

Pyrford Neighbourhood Forum

Site Allocations Development Plan Document (DPD) Draft

Comments to form part of the Consultation process commencing 18th June 2015

1. **The Council have approved the draft Site Allocations DPD without taking into account full representations received.** The Executive, in the meeting on 4 June 2015, referred to a letter dated 3 June 2015, sent by LDA Design on behalf of the Pyrford Neighbourhood Forum. The Executive chose not to review the representations of the letter but were of the view that the draft Site Allocations DPD was "*based on robust evidence*" and as a result could be approved. The LDA Design letter in fact stated to the contrary and demonstrated that the evidence base was not robust. The Executive should have therefore fully taken into account the comments raised within the LDA Design letter before approving the draft Site Allocations DPD for public consultation.

2. **The draft Site Allocations DPD is in part based upon the Peter Brett Green Belt Review ('the Green Belt Review'), which is flawed in a number of respects.** Particularly:
 - (a) Sites GB12 and GB13 are consistently assessed in the Green Belt Review as not being suitable for release due to fulfilling two 'critical' Green Belt purposes, with poor sustainability and high landscape sensitivity. Furthermore, much of the evidence presented in the Green Belt Review undermines the case for its subsequent inclusion.

 - (b) Site GB13 was considered in the Green Belt Review as being particularly sensitive due to the open, exposed, nature of the Site and its designation as an 'Escarpment and Rising Ground of Landscape Importance' (designated in the Woking Local Plan 1999 under Policy NE7 and carried forward into the Woking Core Strategy 2012 by Policy CS24 - Woking's Landscape and Townscape). GB13 was considered unsuitable for residential development.

 - (c) The Green Belt Review "sieves" out a number of sites based on a combination of Green Belt, environmental and sustainability factors, including GB12 and GB13. It then reintroduces GB12 back into the assessment at the end of the process based on land availability and whether the sites have been previously promoted. This is not identified as criteria within the methodology, and there are fundamental flaws in utilising availability/promotion as a key factor for determining areas suitable for release.

 - (d) The Green Belt Review does not provide any reasonable justification for reintroducing sites GB12 and GB13, particularly when there are several alternative sites which have performed better in terms of their Green Belt suitability and/or sustainability credentials, notably Parcels 7, 13, 2, and 28.

 - (e) The sites identified in the Green Belt Review have not all been subject to an equal and consistent assessment. Some sites have been broken down into 'sub-parcels' and subjected to a more refined appraisal, while others have been identified as "potentially suitable" but are not considered further due to a lack of information about ownership and availability. As set out above, this is not a sound means of determining areas suitable for release.

3. Purpose 4 of the Green Belt 'To preserve the setting and special character of historic towns' as defined in the National Planning Policy Framework (NPPF) is removed from the Green Belt Review as it considered irrelevant to Woking, and the assessment consistently neglects to consider important historic assets within the Borough. While it is noted that Woking is not an 'historic town', historic assets should still be assessed in combination with other important 'local' considerations relevant to the setting of Woking.
4. The Council states that it is satisfied that the draft Site Allocations Development Plan Document (draft Site Allocations DPD) follows those recommendations made in the accompanying Sustainability Appraisal (SA) and Green Belt Review, in order to deliver the most sustainable pattern of development as required within the Core Strategy. However there are obvious and noted conflicts between the SA and Green Belt Review conclusions including:
 - (a) Site GB13 was not considered as suitable for release from the Green Belt in the Green Belt Review, yet it is identified as a "preferred site" in the SA. The Council considered that the capacity of sites recommended for release in the Green Belt Review was not sufficient to meet the 2040 housing land supply targets. As a result, the Council have included site GB13 as a safeguarded site based on the SA recommendation, despite consistently being identified as unsuitable in the Green Belt Review and removed from consideration in Stage 2 of the assessment.
 - (b) Parcel 7 is rejected from the SA as it is not considered to be a reasonable alternative, contrary to the Green Belt Review's recommendation that it could be considered as a safeguarded site if other parcels cannot provide sufficient quantum of development for the plan period and beyond to 2040 (as discussed above).
 - (c) The Council rejected the Green Belt Review's recommendation that sites are released for rationalisation of the Green Belt Boundary (with the exception of West Byfleet Junior and Infant School Playing Fields) or released to provide a buffer around identified development sites, stating they are already "clear and defensible".
 - (d) The SA does not only assess sites recommended in the Green Belt boundary review report for development. It is a separate and distinct evidence base that assesses all other reasonable alternative sites promoted and identified in the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review and Topic Paper in equal detail. However, the SA does not assess any sites within Parcel 31, which in the ranking order of Parcels within the Green Belt Review, is considered more suitable than Parcel 9.
5. **Conflict between Core Strategy and Sustainability Appraisal:** There are conflicts that exist between the Core Strategy objectives and SA objectives, as a result of the need to protect the purpose of the Green Belt, whilst identifying sufficient sites to deliver the unmet housing need.
6. **Sustainability Appraisal and the draft Site Allocations DPD:**
 - (a) The SA only partially relies on the Green Belt Review. The Council have come to their own decisions on site allocation and suitability ranking, without any further evidence base to justify this decision. The SA therefore cannot be said to form a robust evidence base;

- (b) The Site Allocations DPD draws directly upon the evidence of the Green Belt Review and the SA, rather than utilising the key document, the SA. The SA in itself has already discounted certain sites and conclusions reached within the Green Belt Review. It is therefore inconsistent to reintroduce this document and conclusions already discounted back into the Site Allocations DPD process;
- (c) The Site Allocations DPD alternates between the Green Belt Review and SA at different stages of the assessment process. Stage 2 utilises the Green Belt Review, whilst stage 3 utilises the SA. This creates an unsound evidence base and inconsistency in the assessment methodology process.

7. Landscape Impact of Developing GB12 and GB13

- (a) Site GB12 is bound by mature tree and shrub belts which substantially screen the urban edge of Woking. All the trees within Site GB12 are covered by a Tree Protection Order (TPO).
- (b) Site GB13 is open, sitting on top of the south-east facing slope of the Wey Valley and with connecting views between the escarpment, river valley and beyond to the Surrey Hills AONB. Development will have an impact of the character of both GB12 and GB13 and could result in the loss sensitive landscape features.
- (c) When considered in the wider context, Sites GB12 and GB13 - together with the adjoining woodland and fields – form a relatively narrow tract of land that provides a continuous stretch of uninterrupted countryside between the town and river valley. This countryside is curtailed by surrounding golf courses, which are formal man-made features in the landscape and of distinctly different character, comprising artificial land forms, fairways and bunkers.
- (d) Sites GB12 and GB13 play an important role in containing the southern edge Woking, and providing a strong landscape context for the village of Pyrford. Sites GB12 and GB13 also form part of a rare example of an area of rural landscape that has not been lost and degraded by golf course development.

8. Historic Environment Impact of Developing sites GB12 and GB13

- (a) This countryside contains a number of important heritage assets. Development on GB12 and GB13 could cause adverse impacts to such heritage assets.
- (b) Sites GB12 and GB13 have an important role in providing a rural setting to Pyrford Court Registered Park and Garden and Listed Buildings. Development could potentially erode the landscape around Pyrford Court, in particular when accessing the property from along Pyrford Common Road and Upshot Lane.
- (c) Sites GB12 and GB13 also form part of the land surrounding Pyrford Conservation Area and an analysis of the historic maps illustrate that the surrounding fields were once farmed by the residents of Pyrford. Whilst development of Sites GB12 and GB13 would not affect the architecture and layout of the village it could erode the rural setting of the village.

9. **Through development of GB12 and GB13, there would be an adverse impact on:**
- (a) Pyrford Court Registered Park and Garden and Listed Buildings and a number of grade II listed buildings;
 - (b) the Pyrford Area, and its surrounding agricultural landscape and several farms that are judged to form part of its setting, including eastwards along Warren Lane to incorporate (grade II Wheelers Farm and Barn);
 - (c) the 1480's well preserved listed Wheelers Farmhouse and outbuildings together with the adjoining 300/400 year old Barn; and
 - (d) the building at Key Lees.
10. **Access and Transport Impact of Developing GB12 and GB13**
- (a) The existing B367 and Upshot Lane priority junction is already busy with traffic and is an accident cluster. This indicates there may be issues with the design, layout or condition of the local highway network.
 - (b) Access into Site GB12 from Upshot Lane would be problematic due to the existing, dense, tree line/hedgerow that borders the site. The result would be a large amount of tree clearance and land take into the Site, which would reduce overall capacity.
 - (c) Site GB12 could also be accessed from the B367 Pyrford Common woodland, bordering the site's southern boundary but this would also result in substantial tree loss and direct vehicular access on to trunk roads is not desirable.
 - (d) Consideration has been given to a roundabout at the priority junction but this would require a very large diameter, resulting in significant tree loss and landscape/heritage impacts. Additionally the area is considered to be of archaeological importance.
 - (e) Pedestrian access to Sites GB12 and GB13 is also considered to be problematic due to the lack of existing footway provision and speed of traffic along the local roads.
11. **Other points to include in the consultation response:**
- (a) **Ecological Impact of Developing GB12 and GB13:** Any local evidence of badgers, birds, protected species or ecological activity.
 - (b) **Water Resource and Hydrology:** Any local evidence flood risk and drainage on both sides.
 - (c) **Infrastructure difficulties and transport:** Reference to access, transport and infrastructure difficulties should be included as applicable.