

Pyrford Neighbourhood Forum



Pyrford Village War Memorial Hall
Coldharbour Road
Pyrford, GU22 8SP

Woking Borough Council
Civic Offices
Gloucester Square
Woking
Surrey, GU21 6YL

29th December, 2014

Dear Ms Jackson,

Response to the Woking Green Belt review produced January 2014

We are writing to you on behalf of the membership of the Pyrford Neighbourhood Forum, in response to the consultant's report, published earlier this year on the Council website. It is our understanding that you are due, in January 2015, to make your recommendations to the Council about land that could be taken out from the Green Belt to meet development needs, which the Council will consider in due course as part of the Delivery DPD process.

Whilst it is noted that the Council has not considered the report nor made any decision about how it wishes to take forward the recommendations of the report, we are aware that the Council will do so as part of the Delivery DPD process that will eventually allocate specific sites for development.

The NPPF states (p19) that 'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.' The letter from Nick Bowles to the Planning Inspectorate in March 2014 states that:

"Alongside these reforms we were always very clear that we would maintain key protections for the countryside and, in particular, for the Green Belt.

The National Planning Policy Framework met this commitment in full.

The Framework makes clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt."

More recently, on October 4th 2014 Eric Pickles issued new advice to councils, stating that:

"This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development."

Paragraph 034 Reference ID: 3-034-20141006 of the advice states:

'In decision taking, can unmet need for housing outweigh Green Belt Protection?

Is unmet housing need (including for traveller sites) likely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt?

Our own survey of local opinion also elicited a strong response against building on substantial green belt land in Pyrford unless there was no alternative. It was also appreciated that some new housing was needed.

Working council is required to fulfil their housing quota and they must provide a minimum of 498 homes through the release of green belt land according to independent recommendation to them and their own calculations. However it is understood other regulations require local authorities to provide for housing needs locally and as such it is necessary to release land for development, starting with brownfield sites, and progressing to Green Belt should there be insufficient capacity elsewhere. The Council has emphasised that whilst some Green Belt will require to be released, and site allocations done soon, that by taking the process forward to 2040, this will help preserve and make more robust, a new green belt boundary

The inference and argument for taking land out of green belt is that it does not fulfil the stated purposes of green belt. The NPPF states that there are five purposes:

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

We have looked at the process which the review followed and, by its own criteria, we believe the conclusions the report reaches are only arguments which may be refuted by other arguments

We suggest the conclusions the report reaches after the first two stages of study should carry the greatest weight.

The crucial testing of parcel 9 against the purposes of green belt is presented on page 31 of the report.

Purpose 1: To check the unrestricted sprawl of large built-up areas.

Purpose 2: To prevent neighbouring towns from merging into one another

Purpose 3: To assist in safeguarding the countryside from encroachment

Parcel	Purpose 1	Purpose 2	Purpose 3	Notes	Overall suitability
9	Critical importance to Green Belt Purpose Continued inclusion within Green Belt of Paramount importance	Slight/Negligible importance to Green Belt Purpose Continued inclusion within Green Belt of minor/negligible importance	Critical importance to Green Belt Purpose Continued inclusion within Green Belt of Paramount importance	1. Designation important to prevention of expansion into open mostly exposed arable landscape where it would be perceived as uncontained growth. Generally strong existing boundaries form clear definition between town and country, where no other suitable boundaries exist (except north west corner). 2. Little/no contribution to Purpose as no significant outlying settlement. 3. As Purpose 1 – safeguards mainly open arable landscape, with distinct character, much of which is exposed on south east facing slopes	Very low Area performs one or more Critical Green Belt purpose(s). Land is fundamental to Green Belt.

Parcels 3,5,6 and 29 were identified as making little or no contribution to green belt purposes. At this point it might have been appropriate to remove parcel 9 from any further discussion. The land clearly fulfils green belt purposes and is playing an important role in protecting the countryside. The land has been the subject of potential Green Belt removal in previous Green Belt Reviews instructed by the Council but due to strong public protest and adverse comment the Green Belt status was retained. It is believed that the arguments and objections before are still substantially relevant today and that no argument has been put forward in the report to justify change.

Parcel 9 per the report becomes a preferred site for the building of 223 houses? We question this as there is little if any detailed justification. Indeed the infrastructure implications are massive and inserting a major

new development in the midst of an antiquated but still operational old village system of sewers, drains and water supply seems totally non viable. Is the entire key area of the Forum to be jeopardised?

3.3 Sustainability is the next criterion which the report looks at to consider whether sites are removable from green belt.

However, tracing the progress of Parcel 9, it is reported to be moderately sustainable in being a moderate distance in terms of driving to the town centre (9 minutes) and a 15 minute bus ride. It is further from the rail station than many other green sites. The sustainability assessment itself is flawed as it doesn't take into account the very limited bus service or road congestion and gives equal weight to car journeys into the town centre which should in fact be discouraged. The highest scoring parcels were Parcel 30 and parcels 31, 20, 17 and 15.

Pyrford in general scored very poorly on the ability to walk and cycle to work (only 2% of the population) and parcel 9 is at the extremity of this capability.

3.3.20 Environmental constraints. The report does not take the agricultural classification of land into consideration because housing need overrides this.

So far, the grounds for taking parcel 9 out of green belt are negligible. There is a strong case for keeping parcel 9 in the green belt.

3.2.22 Could the local community benefit from building on green belt? Parcel 9 is considered to have good accessibility to a local centre. When considering the purposes of green belt, however, purpose 5 is to assist in 'urban regeneration.' The report writers properly consulted land owners etc in preparing the report and the community will be consulted by the Council once Council has debated and considered the report.

3.3.35 Overall ranking in terms of sustainability showed parcel 9 to be ranked 18 out of 31.

3.4 Landscape character and sensitivity to change. The report writers undertook a limited landscape character assessment:

A broad open arable landscape extending across elevated/sloping land which is consequently quite widely exposed to the south east. The urban edge is generally well contained such that the parcel contributes to the rural setting of the village and its integration within the wider landscape. The northern edge is characterised by smaller fields and a higher level of vegetation, including some woodland, which integrates the urban edge successfully meaning that the urban area is contained from the open landscape beyond. The open slopes to the east are highly sensitive to change given their open and exposed nature.

From this they concluded that part of the eastern section has little or no capacity for change based on landscape character and sensitivity. The western section is considered to have low capacity for change. The report was not able to take into account the Pyrford Neighbourhood Forum Plan, due to be published shortly. The area of parcel 9, which later in the report becomes known as parcel 009a, is referred to in the Plan as being valued for its community amenity value which could be compatible with keeping the plot in the green belt.

Overall conclusions of stage 2.

3.5.5 The report states, controversially in our opinion, that:

The Green Belt Review will inevitably have to consider parcels with low or even very low suitability for removal from the Green Belt. It also means that the relative sustainability of a parcel of land will be key in reaching conclusions on which areas to remove from the Green Belt.

We suggest that by the report's own admission, after applying a raft of tests, Parcel 9 emerges as not wholly suitable for removal from the green belt.

3.5.21 states that the preferred parcels for removal are parcel 6 at Byfleet, parcel 20 at Mayford, and parcel 4 at West Byfleet.

3.5.22 states that 'We do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development.'

p72. The Report now moves on to Stage 3 – Delivering Housing . This considers the potential of specific sites to deliver the housing requirement and we reluctantly concede this is a review aspect.

4.3.10 sets out strong arguments why Parcel 9 has a Low to Very Low suitability for housing development. The report shows that the area fulfils a 'Critical' role in respect of Purposes 1 and 3 (to check the unrestricted sprawl of large built-up areas, and to assist in safeguarding the countryside from encroachment). Site 009a appears to have been chosen as being suitable on grounds of sustainability. The local community contest that this a sustainable location, as the review has not taken into account the limitations of the local

infrastructure. The preoccupation of the report is to deliver houses from the green belt and after conducting a fairly detailed study explaining why this land shouldn't be removed from green belt it very quickly seems to overturn its own arguments and at 4.3.11 deems the land suitable for development.

Table 4.3 presents the magically arrived at figure of a yield of 223 dwellings. Again, no local consultation has gone into the shaping of this inconsistent and poorly argued report.

Report Conclusion

6.5.1 This Green Belt review has considered the role of parcels of land in relation to the purpose of Green Belt, potential sustainability and landscape capacity for change. The process is underpinned by a robust methodology which is described in this report.

7. New green belt boundary

The report also recommends removal from the green belt of land:

in order to rationalise the Green Belt boundary at locations where land is contributing little or nothing to the purposes of Green Belt.

The declared intention is to realign the boundary where:

7.3.1 boundaries are not well-defined along enduring boundaries, represent historical anomalies in the boundary, or where areas of land make little /no meaningful contribution to the fulfilment of Green Belt purposes but only provide a local protective, as opposed to a strategic function. The north-eastern section of Pyrford Common is selected for removal from the green belt. For these reasons:

7.3.9 Part of parcel 12. The north-eastern edge of this parcel (Area E on Figure 10) is currently defined along rear garden boundaries. There is an opportunity to realign the boundary (in conjunction with the proposal for Parcel 9 referred to above) to follow Pyrford Common Road. The land that would be excluded comprises dense woodland that is identified as a Site of Importance for Nature Conservation and therefore benefits from protection through other policies. The rest of Parcel 12 would remain designated and fulfil Green Belt Purposes.

There are mixed views on this in the community. It is felt very strongly that the Common should be protected and for many it does not appear to be logical to realign this boundary unless it is to result in equal status for Area E with the main tract of Pyrford Common. Any such reclassification of Area E on Figure 10 should ensure that it is not made available for development and rather should seek this parcel's protection as either Common land or village green space.

Alternatives to Parcel 9 release

It has been suggested by several Forum members that, in place of Parcel 9, that an alternative substantial parcel is that Green Belt Land (mainly so) on Pyrford Road extending from Traditions Golf Club northwards towards the boundary of the Lawn Tennis Club (site extending westwards). This land is flat and appears suitable for housing with little environmental impact and it appears sustainable too.

The Forum is of course prepared to discuss with the Council other land which is suitable for release though it is likely that this could involve small parcels.

Adjoining Key Area bounding with Pyrford

There is concern about the proposals for West Byfleet which immediately adjoins Pyrford to the north and especially Parcel 4. The parcel is suggested in the report as being capable of release from the Green Belt. We perceive that the loss of this key buffer Green Belt Land would allow the virtual merger of the built up Byfleet Village and West Byfleet Village contrary to NPPF and also contrary to page 51 of the report ('the area has high landscape sensitivity to change'). We strongly oppose release of Parcel 4.

Also there is a suggestion without detail in the report that a Travellers Site be developed 'within Parcel 4' and we feel this is inappropriate as it would likely blight Parcel 4 for other purposes. We feel if release of Parcel 4 from Green Belt is not permitted then the Travellers Site being an integral part thereof, would fall too.

Conclusion

We believe that the report has itself made a strong case that Parcel 9 is not suitable for removal from the green belt. We believe that other sites ought to be chosen in preference and we would be happy to discuss possible alternative parcels with you. Whatever parcels of green belt are selected by the Council, as being suitable for future development, will need to take serious note of the added demands on infrastructure.