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## **DRAFT SITE ALLOCATIONS & THE GREEN BELT**

### **1. INTRODUCTION**

**CPRE Surrey welcomes this opportunity to express its concern. We have not had time to study all the relevant documents in detail but our objection is made in a wider context. Our approach has been influenced by the need to plan strategically across local boundaries which demonstrate clearly that the Duty to Cooperate mentioned in paragraph 182 of the National Planning Policy Framework (NPPF) has been fully met. However, it also seeks to open up consideration of other aspects of the problems of planning in this part of Surrey at this time.**

**It would seem clear that the proximity of Woking and Guildford requires them to work together for their mutual benefit. We anticipate that this will be difficult until such time as the draft Guildford Local Plan is available for consideration.**

**We are very aware of the requirement for local planning authorities to demonstrate evidence of having closely cooperated to plan for issues with cross-boundary impacts (NPPF 181). This must in our view include infrastructure issues relating to roads, water as a finite resource, waste disposal and sewage treatment, flood issues, air pollution and a range of other environmental and social aspects.**

**Clearly, it is a complex task to do this when so many different public bodies have to be involved in addition to Woking and Guildford. A major challenge relates to responsibilities that are handled by Surrey County Council with regard to roads, education and social care for children and adults. Other government bodies have to be considered such as Highways England in connection with the upgrading of the A3 and the air pollution caused by congested traffic which should be a source of concern both now and for the future.**

**Planning also has to take account of bodies such as Thames Water, Network Rail, Natural England and English Heritage and those policies established by UK or EC law regarding the environment and health. The constraint of providing SANGS in connection with the Thames Basin Heaths has for example to be taken into account. The ambitious growth plans drawn up by the M3 LEP for Woking and Guildford are also being promoted regardless of the lack of infrastructure to serve such a challenging prospect. We also are aware of the influence that the Mayor of London may have in pressing for extra housing in Surrey to relieve pressures in the metropolis.**

A difficulty which also has to be overcome is the timing and coordination of plans for housing when neighbouring authorities such as Woking and Guildford are at different stages of their Local Plan process. Our concern is to avoid piecemeal development and any lack of joined-up thinking across the district boundaries that exist between Guildford and Woking.

It appears also that councils are being asked by government to aim for moving targets in this context. For example, Surrey is already the most overflown county in the country. Now the Davies Report favouring further growth at Heathrow has been published which has prompted the leader of SCC to predict that the county will require 70,000 more homes and 56 extra schools.

The Planning process itself is in turmoil with uncertainty as to whether government policy assurances made before the election regarding the Metropolitan Green Belt will be kept and the statements of local candidates in its support at all levels honoured. CPRE is very aware that 60% of Woking and 89% of Guildford falls within the Green Belt.

There is great uncertainty as well as to how the words “localism” and “sustainability” are to be interpreted. It appears that the programme for Guildford and Woking as expressed in the M3 LEP plan is a single-minded pitch for economic growth as the only objective. Surely, it is apparent that many other considerations regarding social and environmental priorities are at stake and required by the two communities.

CPRE recognizes also that changes in the personnel involved at GBC with forward planning is another factor that has to be taken into account.

## **2. GREEN BELT ISSUES**

CPRE supports the Green Belt which we believe has been very successful in protecting Surrey's countryside from urban sprawl and suburban encroachment. It is our view that the general public in this area regard it as a part of their heritage. The Government states clearly in Chapter 9 of the NPPF that it attaches great importance to Green Belts. Paragraph 79 says that “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.”

Paragraph 80 reads as follows :

“Green Belt serves 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.”

Paragraph 14 makes clear that its “presumption in favour of sustainable development” is to be limited where “specific policies in this framework indicate development should be restricted”. The relevant policies listed in Footnote 9 to Paragraph 14 include sites protected under the Birds & Habitats Directives, Sites of Special Scientific Interest, land designated as Green Belt, Local Green Space, designated heritage assets and locations at risk of flooding.

Paragraph 83 states that “once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan” which is of course the process with which we are now concerned.

CPRE maintains that “exceptional circumstances” is a far stronger requirement than the “very special circumstances” referred to in Paragraphs 87 and 88 when considering any planning application as to whether it is inappropriate or not. The definition of exception is linked to the concept of the rule being normally applied and kept. Exceptional circumstances have to be regarded as unique and the opposite of required general practice and planning process. That is one of the reasons that a boundary change can only be considered when a new plan is being prepared and discussed.

CPRE is concerned about how Paragraph 85 should be interpreted with its reference to “defining boundaries” and “safeguarded land between the urban area and the Green Belt”. We wonder how this will be applied uniformly in Surrey across a county which values the Green Belt so highly for its permanence and openness, and where its 5 purposes are as relevant now as when they were first established.

### **3. TRAFFIC AND RAIL INFRASTRUCTURE**

As you know, Surrey’s motorways carry 80% more traffic than the average for the South East and our A roads 66% more than the national average.

CPRE has been heavily involved with traffic management issues across the county for many years. We served on the M25 Orbit Committee, and were involved with the consultation on the A3 Hindhead Tunnel, the Cobham Motorway Service Area, and the M25 Hard Shoulder Running Initiative between Junctions 5 and 7.

We have also been concerned for a prolonged period with the various AirTrack rail proposals linking Guildford and Woking to Heathrow which are now in abeyance. CPRE is currently monitoring the North Downs Rail proposals linking Reading to Gatwick via Guildford.

The CPRE Aviation Group reviews regularly development plans which will affect Surrey which is the most overflowed county in the country and suffers from major road traffic threats from possible future development at Gatwick, Heathrow, and Farnborough.

We are opposed to linear development within the Green Belt along the roads which link Guildford and Woking, and also Aldershot, Farnham and Godalming. We object in particular to development proposals which will further increase traffic congestion on the A320, A322 and A323.

The detrimental impact of traffic congestion on quality of life across Surrey is a topic of great importance to everyone. The location of schools and the school run are of course a daily cause of traffic problems. The proposal for the Hoe Valley School and its associated Leisure and Sporting facilities will certainly not improve matters on the A320 at Mayford, even if Paragraph 89 of the NPPF allows for greater flexibility to be shown for outdoor sport and outdoor recreation within the Green Belt as long as it does not conflict with its openness. The scale of the buildings concerned and the amount of traffic generated by sporting events on a regular basis needs to be rigorously reviewed. The visual impact on the local community of floodlighting at night and noise disturbance would also seem to be legitimate concerns. This is in our opinion a matter that will have a major impact not only on the village of Mayford but also a far wider area. The Woking Traffic Survey acknowledges that the proposed developments on the Green Belt around Mayford will have a damaging traffic effect on the A320 and A322 as well as other local roads.

Congestion on A roads leads to overuse of B roads by speeding traffic that exceeds the relevant limits which are invariably not enforced. The B367 from Pyrford Village to Ripley is an example of this problem. Speed limits for the Pyrford Conservation Area and elsewhere along this road are not observed except where traffic lights or the narrowness of the road itself, as at Newark Lane, slows traffic down.

**It is our view that the boundary of the Pyrford Conservation Area needs to be reviewed to incorporate a wider heritage setting, stretching from Pyrford Court and the Bothy down the hill to Wheelers Farm and Newark Bridge. It is important that the setting of the ruins of Newark Abbey are protected. The prospect of safeguarding Green Belt land on both sides of Upshot Lane for the development of 423 new houses at some remote stage in future planning is to our mind incorrect, premature, and unhelpful.**

**An example of a C road which is also already under severe traffic pressure is Salt Box Lane which forms the link between the A320 and the A322 as well as funneling through traffic between the M3 and the A3. If housing plans proceed as outlined for Woking and Guildford, small local roads such as this will be overwhelmed.**

**Burdenshot and Gooserye Roads are examples of D roads where safety is a major concern as traffic seeks to find a way through to Worplesdon station which is of course located within Woking BC and proposed as a Park and Ride location for both Guildford and Woking.**

**It appears to us that further analysis is required in both districts of the impact of the huge housing projects now being proposed and the inadequacy of the infrastructure which is currently available to handle the road traffic which they will generate if they go ahead.**

#### **4. EDUCATION CATCHMENT AREAS**

**CPRE is concerned at the way in which this topic is being handled across District Boundaries where there seems to be a lack of overall planning.**

**The Howard of Effingham school is used by many children who come from Bookham and Fetcham in Mole Valley District. Proposals for an expansion of this school have been made that would involve the loss of Green Belt land. The increase in size would be wholly out of scale to the village of Effingham. We understand that there are school vacancies available in Leatherhead.**

**Children from Ripley are being required to travel long distances to schools in Sheerwater and Addlestone. If Hoe Valley School is to be built, what will the future be for Sheerwater school.**

**The new school proposed in Mayford will have a catchment area covering South Woking, and will have a substantial impact on the village and on neighbouring communities. Will children from Guildford be able to attend this school?**

**A number of the outline development proposals for Guildford include schools as part of their draft plans. These include Wisley Airfield for which the outline application will not be ready for review until December.**

**CPRE maintains that coordinated planning needs to be improved so that travel by car to school is reduced both for the benefit of the children concerned and to minimise traffic congestion and car parking difficulties in the communities where schools are located. Guildford residents are well aware of just how much traffic flow is improved during school holiday periods.**

## **5. BROWNFIELD SITES & HOUSING NEED**

**CPRE welcomes the Government's new emphasis on requiring councils to work on a register of brownfield sites. Paragraph 80 of the NPPF makes clear that the Green Belt has an important role to play in encouraging the recycling of derelict and other urban land and assisting in urban regeneration. Development of brownfield sites should have priority even if contaminated land is involved.**

**The Government has indicated that financial help may be available to reduce the extra cost of clearing up contamination to enable housing construction to proceed. It is important that this is followed up by local authorities.**

**It should be remembered that a government spokesman in a recent interview on BBC Radio 4 stated that housing need does not necessarily require giving up Green Belt land. CPRE has severe reservations about the way in which GL Hearn has calculated housing need for Guildford and suspects that this has been exaggerated. It may be that the same approach has been followed for Woking and should therefore be questioned as well.**

## **6. SLYFIELD DEVELOPMENT**

**As you no doubt know, this project is an important element within the proposed Guildford draft plan. It requires moving Guildford's outdated sewage works to a new site closer to the C road Clay Lane, which gives access to the A3. This will enable about 1,000 houses to be built at its present location.**

**The new sewage works and waste handling facilities are an important consideration for the future of Guildford, and should help to ensure a cleaner river Wey which as you know acts as a shared boundary with Woking for several miles. We understand that the cost of moving the sewage works alone will probably be in excess of £60 million which Thames Water are reluctant to invest. We understand that the arrangements for the municipal waste transfer station would be on top of this. We assume that housing development at Mayford and Pyrford may possibly depend on future sewage handling capacity at either Send or Slyfield but have not checked this.**

**The only current access to the Slyfield Industrial Estate is from the A320 which is often congested at its junction with Moorfield Road. This requires urgent improvement so that the traffic link between Guildford and Woking is made easier. An additional access road is said to be necessary for the Slyfield Industrial Estate to and from Clay Lane. Progress with this link road does not depend on approval from Highways England although access to and from the A3 for HGVs is a main objective for this new infrastructure. We believe that a loan of £7 million has been negotiated for this purpose. CPRE has concerns about the acceptability of this development which again involves the loss of Green Belt land owned by the GBC and is highly questionable on flooding grounds.**

**Whatever ultimately happens, the economic prospects for both Guildford and Woking depend on the A320 being "improved" and the current congestion problems overcome.**

## **7. CONCLUSION**

**It is clearly essential that the many leading questions raised in this letter are answered if a coordinated approach and satisfactory planning outcome is to be reached by the two local authorities.**

**CPRE does not believe that the concept of building on the Green Belt is the answer. Housing development at the levels being discussed is neither realistic nor practicable. There are too many issues unresolved and some might say too many players involved.**

**It remains to be seen what Guildford will issue as a draft local plan document for further consideration and consultation and when. Until then, we will not know whether the press release issued by the GBC on 24<sup>th</sup> November 2014 can be relied upon.**

**It would seem wise for Woking to delay finalizing their plans until GBC clarifies what they have in mind. It is apparent that the proximity of the two towns requires a good understanding of how they can best cooperate for their mutual benefit.**

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