be considered developable sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. It is noted that a number of sites in the DPD are home to operational businesses and that their availability is subject to those businesses moving or being relocated.</p> <p>The DPD is unsound as it has not been positively prepared to deliver the objectively assessed housing needs of the Borough as required by national planning policy.</p> <p>Does not wish to participate at the public examination and does wish to be informed when the DPD progresses to the next stages.</p>
<p>Contributor Proposed Modification: Additional sites should be identified for housing with the Site Allocations DPD to ensure that while a new Local Plan is being progressed, the Site Allocations DPD provides sufficient flexibility to deliver the required level of housing within the district.</p> <p>The Council should go further in justifying the inclusion of sites that are currently home to operational businesses and show no signs of availability. Where their availability cannot be clearly demonstrated, they should not be included in the Site Allocations DPD.</p>
Modification Reference: U0000217
<p>Officer Response: The Council has an up to date Core Strategy to set the strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. In accordance with Section 6 of the Core Strategy, the Council is committed to the comprehensive delivery of the requirements of the Core Strategy and the preparation of the Site Allocations DPD is a key means to achieving this objective.</p>

The Site Allocations DPD has a clear purpose set out in the Core Strategy to identify specific sites to enable the delivery of the Core Strategy. Policies CS1 (A spatial strategy for Woking Borough), CS2 (Woking Town Centre), Policy CS6 (Green Belt), Policy CS10 (Housing provision and distribution) and Section 6 (Monitoring and implementation) of the Core Strategy all highlights the role of the Site Allocations DPD to identify sites to enable the delivery of the Core Strategy. Previous Local Development Schemes also highlight the distinct purpose of the Site Allocations DPD. The Site Allocations DPD has been prepared to meet this objective by identifying sufficient land to enable the delivery of the Core Strategy. In accordance with paragraph 139 of the NPPF, the DPD goes further and safeguards land to meet future development needs beyond this plan period to ensure the enduring permanence of the Green Belt boundary.

It would be simplistic and bad planning for the Site Allocations DPD to allocate further land for development to meet Woking's objectively assessed housing need up to 2027. It is highlighted that it is not the purpose of the Site Allocations DPD to determine the housing requirement for the Borough. That is the distinct purpose of the Core Strategy. Paragraph 20 of the NPPF clarifies the role of strategic policies. Strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement of the natural, built and historic environment. It would be wrong to expect non-strategic policies in the Site Allocations DPD to be performing the role of the Core Strategy by planning for a higher housing requirement.

The development requirements of the Core Strategy, including the housing requirement have been identified in an integrated manner and justified by a significant body of evidence base studies. These include an Infrastructure Delivery Plan, Employment Land Review and an Employment Topic Paper. The studies have informed the necessary scale and type of infrastructure and economic growth necessary to support and align with the expected quantum of housing growth. To allocate land to meet the objectively assessed need up to 2027 without due regard and a corresponding review of office floorspace, warehouse floorspace, retail floorspace and the necessary infrastructure to align with the revised housing requirement would at best be irresponsible, overly simplistic and ill conceived. It would undermine the overall purpose of the plan-led system to plan in a holistic manner and would also undermine the sustainable development of the Borough, which is the overall aim of national policy.

Sites allocated by the DPD are either considered deliverable in the next 5 years or developable in 6-10 years. This is in accordance with the SHLAA methodology, the credibility of which is outlined in Paragraph 11.7 of the Regulation 19 Issues and Matters Topic Paper.

Response Reference: U0001190

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 02721/2

Name: Thames Water

Number of Signatories: 1

Comment Type: COMM

Site Reference: GB10, GB11, GB12, GB13, GB14, GB15, GB17, UA14, UA32, UA40, UA44

Summary of Comment: Refers to national planning policy which seeks to ensure joint working with infrastructure providers, including wastewater/sewerage (and water supply) infrastructure providers. Water and sewerage/wastewater investment plans should align with development needs. Recommends the DPD includes specific reference to provision of this infrastructure to service development proposed in a policy.

Provides a table setting out specific comments for each proposal site, although more detailed modelling may be required to refine the requirements. The table identifies sites where infrastructure is likely to be required, and where early engagement by developers with Thames Water would be beneficial. Local upgrades to existing drainage infrastructure may be required, and therefore a detailed drainage strategy should be submitted with any planning application. These sites include: GB10, GB11, GB12, GB13, GB14, GB15, UA14, UA32, UA40, UA44. With respects to UA44, an indication of the location, type and scale of development together with anticipated timings of delivery would be useful for Thames Water to make a detailed assessment of the impacts on wastewater infrastructure.

Stresses that planning conditions may be necessary to ensure infrastructure is in place ahead of occupation of any development. Sets out common timeframes for connection to existing infrastructure, and/or upgrading of existing infrastructure to serve development. Supports key requirement in GB17 on Woking Palace that the detailed design and site layout should take into account proximity of sewage works. However, where development is proposed within 800m of the works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. This would establish whether amenity and health will be adversely affected by the sewage works as per paragraphs 176 and 180 of the NPPF, and whether a buffer will be required. Suggests new text to include in policy GB17.

Contributor Proposed Modification: We recommend the DPD include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

"Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."

"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

"The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised." Policy GB17 should include reference to the requirement for an odour impact assessment - particularly if development is within 800m of the sewage works. For example: "When considering sensitive development close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided."

Detailed drainage strategies should be submitted with planning applications for development at the following sites: GB10, GB11, GB12, GB13, GB14, GB15, UA14, UA32, UA40, UA44. With respects to UA44, an indication of the location, type and scale of development together with anticipated timings of delivery would be useful for Thames Water to make a detailed assessment of the impacts on wastewater infrastructure.

Modification Reference: U0000318

Officer Response: The Thames Water AMP5 (2010-15) had informed the Core Strategy. The Core Strategy contains policy CS16 which will ensure an effective integration of proposed development and the infrastructure to support it. It is stressed that it will be necessary in some cases to require developers to put in place the necessary infrastructure before development commences. Representations made by Thames Water in response to the Regulation 18 consultation have also been taken into account, and robust wording was incorporated in the DPD to make sure that the wastewater and sewerage infrastructure needs of development are fully assessed and where necessary mitigation provided as part of the planning application process.

The Site Allocations DPD introductory text contains a section on Infrastructure. A paragraph within this section highlights that specific infrastructure needs to support the development proposals are set out in the Infrastructure Delivery Plan (IDP). The Council worked with Thames Water to produce the section of the IDP on waste water, which stresses that developers engage with Thames Water early to establish a development's demand for wastewater infrastructure and identify capacity constraints (see paragraph 13.99 of the IDP). The IDP also lists the sites that Thames Water warned may have insufficient wastewater network capacity. In recognition of the fact that the proposal sites have changed since the publication of the IDP, and in order to ensure wastewater infrastructure is sufficiently accounted for in order to support sites where wastewater network capacity has been identified by Thames Water as a potential issue, it is reasonable to require as a key requirement under relevant site allocation policies the need to consult with Thames Water on wastewater infrastructure capability and drainage strategy.

The Council do not believe the uses proposed for sites GB12, GB13, GB14 and GB15 warrant the need for wastewater infrastructure improvements. These sites are proposed for Suitable Alternative Natural Greenspace, which would not generate a need for local upgrades to the existing drainage infrastructure.

Policy GB17 contains a key requirement that development must address: 'Detailed design and site layout to take into account proximity of sewerage works. Discussions with operators of the site (Thames Water) are recommended'. It is considered reasonable to strengthen this requirement as per Thames Water's suggested text in order to ensure development is acceptable and is in accordance with national planning policy.

With these additional changes, the Council is satisfied that wastewater and sewerage issues are adequately accounted for in the draft DPD (as required by the NPPF and Planning Practice Guidance), and will be addressed effectively at the planning application stage.

Response Reference: U0001376

Officer Proposed Modification: A key requirement should be added to proposals UA14, UA32, UA40, UA44, GB10, and GB11 to read as follows: Early assessment has identified potential wastewater network capacity constraints in this area. Early consultation with the statutory water and sewerage undertaker for Woking is recommended to determine the impact of development on the wastewater network, and whether a detailed drainage strategy should be submitted with a planning application.

The key requirement under policy GB17 requiring liaison with Thames Water to take into account proximity of the sewerage works should be amended to read as follows: Detailed design and site layout to take into account proximity of the sewerage works. Discussions with the operators of the site (Thames Water) are recommended. A Technical Assessment should be undertaken in consultation with Thames Water which should establish whether amenity of future users will be adversely affected by the sewage works and identify appropriate mitigation measures to address any adverse impacts.

Wishes to Attend Examination (T = Tick):**Contributor Reference:** 04962/2

Name: Thameswey Group
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB01, GB02, UA14, UA17, UA18, UA26
<p>Summary of Comment: Considers the DPD to be unsound, but is legally compliant and complies with duty to cooperate. Does not wish to participate in the examination and wishes to be informed of the next stages of the DPD.</p> <p>UA17 and UA18 - the allocations require minor amendments to take account of recent planning applications and proposals. Both UA17 and UA18 are in one ownership and will be coming forward in one development, and the allocation should be amended to reflect this position. Requests that these allocations be combined. Modifications proposed.</p> <p>UA26 - the proposed allocation requires minor amendments to take account of recent planning applications and proposals. Modifications proposed.</p> <p>GB1- The proposed allocation is supported but requires minor amendments to take account of recent planning applications and proposals. Considers the land should come forward before 2022. Modifications proposed.</p> <p>GB2 - The proposed allocation requires minor amendments to take account of recent planning applications and proposals. Considers the land should come forward before 2022, and that it may be suitable for more than 6 pitches. Modifications proposed.</p> <p>UA14 - The proposed allocation requires minor amendments to take account of recent planning applications and proposals. Modifications proposed.</p>
<p>Contributor Proposed Modification: Both UA17 and UA18 are in one ownership and will be coming forward in one development, and the allocation should be amended to reflect this position. These allocations should be combined, and include more specific reference to residential development in a mixed use comprehensive scheme.</p> <p>The allocation currently states: 'Any other site specific and other requirements will be determined on a case by case basis depending on the nature of the scheme that would come forward'. The text should state that proposals which include residential uses will be considered acceptable where justification is provided, which may include schemes where employment generating floorspace is provided within a mixed use scheme, or justification that a fully residential scheme is appropriate in cases where the development of employment generating uses are unlikely to come forward within the Local Plan timeframe.</p> <p>UA26 - additional clarification to the text is required to reflect recent proposals in Woking that have implications on the site:</p> <ol style="list-style-type: none"> 1. The allocation refers to the specific need for family accommodation (2+ bedrooms) in the area. However, due to the proposals at Sheerwater which include significant family housing, the need may include a wider range of homes, so it is requested that the wording is changed to the following: 'specific need for housing appropriate to the needs of the Borough'. 2. The draft allocation states that there should be 'No net loss of office floorspace'. However, the existing office building at 121 Chertsey Road has been vacant for several years through lack of demand. It is proposed that the above be deleted and the following inserted: 'Any loss of office floorspace should be justified by way of appropriate reports submitted with relevant planning applications'. <p>GB1 - it should be noted in the allocation that the site may come forward before 2022, subject to detailed consideration in a planning application.</p> <p>UA14 - additional clarification to the text is required in response to recent proposals on a site within the Estate. The following text should be more explicit to reflect the recent planning application on the Format House/9 Poole Road site which included residential accommodation on the upper floors: 'Any other site specific and other requirements will be determined on a case by case basis depending on the nature of the scheme that would</p>

come forward'. The text should state that proposals which include residential uses will be considered acceptable where justification is provided, which may include schemes where employment generating floorspace is provided within a mixed use scheme; or justification that a fully residential scheme is appropriate in cases where employment generating uses are unlikely to come forward within the Local Plan timeframe.

GB2 - it should be noted in the allocation that the site may come forward before 2022, subject to detailed consideration in a planning application. Subject to detailed design, the land may be suitable for more than the 6 pitches proposed in the allocation, and this should be reflected in the text.

Modification Reference: U0000490

Officer Response: The sites UA17 and UA18 can come forward individually and be developed independently and as such the Council does not consider it necessary to combine the allocations. However, each of the allocations accommodates the potential scope for the two sites to be developed comprehensively (see the third to last bullet points of each of the key requirements). The Council will encourage this through pre-application discussion, but will not object in principle to the sites coming forward separately. The Planning application submitted ref. PLAN/2018/0660 has yet to be granted Planning Permission, therefore limited weight can be afforded to it. If and when the Planning application is granted approval, the site allocations DPD will take account of that. The sites are currently occupied by two office buildings with a total of 2,324m² between them. The Employment Land Review 2010 found that both sites are of a quality that makes them worth retaining in employment use, and have scope for intensification of use. The development sites are proposed for two office allocations and will help deliver a significant proportion of the office element of Policy CS2 target. The Council considers the wording for the Policy is appropriate and reflects the requirements of the Core Strategy for office floorspace. If a mixed-use scheme is to come forward that incorporates the employment objectives for the site, the Council will consider the proposal on its own merits.

With regards to UA26, the latest assessed housing need across the West Surrey Housing Market Area is for 20% 1 bed, 30% 2 bed, 35% 3 bed and 15% 4 bed dwellings. Therefore the Council considers the wording for the Policy is appropriate and reflects the current need for family accommodation in the Borough. Policy CS11 of the Core Strategy emphasises that the appropriate percentage of different housing types and sizes for each site will depend upon the established character and density of the neighbourhood and the viability of the scheme. This can be addressed as part of the planning application process.

The Site Allocations DPD does not rule out comprehensive redevelopment of the proposed allocation site UA26. Any such planning application would be determined on its own merits, including any case backed by evidence for the loss of office floorspace. However, Policy CS15 of the Core Strategy seeks to redevelop outmoded employment floorspace to cater for modern business needs, and to contribute towards future growth in economic development as envisaged in the Core Strategy. In this regard, site allocation policy UA26 seek to retain office uses, and the Council does not intend to modify this policy.

The representation regarding GB1 and GB2 and amending the time restrictions for releasing Green Belt land for development would be at odds with the spatial strategy for the Core Strategy. The timing for the release of Green Belt land is prescribed by Policies CS1 and CS6 of the Core Strategy. They require land to be released from the Green Belt to meet housing need between 2022 and 2027. This is necessary to ensure that most new development is focused on previously development land in the urban area which offers the best access to a range of services and facilities, in line with the objective of sustainable development. Policy SA1 of the Site Allocations DPD is drafted to be in general conformity with this objective. The Site Allocations DPD clearly demonstrates that sufficient land has been identified on previously developed land in the urban area to meet development

needs up to 2022. The request to amend the time restrictions on the release of Green Belt land is therefore not justified and unacceptable.

The Council takes the view that the proposed anticipated densities are reasonable and are broadly in line with the Core Strategy. It is always emphasised that the proposed densities are indicative and actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. The current Planning applications are pending and have yet to be granted Planning Permission, therefore limited weight can be afforded to them until they have the benefit of planning approval.

With regards to policy UA14, the Site Allocations DPD does not rule out comprehensive redevelopment of proposed allocation site. Any such planning application would be determined on its own merits, including any application of incorporating residential uses by the applicant. The proposed development is located within a designated Employment Area 'Butts Road/Poole Road'. Policy CS15 of the Core Strategy safeguards land within employment areas for B uses except in the Butts Road/Poole Road employment area where redevelopment for mixed office and residential use will be supported if it does not result in an overall loss of employment floorspace.

To reflect requirements of policy CS15 a minor modification is proposed to expand the uses on site UA14 to include an element of residential use, on the proviso that it will not lead to an overall loss of employment floorspace at the site.

Response Reference: U0001787

Officer Proposed Modification: Amend policy UA14 to read: 'This 1.56ha site is allocated for mixed use development to comprise of offices, warehousing, and a new energy station. An element of residential use, including Affordable Housing, will be supported if it does not result in an overall loss of employment floorspace.'

Add the following key requirements to policy UA14:

- If a residential element is proposed, a contribution towards infrastructure provision via the Community Infrastructure Levy as well as a Strategic Access Management and Monitoring contribution to mitigate the impacts of residential development of the site on the Thames Basin Heaths Special Protection Area.
- If a residential element is proposed, a contribution towards Affordable Housing provision in accordance with Policy CS12: Affordable Housing of the Core Strategy.

Amend the following key requirement on p89 of the DPD to read:

- "Building(s) should be designed to be adaptable or capable of being adaptable to allow scope for changes to be made to meet the needs of the occupier(s); any residential element of the scheme should incorporate 'Optional requirement M4(2): Category 2 - Accessible and adaptable dwellings' where practical and viable".

Insert an additional sentence under paragraph 2 of the reasoned justification to read: 'In accordance with policy CS15 of the Core Strategy on Sustainable economic development, a redevelopment proposal which includes an element of residential use will be supported if it does not result in an overall loss of employment floorspace.'

Wishes to Attend Examination (T = Tick):

Contributor Reference: 01712/2

Name: Mr Richard Thomas

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB11, GB12

Summary of Comment: Agree with all the issues raised by the West Byfleet Neighbourhood Forum and Byfleet, West Byfleet and Pyrford Residents Association. The document has been delayed by horse-trading, which has resulted in proposals to dump too much housing on West Byfleet, with little or no rationale other than lobbying by the rest of the Borough.

It is madness to put 15 permanent pitches next to some of the finest residential homes.

<p>The infrastructure cannot take these homes, considering the Sheer House and Broadoaks proposals. Parvis Road is often saturated; the health centre is always busy and schools are at capacity, increasing their size would reduce teaching quality. The process is unsound, with six weeks (before Christmas) to respond.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The issues raised by other organisations are addressed under the responses to those organisations' representations. The concentration of Green Belt loss in Byfleet and West Byfleet, and the process followed by committees and Full Council, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 5 and 24. Disagree that permanent Gypsy and Traveller pitches are incompatible with existing housing. The impact of the proposals on local infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. Information on development at Broadoaks and Sheer House was incorporated into the transport evidence base and provided to infrastructure providers to inform their plans. The adequacy of the consultation process is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 9.</p>
<p>Response Reference: U0001127</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 01191/2</p>
<p>Name: Mr David Thompson</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: COMM</p>
<p>Site Reference: RG18GB12, RG18GB13</p>
<p>Summary of Comment: Supports the decision not to safeguard previously proposed sites in the Green Belt at Pyrford. The earlier recommendations, proposals and reasons for safeguarding these sites are wrong.</p>
<p>Contributor Proposed Modification: The Council had previously proposed removing the above two fields in Pyrford from the Green Belt so that they could be used for residential development - therefore it might reasonably appear that the fields are simply being left alone because they are not needed at present rather than they are not suitable. Accordingly I believe that the Council needs to incorporate a statement unequivocally and without reservation that the two fields in Upshot Lane are an ESSENTIAL PART OF THE GREEN BELT and thus not suitable for any development purposes be it residential or commercial.</p>
<p>Modification Reference: U0000119</p>
<p>Officer Response: Support noted. Making a specific statement in the DPD that the formerly proposed Pyrford sites are not suitable for residential or commercial development is neither necessary, since this position is implicit in the fact of their retention in the Green Belt and is specifically justified by the evidence that supports the Plan, nor appropriate, since similar statements are not made in the DPD about any other sites.</p>
<p>Response Reference: U0000893</p>

Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 02632/2

Name: Ms Genevieve Thompson

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB07, GB09

Summary of Comment: Welcomes the exclusion of sites north of Saunders Lane from the DPD.

Objects to the release of sites GB9 and 20g from the Greenbelt because:

1. the justification for the release of GB9 is inaccurate - it will not form an isolated pocket of green belt as it is a continuation of the rising ground of landscape significance along the Hook Heath escarpment.
2. GB9 can fulfil the function of green infrastructure whilst remaining in the green belt.
3. lack of reasoning for removing 20g - as in point 1, 20g, adjoining GB9, is a continuation of the corridor along the escarpment.

Objects to release of GB7 from Greenbelt - it can fulfil the function of green infrastructure and forms a gap between Woking and Mayford whilst remaining in the Greenbelt.

Contributor Proposed Modification: Retain sites GB7 and GB9 and site reference 20g in Green Belt.

Modification Reference: U0000441

Officer Response: Given that sites GB7 and GB8 are proposed to be released from the Green Belt. It is also necessary that GB9 is released from the Green Belt to ensure a strong, defensible Green Belt boundary in the future. It is agreed that the site is situated at a high point of the Escarpment of rising ground of landscape importance, and that it is likely to be unsuitable for built development. The Site Allocations DPD therefore proposes that the land is safeguarded for Green Infrastructure use to meet long-term Green Infrastructure needs.

It is agreed that the policy could be improved regarding intentions for site WGB020g to the north of site GB9. A modification has been proposed to make the policy clearer. If WGB020g were not released from the Green Belt along with the land to the south within GB9, it would create a pocket of isolated Green Belt land. This also applies to the land at the north of site GB7 - if only land to the south of the school were released from the Green Belt for development, it would leave an isolated pocket of Green Belt land making up the 'separation gap'. Policy GB7 makes it clear that the area of separation (hatched on the proposals map) is not for built development and will be protected by policies in the Development Plan.

Response Reference: U0001646

Officer Proposed Modification: Modify policy GB9 and its reasoned justification to better reflect intentions for site WGB020g. Extend site GB9 northwards to include site WGB020g, to make it part of the safeguarded land. Amend maps on pages 273 and 274 accordingly, and amend Proposals Map. Amend second paragraph to read: "This site will only be released for development as part of the review of the Core Strategy and/or the Site Allocations DPD. The northern part of the site, which is hatched on the Location Plan, is not intended for the purposes of Green Infrastructure as it contains residential properties. Until the site is released for development between 2027 and 2040, any development of the site will have to comply with the Green Belt policies of the development plan." Replace last paragraph of the RJ with: "The entire site, including the area hatched on the Location Plan, is safeguarded for future green infrastructure needs between 2027 and 2040, in accordance with Policy SA1. However, it is acknowledge that

the hatched area of the site contains residential properties that will not be developed as Green Infrastructure. This part of the site is included as part of the safeguarding policy to ensure a defensible Green Belt boundary. Until between 2027 and 2040 when the site is intended to be released for development, it is expected that the development of any part of the site will have to comply with the Green Belt policies of the development plan. A specific policy and key requirements to guide the development of any part of the site will be determined as part of the review of the Core Strategy and/or the Site Allocations DPD." Insert a new bullet point under the heading 'Safeguarded Sites' in policy SA1 to refer to 'Land adjacent to Hook Hill Lane, Hook Heath, Woking (Proposal Site GB9).

Wishes to Attend Examination (T = Tick):

Contributor Reference: 00706/3
Name: Mrs Roberta Tilley
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Object to site GB10: The site is Green Belt The site is adjacent to Parvis Road which is presently congested, and is subject to further pressures from other sites nearby Schools, health, water, sewage etc. are subject to further pressures from several sites, which will necessitate massive investment This site should be removed and more consideration given to spreading sites more widely around the Borough, and to developing on golf courses, several of which are struggling to maintain membership.
Contributor Proposed Modification: The sites to be taken out of Green Belt should be more widely spread throughout Woking borough and this major site in West Byfleet removed. Remove site GB10.
Modification Reference: U0000272
Officer Response: The traffic impact of the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. Other sites nearby including Broadoaks and Sheer House were included in the traffic mitigation evidence base, and also provided to inform the planning of infrastructure providers. The impact of the proposals on infrastructure is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The concentration of Green Belt loss on Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. All but one of Woking's golf courses are in the Green Belt, and as such their suitability for removal from the Green Belt was tested through the Green Belt Boundary Review. Unlike the allocated and safeguarded sites, none of the golf courses was considered suitable for Green Belt removal. The case of the New Zealand Golf Course (part of the formerly proposed Martyrs Lane site) is addressed by the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11.
Response Reference: U0001197
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06910/1
Name: Mr Robert Tilley
Number of Signatories: 1
Comment Type: COMM

Site Reference:
Summary of Comment: DPD is legally compliant, sound and complies with Duty to Cooperate. In spite of the DPD being legally compliant, it has failed to consider golf courses for development. Golf is an expensive minority sport, and the courses are an excessive waste of valuable development sites. None of the golf courses are in the flood plain. West Byfleet and New Zealand golf courses are close to services and amenities, furthermore West Byfleet golf course is not in the Green Belt. These courses should have been considered.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Green Belt Boundary Review undertaken for the borough identified numerous parcels of land covering golf courses, however it was concluded that these sites were unsuitable in terms of environmental constraints, sustainability, capacity for change and the current function in which is served. Allocating golf courses for development would also undermine the objectives of Policy CS17 of the Core Strategy, as development of these sites would have resulted in the loss of the land for sport and recreation.
Response Reference: U0001246
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06701/1
Name: Miss Beverley Tourle
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: The proposed release of green belt sites for this plan period is fundamentally unsound, as the need for their release has not been demonstrated. According to the SHLAA and housing completions studies there is no demonstrated need for greenbelt release sites in the 1-5 and 5-10 year period. The failure to consider the most recent SHLAA background evidence makes the DPD unsound. The SHLAA demonstrates that there are sufficient brownfield sites to meet housing targets in the Core Strategy. If density of development is optimised as per Chapter 11 of the NPPF, then green belt land is not required. Taking into account consented development due to be delivered, there will be a surplus of 964 units on the proposed urban allocated land for the plan period. A detailed critique has been provided explaining the lack of need. 1. If there was a demonstrated need for green belt release in accordance with the NPPF's sequential preference for urban land to be developed prior to the release of greenbelt land then GB10 should not be included in the sites to be allocated. GB10's deliverability in the short to medium term is questionable given the sites designation in the Surrey Mineral Plan as a safeguarded site until 2027. The site is also identified as requiring considerably more mitigations before it will be deemed not to cause harm than sites GB1, GB2, GB4, GB5 and GB7. These include mitigations against landscape impacts (GB10 land is particularly sensitive to change); highways impacts; heritage assets impacts (e.g. locally listed buildings at West Hall and Broadoaks and the Wey Navigation Conservation Area); contamination remediation; and impacts on future minerals resources supply. Detailed site specific considerations are provided. Some of the GB10 policy aims rely on third party agreement. These factors undermine the deliverability of site GB10 in the plan period.

2. The release of the smaller sites would provide greater flexibility and delivering the most sustainable development possible. The release of GB10 in the plan period would be contrary to the presumption in favour of sustainable development

3. GB10's actual accessibility by sustainable modes of travel, rather than perceived access, to goods and services is not demonstrably better than that of GB1, GB4, GB5 and GB7. The shape of the site is irregular - the actual sustainable mode travel distances are inaccurate. There is no pedestrian access to Dodd's Crescent in the west, nor are the owners of Broadoaks likely to grant access over their land. Walking distances to the railway station will be around 1.6km / 20 minutes, causing people to drive.

4. The release of GB10 in the plan period, whilst there are two other significant developments delivering circa 500 units with West Byfleet, will result in harmful highways and amenity impacts and there will be unsustainable pressure on the existing social infrastructure, especially local schools.

The site is no more sustainable than GB1, GB4, GB7 and is noted as being more sensitive in landscape terms and as having a less well defined boundary to prevent urban sprawl than the other sites. Its release would undermine the purpose of the green belt more than the release of some of the safeguarded sites.

Redevelopment of West Byfleet centre should be considered. In the short-medium term with the regeneration of Shere House there will be major highways disruption and limited access to goods and services. In addition to the Broadoaks site, this amount of development will put strain on social infrastructure, especially local schools.

The release of green belt land in this plan period is premature and fails to meet the tests of being sustainable, justified and in accordance with the NPPF which requires exceptional circumstances (including housing need) to be demonstrated before any green belt release. Should there be a need justification then it is respectfully requested that GB10 removed from the green belt allocations for the plan period as its inclusion renders the Site Allocation DPD unsound on the grounds that it would fail to meet the 5 tests of soundness. Supports the release of GB1 and GB7 if a housing need case exists (details are provided as to why they are sequentially preferable); objects to the safeguarding of GB4 and GB5 over the release of GB10 as they are more sustainable with fewer constraints. GB2 better meets the criteria for traveller pitches than GB10. GB1, GB2 and GB7 would have the potential to deliver 183 dwellings and travellers pitches where a need can be justified. Should it be concluded that further release is justified, GB4 and GB5 should be released in advance of GB10 as they make a lesser contribution towards the purposes of the green belt.

GB10's release in the plan period is not a sustainable development option; its release is not "justified" taking account of all reasonable alternatives; its release is not "effective" as its designations and site specific characteristics suggest that it will not be deliverable over the plan period; and its release would not be consistent with the National Planning Policy guidance on housing supply, green belt release or neighbourhood plan aims and policies.

Contributor Proposed Modification: If the Authority demonstrates a justified need for green belt release in accordance with the NPPF's sequential test, GB10 should not be included in the sites to be allocated. Sites GB1, GB2 and GB7 should be allocated in the plan period in preference.

Should the Authority be able to justify further release then it is submitted that sites GB4 and GB5 be allocated for release in advance of GB10 as they make lesser contribution to the purposes of the green belt than GB10. They are also subject to fewer constraints. GB2 is a more appropriate site than GB10 for traveller pitches, and better meets the criteria. GB1, GB2, GB4, GB5 and GB7 would more readily and flexibly deliver houses and traveller pitches if there is a need.

Modification Reference: U0000334

Officer Response: The concerns raised in the representation are comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Sections 1 and

2 provide detailed justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. This sets out how the Council has taken into account the latest evidence, including the 2017 SHLAA and SHMA, and at paragraphs 1.7-1.8 responds to the belief that there are adequate previously developed sites to meet housing need to 2027. Reference on page 18 of the DPD to the 2014 SHLAA being the latest published document was correct at the time of publication of the DPD; it is proposed that this be modified in future iterations of the DPD to refer to the updated SHLAA. It should be noted, however, that emerging 2017 SHLAA evidence was taken into account in the Regulation 19 draft of the DPD. Paragraph 1.9 details how the exceptional circumstances case to identify Green Belt as the future direction of growth to release land for housing development between 2022 and 2027 has been established through the in-principle policies of CS6 and CS10 in the Core Strategy, and that up to date evidence in the SHLAA does not provide any significant new evidence that would lead the Council to change this policy approach. Section 1 also describes how the Council is satisfied that the proposals in the DPD to release Green Belt land can withstand scrutiny at an Examination.

The objections to the release of site GB10 ahead of sites GB4 and GB5, and others, are noted. The Council has considered various permutations of Green Belt site allocation options to deliver homes up to 2027, and which should be safeguarded for the future. In coming to its final spatial strategy presented in the Site Allocations DPD, the Council has taken into account the evidence in the GBBR (in particular Section 6 on Options for Development); along with other evidence such as the outcomes of the Sustainability Appraisal, and evidence around availability, suitability and deliverability of sites. Paragraph 6.2.6 of the GBBR states that if the Council wishes to give priority to the most sustainable location for new development, then option 3 (i.e. bringing forward parcel 4 within which site GB10 is situated) would seem to be the most appropriate. Land at West Hall is within close proximity to the Borough's second largest centre - the District Centre - with all its facilities and services. The comprehensive development of one large site also brings opportunities to provide facilities as part of the development; as well as delivery of a similar number of dwellings anticipated in policy CS10 of the Core Strategy. It is considered that the urban area and Green Belt proposal sites presented in the DPD will, together with continuing delivery from sites of fewer than 10 dwellings, ensure sufficient contingency to cover the risk of non-implementation and ensure the comprehensive delivery of the Core Strategy housing and affordable housing requirements. The concerns about accessibility to the station and propensity to walk are noted. Both the GBBR and Sustainability Appraisal used Geographical Information Systems to determine distances from the approximate centre of each site. The appraisal of the site found accessibility to local facilities and services to be moderate, but was within walking distance to several key facilities including recreation space, a primary school, the church and a community centre. The site is considered to be within suitable cycling distance of all facilities within the District Centre, including the railway station. Development of the site also brings an opportunity to improve accessibility to the Centre via improved footpaths, cycle links and bus services. This has been reflected in the key requirements within the policy, which requires a detailed Transport Assessment and Travel Plan to be submitted with any planning application. This is also only one indicator of sustainability, and both the GBBR and Sustainability Appraisal considered the overall sustainability of the site to be high. The redevelopment of Sheer House and highways disruption that this may cause during construction is considered to be only temporary, and in the longterm will result in a District Centre that will even better serve prospective residents of land at GB10. Concerns regarding infrastructure provision are addressed in Section 6 of the Topic Paper. Section 3 of the Topic Paper describes in detail how a sequential approach was taken in identifying suitable sites for pitches, with the urban area being considered before land in the Green Belt. Paragraph 3.8 goes into detail about how specific sites were preferred, and paragraph 3.10 addresses concerns about how the impacts in terms of viability and

deliverability of housing on site GB10 will be minimised with appropriate siting, layout and design of traveller pitches.

Section 17 of the Topic Paper addresses concerns about the conflict with Surrey County Council's Minerals Plan. Section 16 addresses concerns regarding conflicts with the West Byfleet Neighbourhood Plan. Site GB10 was thoroughly appraised for sustainability within the Sustainability Appraisal, and also within the GBBR. The site specific considerations flagged in the representation were all thoroughly appraised in both the Sustainability Appraisal and the GBBR, including the distinctive character and wildlife value of the River Wey, the potential highway impacts; heritage assets and their setting; valuable green infrastructure assets; contamination; proximity to local facilities and services; and existing constraints such as minerals safeguarded areas. All of these issues have helped shaped the key requirements of policy GB10 that will help make any development proposal acceptable. This includes making sure that site specific matters such as biodiversity, heritage settings and landscape character are fully assessed and where necessary mitigation measures identified to address adverse impacts. The requirements will also ensure that the siting, layout and design of development on the site, as well as incorporation of significant areas of green infrastructure, minimise any adverse impacts on the landscape setting of the area. The Council is satisfied that the site can be developed for the proposed uses without significant damage to surrounding heritage assets and landscape character. This conclusion is supported by the available evidence. It is also worth noting that none of the relevant environmental and conservation bodies such as Natural England or Historic England have objected to the use of the site on the basis of its potential significant impacts on sensitive and historic landscapes.

Response Reference: U0001738

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06832/1

Name: Mr And Mrs Towner

Number of Signatories: 2

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11, GB12, GB18

Summary of Comment: Residents of one of original Stable Cottages at West Hall. Strongly object to GB10 and building on any of the Green Belt land in Byfleet and West Byfleet.

1. Development at GB10 would reduce greenspace and trees that should be protected, and associated wildlife. The site is of local historical interest. This would be lost to the community forever.
2. The site is a slice of countryside set amidst a busy area and should be protected for those visiting elderly residents at the Care Home, dropping children off at the Busy Bees nursery and those living at the four cottages of the Stables buildings. Traveller pitches and mass-produced houses would be at odds with the unique location.
3. The site is prone to heavy flooding. The flood plain is unsuitable for development. All of the proposed Green Belt sites in the area are vulnerable to flooding.
4. The small track road that circles the West Hall estate from Parvis Road is unsuitable for greater vehicle traffic, including Traveller caravans. A new access road would be required, although this would increase traffic on an already busy Parvis Road. The A245 will not cope with 1000 houses and 21 traveller pitches concentrated in this area.
5. Development at West Hall would displace horses and horse owners.
6. The Green Belt along Parvis Road breaks up the otherwise dull built-up landscape. Development at Broadoaks and West Hall will diminish this benefit. Green Belt is being

disproportionately lost in Byfleet and West Byfleet - the load should be spread e.g. to Pyrford and Martyrs Lane areas. The sites in Byfleet and West Byfleet should have been ruled out for the same reasons. Lack of equity.

7. Infrastructure such as schools and healthcare facilities are overstretched and will not be able to accommodate over 2000 new residents.

8. The school fields and St Mary's Church fields are of significant use to the local community and should be maintained for community use.

9. Using Green Belt land should be a last resort. It acts as a buffer to the traffic and built-up areas surrounding it. It should be preserved and protected, and used as a last resort after all brownfield sites have been considered. Other local Green Belt sites should also be considered more equitably.

Contributor Proposed Modification: Consider brownfield sites ahead of Green Belt sites.
 Spread development more evenly across the Borough, and identify Green Belt sites in other areas.
 Retain school fields and St Mary's Church land for community use.

Modification Reference: U0000280

Officer Response: The Council is committed to conserving important sites and habitats of the Borough, to the improvement of green spaces and biodiversity through new development. This is set out in detail in Section 19 of the Council's Regulation 19 Issues and Matters Topic Paper, including the planning policies that any scheme at West Hall would need to comply with which aim to conserve protected trees and biodiversity assets. The Council acknowledges that only exceptional circumstances should allow for the release of Green Belt land for housing, and Sections 1 and 2 of the Topic Paper explain in detail why the Council believes these exist for the West Hall site. The landscape sensitivity of the site is recognised in the Site Allocations DPD, which emphasises that any development scheme should integrate sufficient green infrastructure and landscaping to provide a buffer between the site and the adjoining Green Belt. The adjoining Green Belt refers to the wedge of land between the eastern boundary of the site and the River Wey and M25. Any new development within the site should therefore be buffered from existing development (including the converted stable cottages, offices, care home and nursery) by strong landscape buffers. The key requirements of policy GB10, as well as other policies in the Development Plan such as CS21 on design and CS24 on landscape, require development proposals to retain large areas of woodland and parkland; to achieve suitable densities; to deliver strong landscape edges; take regard of locally listed heritage assets and their setting; retain protected trees and tree belts; and provide new and improved green infrastructure to avoid significant adverse impacts on the character of the area and enhance the setting of the development. The proposed allocations include a list of key requirements to be met to make the development of Traveller sites acceptable, which include ensuring the siting, layout and design of the site minimises any adverse impacts on the amenity of nearby residents and the landscape setting of the area - this is explained in detail in Section 3 of the Topic Paper. The Council accepts that any land taken out of the Green Belt will lead to a reduction in the total amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. This concern is addressed in detail in Section 4 of the Topic Paper.

The concern raised regarding flooding is addressed in Section 7 of the Topic Paper. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward. These assessments would need to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation.

Details of any access arrangements will be determined as part of the development management process, at the pre-application and application stage. In all sites identified,

the Council is confident that suitable and safe access can be provided. This will be determined on a case-by-case basis and it will be affected by the layout and configuration of the site, and landscape issues. Surrey County Council has also provided the Council with informal advice on access arrangements to sites. Development proposals will need to submit detailed Transport Assessments to make sure the development impacts are fully assessed - including any impacts on Parvis Road - and that appropriate site specific measures are identified to address any adverse impacts.

The site has been promoted by the landowner and is therefore considered to be available for development. Whilst the Council sympathises with the existing users of the land, the onus is on the landowner to engage with these users during the preparation of any development proposals, and assist with alternative arrangements if necessary. The total amount of land proposed to be released from the Green Belt represents approximately 1.93% of the total Green Belt of the Borough (see Section 4 of the Topic Paper). Section 5 goes on to address concerns about disproportionate allocation of sites in West Byfleet and Byfleet. The Council has conducted a thorough assessment of brownfield sites across the Borough (see Section 11 of the Topic Paper), and believes exceptional circumstances exist for the release of Green Belt land for development (see Sections 1 and 2 of the Topic Paper).

The Council has thoroughly considered the possibility of including land to the east of Martyrs Lane in the DPD. It would be wrong for the Council to allocate the land east of Martyrs Lane for future development for the following reasons:

- The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.
- The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.
- The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;
- It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.
- The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.
- There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.
- A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land to the east of Martyrs Lane for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land. Paragraph 14.12 of the Topic Paper sets out in detail why the Council believes very special circumstances justification does not exist to safeguard the Pyrford Green Belt sites. The Council does not believe the same criteria apply to sites GB4, GB5 and GB10. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

The Council do not intend to build on the school playing fields - this site is recommended for release from the Green Belt in order to create a defensible Green Belt boundary and avoid creating an 'island' of Green Belt in the urban area. It will still be protected from development by planning policies in the Development Plan. Section 15 of the Topic Paper responds to concerns about land owned by St Mary's Church. Section 3 of the Topic Paper responds to concerns about Traveller pitches, including how site specific adverse impacts should be mitigated satisfactorily.

Response Reference: U0001619

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06473/1

Name: Mr Tu Tran

Number of Signatories: 1

Comment Type: OBJ

Site Reference: UA07

Summary of Comment: DPD is not legally compliant, sound and does not comply with Duty to Cooperate.

Reasons why the DPD is non compliant and unsound are as follows;

Under UA7 there is no mention of development of Guildford Road. However, consultation information was released elsewhere which detailed the proposals for Guildford Road, Victoria Arch and Station Approach. In this, it is clear that the property of the representor will be demolished, and a deadline for public comment was stated. The representor was not notified about this information, and was therefore unable to make a comment in time. The map issued with this consultation is of too smaller scale to make out any detail.

The map given with the DPD shows that Guildford Road is outside the area of proposed development.

Planning documents have been difficult to understand in terms of jargon.

Proposed modifications are as follows;

WBC should ensure that all residents and businesses affected by any development are notified in good time so that representations can be made. There was a lack of information sources, and those used to relay information such as newspapers and the council website

<p>are inadequate as the coverage is not wide enough and people do not follow online sources.</p> <p>Postcards had not been delivered, and public consultations have also been inadequate. To make documents legally compliant, they must contain less jargon and be made easy for the public to understand. The maps should also be of a more detailed scale.</p> <p>In terms of Duty to Cooperate, records from executive council meeting of 18th October 2018 shows that the council failed to consult with neighbouring authorities prior to deciding on the review. The review should make clear that Woking will not have an unmet need to be met by neighbouring authorities. There needs to be a review of the evidence base. The core strategy is over five years and the review is therefore overdue.</p> <p>Has attached a supplementary report of the core strategy review.</p> <p>Wishes to participate in oral examination for the following reason; "It will be the only way I, or my agent, will be able to explain fully to the inspector why we feel unable to decide on these documents, and hopefully get things changed. I, or my agent, would wish to produce necessary council documents to support my case" Wishes to be informed of next stages.</p>
<p>Contributor Proposed Modification: Proposed modifications are as follows; WBC should ensure that all residents and businesses affected by any development are notified in good time so that representations can be made. There was a lack of information sources, and those used to relay information such as newspapers and the council website are inadequate as the coverage is not wide enough and people do not follow online sources.</p> <p>Postcards had not been delivered, and public consultations have also been inadequate. To make documents legally compliant, they must contain less jargon and be made easy for the public to understand. The maps should also be of a more detailed scale.</p> <p>In terms of Duty to Cooperate, records from executive council meeting of 18th October 2018 shows that the council failed to consult with neighbouring authorities prior to deciding on the review. The review should make clear that Woking will not have an unmet need to be met by neighbouring authorities. There needs to be a review of the evidence base. The core strategy is over five years and the review is therefore overdue.</p>
<p>Modification Reference: U0000377</p>
<p>Officer Response: It is appropriate and necessary for the Site Allocations DPD to facilitate the delivery of the requirements of the Core Strategy. Woking Borough Council's Core Strategy was adopted in October 2018 and in accordance with Paragraph 33 of the National Planning Policy Framework (NPPF) was reviewed in October 2018. It is therefore up to date and provides a sound strategic policy context for the preparation of the Site Allocations DPD. It is noted that Runnymede Borough, Waverley and Guildford Borough Councils all made representations during the review of the Core Strategy which were taken into account by the Council before the review was approved.</p> <p>More broadly, as confirmed in Section 9 of the Regulation 19 Issues and Matters Topic Paper, under the Duty to Cooperate, the Council has also engaged with relevant neighbouring authorities, statutory consultees and key stakeholders before and during the consultation period for the Site Allocations DPD.</p> <p>The consultation for the road layout south of Victoria Arch was separate to the consultation for the Site Allocations DPD. Policy UA7 safeguards land to enable the delivery of transport improvements necessary to support the delivery of the Core Strategy and the Site Allocations DPD. The Council has consulted on a separate scheme for Guildford Road that could be implemented if the Council were to be successful with a bid to government for funding. This scheme is and will be subject to its own consultation arrangements if it is to go ahead.</p>
<p>Response Reference: U0001531</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick): T</p>

Contributor Reference: 06498/1
Name: Mrs Glenis Trangmar
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Objects to development of Green Belt sites in West Byfleet. There are alternative sites available to develop. Housing provision should be distributed throughout the borough. West Byfleet already has Broadoaks development, which was not included in the allocation. The number of flats being completed in the Town Centre have not been considered in housing need. Concerns regarding the following: <ul style="list-style-type: none"> - 50% loss of West Byfleet's Green Belt and associated impact on air pollution; - Inadequate road infrastructure to accommodate extra vehicles; - Inadequate health infrastructure; - Traveller pitches. Not against new development for housing, however it should be distributed more evenly.
Contributor Proposed Modification: Sheer House is empty and could be used to provide new housing without releasing Green Belt. Development should be distributed more evenly.
Modification Reference: U0000373
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 5 specifically addresses the loss of Green Belt in Byfleet and West Byfleet. Section 3 addresses the issue regarding traveller pitches. Section 6 addresses the issue regarding adequacy of infrastructure. Section 13 specifically covers road infrastructure. Developments currently under construction in the Town Centre have not been included in the Site Allocations DPD, as these are likely to be completed or near completion before the adoption of the DPD. However, the quantum of development of development on these sites have been counted towards the overall land supply. The Broadoaks application has been acknowledged in the Policy for GB11, however the figure stated for the yield of the sites in the DPD is indicative and is therefore subject to change.
Response Reference: U0001537
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06916/1
Name: Mr Tony Trangmar
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11, UA42
Summary of Comment: Concerned that the consultation has the quality of a statement of intent. Recognises the need for additional housing, but expresses concern about the concentration of residential development in West Byfleet.

Regarding Broadoaks, questions whether it is acceptable for a single site to result in a 50% reduction in green space in West Byfleet. In addition, 1.3% loss of Green Belt is considered unacceptable.

Concerned that roads and medical facilities are overloaded, and that no major road improvements or increases to medical capacity are planned.

Concerned about the proximity of residential development next to the M25, with respect to emissions and noise pollution.

Considers that Sheer House will further impact on the foregoing points. Questions whether the developments in the town centre, Sheer House and Broadoaks are all required to comply with Government requirements. Notes that post-Brexit figures suggest a 20% fall in housing needs.

Questions the need for permanent Traveller sites.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: This representation has been addressed by the Regulation 19 Issues and Matters Topic Paper.

Section 9 outlines the robust approach that the Council has taken to the Regulation 19 consultation.

Paragraph 5.1 recognises that the proposed allocation of sites is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.

Paragraph 5.2 addresses the loss of Green Belt in West Byfleet. In the former West Byfleet ward, it is noted that the Site Allocations DPD proposes to remove 43.5% of the existing Green Belt. Excluding site GB18, which will not be developed and will continue to provide open space and sports provision for the Junior and Infant schools, the total amount of Green Belt lost for development in West Byfleet is 37.8% (45ha). While the Council sympathises with the concerns of local residents over the loss of this amount of Green Belt land, it has ensured through a number of studies that the land that is released from the Green Belt will not undermine its overall purpose and integrity.

Paragraph 6.7 confirms that the County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms. Section 13 addresses traffic and congestion in greater detail. In particular, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A320 Corridor Study and the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

Paragraph 6.12 addresses GP provision.

Section 8 addresses air and noise pollution.

Section 1.3 provides that the Core Strategy makes provision for 4,964 net additional dwellings. This equates to a housing requirement of 292 dwellings per annum, and one of the purposes of the Site Allocations DPD is to identify a quantum of land capable of delivering this requirement. The Core Strategy was adopted in October 2012 and in accordance with Paragraph 33 of the NPPF was reviewed in October 2018. The review followed guidance provided in the Planning Practice Guidance. Therefore it provides an up to date strategic context for the preparation of the Site Allocations DPD.

All sites identified in the Site Allocations DPD for residential development make a valuable contribution towards meeting the housing requirement. As per paragraph 1.7, it is noted that the Council has allocated a quantum of land within the urban area which may be sufficient to meet the housing requirement. However, it is noted that given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to

bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation, It is also important to identify a range of sites to meet the variety of housing need across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need. The need to allocate permanent Traveller sites is set out in Section 3. In particular, Paragraph 3.2 provides that Policy CS14: Gypsies, Travellers and Travelling Showpeople commits the Council through the Site Allocations DPD process to identify sufficient sites to meet identified need over the plan period. As set out in Paragraph 3.4, the Council has carried out a Travellers Accommodation Assessment (TAA) to determine the scale of need in the area. A need for 19 pitches is to be delivered between 2016 and 2027 has been identified. With the loss of Ten Acre Farm, the need is now 22 pitches. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet the identified need.
Response Reference: U0001305
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06668/1
Name: Ms Yvette-Louise Tree
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB05
Summary of Comment: Disgusted at plans to build on Green Belt land. Green Belt was designated to prevent councils like WBC from building on it. The piece of land floods almost yearly- unsuitable for building. The area is already getting overpopulated; schools and doctors are already at capacity. Road infrastructure is poor, nearly impossible to access Byfleet at rush hour. Shameless for WBC to propose building a road through the land gifted to St Mary's church for a future burial ground- not your land to build on. Council housing is badly maintained (e.g. 6 weeks for a boiler to be repaired); WBC should spend money on investment in existing council housing rather than on private building. Support making the existing Traveller site permanent (the green belt damage has already been done), but strongly oppose more Traveller sites or house-buiding in the area.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Council believes that very special circumstances justification exists for the release of Green Belt land for the delivery of housing. This is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1. The issue of flood risk in relation to the Site Allocations DPD is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 7. The impact of the proposals on infrastructure, including schools and medical facilities, is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. The issue of burial land on part of site GB5 is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 15. The Site Allocations DPD does not specify whether sites will be developed by Woking Borough Council or by other developers (although it does require certain proportions of

affordable housing on many sites, some of which may be delivered as new council housing). The distribution of resources across WBC is beyond the scope of the DPD. Comments will be passed on to relevant sections of the Council for consideration. The need for Traveller sites in the Borough and the reasons behind the selection of sites is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 3.
Response Reference: U0001564
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06445/1
Name: Mrs Barbara Tucker
Number of Signatories: 1
Comment Type: SUPP
Site Reference: GB07
Summary of Comment: Support decision to keep the northern section of the site as green space. An undertaking to do this was given when land was taken to build the new school and sports facility- that should be honoured. The green space acts as a much appreciated clear break between Woking and the more rural village of Mayford, should remain so.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 04056/1
Name: Mr Andrew Turner
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Object to West Hall and Broadoaks developments: Woking is described as a regional hub and the A245 as a regional spoke. Adding to the existing congestion on this road (an increase in traffic between 2% and 5%) through new development will not contribute to the objectives of the Surrey Transport Plan (creating 'an efficient and sustainable transport system which helps improve the quality of life for residents and workers'...) Traveller accommodation at Ten Acre Farm was rejected due to development impacts on traffic and the general environment. The impacts of similar development at West Hall on the A245 traffic would be equal if not worse, especially since the road is a regional spoke and already suffers congestion. This is not robust, evidence based decision making as stated in the TAA. Adding to existing noise and air pollution in the area through increased traffic flow will not enhance WBC's green credentials. The removal of any of the three woodland areas on West Hall would significantly change the sylvan nature of the area and harm the arcadian influence of the countryside. Schools, medical facilities and police resources would face significant extra demands. Climate change means that paving over green spaces will result in runoff to nearby rivers, increasing flood risk.

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The impact of the proposals on traffic congestion is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. Surrey County Council transport officers have been involved throughout the process in assessment of sites and of the more general impacts of development in proposed locations.</p> <p>The impacts of the proposals on noise and air pollution are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>The woodland areas within the West Hall site are not intended for removal, see the policy criteria: 'Retain large areas of woodland.. and strengthen where possible' and 'Seek to retain and improve natural features and habitat connections'. The policy also proposes a significant area of additional green infrastructure; only just over half the site is considered to be 'developable area'.</p> <p>The impact of the proposals on infrastructure including schools, medical facilities and the police is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6. The issue of flood risk in relation to the development proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7. Climate change projections are incorporated into the consideration of site options against flood risk. The site specific Flood Risk Assessment required alongside any planning application by the allocation policy would take into account any updated projections.</p>
Response Reference: U0001581
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05771/1
Name: Mr Stephen Twilley
Number of Signatories: 1
Comment Type: COMM
Site Reference: GB10, GB11
<p>Summary of Comment: The respondent submitted a comment in July 2015 which is considered relevant to the DPD. It contains the below points:</p> <p>WBC's Core Strategy commitment to protecting the integrity of the Green Belt is commendable, provided the actions follow the words. However, why is new development of 4,964 new dwellings, as set out in the Core Strategy document, necessary? If this is due to Central Government, it is argued that this should be resisted in the interests of localism. Additionally, where are the people who make up significant unmet need for affordable housing currently living?</p> <p>It is of paramount importance to develop adequate infrastructure before any new development is permitted, irrespective of any CIL or developers' contributions. Placing an additional burden on infrastructure to ensure a developers' profit is unfair on existing residents, who contribute to Council funds. The respondent is unaware of any improvements to Pyrford Road in 40 years despite major developments along it which have led to an exponential growth in traffic.</p> <p>Any redevelopment of Green Belt land at Broadoaks and West Hall must be preceded by restructuring of the A245, a major connection between the A3 and Woking town centre as well as between the M25 and Weybridge. It is one of the most heavily used 3 digit A roads in the country; the idea of adding 742 dwellings and a school at Parvis Road is incredible. The same considerations apply to 200 dwellings in the Aviary Road area. The road cannot cope with more traffic.</p>

Unless major improvements are made to the road network in and through West Byfleet, there should be no further developments in the area, either in the Green Belt or the urban area.

The respondent raises further questions, which are set out below:

1. How was the need for 4,964 net additional dwellings between 2010-2027 calculated?

2. Why is development on such a scale as to require the release of Green Belt land actually needed?

3. Was WBC forced into agreeing to provide this number of new dwellings by Central Government?

4. Where are the people who make up significant unmet need for affordable housing currently living?

5. Why does table 8 in the DPD give a total of completions of 2,134 when the statement above the table gives a figure of 1,789.

The DPD appears to show the following aggregates for net new dwellings:

Delivered (2010-2018): 2,134

Urban Areas: 2,163

Green Belt: 971

Total: 5,264

6. Where have the 429 dwelling units being built in Victoria Square been counted?

7. Including the Victoria square units, the total planned for 2010-2017 would appear to be 5,697. Why is there such a marked difference to the planning total of 4,964?

8. There would appear to be no need for the GB10 designation. Do you agree and, if not, why not?

9. Given that in the period 2012-2027 Byfleet and West Byfleet has been designated to provide 710 units (73% of the Green Belt contribution) and Heathlands 261 units (27% of the Green Belt contribution), has the DPD given any consideration to fairness of allocation of Green Belt sites across the wards?

Concerns are raised as to whether infrastructure in West Byfleet (roads, schools, shops, parking, sewerage and GPs) can be provided to support an additional 840 dwellings.

Where has WBC specified the improvements require to cater for this growth?

Regarding road infrastructure, Surrey County Council's A245 Corridor Mitigation Study does not appear to have considered the effect of an additional 710 units (and other sites) on the section of the A245 between West Byfleet town centre and the boundary with Byfleet. Has WBC asked SCC to investigate this?

The study recognises that the junction at the centre of West Byfleet is operating at least at capacity and recommends changes to traffic light control as the only viable mitigation study. It is believed that this suggestion has been implemented, however sporadic observation suggests no change in the junction's handling of traffic. Has any difference actually be made to the capacity?

Contributor Proposed Modification: Major improvements in the road network in and through West Byfleet are required to cope with traffic generated from proposed major developments in the area. Development of Green Belt land in the Broadoaks and West Hall areas must be preceded by a radical restructuring of the A245.

Modification Reference: U0000456

Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper describes how the housing need and housing requirement figures were derived for the Core Strategy (see in particular para1.5). Section 1 and 2 also sets out in detail the justification for releasing and safeguarding Green Belt land to meet future development needs.

Planning policies and decisions must reflect relevant international obligations and statutory requirements. The main legislation that sets out the process for the preparation of Local Plans (such as Woking's Core Strategy and the Site Allocations DPD) can be found in Part 2 of the Planning and Compulsory Purchase Act 2004 as amended, and The

Town and Country Planning (Local Planning) (England) Regulations 2012 as amended. These legislative instruments set out the matters that should be considered when preparing a local plan and prescribe their form and content. Additionally, in 2012, and updated in 2018, the Government published the National Planning Policy Framework (NPPF) which sets out government planning policy for England - it must be taken into account in preparing local plans (if national policies are not sufficiently taken into account, the plan is unlikely to be approved by an independent Inspector for adoption). A key social objective in achieving sustainable development (as prescribed by the NPPF) is to ensure that a sufficient number and range of homes can be provided to meet the needs during the plan period. Where a local authority fails to publish an up-to-date local plan, the Secretary of State could intervene to arrange for the plan to be written, in consultation with the local community.

In order to be found sound, Woking Core Strategy had to be prepared in general conformity with the NPPF, be legally compliant, and meet all other international requirements. There is no doubt about the Government's commitment to promote growth and to significantly boost the supply of homes. This was reiterated recently in the Government's Housing White Paper (2017). To determine the number of homes needed, the NPPF sets out how strategic policies should be informed by a local housing need assessment which reflects current and future demographic trends and market signals. The Core Strategy was therefore supported by a Strategic Housing Market Assessment (SHMA), which identified the scale and mix of housing and the range of tenures which the local population was likely to need over the plan period which a) meets household and population projections (taking into account of migration and demographic change); b) addressed the need for all types of housing, including affordable housing and the needs of different groups in the community; and c) catered for housing demand and the scale of housing supply necessary to meet this demand. The evidence underpinning the Core Strategy indicated that a balanced approach to housing delivery, including the consideration of environmental constraints and urban capacity, could reasonably secure an average of 292 dwellings per year until 2027. The SHMA is available on the Woking2027 website in the Research and Evidence Base section. It was updated in 2015.

Paragraphs 10.24 to 10.34 of the SHMA discuss in detail the significant unmet need for affordable housing. The SHMA includes an assessment of the number of households each year who require some form of subsidy in meeting their housing needs, and then goes on to consider market signals and affordability pressures in the area. The SHMA concluded that a supply-demand imbalance and worsening affordability justified the adjustment of the housing need upwards to support an improvement in affordability. The uplift took into account newly-forming households, concealed households and homeless households, and also aimed to contribute to a fall in households living with parents or in shared accommodation. Full conclusions on the overall housing need are set out in paragraphs 10.36 to 10.59 of the SHMA.

The body of evidence in support of the housing policies of the Core Strategy indicated that an amount of new development would be required upon land within the Green Belt. Although the Council seeks to maximise the proportion of housing to be provided within the Urban Area, the Strategic Housing Land Availability Assessment (SHLAA) indicates a shortfall in capacity within the urban area to meet the housing aspirations of the Core Strategy. The Green Belt Boundary Review (GBBR) was therefore conducted as part of preparation of the Site Allocations DPD to assess the most appropriate land provision to meet housing needs in the last five years of the Core Strategy whilst also ensuring the enduring permanence of the Green Belt boundary thereafter. This is set out in more detail in Sections 1 and 2 of the Topic Paper.

In response to questions 5, 6, 7 and 8: the 1789 figure quoted above Table 8 was not updated to reflect the 2017/18 completions (345 dwellings). The Council will correct this accordingly. The Victoria Square development is not included in the DPD given that the development would be substantially completed by the time the DPD is adopted. However,

the development yield is already counted towards the overall housing land supply. It is acknowledged that the Council has allocated sites with indicative total yields exceeding the housing requirement of 4,964. Given the nature of the sites being allocated, the DPD allocates land to deliver more homes than the housing requirement to ensure that at least the housing requirement is delivered and to also cater for any non-implementation of operational brownfield land. The Council does not agree that there is no need for the GB10 designation. The evidence continues to justify the principle established in the Core Strategy that land will be required to be released from the Green Belt to meet housing delivery between 2022 and 2027, and in particular, the need for family homes that could not be met by high density flatted units at the Town Centre. This is described in more detail in Sections 1 and 2 of the Topic Paper, in particular paragraphs 1.7 and 1.8. In response to question 9, the Council accepts that the proposed allocation of sites for development is not evenly spread across the Borough. The Council assessed a range of brownfield sites and Green Belt parcels around the Borough, but could not ultimately achieve an even distribution of allocated sites because of the uneven distribution of constraints (such as flood zones, environmental designations etc) and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. This is set out in detail in section 5 of the Topic Paper.

The Council has undertaken a number of studies, including an Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support future development. This is described in detail in section 6 of the Topic Paper. In terms of road infrastructure adequacy, the DPD is supported by extensive traffic modelling work. As identified in the representation, this includes the 'Potential Mitigation' study for the A245. Sections 9 and 13 of the Topic Paper describe the evidence available. The preferred scenario used in the study included all commercial and residential developments outside and within the Borough of Woking to the forecast year of 2026, plus 592 residential dwellings on green belt land at West Byfleet. This was considered to be the 'worst case scenario', at the time the forecasting scenarios were formulated by the modelling team. Whilst the Council acknowledges that the overall quantum of land identified in the Site Allocations DPD would deliver a housing figure that exceeds figures used in the Potential Mitigation study forecasts, the Topic Paper has explained that this is to cater for non-implementation of sites. The Council is confident that the models used in the study are robust enough to inform planning judgements about the preferred sites in the DPD. As described in the conclusions of the study, the Council intends to continue working with Surrey County Council to finely tune the mitigation options and ensure they continue to ensure that the network is sufficiently able to cope with the flow increase forecast from future development. The study does not anticipate any radical restructuring of the A245 will be required to accommodate growth. The proposed mitigation measures have not yet been implemented - the Council is presently seeking funding for the delivery of these measures, which could come from the Community Infrastructure Levy and/or site specific financial contributions towards transport improvements identified at any planning application stage.

Response Reference: U0001087

Officer Proposed Modification: Amend final paragraph on p17 to read "...delivery to date of 2134 homes, between 1 April 2010 and 31 March 2018 (Table 8)".

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06924/2

Name: Ms Joan Vacha
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA41
Summary of Comment: Opposes development on the grounds of urbanisation, pursued in an indirect manner. Considers that there is no infrastructure to accommodate 2,000 additional people. Notes that Sheer House may also result in an additional 500 people. Considers that there will be no green space left in the area.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The representations have been addressed by the Regulation 19 Issues and Matters Topic Paper. Section 4 addresses the loss of Green Belt land and its impact on general wellbeing and amenity of residents. As set out in Paragraph 4.1, the Council accepts that any land taken out of the Green Belt will lead to a reduction of the total amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. Taking into account the constraints of the Borough and the available evidence, the proposed allocations are the most sustainable to deliver the objectives of the Core Strategy when compared against other reasonable alternatives. Section 9 confirms that the Council has taken the right approach to the Regulation 19 consultation. In particular, Paragraph 9.3 confirms that the Council has gone beyond the statutory requirements to engage with the community during the Regulation 19 consultation. Section 6 confirms that due consideration has been given to the infrastructure required to support the DPD. Paragraph 4.2 sets out the Council's commitment to green space provision. It provides that the Council seeks to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents, as set out in Core Strategy Policy CS17: Open Space, green infrastructure, sport and recreation.
Response Reference: U0001314
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06468/1
Name: Mr Pietro Valentino
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA07
Summary of Comment: DPD is not legally compliant, sound and does not comply with Duty to Cooperate. Reasons why the DPD is non compliant and unsound are as follows; Under UA7 there is no mention of development of Guildford Road. However, consultation information was released elsewhere which detailed the proposals for Guildford Road, Victoria Arch and Station Approach. In this, it is clear that the property of the representor will be demolished, and a deadline for public comment was stated. The representor was not notified about this information, and was therefore unable to make a comment in time. The map issued with this consultation is of too smaller scale to make out any detail.

The map given with the DPD shows that Guildford Road is outside the area of proposed development.

Planning documents have been difficult to understand in terms of jargon.

Proposed modifications are as follows;

WBC should ensure that all residents and businesses affected by any development are notified in good time so that representations can be made. There was a lack of information sources, and those used to relay information such as newspapers and the council website are inadequate as the coverage is not wide enough and people do not follow online sources.

Postcards had not been delivered, and public consultations have also been inadequate. To make documents legally compliant, they must contain less jargon and be made easy for the public to understand. The maps should also be of a more detailed scale.

In terms of Duty to Cooperate, records from executive council meeting of 18th October 2018 shows that the council failed to consult with neighbouring authorities prior to deciding on the review. The review should make clear that Woking will not have an unmet need to be met by neighbouring authorities. There needs to be a review of the evidence base.

The core strategy is over five years and the review is therefore overdue.

Has attached a supplementary report of the core strategy review.

Wishes to participate in oral examination for the following reason;

"It will be the only way I, or my agent, will be able to explain fully to the inspector why we feel unable to decide on these documents, and hopefully get things changed.

I, or my agent, would wish to produce necessary council documents to support my case"

Wishes to be informed of next stages.

Contributor Proposed Modification: Proposed modifications are as follows;

WBC should ensure that all residents and businesses affected by any development are notified in good time so that representations can be made. There was a lack of information sources, and those used to relay information such as newspapers and the council website are inadequate as the coverage is not wide enough and people do not follow online sources.

Postcards had not been delivered, and public consultations have also been inadequate. To make documents legally compliant, they must contain less jargon and be made easy for the public to understand. The maps should also be of a more detailed scale.

In terms of Duty to Cooperate, records from executive council meeting of 18th October 2018 shows that the council failed to consult with neighbouring authorities prior to deciding on the review. The review should make clear that Woking will not have an unmet need to be met by neighbouring authorities. There needs to be a review of the evidence base.

Modification Reference: U0000374

Officer Response: It is appropriate and necessary for the Site Allocations DPD to facilitate the delivery of the requirements of the Core Strategy. Woking Borough Council's Core Strategy was adopted in October 2018 and in accordance with Paragraph 33 of the National Planning Policy Framework (NPPF) was reviewed in October 2018. It is therefore up to date and provides a sound strategic policy context for the preparation of the Site Allocations DPD. It is noted that Runnymede Borough, Waverley and Guildford Borough Councils all made representations during the review of the Core Strategy which were taken into account by the Council before the review was approved.

More broadly, as confirmed in Section 9 of the Regulation 19 Issues and Matters Topic Paper, under the Duty to Cooperate, the Council has also engaged with relevant neighbouring authorities, statutory consultees and key stakeholders before and during the consultation period for the Site Allocations DPD.

The consultation for the road layout south of Victoria Arch was separate to the consultation for the Site Allocations DPD. Policy UA7 safeguards land to enable the delivery of transport improvements necessary to support the delivery of the Core Strategy and the Site Allocations DPD. The Council has consulted on a separate scheme for

Guildford Road that could be implemented if the Council were to be successful with a bid to government for funding. This scheme is and will be subject to its own consultation arrangements if it is to go ahead.

Response Reference: U0001529

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 05179/1

Name: Mr Michael Valter

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Objects to GB10 for the below reasons:

Parvis Road is heavily congested at peak times; its ability to cope with an increase in vehicular movements to serve 550 private dwellings and 15 Traveller pitches is highly debatable.

The site is allocated as Green Belt land and should remain as such

The site is a concrete aggregate protected site

The housing quantity appears to be disproportionate to requirements and constitutes overdevelopment.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: This representation has been comprehensively addressed by the Regulation 19 Issues and Matters Topic Paper.

Due consideration has been given to transport infrastructure, and mitigation is considered sufficient as per Paragraph 6.7. Section 13 also addresses transport and congestion, and Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

The release of GB10 is supported by credible evidence. In particular, as recognised in Paragraph 12.2, the Council believes that the Green Belt Boundary Review is robust to inform the DPD to make sure that any land that is released from the Green Belt does not undermine its purposes.

Section 17 confirms that the designation of mineral safeguarded areas is not an absolute constraint to development. Surrey County Council, the Minerals Planning Authority, has been consulted in the plan preparation process and has not raised an objection to the site's allocation on the grounds of the minerals allocation.

The housing quantity is not considered to be disproportionate to requirements. In accordance with Paragraph 1.7, it is recognised that the Council has identified land capable of delivering more housing than the Borough's overall requirement. Given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation. It is also important to identify a range of sites to meet the variety of housing needs across the Borough. In particular, the need for family homes that could not be met in high rise, high density developments at the main urban centres has to be acknowledged and planned. The Green Belt sites will contribute towards the provision of this type of need.

Response Reference: U0001007

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):
Contributor Reference: 06798/1
Name: Mrs Janet Berry, Mr Andrew Berry And Mr Edwin Wakefield
Number of Signatories: 3
Comment Type: OBJ
Site Reference: GB07
<p>Summary of Comment: Objects to the proposed development to the land adjacent to Egley Road, Mayford GB7. This is green belt land and separates the towns of Woking and Guildford. The proposal to build a large number of homes will be totally out of character on this piece of land and for this area and will spoil the view for many homes in Hillside, Woking and will cause major problems with traffic all day but especially during the morning and evenings. The road is the busiest in Woking being the main artery between Guildford/A3 /M25 and supports close to 30,000 car movements per day.</p> <p>This will lead to loss of the green break between Mayford and Woking. The Village has been separate from Woking since before the Domesday book! Will cause major Road, air and noise pollution.</p> <p>Danger to School Children with the volume of Traffic (School just over half capacity now and near fatality 3 weeks ago). The 3 Schools in 1000 yards catering for several thousand children at risk.</p> <p>The Rural Character of the Area Would Drastically Change Forever, Impacting the 1500 Residents.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Objection noted.</p> <p>The representation regarding Mayford Green Belt and Mayford character have been comprehensively addressed in the Council's Issues and Matters Topic Paper see Section 20 and 21.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures will satisfactorily address any adverse impacts of the DPD.</p> <p>Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.</p>
Response Reference: U0001203
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):
Contributor Reference: 06603/1
Name: Mrs Suzanne Wakeley
Number of Signatories: 1
Comment Type: OBJ

Site Reference:
Summary of Comment: DPD is not legally compliant or sound due to insufficient research, inadequate infrastructure delivery and unreasonable use of Green Belt. Wishes to participate in public examination. Wishes to be informed of next stages.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 6 addresses the issue regarding the adequacy of infrastructure. Section 13 specifically covers road infrastructure. Section 10 addresses the matter regarding insufficient research to support the Site Allocations DPD.
Response Reference: U0001658
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06638/1
Name: Mr Julian Wakeley
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: The DPD is not legally compliant, since the proposals will place the local healthcare system in an unsafe position. The local Health Service practice in West Byfleet is already under strain, above the Government and WBC levels, and strained due to fire at the Weybridge Walk-in Centre. There is no suggestion in the DPD of additional health service staff or an additional practice at the Health Centre: the latter needs to be provided at zero cost to the population. The DD has not met the Duty to Cooperate; none of the workings of the Council have been provided to show residents that an adequate level of due diligence has taken place. The DPD is specious, biased, unsound, not positively prepared, justified, effective or consistent with national policy. The Green Belt developments in West Byfleet will place huge strain on health services that are already beyond acceptable levels of safety and ratios of healthcare staff to citizens. The Council had already made up its mind to recommend this development, with the legal minimum of logic to support the case. Wish to participate in the EiP since I do not believe residents' opinions were properly sought, nor our considerable concerns addressed in public fora.
Contributor Proposed Modification: You need to provide an addition Health Centre practice into the area, and this needs to be achieved at zero cost to the local population. DPD to provide accurate and planned for additional infrastructure to support the increase in levels of healthcare provision, to redress the already existing lack of healthcare in the area - specifically for practices within the Health Centre in West Byfleet.
Modification Reference: U0000284
Officer Response: The provision of healthcare infrastructure to meet the needs of the proposed development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.
Response Reference: U0001119
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06638/2
Name: Mr Julian Wakeley
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
<p>Summary of Comment: The DPD is legally non-compliant since the West Hall proposals represent a material risk to all properties on the Parvis Road side of the M25. Planning blight and property price reduction should be considered.</p> <p>The DPD does not meet the Duty to Cooperate since a risk assessment was not carried out, and the DPD requirement to involve and co-operate with local residents on the issue of flood plain risk has not been met.</p> <p>The DPD is not sound, positively prepared, justified, effective or consistent with national policy, since people's properties might fall within an increased risk of flooding, with impacts on value and insurance premiums. May need to ask the Secretary of State and Department of Environment to intervene.</p> <p>I consider it necessary to participate in the EiP because I live here.</p>
<p>Contributor Proposed Modification: Remove West Hall completely from the proposal, and re-submit and this time include a proper assessment of the risks associated with the development.</p> <p>Review the requirements to build near the flood plain and come up with a better suggestion.</p>
Modification Reference: U0000287
<p>Officer Response: The reduction in value of individual properties is not a material consideration for the planning process. It is not considered that the proposals will cause planning blight. If the development is well planned and well designed, it could have a positive effect. The Sustainability Appraisal of the Core Strategy concluded its delivery would achieve sustainable development of the Borough.</p> <p>A risk assessment is not required to meet the Duty to Cooperate. Local residents have been involved and co-operated with the Site Allocations process through three rounds of formal consultation.</p> <p>Issues of flood risk are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7.</p>
Response Reference: U0001124
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06638/3
Name: Mr Julian Wakeley
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: The DPD is not legally compliant since the effect of increased traffic on Parvis Road on the environment, noise and environmental pollution (including NOX) on Parvis Road has not been properly investigated. The DPD ignores the fact that these issues have recurred for many years and that previous investigations have confirmed congestion is already higher than recommended for a road of this type.</p> <p>The DPD does not meet the Duty to Cooperate since no one has sought the opinions of local residents specifically on the noise and environmental pollution along Parvis Road.</p>

The reports (e.g. with regard to Broadoaks) going back 20+ years should have been enough to render increases in traffic completely unacceptable, especially as the issue of NOX has become so important since then.
The DPD is unsound, not positively prepared, justified, effective or consistent with national policy, since local pollution needs to be considered, with due deference to local people and non-residents.
I consider it necessary to participate in the Examination in Public since we live just off Parvis Road.

Contributor Proposed Modification: Only that the DPD cannot proceed until (i) a full and proper and independent audit of all environmental noise and (ii) pollution levels post build, as far as can be investigated.
You need to conduct a full and open audit of Parvis Road for noise and environmental pollution

Modification Reference: U0000295

Officer Response: The pollution implications of the proposal are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.
Given the existing evidence base, it is not considered necessary or proportionate to carry out a specific audit of Parvis Road for pollution at this stage. At the planning application stage, policy DM6 of the Development Management Policies DPD requires an Air Quality Assessment to be submitted. Policies GB10 and GB11 both require Noise Impact Assessments at planning application stage.

Response Reference: U0000957

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 03920/1

Name: Mr Bob Waldie

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB07

Summary of Comment: The Green belt is not safe under Woking Borough Council. By removing the green belt and allowing development upon that land Mayford is losing its identity as a village and just becoming part of Woking town.

Strongly objects to the removal from the Green belt land of GB7. Mayford has recently had a school/sport centre built on land adjacent to the proposed land and the infill of the land between the school and the houses on Egley Road will effectively join the village to the town.

Detriment to my family's quality of life. Objects on behalf of the wildlife currently benefitting from the Green belt, the loss of their habitat will lead to further degradation.

If this action goes ahead, will consider not voting in future because there is no point in electing councillors that do not empathise with the desire for village life.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

The representation regarding Mayford Green Belt and Mayford character have been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper see Section 20 and 21.

<p>Concerns about the loss of Green Belt and wellbeing has been addressed in Section 4 of the Topic Paper.</p> <p>The Council is committed to conserving and protecting existing biodiversity assets within the Borough and has robust policies such as Core Strategy policies CS7 and CS8 to help achieve that. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation, and reinforced by Development Management Policies DPD Policy DM1: Green infrastructure. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific Key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.</p> <p>In addition, during the preparation of the Site Allocations DPD the Council consulted with Surrey Wildlife Trust and Natural England to seek their input on the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Surrey Wildlife Trust or Natural England. Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess any site specific ecological issues.</p>
Response Reference: U0001200
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06509/1
Name: MRS J S Walker
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Objects to development at GB10.</p> <p>Too many dwellings are proposed for the site.</p> <p>Concerns regarding travellers, as well as impact on the environment and local amenity.</p> <p>Has impact on traffic flow and flooding been considered?</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land, in this case West Hall, for development.</p> <p>Section 3 addresses the issue regarding travellers in West Byfleet.</p> <p>Section 7 addresses the issue regarding flooding in West Byfleet.</p> <p>Section 13 addresses the issue regarding impacts of proposed development on road infrastructure.</p>
Response Reference: U0001225
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06661/1

Name: Mr And Mrs N Walter
Number of Signatories: 2
Comment Type: OBJ
Site Reference: GB04, GB05, GB10
<p>Summary of Comment: Objects to the DPD. There is already a development in progress of over 200 homes on the land at Broadoaks Estate in West Byfleet, Parvis Road. The existing infrastructure of the roads in and around the area, including the A3 can't cope with the heavy traffic that we already have and now with the Broadoaks it will become worse. West Hall, Parvis Road (555 plus 15 traveller pitches), High Road by Queens Head (85 plus 1 traveller pitch), in total around a staggering 900 dwellings with potential 2 cars per dwelling means an additional 1,860 cars on the roads in this small area of Byfleet & West Byfleet. These developments cannot be considered in this small village.</p> <p>Lack of consideration for noise pollution GB4 and GB5 which is alongside that of the M25 either. The exhaust fumes are a significant public health concern. The air quality along the Parvis Road is particularly bad by the motorway bridge and has been reported that it is higher than the recommended levels, this would increase substantially with the addition of hundreds more vehicles. Adequate assessments of flooding from both river and surface water have also not been carried out.</p> <p>The infrastructure report fails to address how and where adequate healthcare and education could be provided for an increased population.</p> <p>WBC has stated that there are 5000 planned houses over the next 10 years. This is a surplus of 2000 to the number required even before a likely reduction in housing need is announced. This housing quantity is unnecessary, excessive and is overdevelopment on an area which cannot stand the increase.</p> <p>If the housing need is already met or in fact exceeded there is no justifiable reason or exceptional circumstances to release any greenbelt for development. These limited areas of greenbelt are successfully performing the greenbelt function of preventing urban sprawl.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: Objection noted.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>The matter of density of development has been addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 18.</p> <p>The impact of the proposed development on noise and air pollution is addressed in Section 8 of the Topic Paper.</p> <p>The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding.</p> <p>In regards to the housing numbers and the release of Green Belt for development, this has been comprehensively addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1, in particular Paragraph 1.7.</p>

Response Reference: U0001097
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 03005/2
Name: Mr Josh Warby
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Support decision not to safeguard sites at Upshot Lane, Pyrford. The sites should not be introduced for the following reasons: They contribute very significantly to the semi-rural setting and character of Pyrford. Their development would casue enormous suffering to the character and setting of the conservation area around St Nicholas Church The Green Belt Boundary Review was flawed and its scoring criteria inconsistently applied. The impact of development on the Green Belt here would be severe and unjustifiable; other sites selected for allocation are more like infill or brownfield sites. Traffic is already dangerously high and the narrow lanes could not support the increase that would arise from 500 houses here. The local infrastructure would be unable to cope with the additional demand The amount of land that had been safeguarded for development beyond 2027 was excessive so the justification for including such land required re-evaluation.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06728/1
Name: Mrs Sally Ward
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
Summary of Comment: Would not like to speak at the examination of the SADPD, however, is willing to if necessary. Would like to be informed when the SADPD progresses to the next stages. Considers the SADPD is unsound because GB10 in the Proposals Map should be taken out of Green Belt. Does not believe that the Draft Site Allocations DPD passes the required test of soundness required by paragraph 35 of the National Planning Policy Framework (NPPF) 2018. In particular the DPD is not, in my opinion, an appropriate strategy taking in to account the reasonable alternatives and based on proportionate evidence and nor is it consistent with national policy. My reasons for this assertion are listed below. The Green Belt The DPD has completely disregards the West Byfleet Neighbourhood Plan (NDP2017). The plan's vision statement seeks 'To maintain, enhance and protect The Area's distinctive and special residential character - especially its green spaces.'Removing the

proposed site of West Hall from the Green Belt deprives West Byfleet of a significant percentage of its open space, and leaves West Byfleet with considerably less Green Belt land than elsewhere in the Borough. The distance of the West Hall site from the main commercial / retail area and the train station will mean a big rise in the reliance on private cars.

Flooding

After a very dry summer there is already standing water in the proposed area. This is naturally occurring water as a result of the land being a flood plain. Although the flood risk has been assessed as low level, construction on the land will have an impact since a river will naturally flood at some point along its course. Other adjacent areas also need to be re-assessed for flood risk as the level of risk will change if this Green Belt site is developed. Other potential sites in the borough have been disregarded because they are areas of historic significance - having important buildings or evidence of remains and artefacts. This site in West Byfleet has none of this historic significance because even the earliest settlers recognised the land as being unsuitable for development.

Traffic Issues

It is already well documented that Parvis Road is at full capacity. There is very little that can be done to alter this situation as there is no space for widening or alternative routes. The mitigating factors that have been suggested will have such a small impact that any difference will be unnoticeable.

Traffic is likely to be at a standstill for more and more of each day. Emergency services will have difficulty making progress along Parvis Road.

A significant number of people come to West Byfleet from outside the area to visit local shops, restaurants and services. These are the people who will be deterred from visiting if they are likely to suffer long delays accessing the town centre. It is therefore local businesses that will be negatively affected.

Pollution

The proposed site is very close to the M25, as well as the A245. Development on this site will not only be exposed to high levels of air and noise pollution, but will also contribute to increasing levels of pollution. This is inconsistent with National Policy (NPPF)

Infrastructure

Schools and health services will not be able to manage the increase in populations. The health centre is already very stretched and struggling to provide a satisfactory service.

Travellers

There should be no plan to incorporate travellers' pitches into the proposed development while urban sites which are in need of re-development elsewhere in the Borough have not yet been considered or utilised.

Other points

West Byfleet is a settlement of roughly 2500 dwellings. To increase the settlement by over 1000 dwellings (if all 3 sites are developed) will drastically and irreversibly change the character of the town. Such excessive overdevelopment is unnecessary, distressing and has a clear disregard for the West Byfleet Neighbourhood Plan

West Byfleet is a neighbourhood which is physically constrained by the M25, The River Wey and Wey Navigation, the railway and the Basingstoke Canal. There is no room for further extensive expansion and to remove a large portion of Green Belt will lead to urban sprawl. The current Green Belt land prevents West Byfleet merging with other neighbouring areas and allows the town to maintain its own individual identity.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.

<p>In regards to the West Byfleet Neighbourhood Plan and Green Belt land remaining see Section 16 and 5 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>In terms of access to retail and train station, the Council is aware the sites proposed will need site specific requirements. The exact nature of these sites specific requirements will be identified through the development management process and informed by a transport assessment. For example key requirements of GB10 and GB11 to be addressed include bus stop provision and direct access to this and also infrastructure improvements to connect pedestrian and cycle networks.</p> <p>The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.</p> <p>Paragraph 20.2 of the Topic Paper describes why the specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the Green Belt Boundary Review; and section 21 of the Topic Paper addresses concerns about urban sprawl.</p> <p>Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.</p> <p>The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>The representation regarding overdevelopment is addressed in paragraphs 1.7 and 1.8 of the Topic Paper.</p>
Response Reference: U0001379
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 03584/1
Name: Mrs Barbara J Warren
Number of Signatories: 1
Comment Type: COMM
Site Reference: UA15
Summary of Comment: Proposes modifications to the DPD to secure a permanent location (from 2020) in the centre of Woking for the Phoenix cultural centre/Fiery Bird, which is currently located in site UA15. The venue will serve as an important place for the local community, and give people a sense of pride.

<p>It will give people a place to play and perform Live music, develop skills and provide entertainment to the wider community. It will also provide opportunities for the local community to have fun, learn and experience social, cultural and educationally based activities.</p> <p>The venue should be accessible to all and be open all day and evenings.</p> <p>The Fiery Bird is currently an excellent facility that provides the beginnings of a thriving music and cultural community, which will then provide an excellent educational, musical, social and fun learning environment for all.</p> <p>Regular events are currently held.</p> <p>Considers it necessary to participate in oral examination for the following reasons;</p> <ul style="list-style-type: none"> -The current venue needs to be kept and refurbished and made accessible OR a new venue with a large and interesting environment has to be provided from 2020, allowing the Fiery Bird to grow, resulting in social, economic and educational benefits for the Borough and Surrey as a whole. -The venue could form a strategic Surrey County Hub.
<p>Contributor Proposed Modification: Proposes modifications to the DPD to secure a permanent location (from 2020) in the centre of Woking for the Phoenix cultural centre/Fiery Bird, which is currently located in site UA15.</p>
<p>Modification Reference: U0000483</p>
<p>Officer Response: The purpose of the Site Allocations DPD is to identify land and to enable the quantum of development in the Core Strategy to be delivered. It does not deal with individual companies or operations that could occupy allocated sites. The Council is aware of the need of a venue for the Phoenix Cultural Centre and the Fiery Bird and could work separately with the owners to find a space for their operations.</p>
<p>Response Reference: U0001740</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick): T</p>

<p>Contributor Reference: 05506/1</p>
<p>Name: Mrs Penelope Watson</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: DPD is not sound, in particular, not an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence, nor consistent with national policy. GB10 should not be taken out of the Green Belt: West Byfleet should remain a village, and Green Belt land should remain as such; green areas need to be protected and maintained for the enjoyment of all villagers.</p> <p>In combination with the planned developments at Broadoaks and Sheer House with the immense disruption, traffic, noise and air pollution it would cause, the proposals for West Hall are outrageous. Parvis Road and Old Woking Road in struggle at present during rush hour, the addition of over 1000 new homes and numerous travellers with as many new vehicles would bring chaos.</p> <p>Where will any new children be educated? How will health facilities cope with the increased population? Current villagers would suffer.</p> <p>Very concerned over the removal of West Byfleet school grounds being taken out of the Green Belt, with the possibility of further development. This would be to the detriment of all pupils.</p> <p>The quantity of houses proposed is excessive and would constitute over-development.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>

<p>Officer Response: The justification in principle for the existence of very special circumstances requiring the release of Green Belt land for housing is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.</p> <p>The impact of the proposals on the enjoyment of green spaces by residents is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4. The proposals for site GB10 are likely to substantially increase the quantity of publicly accessible open space in the area. WBC is confident that the design policies of the Core Strategy, Development Management Policies DPD and Design SPD, in combination with the Character Study (2010) which is used to inform assessment of design against the existing character of areas within the Borough, will be successful in protecting West Byfleet's village character.</p> <p>The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. Development at Broadoaks and Sheer House is factored into the transport evidence base supporting the site allocations.</p> <p>The impact of the proposals on infrastructure, including schools and health facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.</p> <p>The West Byfleet school grounds will continue to be protected by policy CS17: Open Space, Green Infrastructure, Sport and Recreation, and by national policy on recreational facilities, so it is not likely to be developed. The site could not be left in the Green Belt once Broadoaks and West Hall are removed from the latter, without creating an anomalous island of Green Belt.</p> <p>The proposed indicative density for site GB10 of 40 dwellings per hectare (dph) is consistent with the Core Strategy, which recommends a density of 30-50 dph for 'Green Belt sites to be released after 2021/22'. This is a medium density of suburban development. The figure only relates to the developable area of the site (approximately 14.8 ha), and does not include the areas of existing woodland and new green infrastructure which are proposed to take up nearly half the site's total 29.33ha area.</p>
<p>Response Reference: U0001462</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>
<p>Contributor Reference: 05736/1</p>
<p>Name: Ms Marjorie Watson</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB04, GB05, GB10, GB11</p>
<p>Summary of Comment: Strongly objects to hundreds of houses on green belt land in the Byfleets. The area is already overcrowded with a 3 week wait for a doctors appointment, many didn't get their first choice middle or secondary school but you have no plans to change the infrastructure. Parvis Road is crawling most days from 3:30pm and often in the mornings too. Byfleet is surrounded by water and has been flooded a few times now. Building houses on fields that flood already will cause more flooding. The three acre field is owned by the church and they do not want houses on their land. There will be nowhere for the wildlife to go.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Objection noted.</p> <p>The justification to release Green Belt land for development has been comprehensively addressed in Section 1 of the Regulation 19 Issues and Matters Topic Paper.</p>

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. The IDP includes dentist and waste water provision, which can be found on the Council website. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about how the Council is addressing the issue of congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2. Key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. This will be determined as part of the review of the Core Strategy and/or the Site Allocations DPD. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

In regards to the church land see Section 15 of the Topic Paper and see Section 19 in regards to wildlife.

Response Reference: U0001206

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 02415/2

Name: Waverley Borough Council

Number of Signatories: 1

Comment Type: OBJ

Site Reference:

Summary of Comment: Respondent is writing on behalf of Waverley Borough Council. During the Regulation 18 consultation for the Site Allocations DPD, Waverley Borough Council responded that, in view of unmet housing need that already existed within Woking, further consideration should be given to whether the six safeguarded sites, the Martyrs Lane site, or both, could be released sooner, in order to meet some of this unmet need.

During the examination of Waverley's Local Plan, unmet need within the HMA arising from Woking Borough was a major issue, and one of the main modifications to the plan was that the housing requirement increase by 83 dwellings per year, 50% of the unmet need at that time.

Waverley remains concerned that the proposed Site Allocations DPD is only seeking to meet the Core Strategy requirement of 292 dwellings per year. It is recognised that the

Martyrs Lane site has been removed altogether, but there remain a number of 'safeguarded' sites that are currently in the Green Belt and that are intended to meet longer term housing needs.

Waverley notes that Woking Borough Council has carried out a review of the Core Strategy which concluded that no update was necessary, and that the housing requirement of 292 dwellings per year would stand.

Nonetheless Waverley considers that Woking should review/update its Core Strategy to address unmet need. The Core Strategy review notes that if the standard methodology for assessing housing need is used, then Woking's annual need falls from 517 (as calculated by the SHMA 2015) to 409 dwellings. The report also states that if the 2016-based projections are used, initial indications are that the need would be 278 dwellings per annum, slightly lower than the Core Strategy requirement. Waverley recognises that the Government is concerned about these latest projections, hence the recent consultation on changes to the NPPF wherein the Government states that pending a review of the standard methodology, the 2014 rather than the 2016-based projections should be used. It is noted that Woking Borough Council consider the most likely and realistic option for the future housing requirement to continue to be 292 dwellings per year, given the constraints. Waverley does not agree with this approach and strongly considers that through the Site Allocations DPD or a formal review/update of the Core Strategy, Woking should do more to address unmet need, by bringing forward safeguarded sites and reconsidering whether Martyrs Lane should be identified in addition to the other safeguarded sites.

Contributor Proposed Modification: Woking should do more to address unmet need either through a formal review/update to the Core Strategy or the Site Allocations DPD. This could be achieved by bringing forward the release of sites that were being safeguarded to meet longer term needs and to reconsider whether the Martyrs Lane site should be identified in addition to the other safeguarded sites.

Modification Reference: U0000223

Officer Response: It is appropriate and necessary for the Site Allocations DPD to facilitate the delivery of the requirements of the Core Strategy. The Woking Core Strategy and the Site Allocations DPD are two distinct and separate development plan documents but with clear interrelationships. They have distinct purposes, processes and timescales for their preparation that should not be conflated. The purposes and timing for the preparation of these documents are set out in the current and previous Local Development Schemes with no ambiguity. Runnymede, Waverley and Guildford Borough Councils had all made representations during the review of the Core Strategy which were taken into account by the Council before the review was approved. It would therefore be unreasonable to use the Site Allocations DPD as another means to revisit this matter.

Woking Borough Council therefore has an up to date Core Strategy to provide a sound strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the National Planning Policy Framework (NPPF) was reviewed in October 2018. The NPPF requires plans to be reviewed at least once every five years. It will be unreasonable and indeed burdensome to expect the Council to review its Core Strategy again within six months of its latest review. That is certainly not what the NPPF had intended, and obviously that will not provide the necessary certainty that developers, the general public and anyone who has an interest in investing in the Borough need. It is important to highlight that the fact a Core Strategy is 5 years old does not automatically make it out of date.

Regulation 8(4) of the Town and Country (Local Plan) (England) Regulations 2012 (as amended) requires policies contained in a local plan to be consistent with the adopted development plan. Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) (the Act) emphasises this by stating that in preparing a local development document the local planning authority must have regard to any other local development document which has been adopted by the authority. Section 15 of the Act requires the

Council to prepare a Local Development Scheme (LDS) which must specify which development plan documents they wish to prepare and the timetable for preparing them. The Council has published an up to date LDS (October 2018). The LDS identifies the Site Allocations DPD as a development plan document that the Council wishes to prepare. It specifies the overall purpose of the Site Allocations DPD to identify and allocate sites for development. In particular, to identify sufficient employment and housing land and infrastructure to cover the period up to 2027, in accordance with requirements, vision and spatial strategy set out in the Core Strategy. Given that the Council has an up to date Core Strategy, it is imperative and necessary that the Site Allocations DPD is prepared to be consistent with its requirements. Not to have done so would be contrary to the Act, the Regulations and the requirements of the Core Strategy.

The Government has prescribed that unless special circumstances would justify, local authorities should use the standard method to calculate local housing need. It has also prescribed the steps to follow in calculating the need, and in particular, it requires the Council to use the most recent growth projections. At the time the Council carried out the review of the Core Strategy, the most recent growth projections was the 2016 household projections. To have used any other data at the time would have been inconsistent with national guidance. The Council recognises that since the review, the Government has confirmed the need to use the 2014 household projections instead of the 2016 projection to estimate housing need. The Council will follow government guidance that would prevail at the next review of the Core Strategy.

Bringing forward the release of sites currently proposed for safeguarding to meet Woking's objectively assessed housing needs is not considered an appropriate strategy. It would be simplistic and bad planning to bring forward the safeguarded sites for development to meet Woking's objectively assessed housing need up to 2027. The development requirements of the Core Strategy, including the housing requirement are identified in an integrated manner and justified by a significant body of evidence base studies. This includes an Infrastructure Delivery Plan, Employment Land Review and Topic Paper, that identifies the necessary scale and type of infrastructure and economic growth necessary to support and align with the expected quantum of housing growth. To bring forward the safeguarded sites for development up to 2027 without the corresponding review of office floorspace, warehouse floorspace, retail floorspace and the necessary infrastructure to support the outcome of such reviews would at best be irresponsible, overly simplistic and ill conceived. It would undermine the overall purpose of the plan-led system to plan in a holistic manner to ensure sustainable development.

Whilst it would be for future reviews of the Core Strategy to determine future housing requirements, it is very likely that bringing forward the safeguarded sites for development during this plan period would lead to significantly lower housing requirement in the next plan period. There is no scope to release any more Green Belt land for strategic development without damaging its overall purpose and integrity. This point is highlighted in paragraph 3.5.22 of the Green Belt boundary review report. It states 'we do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development'.

Paragraph 139 of the NPPF provides guidance on safeguarded sites. It advises that plans should where necessary identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period. The plan should make clear that the safeguarded land is not allocated for development at the present time. To bring forward the safeguarded sites as suggested by the representation would be contrary to this advice and the intended purpose of this national policy.

Furthermore, allocating land to the east of Martyrs Lane for future development would be wrong for the following reasons:

1. The safeguarding of the land for future development will not be justified by the recommendations of the Green Belt boundary review report and other evidence base studies such as the landscape assessment and Green Belt review report by Hankinson

Duckett Associates. The overall conclusion of the evidence is that the safeguarding of this land would be damaging to the purposes of the Green Belt. As a policy requirement, the Core Strategy prescribes the Green Belt boundary review as the means to identify Green Belt land to meet future development needs. No alternative Green Belt boundary review report has been submitted to the Council to demonstrate why the Council's evidence is not tenable. Consequently, the safeguarding of the Martyrs Lane site carries significant risk of being found unsound and might not be able to withstand scrutiny at an examination when compared with other alternatives.

2. The development of the site will lead to urban sprawl and an encroachment into the countryside. This will be contrary to the fundamental aim of Green Belt policy as emphasised in the NPPF.

3. The development of the whole of the site to include the Golf Course will lead to the loss of a functioning recreational use in contradiction to Policy CS17: Open space, green infrastructure, sport and recreation of the Core Strategy. Development of the site north of the Golf Course (excluding the Golf Course) will lead to isolated development in the Green Belt;

4. It is unlikely that a significant proportion of the land in the ownership of Zealand Golf Club and McLaren Technologies Group Limited would be made available now or in the future to be developed for housing. There is no realistic or reasonable prospect of the Golf Course or the McLaren site coming forward without the Council using its compulsory purchase powers to acquire part(s) of the land.

5. The Council might therefore have to use its compulsory purchase powers to acquire land to enable the delivery of the entire site. A compulsory purchase order application is unlikely to be successful.

6. There is relatively limited scope for introducing sustainable transport measures to access key services and facilities as a means to minimise traffic congestion that will result from the development of the site. This is particularly the case with the part of the site north of the Golf Course.

7. A number of sites north of the Golf Course have been assessed as part of the SA of the draft Site Allocations DPD and rejected. Safeguarding them for future development will not be justified to promote sustainable development.

The damage to the overall purpose of the Green Belt for allocating the land for development far outweighs the benefits that any development would bring. Very special circumstances justification would not exist to allocate the land.

Since the publication of the DPD for Regulation 19 consultation, the Guildford local plan has been examined. The examiner had recommended that it is expected that Guildford meets part of Woking's unmet need and this can be met on the back of the significant over-supply of housing land in the Guildford Local Plan.

Response Reference: U0001188

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06713/1

Name: Mr Peter Webb

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Would not like to speak at examination and wishes to be informed of the progression of the DPD. Considers the DPD to be unsound for the following reasons.

Woking is to create some 5000 new dwellings, of these approx. 2800 are to be located in central Woking. Of the balance of approx. 2200, almost 1000 are planned for West

Byfleet. Thus the remaining 1200 are sprinkled across the rest of the borough. It is too high a concentration in one location and is unbalanced. Whatever character West Byfleet has will be destroyed by the mass of development.

The Green Belt performs the function of preventing ill planned urban sprawl and allows settlements to maintain independence. Developers and councils see it as cheap, easy to use land for profitable development.

The area for the bulk of the development suffers from flooding, surface water, which will inevitably impact upon new dwellings, making them costly and difficult to insure and to sell on.

The percentage of really affordable units is minimal to be useless and developers are always able to get around, with the complicity of councils.

The Parvis Road, A245 is frequently clogged at peak times and these peak times are getting longer and the length of traffic queues growing, something not recognised, and, or disputed by unrealistic council traffic surveys. The traffic issue is further complicated by traffic light controlled railway underbridges at Oyster Lane and Scotland Bridge Road funneling traffic. The latter is also impacted by the canal bridge with weight restriction. The limited bus service is also delayed by the growing traffic, which impacts on those using this service to go to work, etc. Exiting West Byfleet and Pyrford to the A3 is hampered by there being only one road, Newark Lane, B367, or going via Send. The road via Wisley (Lock Lane) is already overcrowded at peak times and the bridge over the Wey Navigation is an issue which is not going to be resolved any time soon, in light of austerity. Getting to the M25 via the A320 (St Peter's) is complicated by the frequent lengthy traffic queues at the Maclaren roundabout, which WBC & SCC have failed to manage.

Those exiting the proposed development may be heading for the station at West Byfleet, this will entail a new controlled crossing, which will slow traffic further.

At peak times, the rail service from West Byfleet to Waterloo is standing room only, SWR apparently have no room for extra services, so another 100 dwellings is estimated to add many more commuters.

The development includes an 80 bed care home for the elderly (almost next door to West Hall, Anchor Home) and a large number of sheltered / extra care units. These will all be home to vulnerable people, the home requiring staffing (at CQC required levels) and the sheltered units are likely to have residents requiring care & support at home. This will create further traffic, staff are not going to live locally, impacting on the congestion levels and how will emergency vehicles such as ambulances access these locations at peak times.

There appears to be no provision anyway for education, or health and social care facilities. How many children of school age can be coped with by existing facilities. We're led to believe that the West Byfleet Health Centre is almost at capacity, there is no room to expand and car parking is already too limited.

We have seen no assessments of the increased impact of noise and pollution from the extra vehicles.

Once this part of GB10 has been taken out the Green Belt, it will be another part and then another part. Woking Borough Council have shown themselves to be untrustworthy in their dealings over the proposed pub in West Byfleet and do not take notice of local concerns.

Why are all the new traveller sites for Woking in Byfleet & West Byfleet, what is the correlation between stabling traveller sites and increase in crime rates.

Car parking in West Byfleet is inadequate now and will be a disaster when / if Sheer House is redeveloped, that proposal already has more units than parking spaces which will inevitably impact on street parking. WBC fails to provide traffic wardens to police parking at present and badly / illegally parked vehicles will cause further traffic issues. The CCTV at the traffic lights is not used for traffic, parking management, or to penalise the many drivers who ignore / jump the lights.

It is vital that homes are built and these should be spread equably across the area, balanced with the required provision for education and medical support, GP, etc Plus, there needs to be really affordable homes for people to establish themselves and their families.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The distribution of development is addressed in Section 5 of the Regulation 19 Issues and Matters Topic paper.

The representation regarding overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper. Section 2 sets out in detail why sites GB4 and GB5 need to be safeguarded for development beyond 2027. Sites GB4 and GB5 have not yet been allocated for development, only safeguarded. Key requirements will be set out in due course in recognition of the fact that needs, and the planning policies reflecting them, may change beyond 2027. Section 21 of the Topic Paper addresses concerns about urban sprawl.

The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward.

The Core Strategy has an Affordable Housing policy (Policy CS12: Affordable Housing) that will apply to development at any of the sites irrespective of their land values. The Council has carried out a viability assessment as part of the preparation of the Core Strategy and the Community Infrastructure Levy. Residential development at any of the sites should be able to meet the Affordable Housing requirements in full and still achieve positive viability. However, Policy CS12 allows scope for an applicant to make a case based on evidence of viability if it is felt that the policy should not apply to a particular proposal.

Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team,

<p>and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet.</p> <p>The Council is aware the sites proposed will need site specific requirements. The exact nature of these sites specific requirements will be identified through the development management process and informed by a transport assessment. For example potential issues of GB10 and GB11 to be addressed include bus stop provision and direct access to this and also infrastructure improvements to connect pedestrian and cycle networks. Sites GB4 and GB5 have not yet been allocated for development, only safeguarded and their requirements will be determined as part of the review of the Core Strategy and or Site Allocations DPD to be informed by up to date evidence at the time.</p> <p>Policy UA7 in the Site Allocations DPD is safeguarded for essential infrastructure which includes railway improvements. Network Rail, who is responsible for rail infrastructure, has also identified a number of capacity improvement projects along the Waterloo to Portsmouth Line. These projects are set out in the 'Wessex Route: Summary Route Plan' report which is available on the Network Rail website.</p> <p>Concerns raised regarding noise and air pollution are addressed in section 8 of the Topic Paper.</p> <p>Sections 1 and 2 of the Topic Paper set out in detail the justification for the release and safeguarding of Green Belt land to meet future development requirements of the Borough. The representation on Traveller pitches has been comprehensively addressed in Section 3 of the Regulation 19 Issues and Matters Topic Paper. There is no evidence to suggest a correlation between stabbling traveller site and increase crime rates.</p> <p>Parking provision to serve a development is a detailed matter that would be determined at the Planning application stage. A key thrust of the transport policies of the Core Strategy and the NPPF are to influence a shift from car based travel to sustainable travel modes such as public transport, walking and cycling. The overall spatial strategy of the Core Strategy is to concentrate most new development at the main centres because they offer a range of key services and facilities to help minimise the need to travel and to encourage sustainable travel modes. Specific references are made to Policies CS1: A spatial strategy for Woking Borough and CS18: Transport and accessibility of the Core Strategy which clearly demonstrate the importance that the Council places on encouraging walking and cycling. These policies have been scrutinised at Examination and judged to be in conformity with the NPPF. In addition to the policies of the Core Strategy, a key objective of the Council's Parking Standards is to use parking provision as a tool to encourage walking and cycling, in particular, at locations where key services and facilities are readily available without undermining economic vitality.</p>
Response Reference: U0001383
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): F

Contributor Reference: 06517/1
Name: Webb South East PUT and Surrey County Council
Number of Signatories: 1
Comment Type: COMM
Site Reference: UA02, UA03

Summary of Comment: Proposed redevelopment of 74-86 Chertsey Road, Woking, GU21 5BJ for residential purposes, reflecting 173 units. The proposal covers UA3 allocation and part of UA2 allocation.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: The Site Allocations DPD does not rule out comprehensive redevelopment of proposed allocation sites UA2 and UA3. Any such planning application would be determined on its own merits, including the suitability of incorporating residential uses at these sites. However, policy CS15 of the Core Strategy seeks to redevelop outmoded employment floorspace to cater for modern business needs, and to contribute towards future growth in economic development as envisaged in the Core Strategy. In this regard, site allocation policies UA2 and UA3 seek to retain office uses, and the Council does not intend to modify these policies to reflect a higher degree of residential use as inferred in the representation. Policy UA2 will, however, be updated to reflect recent planning history of the site.
Response Reference: U0001271
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06717/1
Name: Ms Penny Weiss
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB10, GB11
Summary of Comment: Raises problems with the online response form. The proposed number of dwellings in Byfleet and West Byfleet is disproportionate compared to other areas of Woking Borough, and is inappropriate for the area. So much building across two villages and the resultant Green Belt destruction is not right, and should not be implemented. Local infrastructure will not be able to cope with the 700 new homes proposed, particularly doctors, schools and transport links. The planned A3/ Painshill/ M25 Junction will filter more traffic down Byfleet and then Parvis Roads, but there are no plans to widen this one lane road. The opening of a new Amazon depot at Brooklands will increase heavy lorry traffic 24 hours a day, with the added 1000 cars. Questions how the roads and village will cope.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation is comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, sections 4 to 6 and 11.
Response Reference: U0001668
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06650/1
Name: West Byfleet Infant School
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05, GB11, GB18
Summary of Comment: The DPD is not sound, because it is not justified or consistent with national policy.

It does not meet procedural requirements, as Traveller sites in the Byfleets were not in the Reg 18 consultation.

It is not positively prepared, as the allocated sites in the Byfleets are not sustainable due to inadequate infrastructure.

The Infrastructure Report completely fails to make proper recommendations for school place provision; it is unclear how WBC or SCC propose to accommodate the school age children who will live on the proposed developments. West Byfleet Infant School has undergone an extensive expansion and has reached its structural capacity; any proposed structural changes would severely undermine the feel, ethos and effectiveness of this caring and nurturing school.

It is not justified as reasonable alternatives have not been taken into account.

The quantity of housing has a direct negative impact on WBIS and is unnecessary, excessive and constitutes overdevelopment. Unclear why housing development is focussed on the Byfleets; it should be spread proportionately across the Borough.

It is not effective as it is not clear that sufficient joint working has been undertaken to consider the proposals.

Alarmed by the proposed exclusion of the school playing fields from the Green Belt. The protection of the Green Belt must be of paramount importance, as per NPPF and the West Byfleet NDP. Loss of nearly 50% of the Byfleets' Green Belt would be unacceptable and defeat the purposes of having a Green Belt.

The 22 new Traveller pitches proposed for the Byfleets should instead be spread equally across the Borough. Do not believe that the sequential approach has been demonstrated or the case made for very special circumstances for Traveller pitches in the Green Belt.

Concerned that the proposed Traveller sites would not have safe highway access, adequate parking provision and turning areas, that they may have an unacceptable impact on the visual amenity and character of the Byfleets and may not have adequate infrastructure and on site utilities to service the number of pitches proposed.

Strongly question the ability of the already congested roads to cope with an increase in vehicles dropping off and fetching children from local schools including WBIS. Utilisation of the traffic signals in the village centre could exceed 100%, potentially causing tailbacks on all five approaches, both at rush hour and school drop-off/pick-up times.

These traffic issues would make it extremely difficult or impossible to mitigate against the negative impact of air and noise pollution, both during and after development. WBIS is extremely concerned about its children being exposed to this.

The Broadoaks and Sheer House developments will exacerbate a number of these issues.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The inclusion of sites in the Regulation 19 version of the DPD, that were not in the Regulation 18 version, does not in itself weaken the soundness of the DPD in any way.

The impact of the proposals on infrastructure, including school places, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.

The high proportion of Green Belt housing to be delivered in West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5. When all the housing allocations for the Plan period (Green Belt and non-Green Belt) are considered, the largest proportion of new homes is concentrated in Woking town centre. The sites in Byfleet are not proposed for development until after 2027; the distribution of development across the Borough at that time is not yet known. However, the Town Centre continues to be the key location for future direction of growth.

The number of dwellings that need to be allocated overall is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.

The joint working that underpins the proposals is set out in the Duty to Cooperate Statement, to be published as part of the submission documents to the Secretary of State.

<p>The school playing fields at site GB18 proposed for removal from the Green Belt will continue to have the protection of policy CS17: Open Space, Green Infrastructure, Sport and Recreation, and also of National Planning Policy Framework paragraph 97. The plan is therefore not considered likely to result in the loss of the playing fields. Given the removal of site GB11 from the Green Belt, it would not be possible to keep site GB18 in the Green Belt, and at the same time secure a defensible Green Belt boundary. The relationship of the proposals to the West Byfleet NDP is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16.</p> <p>The amenity impact of the loss of Green Belt is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4.</p> <p>The sequential approach and very special circumstances case for Traveller pitches in the Green Belt, as well as the location of and detailed matters relating to those sites, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.</p> <p>The traffic impact of the proposals is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13. The recent expansion of the West Byfleet Infant and Junior Schools has been considered in the traffic study carried out on the A245.</p> <p>The impact of the proposals on air and noise pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p> <p>Information on development at Broadoaks and Sheer House was included in the traffic mitigation evidence base, and also provided to inform the planning of infrastructure providers.</p>
<p>Response Reference: U0001177</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 05004/1</p>
<p>Name: West Byfleet Neighbourhood Forum</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10, SA1</p>
<p>Summary of Comment: Respondent would like to speak at examination. The SA DPD is unsound because site GB10 should not be taken out of the Green Belt for the following reasons:</p> <p>WBC have not defined enough detail on how it proposes land to be used at GB10.</p> <ul style="list-style-type: none"> - Questions why it is necessary to remove 29.33 ha from the Green Belt, where the stated developable area is 14.8ha plus plus 4.7ha for public open space and green infrastructure. What about the remaining 9.83 ha, and why is it not designated as Local Green Space. Makes residents sceptical about there being further development of homes. There is mention of retaining ' large areas of woodland and parkland setting and strengthening where possible' but no specific protection from development, which is needed. This is a specific concern as the proposed density will be little owned green space (gardens) so the land surrounding the site needs protection as green space. - the size and shape of GB10 seems designed to allow WBC the simplicity of dealing with a single landowner, rather than making best use of land in the area. - suggests that it would make sense to adjust the boundary of the site to adjoin the road running to West Hall care home, include fields along it and remove the heavily wooded (Tin's and Dodd's woods) on the west side. This follows clearly defined boundaries and allow a green corridor to run between GB11 and a moved GB10. - there has not been consultation about the size and shape of the site, only a binary yes/no to acceptance.

Wording in GB10 "Access to the development could be provided through the Green Belt land from Parvis Road acknowledges that WBC have not shaped the land they wish to remove from Green Belt, and wish to use more of it for Highways. This is unsound and not in accordance with para 138 of the NPPF.

- the next line "the retention of the northern part of the parcel within the Green Belt" is unsound as the term 'parcel' is not defined and you are left you guess at its extent.

Traffic modelling

There has been no detailed traffic modelling produced within the DPD or supporting information on increased vehicle flows from GB10. Looks forward to seeing more detailed proposals and 'mitigation options' at Examination.

WBC have changed numbering on the proposals map since the last consultation, which is very confusing for residents. Many supporting documents, including the IDP, use the old numbers, making it very hard to understand the documents.

WBC's town centre development are at exceptional densities compared to the rest of the Borough. This will effectively raise density limits throughout the Borough. It is reiterated by The Leader of the Council, David Bittleston, that higher densities of housing in the urban area can be achieved, but little evidence to show that the increased supply of new homes from such development will be sufficient to prevent the need to release Green Belt. This should be accounted for in the DPD.

- The DPD is not in accordance with para 67 of the NPPF and is unsound.

Uses the Sheerwater Regeneration as an example of the Council using compulsory purchase powers to buy and demolish homes and replace them with higher density housing. This approach could be replicated elsewhere in the Borough, to create more homes on land already used for housing. This is a policy which is not being taken account of by planners, as it is not in the Core Strategy and should be. Housing density should be a strategic policy, as per para 118d of the NPPF's requirement to develop under-utilised land. The policy of the Council to buy land and increase housing density in existing housing areas should be incorporated into the SA DPD and will lower or remove the need to take land of the Green Belt to satisfy housing requirements. This element of the plan is unsound.

There is a lack of information in the SA DPD defining the mix of dwellings expected on specific sites, which the Core Strategy para 5.74 states the DPD will do.

The Core Strategy states that the Council will keep the Broadoaks sites under review in the preparation of the SA DPD. It has only partially done so, modelling 150 homes there. The DPD does not take account of the approval (subject to S106) of planning to construct 254 homes and an 80 bed care home.

The Council has no policy on how to account for the need for additional care home beds, to cater for the Borough's ageing population (para 5.96 Core Strategy) which will release 75% homes [previously occupied by elderly residents] for occupation.

Policy CS3 of the Core Strategy states the Council will facilitate delivery of 170 homes in West Byfleet. Assumes this figure is given to infrastructure providers to plan for additional infrastructure, however it figure is very much an underestimate, with new residential units created from office to residential PD, planning permission (outline with intended full permisison expected in April 2019) for 255 apartments at Sheer House and a number of other schemes. WBC will provide exact figures.

Figures from Riette Thomas (Feb 2013) in a profile of West Byfleet based on ONS Census 2011 estimate 2320 households. With development expected from office to residential conversions, Broadoaks and Sheer House, by 2022 there will be at least an additional 644 homes, an increase in 28% households since 2013. It is unclear whether these figures have been given to infrastructure providers.

Nowhere else in the Borough faces such large increases in the population, even without GB10 being removed from the Green Belt, which based on the lower figures stated in the Core Strategy.

On the phasing of delivery of GB10, no reasons are given as to why development will only be allowed to commence in 2022, and it is unclear whether this is legally enforceable.

Questions whether it is linked to infrastructure provision and available capacity. Without showing that the projected increase in households is sustainable, the plan is unsound. In this respect, the NPPF has a presumption in favour of sustainable development but subject to any adverse impacts of doing so significantly and demonstrably outweighing the benefits. WBC do not have robust enough evidence on the shape and size of GB10 nor impacts of new homes at GB10 and Sheer House. There is a lack of proven evidence to show adequate infrastructure provision to meet the needs of occupiers of these new homes.

The West Byfleet Neighbourhood Forum supported the planning applications for GB11, for delivery of 254 homes and an 80 care home, even though it was contrary to the Neighbourhood Plan policy to 'maintain, enhance and protect the distinctive and special character of West Byfleet'. The Forum recognised the need to support these new homes. However, it does not support removal of GB10 from the Green Belt which would massively effect this policy and is not consistent with national policy on Neighbourhood Plans. As per para 13 of the NPPF, the Forum wishes to 'shape and direct development that is outside of these strategic policies' [of the Local Plan] by recommending that GB10 is retained in the Green Belt.

Raises concern about the viability of GB11 and Sheer House once GB10 is removed from the Green Belt, which will be a far more viable site as the base cost is so low (current woodland and fields). There is a threat that will could lead to a derelict town centre (Sheer House left as an empty office block) and a partially built or slowly developed housing estate on GB10. This would breach para 59 of the NPPF that 'land with permission is developed without delay'. The removal of GB10 from the Green Belt is therefore unsound because WBC have failed to properly assess the economic viability of housing schemes in the neighbourhood area against the proposed GB10 allocation.

WBC have failed to set a housing requirement for designated neighbourhood areas, as well as their whole area, as set out in NPPF para 65.

WBC also have a duty to support development of windfall sites, several of which have come forward and been developed in West Byfleet. If GB10 is released from the Green Belt, such sites that could support a greater density of housing, are less likely to come forward for development. This land will become under-utilised, which is against national policy.

Releasing land at GB10 from Green Belt is about satisfying the Borough's housing requirement, and not West Byfleet. There will be a disproportionate effect on West Byfleet with growth in homes increasing by 50%, which is not sustainable.

Flood risk - southern parts of GB10 are prone to flooding, and therefore the site does not meet the sequential test that steers new development to areas with lowest flood risk, as defined in NPPF para 158.

Consultation on Regulation 19 was too short to consider such as significant planning matter. The timeframe for the Public Enquiry in late 2019 will give the Forum time to study and consider the proposals in more detail. Looks forward to further discussion of the issues at the Examination.

The significant housing development about to take place in West Byfleet have not be properly accounted for, and the impacts from these sites and from Green Belt release have not been fully analysed. Reiterates that the Forum recognises the need for new homes in the longer term in West Byfleet, and is ready to re-consult and amend its plan to continue growth that is sustainable locally.

Contributor Proposed Modification: Sheerwater Regeneration is an example of the Council using compulsory purchase powers to buy and demolish homes and replace them with higher density housing. This approach could be replicated elsewhere in the Borough, to create more homes on land already used for housing and should be incorporated into the SA DPD. This will lower or remove the need to take land of the Green Belt to satisfy housing requirements.

Modification Reference: U0000324

Officer Response: On the details of the proposed GB10 site:

- the area of land allocated reflects the revised Green Belt Boundary and follows the recommendations of the Green Belt Boundary Review. The boundary needs to be drawn clearly and logically using physical features that are readily recognisable and likely to be permanent (as defined in the NPPF). In terms of the allocation's area, this also needs to be drawn logically and not cut the site off from Parvis Road, which is relevant to Tins Wood, which sits at the north of the site. However, the policy includes a key requirement that the main access could be through Green Belt land from Parvis Road, with a new roundabout at Blackwood Close. This would avoid building through Tins Wood. Details of any access will be determined at the planning application stage with the advice of Surrey County Council as Highway Authority for the area. The Council has policies to protect trees which will be taken into account on any access arrangement for the site.

The allocation clearly shows the shape and size of land it would like to remove from the Green Belt, and the detail about access will be confirmed, assessed and publicly consulted on at the point of a planning application being submitted, in line with the Policy's key requirement that identifies 'Significant highway, access and transportation improvements would be needed. These will be identified through a Transport Assessment at the planning application stage'. This does not make the policy unsound but sets out that detail about site access will be determined through the Development Management process, when other factors such as the layout of development and landscaping of the site can be taken into account.

The woodlands referred to are protected by a key requirement in the Policy to 'Retain large areas of woodland and parkland setting and strengthen where possible'. This is in addition to the policy protection contained in the Core Strategy CS7 Biodiversity and Nature Conservation and CS17 which includes green infrastructure, as well as the Development Management Policies DPD mentioned above.

Regarding the point about the lack of clarity about the part of the bullet 'The retention of the northern part of the parcel within the Green Belt' up to the GBBR reference, this is noted and a modification has been proposed to clarify the point.

To add context to the extent of the site's allocation, the Green Belt Boundary Review sets background, and contains the presumption that large parts of the site should not be built on and left green to help maintain a good transition between the urban area and Green Belt. It is proposed that the site should contain substantial areas of public open space and green infrastructure, including the preservation of large areas of woodland and parkland setting. This will serve residents of the development, and also help conserve the distinctive function of green infrastructure and links to the Wey Navigation corridor, which contribute to the character of the area and to local biodiversity. These points are included as key requirements in the policy for GB10 to ensure the site's green infrastructure is minimally impacted by the development, and to help the development fit into the area's green character.

On traffic modelling, please refer to sections 6.7 and 13 of the Council's Regulation 19 Issues and Matters Topic Paper, in particular regarding the mitigation measures identified for the A245.

Regarding the changed numbering on the proposals maps, this is to account for changes to the DPD since the last (Reg 18) stage of consultation, to ensure the proposals map properly reflects the draft DPD's allocations. Some site numbers within the DPD have changed due to the progressing development status of various sites, as highlighted in Appendix 6 of the DPD. Further changes resulted from the removal of the two Pyrford sites (GB12 and GB13) from the DPD following the Council's decision at the meeting on 18 October 2018. While it is noted that changed references on the proposals map may cause confusion, they are necessary to present an accurate picture of the latest, Regulation 19 version of the DPD. It should be noted that consultation events were held and the Planning Policy team were available by telephone and by email during the consultation period to explain any particular queries that any member of the public had. While the consultation is now closed, the team are still on hand to answer any queries

relating to the DPD, recognising that these could not be taken into account as representations.

The densities being taken forward in permitted town centre development are considered acceptable by the Council through the Development Management process, with regard to the Development Plan for the Borough. They do not change the current adopted density guidance contained in the Core Strategy, CS10 Housing provision and distribution, which should be noted provide indicative ranges as opposed to limits, and in supplementary planning guidance on Design. These density ranges inform the indicative yields contained in the text that follows the Site Allocation policies. It should be noted that the Core Strategy's policy on density (and all of its policies) apply to the Site Allocations. As with current town centre development, development proposals at sites included in the DPD will be assessed on a case by case basis, in accordance with the Development Plan, which includes the Core Strategy, Development Management Policies DPD and the Site Allocations DPD.

The Sheerwater example is noted and welcomed as a suggestion for wider application. At the current time, and during the development of the draft DPD, Sheerwater has been the only site considered appropriate for this approach to development. While this development will increase housing densities, a main element of its purpose is to aid redevelopment and regeneration of poor quality housing stock in the area. The strategic policy background to the allocation's approach is contained within the Core Strategy CS15 Priority Places. Across other Council housing estates in the Borough, specific but generally smaller sites have been thoroughly considered in the Strategic Housing Land Availability Assessment (SHLAA) and are included in the draft DPD where appropriate (UA20 and UA21 in Barnsbury). Based on this, and a robust assessment of reasonable alternative sites to meet housing need, the Council considers that the DPD is justified and sound, and does not require modification in this regard. The wider issues referred to are further addressed in sections 1, 10 and 11 of the Council's Regulation 19 Issues and Matters Topic Paper. As set out in Core Strategy Policy CS11 Housing Mix, all residential proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs evidenced in the latest Strategic Housing Market Assessment. Whilst paragraph 5.74 of the Core Strategy is cited, the Council has decided not to be too prescriptive within the policies of the Site Allocations DPD about the mix of dwellings to be provided on allocated sites in recognition that the nature of local needs may evolve over the plan period. This better reflects policy CS11 which expressly refers to planning applications reflecting need 'as evidenced in the latest Strategic Housing Market Assessment'.

Regarding keeping the Broadoaks sites under review in the preparation of the SA DPD, this process is ongoing. If the approval referred to at Broadoaks is substantially commenced prior to the examination of the Plan, the Council will seek to update the Site Allocations to reflect this change. This process of updating has been undertaken with other sites throughout the plan preparation process and the sites that have already been deleted or added are detailed in Appendix 6 of the DPD.

The Council's policy on additional care home beds is contained within the Core Strategy Policy CS13 Older people and vulnerable groups. This outlines the general support for new specialist accommodation, and outlines that the Site Allocations DPD will assist in bringing forward suitable sites to meet need. Site GB11's policy states that provision for elderly accommodation can be included in the mix of dwelling types. A number of other sites that are suitable for general residential use will also be suitable for elderly accommodation, where they meet the criteria of CS13. This will be assessed with regard to evidence of need on a case by case basis, and in this respect the DPD brings forward sufficient suitable sites to meet this specific need.

With regard to the number of homes expected to be developed and infrastructure planning, this has been taken into account in the recent (2018) Infrastructure Delivery Plan, which provides a robust basis for supporting the Site Allocations DPD. The Council will continue to work with infrastructure providers to ensure that changes in need, capacity

and availability of funding are accounted for. This is further detailed in section 6 of the Council's Regulation 19 Issues and Matters Topic Paper.

On the timing of development at GB10 from 2022 is covered in section 1 of the the Council's Issues and Matters Topic Paper and is prescribed in Policies CS1 and CS6 of the Core Strategy. Sufficient land has been identified on previously developed land in the urban area to meet development needs up to 2022. This approach is supported by the Council's evidence base to the Site Allocations DPD, which is considered robust and sufficiently comprehensive, and is detailed further in section 10 and 11 of the Council's Issues and Matters Topic Paper. In terms whether the timing of development is legally enforceable, as and when the Site Allocations DPD is adopted by the Council and becomes part of the Development Plan, Section 38(6) of the Planning and Compulsory Purchase Act 2004 will apply and requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. At its present stage of preparation, in accordance with the provisions of the NPPF, the Site Allocations DPD should be given substantive weight for the purposes of managing development across the Borough.

The position of the Neighbourhood Forum regarding the Neighbourhood Plan is noted, and is dealt with in section 16 of the Council's Regulation 19 Issues and Matters Topic Paper.

The viability of schemes has been assessed (both individually and culmulative) in the Council's economic viability assessment, which is available on the Research and Evidence base page of the Woking 2027 website. The implementation of permissions is part of the development process, and not something that the Council has a direct influence over, unless schemes are Council led. The Council does the best it can to create a conducive environment for businesses and developers to invest. Based on the Council's evidence, there is sufficient housing need for development at both the West Byfleet District Centre and at GB10 (see section 1 of the Council's Regulation 19 Issues and Matters Topic Paper). The Council is confident that bringing forward development at GB10 will not impede viability or delivery of the Sheer House development.

On the lack of having a set housing requirement for designated neighbourhood areas, as set in para 65 of the NPPF, this is correct. The Core Strategy (2012) is the strategic policy document that sets the housing requirement for the Borough, and areas within it. As the designation of all Neighbourhood Areas in the Borough post-dates this, with the earliest being designated in 2014, housing requirements for these areas will be considered when the Council updates its Core Strategy (which is not considered to be in immediate need of modification, following its 2018 review), or if they come forward sooner, as part of a review or development of a Neighbourhood Plan. The Council will work with Neighbourhood Forums to identify a suitable housing requirement for their Neighbourhood Area. It should be noted that this requirement would not be less than is set out in the Core Strategy requirements and Site Allocations DPD, as the NPPF states that neighbourhood plans should support the delivery of strategic policies (para 13) and not promote less development that set out in the strategic policies for the area, or undermine those strategic policies (para 29).

Windfall sites are supported by the Council, and are dealt with through the Development Management Process in accordance with the Council's Development Plan and National Policy. Windfall sites are not included in the Council's housing land supply for the period 0-10 years. In Table 1 of the SHLAA, windfall allowance has been discounted from the periods 0-5 years and 6-10 years. This is to account for non-implementation of developments currently in the pipeline, either as extant permissions and/or as allocated sites. It must be noted that developments that are completed as windfall sites are counted towards the overall completion figures for each plan year. This is considered consistent with the Inspector's Report from the Core Strategy examination which found that "the Council has identified a consistent stream of small sites that have resulted in an average of more than 40 additional dwellings per year...the leeway that such small sites provide would nonetheless appear capable of compensating for any delay in the housing which is

anticipated to be delivered from, for example, Moor Lane or Brookwood Farm." In the period 11-15 years, it is anticipated that only 32 units will come forward from sites under construction or for which there is unimplemented planning permission. It is therefore not considered proportionate to discount windfall as an allowance for non-implementation of pipeline developments during this period.

Again, with regard to the response on viability, the Council is confident that there is sufficient housing need for suitable urban sites to come forward for development at suitable densities, in addition to the proposed Green Belt releases. Again, please see section 1 of the Council's Regulation 19 Issues and Matters Topic Paper for further explanation.

Flood risk is addressed in section 7 of the Council's Regulation 19 Issues and Matters Topic Paper, and impacts of development with regard to infrastructure and traffic are covered in sections 6 and 13 of this paper. The adequacy of the Regulation 19 consultation time period meets the requirements in the relevant planning regulations and in the Council's Statement of Community Involvement.

The Council welcomes the West Byfleet Neighbourhood Forum's willingness to work with us in planning for new homes in the longer term, and the Planning Policy team will take steps to engage and discuss these issues with the Forum as the Local Development Framework progresses.

Response Reference: U0001437

Officer Proposed Modification: Amend key requirement on p280 to read as follows: "Access to the development could be provided through Green Belt land from Parvis Road, with a potential pedestrian access through Broadoaks which would give a more direct route into West Byfleet Town Centre and its services and facilities. The retention of the northern part of the parcel, adjacent to the boundary boundary of the site within Green Belt, would help to avoid perception of development narrowing the Green Belt separation between Byfleet and West Byfleet." Delete the next key requirement: "taking into account biodiversity and flooding constraints, form new Green Belt boundary along edge of development to retained wedge of land adjacent M25 and retaining land to the north of the development within the Green Belt."

At Broadoaks, the Council intends to keep the site under review during the preparation of the SA DPD, and this process is ongoing. If the approval referred to at Broadoaks is substantially commenced prior to the examination of the Plan, the Council will seek to update the Plan to reflect this change.

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06412/1

Name: West Estates Ltd

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05

Summary of Comment: 6.1 We are pleased to note that the draft Site Allocations DPD confirms that the two parcels of land in Byfleet controlled by our client, West Estates, are suitable for residential use. That confirmation is consistent with the conclusion reached in the Woking Green Belt Review that the land should be released from Green Belt, and the strong performance of the sites in the SHLAA 2017. It should be noted Green Belt Review's recommendation to release land for for at least 550 dwellings was made against the background of a requirement for 292 dpa; if the target was to rise significantly (see below), further Green Belt release will be needed, unless the supply of deliverable urban area sites increases.

6.2 The inclusion of our client's land in the draft Site Allocations DPD reflects the locational sustainability of the land coupled with the ability to overcome any identified

constraints. Cite revisions to the NPPF policies on green belt release, in particular paragraphs 137, 138 and 139, and the High Court judgement of 21 April 2015 in relation to a challenge by Calverton Parish Council to the adopted Nottingham, Broxtowe and Gedling 'Aligned Core Strategies' (Paragraphs 50 and 51).

The Development could be achieved without harming the purposes of the Green Belt: The sites are contained by permanent, defensible boundaries, and so they represent a logical infill opportunity between the M25 motorway and existing residential uses, and would not result in urban sprawl.

Byfleet and West Byfleet would continue to be separated by the motorway and an extensive area of Green Belt proposed for retention.

Rather than encroaching into the countryside, the schemes will slightly extend the existing settlement edge, and further expansion will not be possible because of the motorway (and other features).

The site contains no listed buildings, is not part of or adjacent to a conservation area, and will have no impact on the Byfleet CA.

Releasing these sites will have no detrimental impact on the ability of schemes to come forward at sites within the urban areas; the Core Strategy acknowledges Green Belt sites are necessary to meet all types of local need.

The sites are well located in relation to services and public transport, and could provide high quality family homes in a range to meet identified needs, including affordable housing.

The scheme would also create new areas of publicly accessible open space.

The potential dwelling yields for the two sites (total 220 dwellings) stated in the SHLAA and in the SADPD Appendix 4 should not be regarded as fixed. A Vision Document for the two sites has been produced (see attached), which demonstrates that they could accommodate around 245 dwellings in total. More detailed work on this will be undertaken at the appropriate stage. Our client would be amenable to progressing a comprehensive masterplan across the two sites, working collaboratively with other landowners.

Highlight national policy on housing supply, including NPPF paragraphs 33, 59, 60 and 73, PPG (Housing and economic land availability assessment) paragraphs 29, 30 and 40, and the Technical Consultation on Updates to National Planning Policy and Guidance (26.10.2018 - 07.12.2018), in particular the penultimate bullet on Page 8 and paragraphs 12, 18, 25 and 26.

Question the robustness of the Woking Core Strategy Review (2018), in particular the conclusion that the housing requirement remains up-to-date. This conclusion is not justified by a fully evidenced review and the review lacks sufficient detail. A more focused and detailed review of the Core Strategy is required.

In the absence of a fully-evidenced review of the Woking Core Strategy, we consider that the Council has significantly under-estimated the level of housing growth required in the Borough to ensure that the housing requirement is consistent with national planning policy and guidance. We fully expect that the Government will continue to endorse the use of the 2014-based household projections, according to which the local housing needs would equate to 409 dpa. On this basis, we consider that the Site Allocations DPD should allocate additional land in order for to meet 409 dpa.

Our client's land represents deliverable residential development opportunities which is capable of delivering both market and affordable housing within the current plan period, rather than safeguarding them for delivery post-2027. The sites could deliver family houses, as opposed to the demand for flats which can be met in the town centre.

No specific comments on the deliverability of other Green Belt sites proposed for allocation, although we reserve the right to offer comments during the examination.

However, a greater number and mix of sites should be put forward, because of the housing need argument made above and also to ensure flexibility should these sites not come forward as anticipated. Too much focus is placed on just three sites. Most development sites have at least a 4-6 month lead-in period for infrastructure to allow

housebuilding to start, in addition to time for the planning process, and in many cases this period is significantly longer.
Contributor Proposed Modification: Allocate enough additional land within the current plan period (including sites GB4 and GB5) to deliver 409 dwellings per annum
Modification Reference: U0000341
Officer Response: Support welcomed. Agree that the indicative yield previously stated for these sites in Appendix 4 should not be regarded as fixed; it may go up or down as further work is carried out on detailed plans for the sites. Modifications are proposed to clarify that yields will be determined as part of the review of the Core Strategy or the Site Allocations DPD. The Core Strategy Review is adequately detailed and evidenced. The Core Strategy requirement of 292 dwellings per annum continues to be the figure against which housing delivery should be measured; it would therefore not be appropriate for the SADPD to allocate Green Belt land in order to meet 409 dpa. The need to safeguard land for development beyond 2027 is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 2, especially paragraph 2.6. The reasons behind the allocation of GB1, GB7 and GB10 are set out in the Regulation 19 Issues and Matters Topic Paper. The reasons why more Green Belt land is not proposed for allocation are addressed by Section 14 of the same Topic Paper. These three sites are not proposed to be released for development until 2022, so the lead-in times for their development should not delay the start of building on these sites.
Response Reference: U0001731
Officer Proposed Modification: Table 5 in Appendix 4: Amend Column 3 for GB4, GB5 and GB8, to read 'To meet long-term development needs of the Borough. The precise details of the uses on the site will be defined as part of the review of the Core Strategy and/or the Site Allocations DPD.' Delete entire text in Column 4 for GB4, GB5 and GB8, and insert new text: 'The anticipated housing yield for the site will be determined as part of the review of the Core Strategy and/or the Site Allocations DPD.'
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06560/1
Name: West Hall Ltd
Number of Signatories: 1
Comment Type: OBJ
Site Reference: SA1, GB10
Summary of Comment: The DPD is legally compliant, including with the Duty to Cooperate. It is considered to be generally sound on its approach to housing distribution, but there are specific elements within draft policy SA1 and GB10 that the Council hasn't fully justified in accordance with the tests of soundness. If left unchanged, the DPD would be unsound. Fully supports the identification of site GB10 for housing development. Confirms that the site is available and deliverable, and achievable within suggested timeframe. A detailed vision document has been provided to demonstrate how the site could be developed in line with the draft allocation, as modified as per the following suggestions. Supports the Council's commitment to meet the full housing requirement of the Core Strategy. Considers the Sustainability Appraisal to be satisfactory as per NPPF guidance. Considers the Green Belt Boundary Review to have been carried out with full regard to NPPF tests of soundness, and in terms of meeting exceptional circumstances requirements. Fully supports the approach to deliver 550 homes in the latter part of the plan period, and safeguarding land between 2027 and 2040.

Net developable area: 14.8ha is not based on any detailed assessment of the site. Should be modified to ensure effective use of the site is made in line with paragraph 117 of the NPPF.

Public open space / green infrastructure could be delivered onsite; but client owns large tracts of surrounding land, including that immediately south of the site adjacent to the Wey Navigation. In order to make effective use of the allocated site for housing, key requirements should be modified to recognise open space / green infrastructure contribution that adjacent land could make. This land is in the Green Belt and as per para 141 of the NPPF could provide open space / recreation opportunities, enhance visual amenity and biodiversity and improve damaged / derelict land. It would also allow for active management of the land and public access for the wider community.

In line with the NPPF, the policy should recognise the potential for higher densities once detailed assessments have been fully explored at application stage. 40dph should be an average figure, to be reduced in more sensitive parts of the site / increased in less sensitive parts. The site could deliver more than 555 dwellings.

Fully committed to providing affordable housing if viable to do so. Supports change to policy since Reg18 stage which references policy CS12 as being the guiding policy. There is no reason to hold the site back for development post 2022. If adopted in early 2020, the plan should allow for associated infrastructure to serve the site to be provided in advance so housing delivery is not delayed. Taking into account evidence indicating long average times to secure outline consent, to determine reserved matters and finally to deliver the first house, the site should not be held back. Anticipates delivery of necessary consents could take several years. Delivery of the first batch of homes may not materialise until at least 2026/27. Could take until 2034 for the entire development to be completed. Early release of the site would not prejudice other brownfield sites from coming forward as many of these are within the urban area and would provide for different types of housing e.g. high density flatted schemes.

Does not support the release of part of the site for traveller pitches. This is neither justified nor consistent with national policy. There was no prior consultation with the client as to the practicalities of a) delivering the site b) long-term ownership and maintenance strategy and c) possible impact on the commercial viability / attractiveness of the wider residential scheme. Government policy for traveller sites has not been taken into account effectively: the Council's Traveller Accommodation Assessment pre-dates current Government guidance. The Council claims to have found no suitable or viable sites within or adjacent to the urban area but has provided no details of which sites have been assessed as part of the SHLAA, or reasons why sites were discounted. Nearly 70% of the overall need has been allocated at West Hall. There is no reason why pitches should be geographically dispersed around the Borough (as per statements made at the October Council meeting). Either intensification or expansion of current sites within the Borough would be the most appropriate location for pitches as per Government guidance e.g. expanding the Murrays Lane site (SHLAABWB017) or the Brookwood Lye Road site GB1. Prioritising these locations would result in less disruption for the travelling community and aid integration of new pitches, as well as be more cost-effective. There is no evidence why West Hall is the preferred location ahead of other sites e.g. GB4, GB5, GB7, GB8. Neither national planning policy nor guidance supports the principle for traveller accommodation to be met as an integral part of large allocated housing sites - this principle is not being adopted in DPDs in other parts of the country; this approach could also impact upon commercial saleability and cautious approach by potential purchasers of residential properties.

Should it be demonstrated to the Inspector that it is not possible to intensify or extend current traveller sites to accommodate need, an alternative location adjacent to the site on land within the same ownership should be considered (see the Vision Document supplied with rep). This land is considered to be more appropriate and would reduce conflicts between settled and traveller communities in line with Government policy and guidance. This is a key consideration in deliverability of the site.

A Vision Document has been supplied which has been informed by various detailed assessments. A summary of key technical elements from the document includes:

- the site can deliver the required housing numbers and more, in line with the draft allocation;
- the site lies within a highly sustainable location in close proximity to facilities, served by bus routes and is within walking distance of West Byfleet station;
- highway issues can be addressed at the detailed application stage;
- the site is not visible from the wider landscape due to screening and topography;
- there would be no effects on the setting and significance of any designated heritage assets and there would be a negligible effect on the locally listed West Hall;
- there are no ecological issues that would affect the principle or quantum of development proposed, and where required, mitigation measures can be included to ensure there are no adverse impacts upon fauna;
- existing woodland areas will be managed to maximise their ecological, arboricultural and recreational potential;
- no issues in relation to flooding or drainage.

Wishes to participate at Examination as the DPD raises significant issues. Further discussion of the points raised will require discussion between interested parties at the Hearings and aid the Inspector's consideration of the matters surrounding client's landholding.

Contributor Proposed Modification: Net developable area: 14.8ha is not based on any detailed assessment of the site. Should be modified to ensure effective use of the site is made in line with paragraph 117 of the NPPF: "Net developable area of approximately 14.8ha or more could be available for residential development following detailed assessments at the application stage".

Key requirement on green infrastructure / open space should be modified: "Development to integrate approximately 4.7ha of public open space and green infrastructure within and/or adjacent to the site".

Modify the density requirement: "It is anticipated that the site can achieve a residential development yield of at least 555 dwellings on this individual site, calculated at an assumed indicative density of 40 dwellings per hectare (dph). The development density should generally accord with the guidance set out in Core Strategy Policy CS10 and will be informed by various detailed assessments at the application stage".

Site should be released earlier than 2022. Delete reference to between 2022-2027 cited within draft policies SA1 and GB10 and within any supporting text.

Delete references to land being set aside for the delivery of 15 Traveller pitches up to 2027 within draft Policy SA1 and GB10 (and supporting text) or identify the alternative area shown in the vision document as the preferred location for a 15 pitch traveller site.

Modification Reference: U0000354

Officer Response: The Council appreciates the confirmation made in the representation that site GB10 is available, deliverable and achievable within the suggested timeframe. Net developable area: a site allocation should provide certainty and in that regard, having a site boundary is the most appropriate way of managing development. The designation of the site area is informed by a Green Belt Boundary Review (GBBR), which the Core Strategy has identified as a key evidence base to ensure that any land that is released from the Green Belt won't undermine the overall integrity and purpose of the wider Green Belt. In this particular case the GBBR, whilst accepting that there is scope for development of the site as defined in the DPD, also recommends that the area to the east of the site boundary should be retained in the Green Belt in order to avoid a perception of development narrowing the Green Belt separation between Byfleet and West Byfleet. On that basis, the flexibility being sought at this plan-making stage is not considered acceptable. If at the Development Management stage a proposal is submitted which seeks a greater net developable area for residential development; and/or that public open

space and green infrastructure be provided on land adjacent to the site; then these proposals will be assessed on their merits. A case officer will consider the merits given the proposed nature, scale and juxtaposition of any built development and open space within the context of the policies in the Development Plan, including Green Belt policies. The Council will resist any proposal that would undermine the visual gap between West Byfleet and Byfleet.

Density: the Council does not consider it necessary to amend the paragraph on anticipated yield as suggested. The Core Strategy policy CS10; the introductory text of the Site Allocations DPD; and Appendix 4 of the DPD are all very clear that capacities are indicative. Actual densities and scale will be determined at planning application stage. It would be inconsistent to treat site GB10 any differently from other site allocations.

Timing for release: the Council has a very clear spatial strategy set out in its Development Plan to ensure the sustainable development of the Borough. This has been fully endorsed by the Secretary of State during the Core Strategy Examination. The Council has identified in the Site Allocations DPD sufficient land within the urban area to enable delivery of housing to 2022. The Town Centre and Green Belt continue to be the direction of growth between 2022 and 2027. Given the current nature of housing land supply in the SHLAA and Housing Land Supply Position Statement, it is anticipated that there will be sufficient land within the urban area to allow sufficient lead-in times to bring forward land released from the Green Belt between 2022 to 2027. Given this context, the Council does not accept there should be in-principle flexibility for bringing forward this particular site early. The Core Strategy builds in sufficient mechanism for monitoring and review, and that includes reviewing policies if they are not delivering their objectives. If at any given time the Council felt there needs to be a revision of overall spatial strategy based on evidence of housing provision - particularly on previously developed land - then it will do so through the plan-making process. Further detail is provided in the Council's Regulation 19 Issues and Matters Topic Paper, in Section 14, paragraph 14.10.

Traveller pitches: Section 3 of the Issues and Matters Topic Paper describes in detail the Council's sequential approach to identifying sites to meet the accommodation needs of Travellers. The Council did first consider whether legally established sites in the Green Belt had capacity to expand without significant adverse impacts on the environment before new sites in the Green Belt were considered (paragraph 3.7). Intensification of the site off Murray's Lane was explored and rejected due the low sustainability of the site to accommodate further pitches (based on the planning history of the site). The other allocated and safeguarded sites were also considered, but the Council identified land at West Hall to be the most sustainable option given its proximity to the District Centre and all the services and facilities therein. This option was also considered to best meet Government guidance on planning policy for traveller sites in terms of enabling provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure. The representation puts forward an alternative site for traveller pitches within an area of Green Belt to the north-east of the site boundary. However, the Council cannot allocate this land for a traveller site as this would be contrary to evidence in the GBBR which recommends the retention of this land in the Green Belt in order to avoid a perception of development narrowing the Green Belt separation between Byfleet and West Byfleet. The Council is confident that with good siting, layout and design, any adverse impacts on the amenity of nearby and prospective residents and the landscape setting of the area can be minimised (see paragraph 3.10).

Response Reference: U0001763

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06358/1
Name: Westfield Common Residents Association
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB14, UA44
<p>Summary of Comment: The Proposals Map is unsound. The Neighbourhood Centre located in Westfield is incorrectly drawn and includes a residential area, and also registered common land and open recreation land. The map shows the centre as a continuous built-up area running from the shopping parade to Westfield Common, however the actual centre consists only of the parade. GB14 allocation as a SANG is unsound. The site is partly registered Common Land (Westfield Common) and is therefore protected as open space and the public have an unfettered right to roam across this land. The inclusion of the land does not increase the net availability of open public land in mitigation of new housing development. Development of this land to make it suitable for SANG e.g. provision of parking space would actually need to remove open accessible space leading to a net reduction. The landscape (wet woodland) and physical character of the area are not suitable for mass dog walking. The land is a SNCI, and a refuge for Great Crested Newts. It is also too narrow for mass dog walking. i.e. not an open heath land able to absorb large numbers of visitors. UA44 is not legally compliant, is unsound and does not comply with Duty to Cooperate. The site has never appeared in any prior consultations. The site was not part of consultations held during preparation in February to July 2013 and March to May 2014, and through the Site Allocations (Reg 18) June to July 2015. This part of the DPD has never been consulted on publicly by the Council - failing the Councils own Statement of Community involvement. No sustainability appraisal has been carried out or a more detailed one is required before this site can be safely included within a DPD. The underlying assumptions on modes of transport and parking requirements are unrealistic. Wishes to participate at the oral examination for the following reasons;</p> <ol style="list-style-type: none"> 1) I wish to give evidence to the Inspector to ensure that Registered Common Land is afforded all possible planning protection with the appropriate policy being applied. 2) I wish to ensure that the planning inspector is fully cognizant of the common land designation and prior planning inspectorate decisions regarding the common land. <p>Does not wish to speak regarding UA44 representation. Wishes to be informed of next stages.</p>
<p>Contributor Proposed Modification: To improve the soundness of the proposals map the following should be carried out</p> <ol style="list-style-type: none"> 1) the map should be redrawn to show the Neighbourhood centred on the Westfield Shopping parade only. 2) the area of registered common land to the west and front of the Old Woking District Recreation Club should be designated Urban Open Space in keeping with the classification of the rest of Westfield Common to the north of Moor Lane. 3) the area of registered common land to the west and left of Honey Pots lane should be designated Urban Open space in in keeping with the classification of the rest of Westfield Common to the north of Moor Lane. 4) The Loop Roads Sports grounds south of site UA44 should be designated Urban Open Space not left blank in order to preserve its current recreational status. <p>GB14 should be removed as a SANG site and modified to have protected Green Belt status only. UA44 Options:</p>

- 1) Defer inclusion of this site pending consultation with local area on density and form of this area.
- 2) Remove site UA44 from the DPD as it has not been consulted on and has no supporting sustainability assessment.

Modification Reference: U0000361

Officer Response: The Hierarchy of Centres in Woking Borough was originally identified in the Local Plan 1999, but revised with the preparation of the Core Strategy. A Town, District and Local Centres Study (2009) conducted a thorough review of the hierarchy, extent and function of centres in the Borough, in line with Government requirements and guidance. The study recommended that Westfield be designated a Neighbourhood Centre, and was included as such in Table 2 of the Core Strategy (which identifies the main function as serving day-to-day needs of the residents in the immediate surrounding area) and on the Proposals Map as a pink dashed polygon. Policy CS4 of the Core Strategy expands on the role, function and specific proposals for these centres. The policy seeks to protect and retain local shops and other small scale economic uses within neighbourhood centres and shopping parades for meeting the everyday needs of those living locally. The extent of the Neighbourhood Centre as defined on the Proposals Map reflects where proposals for development falling within the defined area must take into account requirements in policy CS4 e.g. relate well to the scale, role and function of the centre. The centre boundaries do not necessarily reflect only the extent of the shopping parade, but also incorporate other buildings and areas where the uses set out in policy CS4 may be considered acceptable; and/or where it is considered appropriate that development proposals take account of requirements in CS4. The Proposals Map prepared for the Site Allocations DPD does not put forward any changes to Westfield Neighbourhood Centre, and the Council does not consider the proposed modification to the centre to be necessary. The common land and recreational space falling within the Neighbourhood Centre is protected by the provisions of policy CS17 on Open space, green infrastructure, sport and recreation. Designating the areas of registered common land as Urban Open Space on the Proposals Map is considered to be unnecessary as it is already afforded protection by CS17, and falls within the definition of Open Space in the NPPF and its associated policy under paragraphs 96 and 97.

Loop Road Recreation Ground is protected under Policy CS17 of the Core Strategy, which sets out a presumption against any development that involves the loss of a sport, recreation or play facility except where it can be demonstrated that there is an excess of provision, or where alternative facilities of equal or better quality will be provided as part of the development. As the Core Strategy sets requirements for open space and outdoor sports facilities, it will be at the point of the review of the Core Strategy that the Council's evidence in this regard will be reviewed and updated, and the Proposals Map updated where necessary. The information regarding uses of this open space is noted and will be investigated further at the relevant time.

The Council is aware of the constraints on land allocated as Westfield Common SANG (GB14). The policy takes these constraints into account. The appropriate nature conservation bodies have been consulted in formulating the policy, including Surrey Wildlife Trust and Natural England. Key requirements have been included within the policy to ensure any development for SANG ensures nature conservation interests are safeguarded, and biodiversity is enhanced. The key requirements also stress that SANG development will need to ensure that increased recreation by people and dogs do not adversely affect the nature conservation interest. Policy CS17 would apply: development involving the loss of open space (such as an area for parking) will not be permitted unless the development is directly related to the enhancement of the open space. Policy CS17 also states that the loss of public open space will not be permitted where there will be adverse impacts on biodiversity. Use of the land for SANG would need to comply with these requirements. Inclusion of the land for SANG offers opportunities to enhance biodiversity; implement other general environmental improvements for the benefit of the public; improve pedestrian and cycle accessibility to the Kingsmoor Park development to

<p>the north of the site, and from Gresham Mill to the east of the site; and improve connectivity of habitats within the site and to the wider green infrastructure network. In parallel, the site would provide SPA mitigation for a capacity of 570 dwellings (subject to the advice of Natural England).</p> <p>Site UA44 has not appeared in previous stages of consultation for the Site Allocations DPD as it was only identified as an assessment site after the Regulation 18 consultation. It was then appraised (by the Sustainability Appraisal) for inclusion in the next iteration of the DPD, and has now been subject to full public consultation as part of Regulation 19 consultation as prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012. Section 9 of the Regulation 19 Issues and Matters Topic Paper describes in more detail how the Council is satisfied that the minimum level of public consultation required by the Regulations has been achieved. Should the site be subject to a planning application in the future, further public consultation will take place at the development management stage. The Council does not intend, therefore, to defer inclusion of the site in the DPD as proposed in the suggested modifications.</p> <p>The matter regarding modes of transport is addressed by Policy CS18 'Transport and accessibility' of the Core Strategy. Various assessments have been carried out to inform transport policy to ensure that the Borough is served by an effective sustainable transport system. There is significant scope to influence a shift in the mode of travel from car-based journeys to public transport and cycling.</p>
<p>Response Reference: U0001730</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick): T</p>

<p>Contributor Reference: 06614/1</p>
<p>Name: Ms Tessa Westlake</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference:</p>
<p>Summary of Comment: Objects to the DPD as it affects Byfleet The number of houses is too large for the community to sustain as it stands. Schools are oversubscribed, not helped by the closure of the Manor School, and it is increasingly difficult to get an early appointment at West Byfleet surgery. What provision is being made for another 900 households? The local roads are virtually at capacity. Parvis Road is always busy, and difficulty on the slightest difficulty on the M25 or A3 causes gridlock for miles around the local area. Traffic mitigation measures are minimal at best and will not solve problems caused by significant number of extra cars. Much of Byfleet is on a flood plain. This point has previously not been taken into account. New houses have previously flooded, and even if the new proposed houses are not affected, they will cover land that previously allowed for drainage, pushing flood water into the village. Feels strongly that no more Green Belt should be lost, especially when brownfield sites are available borough-wide, which should be used first. The plan to compulsorily purchase the field belonging to St Mary's is unacceptable. It is a very well used local amenity that would not be replaced, and has been earmarked by the Church as an overflow burial site. Even if a high amount of new housing is needed, this particular field is not. Overall, raises an objection on the grounds that the concentration is far too great for the area; the roads and local services, already overburdened, will not cope with this influx of new households. The land outlined is Green Belt or does not belong to the Council at all.</p>

Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: This representation has been addressed in the Council's Regulation 19 Issues and Matters Topic Paper.</p> <p>Paragraph 6.9 addresses education provision.</p> <p>Paragraph 6.12 addresses healthcare provision.</p> <p>Paragraph 6.7 and Section 13 address transport infrastructure. In particular, Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.</p> <p>Section 7 addresses flooding. In particular Paragraph 7.7 addresses flood risk in Byfleet and West Byfleet.</p> <p>Section 1 addresses the justification for the release of Green Belt land. In particular Paragraph 1.6 addresses the due consideration which has been given to Previously Developed Land.</p> <p>Section 15 addresses the section of GB5 that is consecrated as a future burial ground.</p> <p>Section 5 recognises that development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. It is within this broad spatial strategic context that sites are allocated or safeguarded for development.</p>
Response Reference: U0000939
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 01641/2
Name: Mr Ian A White
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: Site GB10 should not be taken out of the Green Belt:</p> <p>In combination with the traffic impact of Sheer House and Broadoaks, the increase in traffic will cause even longer delays than currently.</p> <p>In combination with existing pollution from the M25 and A245, the additional noise and air pollution will be above acceptable levels.</p> <p>No additional road, healthcare or educational infrastructure is planned for this large population increase.</p> <p>The loss of this green belt will mean Byfleet and West Byfleet are effectively merged into a single village with no discernible separation.</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The justification for the release of Green Belt land is addressed in the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2.</p> <p>The impact of the proposals on traffic is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13. Development at Sheer House and Broadoaks is factored into the traffic evidence base supporting the allocations.</p> <p>The impact of the proposals on pollution is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 8.</p>

The impact of the proposals on infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6. The impact of the loss of Green Belt land on Byfleet and West Byfleet is addressed in Regulation 19 Issues and Matters Topic Paper, see Sections 4 and 5.
Response Reference: U0001562
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06732/1
Name: Mr Daniel White
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Eform: States the the DPD is not positively prepared, justified, or effective, and it is not consistent with national policy. Considers the DPD to be unsound. Wishes to be informed of the next stages of the DPD's preparation. Email: Deeply concerned that the Council intends to build on the Green Belt in Byfleet, particularly Rectory Lane. It will remove an area where children play and people walk their dogs. Access to the A3 is gridlocked and a few hundred more cars will worsen that road's congestion. Can't believe there aren't other open space in the Borough to build on, that are larger and would have less of an impact. Council tax bills have rocketed with little return other than more congestion. Hopes that some Councillors care about the lives of existing Byfleet residents, and look at other solutions. Tory and Labour Councillors aren't bothered. Hopes that one day the Council will be made up fully of independent representatives.
Contributor Proposed Modification:
Modification Reference:
Officer Response: This representation has been comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper, particularly sections 3 to 5. This paper provides substantial detail to demonstrate the DPD is positively prepared, justified, or effective, consistent with national policy and sound. Points on road congestion, and infrastructure more widely, are addressed in sections 13 and 6, respectively, of this paper. The assessment of alternative sites is covered in section 11 of this paper.
Response Reference: U0001582
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05940/1
Name: Mr Huw Wigley
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Object to proposals for Green Belt loss in Byfleet: Byfleet has suffered from flooding in the last nine years, both on surrounding roads and the proposed safeguarded sites. Developing these areas would increase the risk and flood

water would go into adjacent properties and roads instead. Adequate assessments of river and surface water flood risk have not been carried out.

Roads are already at capacity, heavily congested and High Road is used as a shortcut, causing noise, pollution and danger for residents- this would get worse. The proposed mitigations are unworkable. Stopping the right turn out of Seven Hills Road will just move the problem a few hundred yards, where there is already an issue. Cross- hatching a roundabout on Parvis Road will have no effect- irrelevant whether people enter a roundabout, if they cannot leave it other side. MOVA traffic signals in West Byfleet would be unworkable- would not ease congestion if traffic is queuing on all routes.

Development proposed alongside one of the busiest parts of the M25, without regard for possible future motorway widening.

Village already underserved by infrastructure- all local primary schools at capacity, doctors have minimum 2 week wait for appointments. No police station in the village and crime is increasing. All these issues will be exacerbated by development.

WBC has stated that there are plans to build 5000 houses over the next 10 years. This is a surplus of 2000 to the required number. If the needs of the borough are already met, or indeed exceeded, there is no need to release Green Belt for additional development.

Why is all greenbelt loss taking place in Byfleet, rather than elsewhere in the Borough? Does WBC think we are the area of least resistance? The reasons given for removing sites in Pyrford from the plan were less than adequate, and could easily be applied to GB4, GB5 and GB10.

Not convinced that all brownfield sites have been examined sufficiently. e.g. former McCarthy & Stone offices in Byfleet could be redeveloped with 20 flats, improving the local landscape. Redevelopment of West Byfleet shops (now shelved) is a great opportunity.

The area has above average pollution owing to local traffic and the M25. Development would add to this. Evidence shows that the A245 has the highest pollution readings in the borough. Subsequent readings were taken with the sensor being moved to a location away from the main road, giving an inaccurate picture of true pollution levels in Byfleet.

Comment on current planning application in the area.

My family's quality of life and the value of my property would be adversely affected by the proposals. Appreciate the urgent need for more housing but frustrated that proposals seem to focus only on Byfleet.

Contributor Proposed Modification: I urge Woking Borough Council to reject these proposals for the sake of the people they represent and serve.

Modification Reference: U0000195

Officer Response: The issue of flood risk in relation to the development sites is addressed in in the Regulation 19 Issues and Matters Topic Paper, see Section 7.

The impact of the proposals on traffic congestion, and proposed mitigation measures, are addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.

The Council is aware of Highways Englands M25 South West Quadrant Study, which is ongoing, and the timescale for its completion is not yet known. Whilst the Council would not want to second-guess the outcome of the Study and its potential recommendations, the likelihood of further widening of the M25 is low. In any case, Highways England, who are responsible for the Strategic Road Network, have not raised any fundamental objection to the site allocations, in particular their impact on the Strategic Road Network.

The impact of the proposals on local infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6.

The Site Allocations DPD allocates enough land for housing (including on Green Belt release sites) to deliver 112% of the residual requirement between 2017 and 2027; not 167% as implied. Unclear where the respondent derives the latter figure from. The 12% buffer is necessary to compensate for non-implementation given the nature of the sites that are allocated.

<p>The necessity of releasing land from the Green Belt for housing allocation is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 1.</p> <p>The concentration of Green Belt loss in Byfleet and West Byfleet is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 5. The reasons for removing sites in Pyrford from the plan are addressed in Paragraph 14.11-14.13 of the same document. WBC does not consider that these reasons could be applied to GB4, GB5 or GB10.</p> <p>The assessment of brownfield sites is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 11. It is recognised that new sites will continue to become available and these can be included in the SHLAA, and if they are within the urban area they can come forward with planning applications as windfall sites or potentially be allocated in Neighbourhood Plans. In all cases such sites would be assessed against existing planning policies, including on the retention of viable employment sites.</p> <p>The impact of the proposals on air pollution is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8. The air quality monitoring tube formerly at the kerbside on Parvis Road, West Byfleet, was moved a short distance in 2007, on the recommendation of independent consultants, to a location that reflects what residents living along Parvis Road were being exposed to (i.e. level with the facade of properties facing the road). There have been no subsequent concerns with this location.</p> <p>Comments on current applications, and impacts on property values, are not within the remit of the SADPD consultation.</p> <p>The impacts of Green Belt loss on the amenity of local residents is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4.</p>
Response Reference: U0001603
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06489/1
Name: Mr Simon Wilby
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Objects to new housing on green belt land in Byfleet area, this land has been protected for many years and development will change the fabric of the area, not supported by local people.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
<p>Officer Response: The necessity of releasing Green Belt land in Byfleet and West Byfleet to be allocated and safeguarded for future development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Sections 1 and 2.</p> <p>With regard to the fabric of the area, most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of Byfleet. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental / climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied</p>

that the social, environmental and economic character of the area will not be significantly undermined.
Response Reference: U0001697
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 01980/2
Name: Mrs Elizabeth Wild
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB18
<p>Summary of Comment: No comment on whether the DPD is legally compliant, meets the requirements of the Duty to Cooperate, is positively prepared, justified, effective or consistent with national policy. Considers the DPD to be unsound. Congratulates WBC on efforts to balance multiple views and needs, but raises three concerns:</p> <ol style="list-style-type: none"> 1. Green Belt land should only be declassified if there is no viable alternative. If Green Belt is released, other land should be designated as Green Belt to ensure that overall stock is not eroded. Green Belt land near urban and suburban areas is essential to maintain quality of life. 2. It is wrong to allocate the playing fields in West Byfleet for development because this is an important space for sports and recreation and because West Byfleet has a large number of pubs, cafes, bars and restaurants and does not require another one. 3. Does the development allow for some spaces with a hard surface where children can play safely on their bikes? <p>Wishes to be informed when the DPD progresses to the next stages.</p>
<p>Contributor Proposed Modification: If Green Belt land is released, other land should be designated as Green Belt to compensate so that our overall stock of Green Belt is not eroded.</p> <p>If there are no hard-surfaced spaces in the Borough for children to play safely on their bikes, these should be included in the development plan.</p>
Modification Reference: U0000218
<p>Officer Response: The Council recognises that Green Belt land should only be released where other options have first been pursued. The justification for release of Green Belt land, in accordance with this principle, is provided in Section 1 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 4 of the Regulation 19 Issues and Matters Topic Paper recognises that land taken out of the Green Belt will lead to a reduction in the benefits which it brings to the communities where the land is situated. However, as provided in Paragraph 4.2, the Council is committed to ensuring that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents.</p> <p>Regarding GB18, Paragraph 5.2 of the Regulation 19 Issues and Matters Topic Paper provides that the playing fields will not be developed and will continue to provide open space and sports provision for the Junior and Infant schools.</p> <p>The Site Allocations DPD does not make specific provision for spaces with a hard surface where children can play on their bikes as this is beyond its purview. The purpose of the DPD is to facilitate the delivery of the Core Strategy targets for dwellings, office, warehouse and retail floorspace as set out in Paragraph 1.3 of the Regulation 19 Issues and Matters Topic Paper.</p>

The Council is not seeking to designate replacement Green Belt to compensate for the Green Belt land which is released. There is no land available in Woking borough for this purpose.

Response Reference: U0001081

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06483/1

Name: Neil Willetts

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05, GB10, GB11

Summary of Comment: Objects to building on Green Belt, Concerns regarding the following:

- Increased strain on health and educational infrastructure;
- Urban sprawl;
- Traveller pitches generating conflict;
- Centre of West Byfleet (Sheer House) in decline, additional residential development would exacerbate this issue;
- Increased traffic congestion in Byfleet and West Byfleet, particularly on Parvis Rd (A245), as a result of additional dwellings;
- Increased pollution.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Section 5 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding development of Byfleet and West Byfleet Green Belt. The Green Belt boundary review assessed the parcels of Green Belt land against the purposes of the Green Belt, one of which is to check the unrestricted sprawl of large built up areas. None of the proposed allocations will lead to unacceptable urban sprawl.

Section 3 addresses the matter regarding the disproportionate distribution of traveller pitches in Byfleet and West Byfleet. The overall aim of the Government is to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community. The allocations/policies will help ensure that the accommodation needs of Travellers are met. The DPD and the Core Strategy provides a positive framework to facilitate the redevelopment of West Byfleet District Centre (Sheer House). The proposed developments will assist in improving the profile of the centre as a District Centre and will likely have a positive economic impact on the area.

Section 6 addresses the issue regarding adequacy of infrastructure provision. Section 13 focuses specifically on road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network.

Section 8 addresses the issue regarding pollution.

Response Reference: U0001116

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 02313/2

Name: Mr Anthony Williams
Number of Signatories: 1
Comment Type: SUPP
Site Reference: RG18GB12, RG18GB13
Summary of Comment: Considers Woking Borough Council (WBC) have made the right decision to drop the Upshot Lane fields from the Site Allocation proposals and thank them for doing so. WBC recognise the validity of objections made at the preliminary Regulation 18 consultation held in June and July 2015. To include the fields would impact the character and setting of the conservation area around St Nicholas Church. The Upshot Lane fields contribute very significantly to the semi-rural setting and character of Pyrford as a whole. Traffic through Pyrford is currently high for the narrow roads and traffic from a further 500 houses on Upshot Lane would be unsupportable. Bring about excessive load on the infrastructure of the village, specifically the capacity of the churches, the school and the ability to park near any of the village facilities.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06589/1
Name: Ms Frances Willis
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
Summary of Comment: Objects to site allocations in Byfleet. Concerns regarding flooding. If flood plains are built on, this will result in flooding of properties which have not been flooded before due to the reduction in flood alleviation. Existing temporary traveller site is situated in a flood area. Concerns regarding increased traffic congestion, specifically on the A245. No mention of traffic survey in draft plans. Concerns regarding inadequate health and educational infrastructure. Sure Start centre has been marked for closure, meaning parents have to go elsewhere, which is an issue for those who do not have cars.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 6 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding adequacy of infrastructure. Section 13 specifically covers road infrastructure. As stated in paragraph 13.3, the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. Section 7 addresses concerns regarding flooding in Byfleet and West Byfleet. The closure of the Sure Start Centre is beyond the scope of the Site Allocations DPD. If the closure is about lack of availability of premises within which to operate, the representation will be passed on to the relevant officers of the Council to consider. If this is the case, it should be noted that Policy UA1 is allocated for community uses, which could offer the potential for such a use to operate, subject to an arrangement between the developer and the provider.

Response Reference: U0001604
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06769/1
Name: Mrs J Wilman
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: The Hoe Valley school has only just been completed and was meant as a special release from Green Belt. The Sportsbox was not part of that specific release but was voted through by the Council anyway. The Council's Core Strategy sets objectives and a strategy in para 6 that 4. Protects the integrity of the Green belt and harnesses its recreational benefits to the community 7. Maintains and improves air and water quality and effectively manages impacts from noise and light pollution. The Plan to now remove the site from Green Belt for substantial new housing and another leisure centre will impact the volume of traffic and need to have flood lights, negating the above points. Mayford is a small village with a lack of infrastructure to support such major house building, which will substantially increase car transportation and air pollution. Notes on GB8 allocation states the 'This former tree nursery does however occupy an important green gap between Woking and Mayford, the integrity of which should be retained whilst accommodating development to assist in meeting identified needs'. This will not be maintained with substantial housing development. Asks the Council to review whether the removal of this site from the Green Belt without restriction is the best way to proceed.

Contributor Proposed Modification:
Modification Reference:
Officer Response: The Hoe Valley school, including leisure facilities at the Sportsbox, at Egley Road were considered as part of the Development Management process, with regard to the Borough's statutory development plan at the time of the application (in 2015). This part of the site has been implemented and the school opened in September 2018. On balance, the merits of the proposal and need for a school were among a number of considerations that demonstrated very special circumstances for development in this Green Belt location. Following approval by the Council, the application was referred to the Secretary of State for consideration, but was not called in, meaning the Secretary of State did not consider it necessary to determine the application for the Council. With regard to the reference to Core Strategy para 6, point 4 on the Green Belt, please refer to the Council's Regulation 19 Issues and Matters Topic Paper Sections 1 and 4. On the reference to Core Strategy para 6 on air and water quality, point 7, please see sections 6.11. and 8. With regard to infrastructure and traffic please see section 6. The Council has included an area in the northern part of site GB7, which is hatched on the location plan and is designated as an area of local separation to provide a visual gap between Mayford and the rest of the urban area of Woking.

Response Reference: U0001093
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06821/1

Name: Woking Chamber of Commerce
Number of Signatories: 1
Comment Type: SUPP
Site Reference:
Summary of Comment: The DPD is positively prepared, justified, effective and sound. Members of the Woking Chamber of Commerce were broadly supportive of the DPD and its contents.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Support noted
Response Reference: SUPPOR
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06800/1
Name: Wokingham Borough Council
Number of Signatories: 1
Comment Type: OBJ
Site Reference:
<p>Summary of Comment: Lodges a holding objection to the DPD until such a time as Woking Borough Council demonstrates that it is seeking to meet its full housing need - or that this need can be accommodated within its housing market area or most closely linked HMA - based on up to date evidence.</p> <p>The West Surrey SHMA has identified a housing need arising from Woking Borough of 517dpa (2013-2033). The SHMA recognised that there is a strong relationship between the West Surrey HMA and that covering the Blackwater Valley (centred upon the authorities of Surrey Heath Borough, Rushmoor Borough and Hart District). Therefore, the Blackwater Valley HMA separates Wokingham Borough from Woking Borough's HMA. Waverley BC have committed to 83dpa (2013-2032) on behalf of Woking. Guildford BC have committed to delivering 42dpa (2019-2034) on behalf of Woking. On the basis of the West Surrey SHMA OAN, there remains a significant potential shortfall of over 1600 dwellings in the period 2013-2027 which the proposed allocations in the DPD do not seek to address. There are no agreements or mechanisms in place to enable this to be addressed.</p> <p>Woking's Local Housing Need currently stands at 263dpa. However on 26 October 2018, the Government published a consultation on a revised method for assessing LHN. This consultation proposes that, for the short term, the 2014-based projections will provide the demographic baseline for calculating the LHN. If this approach is taken forward, it would result in an LHN for Woking of 466 dpa. Though limited weight can be attached to the consultation at this stage, government has been clear in its commitment to increasing housing delivery across the country. It is therefore likely that future housing need evidence will suggest a higher figure than the Core Strategy requirement.</p> <p>Despite concluding that the Core Strategy remains up to date, there is strong evidence through the SHMA, and through the LHN, that there is likely a higher housing need than set out in the Core Strategy. Woking's strategy for meeting need does not accord with the more recent plan making and evidence based strategy of its HMA neighbours. There is no mechanism for ensuring that unmet need from Woking, based on more recent evidence, is met within the HMA or as close to where it arises as possible.</p> <p>Although there are uncertainties regarding the LHN moving forward, Wokingham BC considers that the DPD could lead to increased housing pressure outside of south west</p>

Surrey's housing market. Wokingham BC therefore considers that the DPD is not sound as it has not been positively prepared to ensure OAN are met as a minimum in accordance with the NPPF.

Although the safeguarding of rail depots does not preclude the appropriate development of neighbouring areas of land, it is not currently considered that UA34 is acceptable unless there is no impact on the site's current operation. It is noted that rail depots are important for the sustainable supply of aggregate not only in Surrey but in the wider South East. As no such facility exists in central and eastern Berkshire, this area is dependent on such facilities in neighbouring areas. Wokingham BC therefore highlights the importance of this rail depot facility. It is further noted that the NPPF specifies the need to 'safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals. In addition, in accordance with paragraph 192 of the NPPF, it would not be considered acceptable to place unreasonable restriction on existing businesses as a result of development permitted after they were established.

Site GB10 includes a requirement for specific engagement around this site with Surrey County Council MPA as well as a requirement for prior minerals investigation work in order to prevent sterilisation of resource. On balance, Wokingham BC considers this to be a sound approach.

Contributor Proposed Modification: Wokingham BC recommends that the following wording should be added to Policy UA34 in order to make it sound: "Engage with Surrey County Council (Minerals Planning Authority/MPA) and neighbouring mineral planning authorities."

Modification Reference: U0000201

Officer Response: The Council is taking the correct approach in allocating a quantum of sites sufficient to deliver the Core Strategy housing requirement of 292 dwellings per annum to 2027.

It is appropriate and necessary for the Site Allocations DPD to facilitate the delivery of the requirements of the Core Strategy. The Woking Core Strategy and the Site Allocations DPD are two distinct and separate development plan documents but with clear interrelationships. They have distinct purposes, processes and timescales for their preparation that should not be conflated. The purposes and timing for the preparation of these documents are set out in the current and previous Local Development Schemes with no ambiguity. Runnymede, Waverley and Guildford Borough Councils had all made representations during the review of the Core Strategy which were taken into account by the Council before the review was approved. It would therefore be unreasonable to use the Site Allocations DPD as another means to revisit this matter.

Woking Borough Council therefore has an up to date Core Strategy to provide a sound strategic policy context for the preparation of the Site Allocations DPD. The Core Strategy was adopted in October 2012 and in accordance with paragraph 33 of the National Planning Policy Framework (NPPF) was reviewed in October 2018. The NPPF requires plans to be reviewed at least once every five years. It will be unreasonable and indeed burdensome to expect the Council to review its Core Strategy again within six months of its latest review. That is certainly not what the NPPF had intended, and obviously that will not provide the necessary certainty that developers, the general public and anyone who has an interest in investing in the Borough need. It is important to highlight that the fact a Core Strategy is 5 years old does not automatically make it out of date.

Regulation 8(4) of the Town and Country (Local Plan) (England) Regulations 2012 (as amended) requires policies contained in a local plan to be consistent with the adopted development plan. Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) (the Act) emphasises this by stating that in preparing a local development document the local planning authority must have regard to any other local development document which has been adopted by the authority. Section 15 of the Act requires the Council to prepare a Local Development Scheme (LDS) which must specify which development plan documents they wish to prepare and the timetable for preparing them.

<p>The Council has published an up to date LDS (October 2018). The LDS identifies the Site Allocations DPD as a development plan document that the Council wishes to prepare. It specifies the overall purpose of the Site Allocations DPD to identify and allocate sites for development. In particular, to identify sufficient employment and housing land and infrastructure to cover the period up to 2027, in accordance with requirements, vision and spatial strategy set out in the Core Strategy. Given that the Council has an up to date Core Strategy, it is imperative and necessary that the Site Allocations DPD is prepared to be consistent with its requirements. Not to have done so would be contrary to the Act, the Regulations and the requirements of the Core Strategy.</p> <p>The Government has prescribed that unless special circumstances would justify, local authorities should use the standard method to calculate local housing need. It has also prescribed the steps to follow in calculating the need, and in particular, it requires the Council to use the most recent growth projections. At the time the Council carried out the review of the Core Strategy, the most recent growth projections was the 2016 household projections. To have used any other data at the time would have been inconsistent with national guidance. The Council recognises that since the review, the Government has required use of the 2014 household projections instead of the 2016 projection. The implications of this were considered at the review of the Core Strategy.</p> <p>Proposed Policy UA34 gives due consideration to the existing minerals aggregate site. In particular, one of the key requirements is to "engage with Surrey County Council (Minerals Planning Authority/MPA) as the site is identified in the Surrey Minerals Plan as a Rail Aggregate Safeguarded Site. The MPA will need to be satisfied that future development would not prevent directly, or indirectly, the operational requirements of the site."</p> <p>Comments regarding Site GB10 are noted.</p>
<p>Response Reference: U0001516</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06656/1</p>
<p>Name: Ms Rachel Rebecca Woods</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: The DPD is unsound, in particular, not justified or consistent with national policy. Object to site GB10, which is severely flawed and would have a catastrophic environmental/social impact on the Green Belt and West Byfleet: Site GB10 is designated Green Belt.</p> <p>The site is covered by the West Byfleet Neighbourhood Development Plan, which intends to maintain, protect and enhance the special characteristics of West Byfleet, so development would be contrary to the NDP and therefore NPPF para 47.</p> <p>Parvis Road is often at a standstill during rush hour. With additional vehicles from the proposed development traffic would rarely flow freely, and air and noise pollution would worsen, including for the elderly in West Hall Care Home and children at West Byfleet schools and nursery.</p> <p>The proposal would remove many trees, which would increase noise pollution from the M25 received by the proposed housing and in particular by residents of Dartnell Park and West Hall Care Home- not consistent with national policy.</p> <p>West Hall Infant and Junior Schools are oversubscribed, despite recent expansion of the former. No proper proposals for increase in schools provision. The medical centre would also be unable to cope, currently you have to wait 3 weeks for an appointment.</p>

New residents will undoubtedly wish to use the station, but it is over 1km from the site, so they will probably go by car. This will worsen traffic congestion, and it is unlikely the car park at the station could meet the increased demand.

Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision (Parvis Road does not meet this); adequate amenity for occupiers (the site is too small); no unacceptable impact on visual amenity/character of the area (the site does not fit the character of West Byfleet or the NDP); and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities.

The area suffered severe flooding recently and is still at high risk, the site is on a flood plain. No adequate assessment in this respect.

The density is too high and amounts to overdevelopment.

The proposals will exacerbate issues of noise/air pollution and strain on infrastructure caused by the Broadoaks and Sheer House developments.

The amount of development proposed for West Byfleet is disproportionate, should be distributed more fairly to share out the impact on infrastructure.

Inadequate reasons given for excluding Martyrs Lane Green Belt site.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: The justification for removing land from the Green Belt for development is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 1.

The social impact on local residents, in terms of amenity and general wellbeing, of the proposed Green Belt reductions is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 4.

The relationship of the proposals with the West Byfleet NDP, and thereby with NPPF paragraph 47, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 16.

The impact of the proposals on traffic is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 13.

The impact of the proposals on air and noise pollution, including indirectly (through potential tree loss) is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 8.

The impact of the proposals on infrastructure, including education and healthcare facilities, is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 6.

It is true that only a small part of the site is within standard walking distance of the nearest station (although the whole site is in easy cycling distance). However this level of proximity is still better than that for most other sites considered through the Green Belt Boundary Review. Improvements to pedestrian and cycle links to the District Centre are included in policy GB10 as a key requirement. In addition, only slightly over half the total area of the site will be developed, in part because of the need for 'significant areas of landscaping to create an appropriate boundary to the Green Belt'; this is likely to limit development on the areas of the site furthest from the station.

The sequential approach and very special circumstances case for Traveller pitches in the Green Belt, as well as detailed matters relating to such sites, are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 3.

The flood risk implications of the proposals are addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 7. In particular, site GB10 is not on a flood plain.

The proposed indicative density for site GB10 of 40 dwellings per hectare (dph) is consistent with the Core Strategy, which recommends a density of 30-50 dph for 'Green Belt sites to be released after 2021/22'. This is not likely to detract from the general character of the area. In any case, actual density will be determined at the planning

<p>application stage. The figure only relates to the developable area of the site (approximately 14.8 ha), and does not include the areas of existing woodland and new green infrastructure which are proposed to take up nearly half the site's total 29.33 ha area.</p> <p>The Broadoaks and Sheer House sites were included in the traffic mitigation evidence base, and also provided to inform the planning of infrastructure providers. Statements made about the infrastructure impacts of development therefore include these sites. The concentration of Green Belt loss in Byfleet and West Byfleet is addressed by the Regulation 19 Issues and Matters Topic Paper, see Section 5.</p> <p>The reasons for rejecting the site at Martyrs Lane are set out in the Regulation 19 Issues and Matters Topic Paper, see Paragraph 3.11.</p>
<p>Response Reference: U0001149</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>
<p>Wishes to Attend Examination (T = Tick):</p>

<p>Contributor Reference: 06804/1</p>
<p>Name: Angela Woods</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: OBJ</p>
<p>Site Reference: GB10</p>
<p>Summary of Comment: The DPD is unsound: it is not an appropriate strategy nor is it consistent with national policy, because:</p> <ul style="list-style-type: none"> - The site is designated Greenbelt, which should not be built on. The West Byfleet Neighbourhood Plan (NDP2017) policies apply to the site - it should therefore be maintained, protected and its special characteristics enhanced. Releasing the site from the Greenbelt is contrary with NDP2017 policy, and thus contrary to paragraph 47 of the NPPF (not compliant with planning law). - The development cannot be supported by sufficient infrastructure - Parvis Road is congested and often gridlocked, with no capacity for cars from 555 dwellings and 15 traveller pitches. This will result in increased air and noise pollution, detrimental to local residents (e.g. in Dartnell Park), the elderly at West Hall Care Home, and children at the Infant and Junior schools and nursery. Noise pollution, especially from the M25, will be exacerbated with the felling of trees to make way for development. This is inconsistent with NPPF policy. As Chair of Governors at West Byfleet Infant School, highlights that the school is continually oversubscribed. Increased from a 2 form to a 3 form entry but still completely full. The IDP does not make proper recommendations for increase in school provision. The medical centre is also oversubscribed, and does not have capacity to meet needs of increased population. - The site is over 1km from the railway station. Needs to be better access to the station otherwise people will drive there, adding to traffic and pollution. Lack of parking at the station. - Urban sites should be considered for Traveller pitches before those in the Greenbelt. This had not been given due consideration - where is the evidence- The site does not fulfil the criteria that should be considered when determining the allocation of Traveller sites i.e. no safe access from the highway or adequate parking provision; the site is too small for 15 pitches; the site will have an unacceptable impact on visual amenity nor contribute to the character of West Byfleet as per NDP2017 policy; inadequate infrastructure to serve the site. - The area is vulnerable to flooding. Development will be on the floodplain. Inadequate assessments have been made.

- The proposed density of housing is too high and amounts to overdevelopment; especially when considered collectively with planning proposals at Shere House and Broadoaks, which will also put a strain on infrastructure.
- West Byfleet is receiving a disproportionately high number of dwellings and Traveller pitches compared to the rest of the Borough.
- The reasons for excluding Martyrs Lane site are unsatisfactory.

Contributor Proposed Modification: There needs to be a fairer distribution of development around the Borough so that infrastructure can support new development.

Modification Reference: U0000444

Officer Response: Several issues raised in the representation have been addressed in the Regulation 19 Issues and Matters Topic Paper.

Section 1 sets out in detail the justification for releasing Green Belt land to meet future development requirements. Section 5 responds to concerns about the loss of Green Belt in West Byfleet. Section 16 addresses comments regarding the West Byfleet Neighbourhood Plan.

Section 6 sets out in detail how the Council has assessed infrastructure to support future development, including schools and medical facilities. The Council continues to work with Surrey County Council to identify needs for future school places - and where these needs can be accommodated - and to work with the public health bodies regarding healthcare provision to meet future development needs.

Section 13 addresses concerns raised about traffic and congestion, including that on the A245.

Section 8 addresses concerns about air quality and pollution, and the impact on the wellbeing of residents. Section 8.4 sets out how policies in the Development Management Policies DPD would seek appropriate schemes of mitigation to minimise any adverse impacts, including from noise and air pollution, which would be considered in detail at any planning application stage.

Section 19 explains how any future development proposal would take into account trees and woodland of value, and how planning policies are in place to ensure any future schemes maximise the green infrastructure potential of development sites. Section 4.2 also provides details about how loss of open space and Green Belt will be addressed.

The Sustainability Appraisal assessed site GB10 as having moderate accessibility to services and facilities. Although it is within walking distance of several community facilities, it is acknowledged that the site is beyond walking distance to the railway station. Development of the site at such a scale would bring an opportunity to improve accessibility to the District Centre through improved footpaths, cycle links and public transport services. In recognition of this, a key requirement that development must address includes contributing to the provision of essential transport infrastructure. The exact nature of these site specific requirements will be identified through the development management process and be informed by a Transport Assessment at planning application stage. Any development would also be assessed against policy CS18 of the Core Strategy which seeks to promote sustainable transport modes such as public transport, walking and cycling, and reduce reliance on private car.

Concerns regarding traveller sites have been addressed comprehensively in Section 3 of the Regulation 19 Issues and Matters Topic Paper.

Section 7 addresses concerns regarding flooding of the site. The Council believes assessments are robust, as set out in detail in Section 10.3.

With regards to the density of the site: the Council takes the view that the proposed anticipated densities are reasonable and broadly in line with the Core Strategy. It is always emphasised that the proposed densities are indicative, based on ranges provided in policy CS10 of the Core Strategy. Actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage.

Green Belt sites will contribute towards the provision of family homes that cannot be met

<p>by high density flatted development. The indicative density reflects the desire to provide family homes to meet needs.</p> <p>The evidence base takes into account the cumulative impacts of future development, including impacts on infrastructure. This is explained in detail in Section 6 of the Topic Paper. The Council provides infrastructure providers with maps and lists of proposal sites, who then in turn assess future infrastructure needs having regard to the total amount of development in each area.</p> <p>Section 5 addresses concerns about the disproportionate amount of development allocated to West Byfleet.</p> <p>Section 3.11 sets out in detail the reasons why land to the east of Martyrs Lane was rejected for safeguarding.</p>
Response Reference: U0000923
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06827/1
Name: Mr Mike Woods
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10
<p>Summary of Comment: The DPD is unsound. It is not an appropriate strategy nor is it consistent with national policy.</p> <ol style="list-style-type: none"> 1. Site GB10 is designated Green Belt in the West Byfleet Neighbourhood Development Plan, so development would be contrary to the NDP, which seeks to maintain, protect and enhance the special characteristics of West Byfleet, and therefore NPPF para 47. The NDP also emphasises the importance of protecting green spaces. 2. The heavily congested Parvis Road would not be able to cope with additional traffic. This is exacerbated further if there are problems on the M25, or if there are traffic light problems in West Byfleet. The increased traffic would be at a standstill, increasing air pollution which would cause ill health to local residents, the elderly at the Care Home and children at the schools and nursery. 3. They would also be vulnerable to increased noise pollution. This would be exacerbated by cutting down trees, which buffer the M25. An increase in air and noise pollution is contrary to national policy. 4. Schools and healthcare facilities are at capacity. The local schools and medical centre could not absorb influx of new residents. This infrastructure, as well as traffic, air and noise pollution, will also be adversely impacted by development at Sheer House and Broadoaks. 5. Residents would be car reliant: the site is over 1km from West Byfleet railway station with significant upgrading needed to the route. There is a lack of public transport, and parking. 6. Sequential approach not demonstrated or case for very special circumstances made for Traveller pitches in the Green Belt. These proposals also do not meet the criteria for safe highway access, parking and turning provision; adequate amenity for occupiers; no unacceptable impact on visual amenity/character of the area; and adequate infrastructure and on-site utilities, safe and reasonable access to schools and other local facilities. 7. The area suffers frequent and severe flooding; no adequate assessment of river or surface water flood risk. 8. The density of housing is too high and amounts to overdevelopment. The area is receiving a disproportionate amount of development compared to the rest of the Borough. A fairer distribution would ease pressure on infrastructure.

<p>9. Inadequate reasons given for excluding Martyrs Lane Green Belt. It is catastrophic on both environmental and social levels.</p>
<p>Contributor Proposed Modification: Sequential test for Traveller site selection. Fairer distribution of site allocations to ease infrastructure pressure.</p>
<p>Modification Reference: U0000278</p>
<p>Officer Response: Several issues raised in the representation have been addressed in the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 1 sets out in detail the justification for releasing Green Belt land to meet future development requirements. Section 5 responds to concerns about the loss of Green Belt in West Byfleet. Section 16 addresses comments regarding the West Byfleet Neighbourhood Plan.</p> <p>Section 6 sets out in detail how the Council has assessed infrastructure to support future development, including schools and medical facilities. The Council continues to work with Surrey County Council to identify needs for future school places - and where these needs can be accommodated - and to work with the public health bodies regarding healthcare provision to meet future development needs.</p> <p>Section 13 addresses concerns raised about traffic and congestion, including that on the A245.</p> <p>Section 8 addresses concerns about air quality and pollution, and the impact on the wellbeing of residents. Section 8.4 sets out how policies in the Development Management Policies DPD would seek appropriate schemes of mitigation to minimise any adverse impacts, including from noise and air pollution, which would be considered in detail at any planning application stage.</p> <p>Section 19 explains how any future development proposal would take into account trees and woodland of value, and how planning policies are in place to ensure any future schemes maximise the green infrastructure potential of development sites. Section 4.2 also provides details about how loss of open space and Green Belt will be addressed. The Sustainability Appraisal assessed site GB10 as having moderate accessibility to services and facilities. Although it is within walking distance of several community facilities, it is acknowledged that the site is beyond walking distance to the railway station. Development of the site at such a scale would bring an opportunity to improve accessibility to the District Centre through improved footpaths, cycle links and public transport services. In recognition of this, a key requirement that development must address includes contributing to the provision of essential transport infrastructure. The exact nature of these site specific requirements will be identified through the development management process and be informed by a Transport Assessment at planning application stage. Any development would also be assessed against policy CS18 of the Core Strategy which seeks to promote sustainable transport modes such as public transport, walking and cycling, and reduce reliance on private car.</p> <p>Concerns regarding traveller sites have been addressed comprehensively in Section 3 of the Regulation 19 Issues and Matters Topic Paper.</p> <p>Section 7 addresses concerns regarding flooding of the site. The Council believes assessments are robust, as set out in detail in Section 10.3.</p> <p>With regards to the density of the site: the Council takes the view that the proposed anticipated densities are reasonable and broadly in line with the Core Strategy. It is always emphasised that the proposed densities are indicative, based on ranges provided in policy CS10 of the Core Strategy. Actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. Green Belt sites will contribute towards the provision of family homes that cannot be met by high density flatted development. The indicative density reflects the desire to provide family homes to meet needs.</p> <p>The evidence base takes into account the cumulative impacts of future development, including impacts on infrastructure. This is explained in detail in Section 6 of the Topic Paper. The Council provides infrastructure providers with maps and lists of proposal sites,</p>

<p>who then in turn assess future infrastructure needs having regard to the total amount of development in each area. Section 5 addresses concerns about the disproportionate amount of development allocated to West Byfleet. Section 3.11 sets out in detail the reasons why land to the east of Martyrs Lane was rejected for safeguarding.</p>
Response Reference: U0001502
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06840/1
Name: Mr James Woods
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA44
<p>Summary of Comment: DPD is not legally compliant, since site UA44 was not part of the Reg 18 consultation. Need to consult on this site. DPD is not positively prepared, effective, consistent with national policy or sound. It was not prepared in accordance with the Statement of Community Involvement, as it was not consulted on publicly. Site UA44 needs a full sustainability appraisal. Disagree the statement under bullet point 13 of the policy that the site is in a sustainable location- it would be sustainable for just a few additional properties. The assessment of the site in the SHLAA was not consulted on. Disagree with the SHLAA conclusion that it has 'excellent accessibility', that must be based on a desk top study. The site in the DPD is larger than that in the SHLAA- no evidence that the additional area is available for development. Bullet point 5: don't want density to be maximised, should consult on this criterion. Proposal for 992 flats: Who does WBC envisage purchasing so many 60sqm, 2 bed flats? Would seem too small for families, who give the area its current character. Will they be buy to let flats for institutional investors? Risk of saturation of small apartments in the town. How would an extra 671 parking spaces be fitted in? It could encourage unregulated parking across the area. Roads in the area could not take more people exiting Westfield Avenue in the mornings or joining in the evenings, in combination with Willow Reach development. Are there plans to upgrade this? Woking Station infrastucture is at breaking point, has not built capacity to accompany the recent growth of the town. The area is currently tranquil, high-rise buildings would be out of character. Something like the Willow Reach development would be more appropriate. Concerned as a Woking Football Club supporter about the sustainability of the scheme for the football club- risk of taking on too many costs with an oversized stadium. Have the club directors had adequate input? Has the suitability of a partnership with GolDev been studied in depth, given the collapse of the project in Braintree? How much money is anticipated to end up with the football club?</p>
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS

<p>Officer Response: It is acknowledged that not every individual proposal in the DPD has gone through the Regulation 18 consultation. However, residents have had adequate opportunity to comment on the proposal during the Regulation 19 consultation. Site UA44 has been subject to a full sustainability appraisal; see the Site Allocations DPD Sustainability Appraisal, in particular Appendix 1 pages 873-887. The site is within easy walking distance (measured along walking routes) of local shops and services in Westfield Neighbourhood Centre, and is also just over 500m from Kingfield Local Centre and within 1km of the town centre.</p> <p>The site area in the SHLAA is smaller than the site in the DPD. However during the preparation of the DPD it became apparent subsequent to correspondence with the developer, that the site boundary could be expanded. The extended site was assessed as part of the Sustainability Appraisal, the framework for which is outlined above.</p> <p>The SHLAA is an evidence base document and as such its conclusions are not consulted on specifically. However the public are welcome to comment during DPD consultations on the quality of the evidence base supporting the DPD in question.</p> <p>Bullet point 5 has been consulted on as part of the Regulation 19 consultation exercise. It does not state that density should be maximised, rather that the density used should maximise the efficient use of the site without compromising the general character of the area.</p> <p>There is no proposal for 992 dwellings on site UA44 included in the SADPD. The policy for site UA44 gives no indicative dwelling number. In terms of dwelling mix, the policy UA44 states that the 'development should provide a range of housing sizes as set out in Core Strategy Policy CS11: Housing mix'. The latter policy requires developers to refer to the dwelling mix need identified in the latest Strategic Housing Market Assessment (SHMA). This dwelling mix need does incorporate the need for family housing.</p> <p>There is no proposal for a specific number of parking spaces in policy UA44. The thirteenth key requirement of the policy relates to car, coach and cycle parking and refers to the Council's adopted Parking Standards, which would be applied to any proposal for development.</p> <p>The impact of the proposals on highway capacity is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 13.</p> <p>The impact of the proposals on infrastructure is addressed in the Regulation 19 Issues and Matters Topic Paper, see Section 6. In particular, planned improvements to Woking Station and surrounding infrastructure are described in the Infrastructure Delivery Plan, p. 57-61, and facilitated by SADPD policy UA7.</p> <p>There is no specific proposal for high-rise buildings in policy UA44. The policy requires the scale of development not to detract from the general character and appearance of surrounding streets. Any proposal will be assessed against this requirement.</p> <p>There is no specific proposal for a significantly larger stadium in policy UA44, which only proposes that the stadium be retained and enhanced.</p>
Response Reference: U0001517
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06848/1
Name: Woodsted Properties Ltd
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA02
Summary of Comment: Considers that the DPD is not legally compliant, not sound and does not comply with the Duty to Cooperate.

Wishes to participate in the public examination.

Landowners Woodsted Properties Ltd. and their agent Childs & Co. have been engaged in discussions with WBC for a period of over 10 years, regarding a likely use of their land. In June 2014, an outline application (PLAN/2014/0759) was submitted for the redevelopment of Woodsted House, Trizancia House and Chester House. This was not determined, and a subsequent appeal was dismissed, largely due a lack of specific detail and the inability of the applicant to enter into a Section 106 Agreement regarding Affordable Housing.

In May 2014, Woodsted Properties Ltd. were advised that the Council entered into a Development Agreement with SJR KMN Woking Ltd to develop the land occupied by Woodsted House, Trizancia House, Thomson House, Kings Court and Chester House. The respondent queries whether the agreement is still in force or legally valid. Despite the intention for comprehensive development of these sites, it is noted that permissions were separately granted at Kings Court (PLAN/2014/1263, now under construction), and Chester House (PLAN/2015/0912, not implemented). In view of this, Childs & Co. submitted a separate outline application (PLAN/2015/0545) for Woodsted House only, but this has yet to be determined.

It is noted that para. 4 of the Reasoned Justification for UA2 incorrectly omits any reference to Woodsted House as part of PLAN/2014/0759. This is considered to suggest that this site is not considered part of the development, despite having been included in the development agreement. Consequently the Reasoned Justification is considered inaccurate, and appears to place a planning blight on the Woodsted House site. The site plan attached to UA2 is vague in that it doesn't show the sites of Woodsted House and Trizancia House and the vehicular access owned by Woodsted Properties. As a result of the errors in the description and Reasoned Justification, Policy UA2 cannot be regarded as sound or legally compliant. It is also considered that the Council has not complied with the Duty to Cooperate in its engagement with the landowners and their agents.

Both Woodsted House and Trizancia House are now vacant and ready for development.

Contributor Proposed Modification: The DPD Policy can only be succesful if Policies UA2 and UA3 are combined into one policy to ensure that the whole site area is made available for development at full market value with no exceptions, and that the existing vehicular access to Woodsted House is fully taken into account.

Modification Reference: U0000337

Officer Response: Sites UA2 and UA3 were assessed by the SHLAA (2017) as SHLAACAN001 and SHLAACAN0035 respectively and considered to be individually developable within 6-10 years.

It is noted that while the sites are separately allocated, there would not be an in-principle policy objection should stakeholders seek to submit an application for the comprehensive redevelopment of both sites.

It is noted that the reasoned justification for UA2 omits any reference to Woodsted House as part of PLAN/2014/0759. The reasoned justification will be modified to reflect this, and the recent planning history of the site.

It is noted that the site plan for UA2 is considered up-to-date.

Response Reference: U0001628

Officer Proposed Modification: Amend fourth paragraph of the reasoned justification of p35 of policy UA2 to read "Trizancia House, Woodsted House and Chester House were refused..."

Wishes to Attend Examination (T = Tick): T

Contributor Reference: 06848/2

Name: Woodsted Properties Ltd
Number of Signatories: 1
Comment Type: OBJ
Site Reference: UA03
<p>Summary of Comment: The DPD is not legally compliant or sound, as a result of errors in the description and Reasoned Justification for UA2 and UA3, and does not comply with the Duty to Cooperate as a result of WBC's failure to engage with the landowners and their agent over 10 years.</p> <p>The landowners Woodsted Properties Ltd and their agent have been discussing the use of this land with WBC for ten years. Applications for change of use to flats and a hotel were refused in 2010 and 2011. An outline planning application for a comprehensive development across 3 sites, as encouraged by WBC, was made on 27 June 2014, but not determined, and an appeal against the non-determination dismissed, largely due to lack of detail and the applicant's inability to enter a S106 Agreement on Affordable Housing. On 28 May 2014 the applicants and their agent were advised that the Council has entered into a Development Agreement with SJR to develop the land occupied by Woodsted House, Trizancia House, Thomson House, Kings Court and Chester House. There was no advance consultation with the applicants, and WBC did not provide an explanation when asked; unclear whether the agreement is still in force or even legally valid. Separate planning permissions were then granted on Kings Court (now under construction) and Chester House (not implemented). In view of this, Childs & Co sought outline permission on Woodsted House but this application has yet to be determined after three years.</p> <p>To deliver a comprehensive development as required by WBC, sites UA2 and UA3 should be developed together along the lines proposed by application PLAN/2014/0759. PLAN/2014/0759 is incorrectly described in para 4 by omitting reference to Woodsted House. This suggests that this important site is not considered part of the development, placing a planning blight on it.</p> <p>The important access to the adjoining site, owned by Woodsted Properties, should be included in the Reasoned Justification</p> <p>The UA2 site plan is vague in not showing the sites of Woodsted House, Trizancia House and the vehicular access owned by Woodsted Properties.</p> <p>The sites of Woodsted House and Trizancia House are vacant and ready for development, as shown by their being used as storage/equipment depots for the development of Kings Court in the interim.</p> <p>The DPD can only be successful and treat all sites equally if UA2 and UA3 are combined into one policy to ensure that the whole site area is made available for development at full market value with no exceptions, and that the existing vehicular access to Woodsted House is fully taken into account.</p>
<p>Contributor Proposed Modification: In simple terms, the DPD Policy can only be successful if Policies UA2 and UA3 are combined into one policy to ensure that the whole site area is made available for development at full market value with no exceptions, and that the existing vehicular access to Woodsted House is fully taken into account. This is the fair way to ensure that all the sites are treated equally.</p> <p>Only by making this essential modification can the DPD be regarded as legally compliant, sound and complying with the Council's Duty to Cooperate.</p>
Modification Reference: U0000353
<p>Officer Response: The policies for sites UA2 and UA3 require the development of each site to consider the immediate context, including other proposed sites adjacent. It is considered that this already provides the flexibility required for the sites to come forward together as a single proposal. WBC would not however wish to require such a combined development. Should the sites come forward separately, this would also be acceptable.</p>

<p>The indicative site capacity set out for site UA2 has been subjected to scrutiny at Examination and supported to be achievable. WBC would not consider that an application refused at appeal, in part because of concerns related to the scale of the proposals, provides a sound basis on which to redraft the policy. However, any proposals for a new planning application on this site would be reviewed on their merits, having due regard to the policies in the SADPD.</p> <p>Agree that the description of application PLAN/2014/0759 should also refer to Woodsted House. The Reasoned Justification will be amended to reflect the latest planning history of the site.</p> <p>Considering that the site allocations UA2 and UA3 are for redevelopment, it is not thought necessary to make particular reference to the existing access point to the sites; an alternative access may potentially emerge as more suitable. Both policies refer to 'an effective access arrangement to ensure highway safety'.</p> <p>The site boundary plan is accurate in not showing the sites of Woodsted House and Trizancia House, since they have both been demolished, and the site is being used as a depot as noted by the respondent. No access is indicated, since the plan only shows the site boundary and Ordnance Survey base data.</p>
<p>Response Reference: U0001768</p>
<p>Officer Proposed Modification: Amend first paragraph of the Reasoned justification on p35 of policy UA2 to read: "The site is located within Woking Town Centre and is located on a main road into the Town Centre from Victoria Way and the M25. It currently comprises of offices. The site is within Woking Town Centre High Accessibility Zone." Amend the whole of the second paragraph to read: "Both Woodstead House and Tricenzia House have been demolished. The latter building comprised of offices, which were vacant for some time and subsequently approved for demolition and use as a temporary car park (PLAN/2015/01111). There is an opportunity for redevelopment of the whole site to deliver a mixed-use scheme of residential and office uses. Amend fourth paragraph of the Reasoned justification on p35 of policy UA2 to read "Trizancia House, Woodsted House and Chester House were refused...."</p>
<p>Wishes to Attend Examination (T = Tick): T</p>
<p>Contributor Reference: 02259/2</p>
<p>Name: Mr Norman Woolley</p>
<p>Number of Signatories: 1</p>
<p>Comment Type: SUPP</p>
<p>Site Reference: RG18GB12, RG18GB13</p>
<p>Summary of Comment: It is noted that Regulation 18 sites GB12 and GB13 have been removed from the Site Allocations DPD. This is considered a sensible decision as any additional housing at these sites would be inappropriate for the below reasons:</p> <ol style="list-style-type: none"> 1. The area is unable to support more traffic on narrow roads. 2. The existing school is unable to take more pupils. 3. The West Byfleet Health Centre has a full patient quota. 4. Local shops are unable to cater for more custom due to inadequate parking facilities. The proposed development in nearby West Byfleet has seen the closure of many existing shops and restaurants. 5. Existing services including gas, electricity, water and sewage facilities, are under severe strain and could not accommodate additional housing development.
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: Support for the removal of Regulation 18 sites GB12 and GB13 is noted.</p>

Response Reference: U0001300
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06515/1
Name: Mrs Debbie Wordingham
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB10, GB11
Summary of Comment: Concerns regarding the amount of dwellings and traveller pitches allocated to GB10 and GB11. Objects to developing on the Green Belt. Why can development not be distributed more evenly?
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: Section 1 of the Regulation 19 Issues and Matters Topic Paper addresses the issue regarding the release of Green Belt land for development. Section 3 addresses the issue regarding traveller pitches. Section 5 specifically addresses Green Belt land in Byfleet and West Byfleet, and also addresses the issue regarding distribution of development.
Response Reference: U0001387
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05410/1
Name: Mr A J Wyatt
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: Strongly objects to the release of GB7 from the Green Belt. This is the last piece of natural wildlife land that stops Woking sprawling into the village of Mayford. The land is adjacent to the A320 which already has approximately 25000 movements per day. It serves the new Hoe Valley School which is only at 50% capacity, has already had a major accident, and also serves Barnsbury School. Argues that to release this land for development does not make sense and would be completely irresponsible.
Contributor Proposed Modification: None Stated
Modification Reference: NOMODS
Officer Response: This representation has been comprehensively addressed by the Regulation 19 Issues and Matters Topic Paper. Section 20 addresses the physical separation between Woking and Mayford, and in particular provides that the northern part of GB7 has been designated as an area of local separation to provide a visual gap between Mayford and the rest of the urban area, in order to strengthen the visual separation between Mayford and the rest of Woking. Paragraph 6.7 and Section 13 address transport infrastructure. In particular Paragraph 13.3 provides that the Council has worked with Surrey County Council to carry out the A320 Corridor Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed.

Response Reference: U0001061
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 06763/1
Name: Ms Angela Wyatt
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB07
Summary of Comment: The Green Belt should not be eroded, objects to urban sprawl. Appalling to further develop land leading onto an already extremely busy road. Concerned about the site becoming a 'dense mass of concrete' and traffic impacts. There are safety concerns due to traffic levels. There are already 3 schools and enough leisure centres in the area. The proposal is overdevelopment, would negatively impact wildlife and village life.

Contributor Proposed Modification:
Modification Reference:
Officer Response: The justification for the release of Green Belt for development to meet Core Strategy development requirements is addressed in section 1 of the Council's Regulation 19 Issues and Matters Topic Paper. Further detail, including on the issue of urban sprawl, can be found in sections 4 and 21 of this paper. Traffic is addressed in section 6 and impact on wildlife in section 19 of the Council's Regulation 19 Issues and Matters Topic Paper. Development density will be in keeping with the character of Mayford, which is the first key requirement of Policy GB7 (which development proposals will be assessed against) regarding development to the south of the site, and will also have regard to the special character of Mayford, which is recognised in Core Strategy Policy CS6: Green Belt. This policy states that development will not be allowed if it is considered to have an unacceptable effect on the primarily residential character of the village. This issue is further addressed in section 20 of the Council's Regulation 19 Issues and Matters Topic Paper. Furthermore, while development will increase the local population, most of the Borough's housing need is internally generated, and so meeting that need is not expected to undermine the overall social fabric of the area. Development will be supported by adequate local infrastructure to minimise social and environmental pressures as a result of development, as detailed in section 6 of the Council's Regulation 19 Issues and Matters Topic Paper.

Response Reference: U0001280
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):

Contributor Reference: 05670/1
Name: Mrs Kathryn Young
Number of Signatories: 1
Comment Type: OBJ
Site Reference: GB04, GB05
Summary of Comment: Objects to proposals for Greenbelt land in Byfleet to be used for housing. The environment of Byfleet has declined over my 38 years as a resident. This will be exacerbated by building on Greenbelt.

<p>Disproportionate amount of Greenbelt land in Byfleet - this will add to overcrowding; oversubscribed schools and medical facilities; congested roads; pollution (high from the M25); flooding and other infrastructure such as waste water system. Development will damage remaining wildlife. The village cannot cope with more building.</p>
<p>Contributor Proposed Modification: None Stated</p>
<p>Modification Reference: NOMODS</p>
<p>Officer Response: The issues raised in the representation are comprehensively addressed in the Council's Regulation 19 Issues and Matters Topic Paper. Section 4 responds to concerns about the effects of reducing Green Belt land on the amenity and wellbeing of residents; and Section 5 responds to concerns about the disproportionate amount of Green Belt land being released in West Byfleet and Byfleet. Section 6 of the Topic Paper responds to concerns about infrastructure delivery, including for healthcare services, schools and road infrastructure. As highlighted in paragraph 6.4, the IDP will continue to evolve with new information and the Council continues to work with infrastructure providers to plan for growth in the area. Housing trajectories and proposals are shared with Surrey County Council, Surrey's School Commissioning Team, and the Northwest Surrey Clinical Commissioning Group to assist in infrastructure planning. Overall, the Council is confident that the infrastructure delivery plan provides adequate information on infrastructure provision to support the delivery of the Core Strategy and Site Allocations DPD. Thames Water - the wastewater infrastructure provider - has been consulted and has advised which sites may need capacity improvements. Early engagement with Thames Water regarding wastewater infrastructure capacity has been included as a key requirement in relevant site policies. Section 13 goes into more detail about concerns about congestion, including how the Council and Surrey County Council are satisfied that the proposed mitigation measures for the A245 will satisfactorily address any adverse impacts from cumulative development in Byfleet and West Byfleet. Section 8 of the Topic Paper responds to concerns about pollution. The concern regarding vulnerability of the sites to flooding is addressed section 7 of the Topic Paper, which also points to the assessments undertaken regarding flooding. Only a very small percentage of site GB5 falls within Flood Zone 2: should the site be required for future development, key requirements would be included in a site allocation policy requiring comprehensive flood risk assessments to demonstrate that development would not increase flood risk elsewhere or exacerbate the existing situation; as well as Sustainable Drainage Systems requirements. A large part of the Byfleet SANG site does fall within Flood Zone 3, but it is proposed for open space use, in particular as Suitable Alternative Natural Green Space - not built development. The proposed uses for this site are considered appropriate development for this level of flood risk, and will not exacerbate flooding elsewhere. The whole of site GB10 is within Flood Zone 1, but it is acknowledged it is adjacent to land classified as Flood Zone 2 and 3. The Environment Agency has been consulted, and appropriate key requirements have been included in the site allocation policy to ensure comprehensive flood risk assessments are undertaken as part of any scheme coming forward. The representation regarding unnecessary, excessive and overdevelopment; and lack of need for Green Belt land; is addressed in paragraphs 1.7 and 1.8 of the Topic Paper. Section 2 sets out in detail why sites GB4 and GB5 need to be safeguarded for development beyond 2027. Sites GB4 and GB5 have not yet been allocated for development, only safeguarded, in recognition of the fact that needs, and the planning policies reflecting them, may change beyond 2027. Section 19 of the Topic Paper responds in detail to concerns about impacts on wildlife.</p>
<p>Response Reference: U0001650</p>
<p>Officer Proposed Modification: No proposed modifications as a result of this representation</p>

Wishes to Attend Examination (T = Tick):

Contributor Reference: 05708/1

Name: Mr David Young

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB04, GB05

Summary of Comment: Objects to the removal of Greenbelt in Byfleet. The M25 (high traffic noise and air pollution); regular flooding of the River Wey; and traffic on Parvis Road, around Brooklands Retail Park and through the Byfleet area already blight residents living in Byfleet. The proposed development will result in overcrowding, more traffic, greater risk of flooding and the knock-on effects of removing Greenbelt e.g. stress and respiratory complaints. The proposals discriminate against ordinary working people who struggle to defend themselves against supposedly local democratic decisions. Cuckoos, skylarks and bats have disappeared since the M25 opened, presumably due to air quality. Humans will be subjected to pollution from the M25 if houses are built here. Greenbelt should be retained for wildlife and preservation of air quality.

Contributor Proposed Modification: Retain Green Belt in Byfleet.

Modification Reference: U0000443

Officer Response: The need to safeguard Green Belt land, including that in Byfleet, to meet future development needs is explained in detail in Section 2 of the Regulation 19 Issues and Matters Topic Paper. This is expanded upon further in Sections 4 and 5, which include comments on the general wellbeing and amenity of residents. Section 7 responds to concerns about flooding. Section 8 responds to concerns about air quality for both residents and wildlife. Section 13 responds to concerns about traffic and congestion. Section 19 responds to concerns about wildlife. Sections 9 and 24 describe the adequacy of the public consultation and political decision-making process.

Response Reference: U0000919

Officer Proposed Modification: No proposed modifications as a result of this representation

Wishes to Attend Examination (T = Tick):

Contributor Reference: 06740/1

Name: Mrs Kay Young

Number of Signatories: 1

Comment Type: OBJ

Site Reference: GB10

Summary of Comment: Objects to the removal of GB10 from the green belt, and considers the DPD flawed for the following reasons:
1. The infrastructure plan addresses neither provision of school places nor adequate health care; both services are already over capacity in the area. Also concerned about the appropriate infrastructure for roads, sewage and water.
2. Parvis Road is already very congested at peak times, especially during recent road works. The current road layout is inadequate to support the influx of additional cars. The site is a good distance away from the nearest station so many commuters will be reliant on private vehicles, causing congestion.
3. Concerned that Green Belt land is being lost; considers that this is a beautiful space, of value to children at the nursery and residents at the care home. Development will harm amenity and undermine the West Byfleet Neighbourhood Development Plan which seeks

to maintain, enhance and protect the character of the village. Protection and enhancement of green spaces is part of this plan, and development would contradict this objective.

4. The plan makes inaccurate statements about the Green Belt function of the site; it does prevent urban sprawl and does assist in safeguarding the countryside. A lot of wildlife lives in the area, and concerns are raised about the impact on the natural environment.
5. The site is a Minerals Safeguarding Area for concreting aggregate. The SCC website states that "mineral resources and waste infrastructure are essential to support a modern economy." Plans to develop a safeguarded site should be rejected. The allocation runs until 2020, which brings into question the attraction of this site to a developer.
6. Concerned that there is insufficient evidence of consideration of noise pollution
7. The plan is not consistent for WBC's policy on Gypsy, Travellers and Travelling Showpeople because the site does not have adequate parking and turning areas, safe access from the highway, adequate amenities, appropriate infrastructure, or safe and reasonable access to local facilities including school and healthcare.
8. There is not sufficient evidence to demonstrate that appropriate flood assessments have been carried out; the site is subject to flooding.
9. The plan is inappropriate as it constitutes overdevelopment; the amount of housing is unnecessary and excessive.
10. Inadequate consideration has been given to alternative sites, as required. WBC should focus on PDL first.

Does not wish to speak at the examination; would like to be informed when the DPD progresses to the next stages.

Contributor Proposed Modification: None Stated

Modification Reference: NOMODS

Officer Response: Many of the issues raised in this representation are addressed by the Regulation 19 Issues and Matters Topic Paper.

Section 6 of the Regulation 19 Issues and Matters Topic Paper confirms that due consideration has been given to infrastructure. In particular, Paragraph 6.9 addresses education provision; Paragraph 6.12 addresses GP provision; Paragraph 6.10 addresses water provision; Paragraph 6.11 addresses sewage and 6.7 addresses transport. Transport infrastructure is also addressed by Section 13 of the Regulation 19 Issues and Matters Topic Paper. In particular Paragraph 13.3 confirms that the Council has worked with Surrey County Council to carry out the A245 Mitigation Study to identify the potential mitigation measures that might be necessary to address development impacts on the network. With appropriate mitigation, the transport impacts of development can be addressed.

GB10 includes a key requirement to encourage sustainable transport choices. Namely "the developer will contribute to the provision of essential transport infrastructure related to the mitigation of the impacts of the development of this site, in addition to the relevant Community Infrastructure Levy (CIL) contribution. The exact nature of these site specific requirements will be identified through the development management process and informed by a Transport Assessment. Potential issues to be addressed include:

1. Significant infrastructure required to provide access to the A245,
2. Lack of pedestrian and cycle infrastructure (including crossing) that would link to the surrounding strategic pedestrian and cycle network,
3. Appropriate and adequate provision of car and cycle parking in accordance with the adopted car and cycle parking standards but that takes into account the site's sustainable location and will not compromise on highway safety;
4. Bus stop provision and direct access to this."

The impact of the release of Green Belt land on wellbeing and amenity is addressed in Section 4 of the Regulation 19 Issues and Matters Topic Paper. In particular, Paragraph 4.2 sets out the robust policy framework that exists to ensure that sufficient high quality open space and green infrastructure is available to meet the open space and recreational needs of both existing and future residents.

Concerns about potential conflict with the West Byfleet Neighbourhood Plan are addressed in Section 16 of the Regulation 19 Issues and Matters Topic Paper Paragraph 12.2 of the Regulation 19 Issues and Matters Topic Paper confirms that the Green Belt Boundary Review is sufficiently robust to inform the DPD and to make a sure any land released from the Green Belt does not undermine its purposes.

Section 19 of the Regulation 19 Issues and Matters Topic Paper addresses biodiversity. In particular Paragraph 19.1 sets out that during the preparation of the Site Allocations DPD, the Council consulted with Surrey Wildlife Trust and Natural England to advise on the biodiversity value of each of the proposed sites. Overall, Surrey Wildlife Trust and Natural England did not raise any objection to the proposed allocations based on biodiversity issues that could not be addressed. Regarding GB10 specifically, it is noted that the key requirements include inter alia that "any development here will need to include significant elements of Green Infrastructure, having regard to the landscape's particular sensitivity to change (GBBR, paragraph 3.5.12).

The fact of GB10 being safeguarded by Surrey County Council's Minerals Plan is addressed by Section 17 of the Regulation 19 Issues and Matters Topic Paper. Paragraphs 8.6 to 8.10 of the Regulation 19 Issues and Matters Topic Paper address the consideration which has been given to noise pollution.

As per Section 3 of the Regulation 19 Issues and Matters Topic Paper, the allocation of GB10 to meet Traveller accommodation needs is considered to be consistent with WBC's policy on Gypsy, Travellers and Travelling Showpeople. The site-specific requirements will be addressed through the Development Management process in accordance with Core Strategy Policy CS14.

Section 7 of the Regulation 19 Issues and Matters Topic Paper sets out the due consideration that has been given to flooding, and Paragraph 10.2 provides a list of evidence base studies that have informed the Site Allocations DPD. These include the Strategic Flood Risk Assessment (2015) and the Sequential Testing of Sites in the Site Allocations DPD (2018).

GB10 is not considered to constitute overdevelopment, and the amount of housing proposed is considered necessary. Paragraph 1.7 of the Regulation 19 Issues and Matters Topic Paper recognises that the Council has identified a quantum of land capable of delivering more housing than the overall housing requirement. However, given the nature of brownfield sites, the difficulty associated with their delivery, the lead time that it takes to bring forward such sites and the fact that most of the sites are presently in active use, it is important that sufficient cushion is built into the overall quantum of land that is identified to cater for non-implementation.

Section 11 of the Regulation 19 Issues and Matters Topic Paper confirms that there has been a thorough assessment of reasonable alternative sites to inform the selection of preferred sites. In particular Paragraph 11.6 provides that whilst most development will be focused on previously developed land in the urban area, the need for land to be released from the Green Belt continues to be justified.

Response Reference: U0001012
Officer Proposed Modification: No proposed modifications as a result of this representation
Wishes to Attend Examination (T = Tick):