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Westfield Common Residents' Association
8 Moor Lane
Woking
Surrey
GU22 9QY

22 September 2011

Planning Policy
Woking Borough Council
Gloucester Square
Woking
Surrey GU21 6YL

Dear Sir,

Response to Woking Local Development Documents – Core strategy 2027

Westfield Common Residents' Association have reviewed the core strategy consultation document and find it unsound; in many instances it is neither justified nor effective. Listed below are our principal comments and observations. Where possible we have made reference to the specific paragraph of the strategy document. Our summary below seeks to provide an outline of our recommendations while our key areas of concern, numbers 1 to 8, are covered in more detail on the subsequent pages:

1. Deprivation in south Woking
2. Lack of community involvement
3. Local Development Plans
4. Protection of Green Belt and other green areas
5. Flood Plains
6. History and Neighbourhood
7. Economy and employment
8. Transport and cycling

Executive summary and recommendations

Our strong recommendation is that before finalising the core strategy, Woking Borough council should rethink its vision for delivering affordable housing in already deprived areas (such as Westfield) and consider alternative ways to improve the economy by cherishing our green open space, Woking's history, by working with existing key stakeholders such as McLaren and Mercedes Benz World and seeking to protect our special leafy pocket of Surrey.



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The Government inspector requires detailed, thorough and up to date facts be used in determining the strategy and it also requires that the views of local communities are taken into account. We strongly believe that producing over 600 pages of detailed 'statements of intent' and using out of date statistics does not meet this requirement. Even residents with the brain power required to fully understand the statements cannot be expected to fully understand the impact of this strategy on the area that they have chosen as their home.

We further strongly recommend that WBC adjust the plan in the light of data from:

- Surrey Local Economic Assessment - This gives an overview of Woking's comparative economic performance compared with other Surrey Boroughs and International Cities and the areas Woking needs to address to further increase its competitiveness
- Surrey CC Families in Poverty Needs Assessment – February 2011 – This provides further information on the wellbeing of Woking residents and the issues WBC needs to address
- NHS Woking Health Profile – June 2011 – This further highlights the Social issues that need to be addressed in Woking
- Guildford Retail & Leisure Study – May 2011 – This provides very detailed information on the strengths & weaknesses of Woking's Retail Centre. It highlights opportunities for growth that will not be obtained by just having more retail space and a railway station.
- Housing Strategy Consultation Residents Survey – January 2011 – This provides an update to the data used in the SHMA
- BCSC Study Paper – Empty Shops- What does the future hold for Town Centres – September 2011 – This provides an indication that voids in Town High Streets and Shopping Centres will continue to grow. It therefore casts doubt on the economic merit of increasing Woking's Retail Floor space by 75,000 square metres.
- More accurate data is taken into account in determining housing need and the changing requirements of Woking's population.

Whilst we appreciate that Government policy is encouraging councils to build our way out of recession, we strongly recommend that the council reconsider its plans for development across the borough. The impact of over development will render Woking a less than attractive place to live, with a high density of homes, over used areas of natural green space, high rise blocks, more vacant office and retail space, more areas of deprivation and more low quality retail outlets. The approach to develop a retail centre to compete with neighbouring Guildford is fundamentally flawed without persuading stores such as John Lewis and Marks and Spencers to open Premium Retail Outlets here.



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Key Areas of Concern

1. Deprivation in south Woking

In Paragraph 1.3 the strategy states:

That 'pockets of deprivation at Sheerwater, Maybury and Lakeview' have been identified for priority action and investment. We recommend that Westfield is included in this 'priority' list given that according to the Surrey Families in Poverty Needs Assessment Old Woking, Kingfield and Westfield also have the same issues. Kingfield & Westfield having the second highest distribution of Children living in Poverty (19.9% vs a Woking Average of 11.4%) and a teenage pregnancy rate 3.5 times the Surrey average and nearly twice the Regional Average.

According to NHS research, alcohol and smoking related issues in Kingfield and Westfield are also higher than the national average.

2. Lack of community involvement

In Paragraph 1.13 the strategy states:

Five key principles underpin the preparation of the Core Strategy:

- Effective involvement of key stakeholders and the general public at all relevant stages of the process in accordance with the Statement of Community Involvement.
- Corporate approach to its preparation, hence the involvement of all service areas of Woking Borough Council.
- Robust, credible and up to date evidence to justify policies and proposals.
- Appropriate scrutiny and involvement of Councillors through relevant committees of the Council. In particular, a cross party Working Group has been established to oversee the preparation of the Core Strategy.
- Quick and efficient management of the process in accordance with the Local Development Scheme.

Whilst the consultation document is well written, we believe that it has not been proactively debated outside of the council. The Citizen's panel were invited to respond, however the impacts of this policy are so wide-ranging, and the issues so dependent on having a good understanding of the data supporting the policy, the majority of Woking residents remain ignorant of the impact this strategy could have.

We believe that data from the 2007 WBC Household Survey where you asked residents if they would like more affordable housing (which was not defined as per HCA PPS3 June 2011), has provided statistics which did not set the question in context. It is therefore, being used for the wrong purpose. For example, you asked if people wanted more affordable housing, and the answer was clearly a resounding 'yes'. However, if you asked those same people are you happy to use green belt land, erode existing common land, designate SNCl as 'urban open space, and have



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tower blocks in the town centre so you can buy a cheaper house – the answer could be entirely different.

The residents' associations of Woking and individual residents should have been invited to detailed sessions to build an overall understanding of the impact of the strategy to enable them to fully understand and provide alternative options and solutions to the housing issues – a solution built through thorough and robust consultation. We strongly recommend that Woking BC implements the intentions of the new Localism Bill and meets with the various residents' associations on a regular and inclusive basis to ensure that all stakeholders needs are met.

- Whilst we appreciate that events for the public at large have been held; these were within the holiday month of August and when children went back to school. Best practice does not approve of using known busy times to hold such drop in presentations. In addition, it would be impossible for an attendee to fully appreciate the impact of the plans from an informal drop in session.
- By using surveys for 'general' questions we believe the council is basing its strategy for its own gain, rather than for the benefit of all residents.
- At one of the first citizens panels, the speaker who created the initial document was unable to adequately answer questions regarding Woking's inability to manage SANGs already designated (and yet the core strategy does nothing to address this poor management). The speaker was also unable to answer questions from the group regarding the Local Development Plan recommendations and it was apparent that the core strategy at that point, and its later iterations, have been restricted to the one need to convince people (invited stakeholders) that overdevelopment is required.

The SWOT analysis in the core strategy document is extremely biased and does not take into account other stakeholders views in any way. In such a vital document covering the next 15 years, we would have expected a far more detail SWOT analysis, perhaps on each of the individual Core Strategy Issues. The council should seek to work with all stakeholders and the public to ensure that needs are met, viewpoints understood and objectives agreed.

3. Local Development Plans

In Paragraph 1.26, the document sets out how the core strategy has taken elements of the South East Plan and proven them to be reliable.

Until this core strategy is finalised, the Local Development Plan remains in place with its recommendation for no more than 200 homes on Moor Lane. So why then in the core strategy does it state in Paragraph 5.66 that in Westfield, 'The site (Moor Lane) has outline planning permission for 440 new dwellings, 60% of which will be affordable'. This is clearly not in line with the existing LDP; outline planning permission has lapsed and the site does not have adequate



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access. It is wrong to imply that this development is already 'decided' in its entirety in the core strategy. Either it is covered by the LDP or the core strategy. We recommend that development in South Woking is developed either in line with the LDP or in line with the core strategy from January 2014. Unless such action is taken, we strongly believe that development in Moor Lane is being 'squeezed in' before the core strategy has been finalised, and not in accordance with existing Local Development Plan's.

With regard to the data used to calculate housing need, we recommend that the council revise the strategy in line with up to date statistics and plan according to that data, rather than seeking to justify further over development of Woking.

For Social and Affordable Housing considerable weight is put on the 2007 Fordham's Research paper, made at a time when demand for local housing was much higher than it is today, accompanied by the 2007 WBC Household Survey which is now four years out of date. It is hoped that WBC would have taken care of many of the issues raised in that survey and thus the issues highlighted would not still be relevant today. In addition:

- 2007 was a freak year when Property Prices were at an all time high relative to earnings. Due to the current economic climate a lot has changed since then. At that time (March 2007) Woking had 3244 households on its register for social Housing (a 47% increase over the previous year!) which by March 2010 had fallen to 2086. During the same period the number of Social Homes in both Woking and the South East had stayed constant although the demand for Social Housing in the South East had increased by 3.3 % homes in the SE at the same time as it had decreased in Woking by 35%! The Study fails to highlight that multiple applications can be made to LA registers. Furthermore non married couples can both register individually.
- WBC's strategy (CS1) is to build 1737 new affordable dwellings) of which over 400 are planned to be in Westfield and 300 in Brookwood Farm (5.66 page 65). Based on the deprivation issues of Sheerwater and Lakeview considerable care will be needed in the design of these new Estates to make sure that Woking does not generate two further "pockets of deprivation". As indicated below the supporting Evidence Base does produce conflicting numbers of Affordable Homes required. However if the SHMA is correct it would imply that WBC will have a considerable pent up demand for Affordable Homes
- Future Home demand indicated in Section 1.27 and Paragraph 12.41 of the now defunct Fordham Research Housing Needs and Assesment Paper states that Woking requires an additional 8910 new homes up to 2027 (42% of which will be Affordable ie 3735 or 249 per year). This number is in direct conflict with the 499 number used in Sections 1.27 and other sections throughout this document. The Strategy also makes the presumption that Affordable Homes have to be supplied via new build or Council Acquisitions. No economic comparison is made anywhere in the documentation of the economic benefits of further



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subsidising open market rents. A strategy that could provide a more rapid supply of “Affordable Housing” plus a more integrated Society.

- The historic SE Plan (Paragraph 1.27) indicates a need for 5840 additional homes; the ONS Household Forecast – Table 406 - provides an estimate of an increase of 8000 additional households during this period. All of these numbers are in excess of the current plan to build an additional 4380 homes. To monitor reality it is suggested that Fig 4 is also used to show Actual Change in Households together with Forecast change in Households against the actual and forecast number of new homes built.
- Paragraph 2.14 requires rewriting to bring it up to date and use consistent data. According to the ONS data Woking now has the 2nd lowest Median House Price value in Surrey (£248,000) compared with a Median Value of South East England of £217,000 and Surrey Median Value of £290,000. The figures used in Sections 2.12 to 2.15 should be adjusted accordingly and brought up to date.

ONS Tables 581 & 582 show the following data for Mean/Median Property Prices:

	Q4 2010		Q1 2011	
	Mean	Median	Mean	Median
England	£236,221	£182,000	£238,807	£175,000
South East	£279,197	£225,000	£278,865	£217,000
Surrey	£386,525	£300,000	£397,896	£290,000
Woking	£340,202	£275,000	£326,344	£248,000

- Two other issues exist within this Paragraph
 - It makes the presumption that the correct strategy in today’s Housing Climate is for first time buyers to purchase property at a time that average mortgage advances are in excess of 3 times disposable income. The SHMA Report S11 highlights the fact that Families renting are far more mobile than those purchasing with 68.2% Woking renters moving within the past 2 years. I.e. renting facilitates a more dynamic workforce.
 - Uses average earnings in the Borough as a comparison with average House Purchase Prices. SHMA Paragraph 5.17 indicated that the Average (Mean)



Household Income in Woking was around £52000 whereas the average of newly formed households was £15405 thus $\frac{£345,674}{52000} = 6.6$ not 13.6. It is suggested it may be better to use ONS Table 572 which shows the Median Earnings vs. Median House Price and Table 576 shows the 15% Quartile vs. Mean Lower Earnings as an indicator of "Affordability" for New Households.

- As highlighted in Paragraph 5.96 and supported by the ONS Population Projections, it is forecasted that the older Population will increase by 32% and require an additional 2500/3000 homes. Although this should free up some larger homes (January 2011 Housing Strategy Consultation Paper) it is unlikely these will satisfy the increased demand created by the envisaged future population growth. It is our understanding that the Housing Mix in Paragraph 5.72 developed using the BHM tool does not take into account the projected future change in type of household and household size as projected by the ONS. If this observation is correct the SHMA numbers requiring reworking to reflect the anticipated changes in the profile of Woking residents.
- CS10 indicates the proposed construction of 440 dwellings on Moor Lane, Westfield, a site of 9.75 hectares. This equates to a density of 45 homes per hectare which is totally inconsistent with the local area and current Local Plan of 20dph. Surely under the new Localism Bill this together with all the other targets needs to be discussed and agreed with the local population. As such this whole Strategy needs to be written along the following lines. *'The Council, in consultation with local neighbourhood forums will discuss and agree the future sites to enable delivery of 4964 new homes between 2010 and 2027, 35% of which need to be classified as affordable for either rent or assisted purchase.'*
- CS12 requires further thought. Although it is fully appreciated that there is a need for Affordable Housing, there does not appear to be any reference to any research of the Social implications of introducing a 50% requirement for affordable housing in areas that already have Social problems such as Kingfield and Westfield, recognizing the issues of deprivation that similar historic policies have brought to Sheerwater and Lake View. These ideals are further expanded in Woking's Community Strategy which includes the following objectives:
 - Exploring through policy and action ways in which all local people have an expectation of a decent, appropriate and affordable place to live
 - Ensuring that when new areas are built the local infrastructure grows with it
 - Conserving green spaces and ensuring they are accessible to all
 - Helping people to feel safe in their community



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- Exploring ways in which an imaginative architectural approach might meet housing needs in semi rural locations

To ensure such objectives are taken into consideration CS12 should therefore add a Paragraph that Affordable Housing should be built in accordance with the aims developed in consultation with the local citizens and expressed in Woking's Community Strategy.

Furthermore the clause "A financial payment to be utilized in providing affordable housing on an alternate site" should be removed. It is because of such historic "get outs" that Woking has failed to keep pace with its Social Housing commitment.

- Nowhere in either the Core Strategy or supporting documentation can we find any reference to tackling WBC's poor performance with regard to RSL rents (Table 704) which in 2010 were the 4th highest in England. CS12 needs to be modified to include a target that Woking's RSL rents are equal or no higher than its adjoining Boroughs:

2010 Ave Weekly RSL Rents

Woking	£103.13
Guildford	£ 99.67
Surrey Heath	£ 92.48
Elmbridge	£ 98.70
Mole Valley	£ 86.48
Runnymede	£ 98.91
Surrey Average	£ 95.38

An action statement needs to be included to cover this point



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4. Protection of Green Belt and other green areas

In section 2.3 the core strategy states:

- 2.3 Outside this main urban area, the remaining 60% of the Borough is Green Belt. Relatively little of the Green Belt land is in active agricultural use. The main uses of Green Belt land are open spaces, playing pitches, golf courses, commercial nurseries and horse grazing. There is also a significant amount of low density residential property, and some industrial premises, in the Green Belt. This area also contains extensive heathland, of which the most significant areas, Horsell Common, Sheets Heath and Brookwood Heath, are designated as part of the Thames Basin Heaths Special Protection Area. Two other heaths, Smarts Heath and Prey Heath, and the Basingstoke Canal are designated as Sites of Special Scientific Interest.

We also note that the strategy seeks to:

local area.

- 4) To protect the integrity of the Green Belt and to harness its recreational benefits for the community.
- 5) To enable a vibrant local economy with good quality offices, businesses

However, there is little evidence that protection of the green belt and other areas is going to be actively managed. There is no mention of working with local stakeholders such as Surrey Wildlife Trust to better manage and protect existing common land which has fallen into neglect since WBC ceased to employ a specialist team to maintain green areas.

We note that in several cases the boundary of the green belt is inaccurately recorded in the maps included within the core consultation document, e.g. On Moor Lane the green belt actually extends to the northern boundary of Moor Lane where it joins seamlessly with the Common Land. It does not stop at the southern boundary of the road.

There is limited recognition of the Westfield Common as registered common land (registration record CL121) and that planning policies need to be adjusted accordingly to protect the common land and only permit lawful development under section 38 or section 16 of the Common Land Act.

The maps included in the core strategy document are materially inaccurate and fail to record the correct extent and boundaries of Westfield Common. A copy registration record as recorded in the Common Land register may be obtained from Surrey County Council and an image of the official map is presented below:



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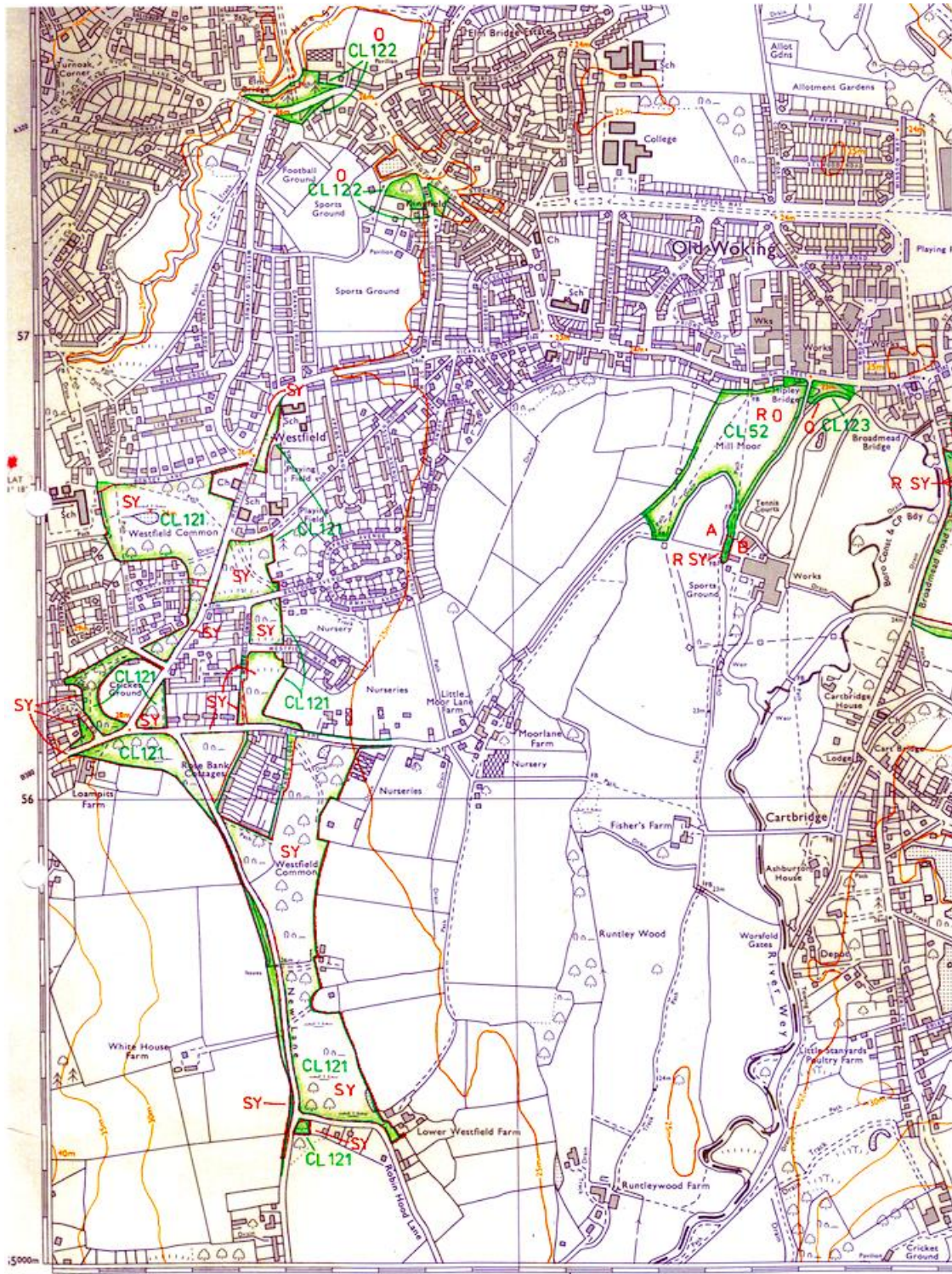


Figure 1 - Copy of Official Registration map for Westfield Common



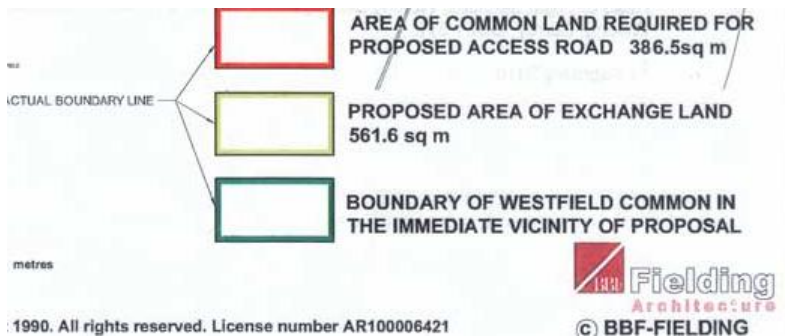
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This shows the the accurate boundary of Westfield Common to the north side of Moor Lane, extending to edge of the boundary of the house names 'Withays'.

Figure 1a – copy of application for land swap





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Woking Borough Council have a statutory duty to protect the common from inappropriate development and it is therefore beholden upon you to ensure that the maps included in the consultation document are accurate enough for policy development.

The consultation document curiously applies different policies to different parts of Westfield Common with the northern part designated Urban Open Space and the southern part as SNCI. This is incorrect – both areas are SNCI.

The official SNCI map for this area as supplied by Surrey Wildlife Trust (See below) records all of Westfield Common as SNCI.

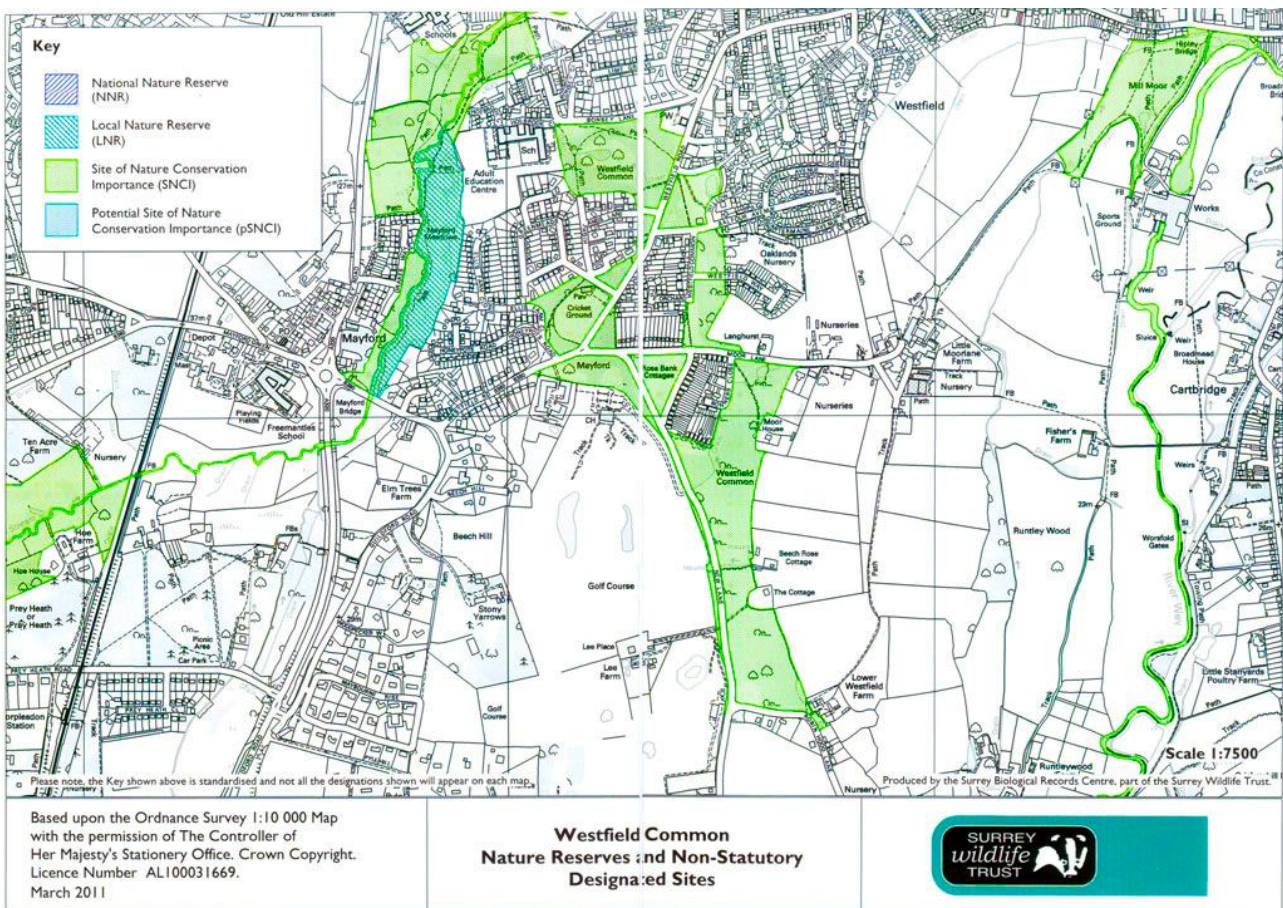


Figure 2 - Official SNCI map



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There is no justification for bifurcating Westfield Common into two areas and applying different planning policies to each.

As registered Common Land, both areas are subject to the same requirements in terms of protection and allowable development. The split is disingenuous and one has to question its wisdom or its justification. For example, the northern part of Westfield Common it appears to have lost its SNCI status despite the fact that nationally important Great Crested Newts are recorded in its ponds. Surely this must remain SNCI to afford protection for Wildlife and Nature.

In particular care must be taken to ensure that no inappropriate permanent developments on Westfield Common are signed off at the local planning committee without the consent of the Secretary of State. Such development would be unlawful and could be challenged in Court at great expense to local tax payers.

The Council's policies must recognise that they are only the registered keepers of Westfield Common (a statutory duty to protect the common); that the land is not owned by Woking Borough Council and it is not theirs to exploit for development whether small scale or large scale.

We strongly require the core strategy to include and name the following SNCIs and their natural green state to actively protect them for the future enjoyment of the residents:

- Westfield Common
- Mill Moor Common
- Whitmoor Common

This extract from the LDP which supports this view:

We also strongly require the core strategy to recognise the requirement to provide statutory protection for registered common land and that the planning policies proposed recognise their status as such.

Protection of these areas must be included as part of the core strategy. Building high density developments adjacent to these sites will place an irrecoverable burden on these areas which have been poorly managed by the council for decades.

Natural environment

The Hoe Stream flows through the west and north of the area where it provides an environmental and recreational resource for the area. The Hoe Stream together with the Hoe Valley Linear Park are designated as Sites of Nature Conservation Importance (SNCI) to protect the regionally important watercourse, woodland and meadows. There are a number of other SNCIs in the area including the River Wey which flows along the eastern edge of the area, Mill Moor and Westfield Common. These are important grassland, wetland and woodland habitat sites. Parts of the area close to the River Wey and Hoe Stream lie within the flood plain.

Both the Hoe Valley and River Wey are considered by the Council to be important landscape features which should be protected.

- protect the regionally important SNCI at Mill Moor, Westfield Common, the Hoe Valley Linear Park and the courses of the River Wey and Hoe Stream from development which harms its nature conservation value (NE2)
- ensure that any development in the valleys of the River Wey and Hoe Stream both respects the quality of the landscape (NE6) and does not lead to an increased risk of flooding (NE11). Development will not normally be permitted in the flood plain

The Westfield Common Residents' Association vision is to protect Westfield Common and its surrounding commons, in their entirety, from further erosion by unwanted demand for space by



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the council. We are working in conjunction with SWT and we run regular clean ups (a council responsibility), social gatherings and nature interest walks for the community. None of this vision, has been taken into account by the council or its representatives whose 'ward' boundaries dissect this precious common land.

In particular the impact of the vast developments at Gresham Mill, Hoe Valley and Moor Lane will all have a significant detrimental affect on the flora and fauna adjacent to the SNCIs. None of these developments or data including their impact has been taken into account in putting together the core strategy.

In the strategy document, golf courses are noted to be a main occupier of green space.

- 2.23 Provision of playing pitches and children's play areas is generally adequate, although there are some local shortages which need to be addressed. There are 11 golf courses, which are one of the main occupiers of land in Woking's Green Belt.

The residents' association is keen to stress that retaining golf courses are preferable to using these areas as brown field sites for development. We also respectfully remind the council that they approved the use of green belt for golf courses and have effectively created a future source for development needs. One of our key issues is access to open areas, as developers and new owners will seek to restrict natural footpaths and 'close off' their new desirable homes.

We also note that the proposals map designates areas in Westfield as 'urban' yet the Local Development Plan describes them as semi-rural.

5. Flood Plains

The strategy document states:

- 2.4 The Borough lies on the north bank of the River Wey, with water meadows and flat relatively fertile land by the river, and gently undulating sandy ground to the north and west, which form attractive local features. However, the land alongside the Wey and Hoe Stream is liable to flood and currently, around 3,500 properties in the Borough are located within such areas. The Council has recently commenced work on the Hoe Valley Scheme, which is a comprehensive development proposal including a significant flood alleviation scheme for the area.

The residents' association also note that the proposals map does not indicate the flood plain areas within the growth area. In particular, the flood plain on the north side of Moor Lane and on Mill Moor Common.



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6. History and neighbourhood

In section 2.6 the strategy covers the historic nature of Woking.

Woking has developed into the large modern town we see today, over the last 150 years. Housing development, originally intended for wealthy London commuters, was built in areas such as The Hockering, Hook Heath, Pyrford and West Byfleet. Woking Town Centre grew into a Victorian commercial centre, with public buildings, shops and workers' housing. Large areas were used for horticulture to serve the London and local markets. In the 1950s, Sheerwater was developed as a London County Council housing and industrial estate, and many families relocated there from London. In the 1970s and 80s, Goldsworth Park was developed, as a major new community

The residents' association agrees that history is important, and we are pleased to see that certain areas have achieved 'conservation area' status. We strongly believe that additional hidden gems in Woking should be added to the 'protection lists'. For example, new areas should be clearly identified and applications for conservation areas and village green status should be welcomed by the council, a clear sign of the 'community at work, together.' The core strategy does not specifically state that this type of protection should be taken into account or encouraged. The danger of the current draft of the strategy is that it only protects existing 'designated' areas as it seeks only to deliver a vision based around building more and more homes and not an overall vision taking into account all the factors that residents and other stakeholders require.

Old Woking and its surrounding commons in particular should be cherished for their history and environment (similar to the protection afforded to Horsell Common, St Johns Lye and areas such as Bookham Common). At this very time, the council are allowing more and more development in this area. It is with regret that the historic pub, the White Hart has been purchased by developers and could be bulldozed to the ground in favour of more housing. The White Hart is in the heart of the Old Woking conservation area, and yet is just within a neighbourhood centre; we hope that it will not fall foul of this trend to allow old buildings to decay (by developers) only to be resurrected with Woking Borough council's agreement to housing development (as is has been the case with Gresham Mill).

Ancient rights of way such as lanes, footpaths and 'green lanes' should be protected and we strongly recommend that new developments are restricted from diverting footpaths. For example, the Gresham Mill development of over 70 apartments, townhouses and car parks has temporarily closed the right of way which enables all from the community to see the mill pond and enjoy the beauty spot. The new owners are swift to prevent walkers approaching the new development by the footpath which runs down the main entrance (the single drive). Walkers are directed to the often water logged (flood plain) path across Mill Moor when the signpost and right of way is still usable. We require a commitment to ensure that access is not prevented to any open spaces by diversions to footpaths from developers or owners who have the money and desire to protect



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their interests and own a piece of the 'beauty'. There is no mention of the protection of ancient rights of way, a real gem in the borough.

We are concerned that the original Westfield Neighbourhood Area dated 21/4/09 has shrunk on the Proposals Map and now excludes the Grade II and Historic Buildings facing Westfield Common. Recognising the intent of WBC to develop Moor Lane we recommend that the council seeks to discuss this neighbourhood area with the residents' associations across the common (as outline in the initial section covering community involvement). Westfield Common and Westfield are important areas which need to have a cohesive identity for all the community, not just an arbitrary line.

It is extremely curious that Woking Borough Council does not attach any particular importance to Westfield Common as a historic feature of Woking. As you are aware Westfield Common is contemporaneous with the historic medieval manors and village of Old Woking. The existence of Westfield Common was first recorded in writing in 1546 thus it predates the existence of modern Woking by hundreds of years.

By way of illustration we enclose a copy of John Remnant map of 1719 which is held at the Surrey History Centre. The boundaries of Westfield Common can be observed clearly.



Figure 3 - John Remnant map, 1719



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The extract below shows Westfield Common and the outline of Rosebank Cottages more clearly.



Westfield Common should be a cherished part of Woking's heritage and it is bewildering that planning policies are not being adopted to enhance and protect the area from inappropriate development.

It is also worth enquiring why there is no conservation status attached to Rosebank Cottages; there are very few areas left in Surrey where historically intact former agricultural housing is preserved in its original landscape setting.

Please find the additional extract from the LDP which supports the protection of this historic area:

Built heritage and conservation

Within the area there are a number of buildings which are either statutory Listed or Locally Listed Buildings because of their architectural or historical interest. These include The Old Cricketers, Westfield Common, Elmbridge Cottage, Kingfield Road and a 16th century barn at Moor Lane Farm, Moor Lane. There are additionally, a number of sites where there may be archaeological remains. The Local Plan will:

- ensure that development does not harm the character or setting of Listed and Locally Listed buildings in the area (BE10 - BE14)
- require archaeological assessments in Areas of High Archaeological Potential as part of a development proposal (BE16)

7. Economy and employment

In section 2.18 the strategy covers the economy and job creation. We strongly believe that using data from 2004/5 presents a more positive picture than would be seen in 2010/2011. There is currently considerable vacant office space/retail space and the trend down in 2009 should not be used to present an argument for more office/retail space. In particular, Woking needs to decide what type of retail it wants to focus on. At present it is not able to compete with Guildford



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for high end retailers. As a result, Woking's retail offering services only those with lower incomes and the preference is to go to London or Guildford for special items. Guildford is only a few miles away, so we believe it is fool hardy to try to boost the economy chasing a retail vision in Woking.

8. Transport and cycling

In the strategy document Woking's status as a cycle town is mentioned along with the desire to influence a shift in transport choices.

currently has a direct rail service to Heathrow airport taking only 30 minutes. Investment in cycling has significantly increased since Woking's designation as a Cycle Town in 2008, providing attractive alternatives to the car. There is significant scope to influence a shift in the mode of travel from car-based journeys to public transport and cycling.

This is clearly commendable, but it is important to consider how this will be delivered. Merely designating roads as cycle routes, does not make them safe or appropriate. It would also not be advisable to further dissect our limited green space by adding new cycle paths. So a clear strategy for this should be developed. Perhaps, Woking could make better use of existing foot paths, which are by their nature the shortest from one place to another. Cyclists could be encouraged to 'give way' to pedestrians using a Woking cycle 'code of conduct' to alleviate issues. At the same time care needs to be taken to communicate to car drivers the values of Woking being a cycle town and to ensure that they are aware of their conduct whilst driving on roads in the borough. We believe the creation of Woking as a cycle town has been poorly delivered as evidenced by the issues highlighted in the Town Centre and along the canal.

Paragraph 5.167 indicates that Transport Assessments have been carried out to identify the Transport Issues. A review of the June 2010 Transport Assessment shows that to date no "joined up thinking" has been given to the Transport implications of all the developments taking place in adjoining Boroughs. The Transport Assessment just looks at the growth provided by known and future developments in Woking. Within Westfield Common we are only able to comment on the projected increase in Traffic identified under Zone 267 node which shows an increase in Traffic Movements created by the proposed Moor Lane development. This is quoted as creating additional departures of 152.5 vehicles and arrivals of 65.1 through the hours of 0800 – 0900. This is at complete odds with the Mayer Brown Transport Assessment, again calculated using the TRICS database, which indicated an increase of 213 arrivals and 88 departures during the same time period ie an increase traffic flow of 38%. If this error was replicated throughout this Assessment this would indicate that the Traffic Flows would increase from 1330 to 1840 during the Peak Period.

We believe that Woking's economy has some key valuable assets in the businesses which have set up major sites here, McLaren in particular. However the core strategy focussing on building retail and more offices, rather than focussing on those business that can really create a focus for the areas economy, if you like deciding who our 'Target Market Employers' should be.



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Conclusion

Westfield Common Residents' Association have grave concerns about the core strategy as it stands at present being capable of delivering a place where people will choose to live, work and play. We encourage the local MPs to prevent over development in the borough. We challenge the council to see if it is able to find any existing residents who are keen to live in a high density area and believe it to be an 'attractive place to live'.

I am disappointed to see Woking Borough Council conduct yet another hasty and incomplete consultation exercise.

Yours faithfully

Nicola Cull
Secretary
Westfield Common Residents' Association

cc:

WCRA membership
Jonathan Lord. MP for Woking
Open Spaces Society
Surrey Wildlife Trust