



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

June 8, 2009

Adrian Bishop  
Borough Planning Officer  
Planning Department  
Woking Borough Council  
Civic Offices  
Gloucester Square  
Woking  
Surrey GU21 6YL

Dear Adrian,

**Moor Lane Access - Planning Application – Reference: PLAN/2009/0434**

As chairman of the Westfield Common Residents' Association (WCRA), I am writing on behalf of the membership to express strong concerns about the Planning Application that has been submitted for access to the proposed "Moor Lane" Housing Development.

As you may be aware, WCRA draws its members from the 475 households located within and on the border of Westfield Common. The membership was consulted on this matter at a public meeting on **Friday 5<sup>th</sup> June** at the Moorcroft Centre at which no less than 85 members attended.

The membership made it quite clear that they were opposed to the planning application, felt that Woking Borough Council had not engaged with the community in an open and transparent manner and that the proposed Access application was inconsistent with the matters detailed in the original Outline Planning Application submitted on 20 June 2006 and the developer consultation of May 2009.

A review of the planning documents has been carried out together with an independent Traffic Assessment commissioned by some of our membership. These reviews have highlighted significant flaws, issues and errors in the planning application documentation that we are bringing to your attention. We would urge you to address these concerns with utmost diligence.

In summary, we have noted the following types of issue with the planning documents submitted:

- Errors in the details of the document submission suggesting a lack of care and attention to the preparation of the application;

- Concern that the current design of proposed junction at Balfour Avenue and Westfield Avenue is not suited to meeting both the demands of existing residents and commuters from the new housing development, in particular:
  - The vehicular capacity of the Westfield Road / Balfour Avenue junction which has been analysed using incorrectly assigned development traffic, and without forecasting to realistic future year scenarios (year 2006 analysed);
  - Questionable interpretation of PICADY output data, despite the output being based on incorrect input data;
  - Further concern over other nearby junctions, such as the Balfour Avenue / Westfield Common junction, where the proposed development is likely to have a significant impact;
  - Misleading statements regarding the width of vehicular access to the development site, which do not consider the width of existing roads leading to the development and their associated vehicular capacity.
- Concern that the wider downstream impact on other road junctions have not been assessed;
- Concern about the potential spill-over of parking in Moor Lane and other surrounding roads as a direct result of development residents attempting to bypass a congested and inefficient main exit route proposed for the junction of Balfour Avenue and Westfield Road, i.e. new development residents parking in Moor Lane (and other streets) and walking to and from their properties. In the case of Moor Lane, creating in effect an alternative main access by stealth;
- Concern that policy matters have liberally / inadequately interpreted, e.g. The excessive distance to nearby bus stops, and hence non-compliance with government policy documents PPG13 and PPS3 which require new development to be sustainable and readily accessible to public bus transport;
- Concern that protected Common Land will be removed to provide access routes without clearly defined and agreed mitigation actions;
- Concern that the full impact of the proposed access cannot be fully assessed without a clearer understanding of the proposed housing development;
- Concern that comments from the County Highway Authority (so called agreements in principle) are not supported by documented statement in writing and that therefore full public scrutiny cannot take place;
- Concern that ecological and arbocultural detailed impact assessments have not been carried and mitigation actions agreed.

The specifics of the review comments are shown in **Appendix A** to this letter and I would request that each matter is responded to in turn.

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As the planning document currently stand, we would request that the consent for the Planning application be refused pending clarification of the points that we have raised on behalf of our membership. I therefore urge the Planning Authority to not approve this Planning Application submission.

The membership has instructed me to request that the matters that have been raised are treated with utmost care and attention and remind Woking Borough Council of their duty towards them as Local Council taxpayers and customers.

I am looking forward to your response.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'William B. Corney'. The signature is stylized with a large, looped 'W' and a long, sweeping underline.

William B. Corney  
Chairman  
Westfield Common Residents' Association

**Appendix A – Flaws, Issues & Concerns**

**Application Form for Planning Permission**

Document = Application for Planning Permission			
Ref	Page	Objection / Comment / Observation	Action
4	2	Document Error  The document incorrectly states that Balfour Avenue is an access location site. This is factually incorrect as it is actually Newlands Avenue in this context.	Please amend the document accordingly.
8	8	This statement is at best inaccurate or misleading.  The accesses proposed were NOT shown at the Public Consultation Workshop (21 March 2009).	Please amend the document accordingly.
12	4	Foul Sewage.  This should be a reserved matter. No investigation has been carried out to determine if the existing sewer system has capacity to handle the extra volumes proposed.	Request that a detailed sewer infrastructure assessment is carried out and that this should be made a condition of approval.

**Design & Access Statement**

Document = Design & Access Statement			
Ref	Page	Objection / Comment / Observation	Action
	1	Site Redline  We note that the redline has changed boundary in comparison to the maps presented in the outline planning application.  For example it no longer includes a boundary to the south side of Moor lane or an extended corridor to west Moor Lane to junction of New Lane.  Does this mean that the previous redline is now null and void.	Please clarify the position on this.  Please clarify the inconsistency between the proposed access vs. the access proposed in the Outline Planning application.  Is the previous Outline Planning Application now null and void?  In which case how can the proposed access be reviewed objectively by residents without knowing in detail what the proposals are for the housing development.

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2.1	4	<p>Document Error</p> <p>Incorrectly states that the eastern most access point is Balfour Avenue when it is in fact Newlands Avenue. This error is then repeated throughout the entire document.</p>	<p>Please amend document.</p>
2.2	6	<p>Loss of Common Land</p> <p>The loss of at least 936m<sup>2</sup> of common land caused by the development of access route 12b is unacceptable and will damage the amenities of existing residents.</p> <p>It is suggested that this could be mitigated by replacement along the western perimeter of the reserved housing hand by moving the site redline.</p>	<p>Request that the replacement of common land be made a condition of any access consent that leads to a net reduction in common land.</p> <p>The replacement should be made by replacement along the western perimeter of the reserved housing hand by moving the site redline and we request that this be made a condition of consent.</p> <p>The option to provide replacement common land elsewhere in the Borough not contiguous with the site would be wholly unacceptable to our membership.</p>
-	-	<p>Westfield Common</p> <p>Westfield Common, Woking is registered as CL121 in the Common Land register (<b>Commons Registration Act, 1965</b>). Westfield Common, which is 26.84 hectares in area, is registered as common land (CL 121) under the Commons Registration Act 1965.</p> <p><b>Section 38 of the Commons Act 2006</b> requires that consent be sought to carry out restricted works on land registered as common land under the Commons Registration Act 1965. Restricted works are any that prevent or impede access to or over the land. They include fencing, buildings, structures, ditches, trenches, embankments and other works, where the effect of those works is</p>	<p>Note that the following statutory requirements need to be complied with and request that these be made a condition of approval.</p>

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		<p>to prevent or impede access. They also include, in every case, new solid surfaces.</p> <p>Under the <b>Law of Property Act 1925 (Section 194)</b> it is unlawful to construct buildings, erect fences, or carry out any other works which prevent access to common land unless the Secretary of State for the Environment, Food and Rural Affairs has given permission.</p> <p>Under the <b>Law of Commons Amendment Act 1893 (Section 2)</b>            Any inclosure or approvement of a common (removal of common rights and enclosure of the land) is not lawful unless the Secretary of State for the Environment, Food and Rural Affairs has granted permission.</p> <p><b>Road Traffic Act 1988 (Section 34)</b>            This makes it unlawful for a person to drive a motor vehicle on any common land (as well as some other types of land) without lawful authority</p>	
3.3.3	9	<p>No assessment of existing surface water infrastructure has been carried out.</p> <p>Clearly such matters should be considered at the outset to determine what improvement works are required.</p>	Request that such an assessment be made a condition of consent.
3.3.4	10	<p>Construction Works</p> <p>Re: Construction Works normal working hours of 8:00 – 18:00 Mon – Fri with possible limited works on a Saturday.</p> <p>Clearly with the potential access</p>	Request that consideration be given to reducing working day to avoid morning and evening peaks of traffic.

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		<p>issues it would be preferable to avoid construction traffic adding additional congestion at Westfield Road / Balfour Avenue junction during peak hours.</p> <p>Working on a Saturday should be avoided – this would interfere with residents' enjoyment of the Common and we are entitled to peace and quiet.</p>	
3.3.4	10	Note that that the upgrade of junction of Balfour Avenue and Westfield Avenue is not a material part of the application.	Request that any necessary upgrade of roads required to allow development traffic to access the site without causing undue noise, congestion and safety risks to existing residents is carried out prior to start of Housing Development construction. This should be a condition of consent.

### **Site Access Statement**

Document = Site Access Statement (May 2009)			
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1.2	1	More accurate to state that the site is improved farmland rather than undeveloped.	Please correct the misleading statement.
1.6	2	Is the agreement in principle formally documented?	<p>Request that the comments from the County Highway Authority should be appended to the planning documents to enable public scrutiny to take place.</p> <p>We request that public scrutiny is allowed to take place prior to planning consent being granted.</p>
2.2	-	The Institution of Highways and Transport (IHT) document 'Guidelines for Planning for Public Transport in Developments' (March 1999) states 'The maximum walking distance to a bus stop should not exceed 400m and preferably be no more than 300m'.	<p>This statement by the IHT would appear to contradict Mayer Brown's assertion, but without knowing what document the guidelines have supposedly been taken from, it is not possible to comment further at this stage.</p> <p>Notwithstanding, the 400m distance criterion is widely accepted and suggests that the majority of the site under consideration will be too far from the</p>

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			<p>nearest bus stop to encourage sustainable travel by bus.</p> <p>This is in contradiction to both Planning Policy Guidance (PPG) Note 13: Transport and Planning Policy Statement Note (PPS) 3: Housing, which require development to be sustainable and readily accessible to public bus transport.</p>
2.2	-	<p>Although the walking distances to the nearby bus stops do fall within the accepted walking distances using the PTAL methodology, PTAL is the standard method used by Transport for London and is not commonly used outside of Greater London. As such, CEC consider that in this location, the Institution of Highways and Transport document is more applicable than any reference to the PTAL methodology recommendations.</p>	
2.4	3	<p>It should be noted that the alternative bus stop mentioned on New Lane at Warners Corner does not have real-time information facilities, shelters or DDR compliant kerbing.</p> <p>Indeed the north bound stop only has a minimum amount of green verge making it potentially an unsafe place to wait for more than a few commuters.</p> <p>There is no pedestrian access across the road from the south bound to the north bound bus stop.</p>	<p>The suitability of this alternative bus stop is a questionable inclusion given the lack of facilities.</p> <p>Or is the intention that more common land is developed to upgrade these facilities.</p>
2.8	3	<p>What are informal routes across common land?</p>	<p>Please explain what this statement means?</p> <p>Is this a commitment to create routes?</p> <p>What is the net impact of such access on existing residents and the open</p>

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			environment and the common land.  Has this been assessed?
3.7	4	The table summary is unclear and lacks annotation.	Please define what AM & PM Peaks mean?
3.8	5	<p>The figures for peak movements seem somewhat understated compared to regional census data.</p> <p>According to the UK Census Surrey has both a higher level of car ownership, car availability and relies on car transport to get to work.</p> <p>The relevant figures are:            Car ownership per person Surrey Census (2007) = 0.586 cars per person.            Car availability per person Surrey Census (2007) = 0.724.            Avg % of Surrey people using car as means to get to work = 65% (UK Census)</p> <p>So working on the same development planning assumptions. On an estate of 450 houses, population of 1125 people then:            Car Ownership = 733.            Car Availability = 905.            Number of Cars used to get to and from work = 588 minimum number of car movements during peak times in the morning / evening.</p>	<p>Please explain the relevancy of producing forecast models based on areas outside of Surrey.</p> <p>Are these figures not somewhat understated?</p>
3.8	5	<p>The TRICS assessment discusses additional movements via the key Westfield Road / Balfour Avenue junction.</p> <p>What about aggregate movements i.e. the total movement of existing plus</p>	Please clarify the impact on aggregate movements.

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		<p>forecasted new movements?</p> <p>The existing residences comprise:            Balfour Avenue = 45 residences.            Campbell Avenue = 40 residences.            Quartermaine Avenue = 48 residences.            Newlands Avenue = 30 residences.            Westfield Common = 18 residences.            The Orchard = 14 residences.            Westfield Way = 45 residences.            Willow Bank = 29 residences.            Total = 269 residences            This equates to:            673 people            396 cars owned            487 cars available            316 car work journeys.</p> <p>Therefore only 9.5 extra cars movements before capacity reached!</p>	
3.10	-	<p>Although Mayer Brown's report states that 'site traffic was distributed at the junction on a pro-rata basis according to the base traffic flows', the assignments shown on Mayer Brown's Figures 3.2 and 3.6 are incorrectly calculated. For example, in the PM peak hour, departures from the site should be 23% turning left (southbound along Westfield Road) and 77% turning right (northbound along Westfield Road) compared to the 54% and 46% shown on Figure 3.6 respectively.</p>	<p>As such, the development flows have been incorrectly assigned, resulting in invalid results from the subsequent junction analysis.</p> <p>Specifically, the number of vehicles egressing right from the minor arm (Balfour Avenue) will have a significant impact on the junction capacity.</p> <p>By underestimating the number of these 'right-turners' associated with the proposed development, Mayer Brown have erroneously over estimated the future vehicular capacity of this junction.</p>
3.11		<p>Mayer Brown's report states that Table 3.2 of their report which shows maximum RFC values for</p>	<p>Please respond.</p>

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		<p>Balfour Avenue of 0.969 and 0.976 'clearly indicates that the junction would operate within capacity with the addition of the predicted development traffic flows'.</p> <p>However, the Design Manual for Roads &amp; Bridges document TD 42/95: Geometric Design of Major/Minor Priority Junctions (Volume 6, Section 2, Part 6) states that 'due to site to site variation, there may be a standard error of prediction of the entry capacity by the formulae of + or - 15% for any site.</p> <p>Thus, queuing should not occur in the various turning movements in the chosen design year peak hour in 5 out of 6 peak hour periods or sites, if a maximum RFC of about 85% is used.</p> <p>The Technical Document goes on to say 'the appraisal should normally be based on an RFC of about 85% in urban areas or 75% in rural areas' (i.e. 0.85 or 0.75).</p> <p>Mayer Brown state that the RFC 'generally lies between 0 and 1, with 1 being the junction operating at its maximum theoretical capacity. However it is generally accepted that junctions do continue to operate above this theoretical capacity level'.</p> <p>This clearly goes against what is stated in the relevant Technical Document. As such, the operation of this junction in</p>	

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		future years is questionable, should the development proposal go ahead.	
3.13	5	Looking at the table this indicates that during the AM peak. Balfour Avenue (left out) can absorb a 3.1% increase in traffic before it reaches maximum theoretical capacity. Balfour Avenue (right out) can absorb a 2.4% increase in traffic before it reaches maximum theoretical capacity.	
3.17	6	Why are the proposed road works on Balfour Avenue not included in the application?	Request that this is made a condition of approval.
3.21	6	Mayer Brown's report states that 'Mayer Brown is not aware of any accident history at the Westfield Road / Balfour Avenue junction', however from discussion with local residents there is evidence that a number of minor accidents have occurred here in the last few years	Request that the Police Authority is contacted for details of accidents.  Look into the personal injury accident data for the last five years and establish that there are no recorded accidents.  This is a material consideration.  No impact of traffic problems caused by accidents either in the immediate area or from spillover from the main A-class roads (such as the A320 or A3 have been considered.
3.22	6	There are several other well known bottlenecks with current traffic levels. An assessment should be carried out for these as well including: Junction of Westfield Road / New Lane Junction of Westfield Road / Woking High Street Junction of Guildford Road / Egley Road	Request that impact assessments be carried out on the following junctions: Junction of Westfield Road / New Lane Junction of Westfield Road / Woking High Street Junction of Guildford Road / Egley Road.  Furthermore modelling of the junction of Balfour Avenue and Westfield Common should be considered as well.  We would request that these additional assessments are carried out prior to resubmission of a new improved access application.

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4.21 / 4.23	10	Please elaborate on why Moor Lane is no longer practical as an access route.	Request that the planning officer as part of his presentation makes a statement clarifying this position to the planning committee.  Is this a temporary glitch while matters are resolved elsewhere?
4.46	13	Option 12b will lead to a loss of significant amounts of common land (at least 458m <sup>2</sup> (non-housing site land).  What do the council propose to do to provide additional common land in this area that will be lost?	Object to the loss of common land.  Request that the replacement of this common land at the western part of the site be made a condition of planning approval.  Refer to Secretary of State for permission.
4.56	15	Given the current state of Newlands it is clear that it could be employed as an emergency access.  Reserve judgement on option 5 – Pending understanding of how existing tenants are going to be refocused.  Object to option 12b unless mitigation action for replacement of common land is put in place and clear demonstration of the viability of the proposed road access and downstream impacts are properly modelled.	Please clarify how the existing tenants are going to be refocused.  Please make mitigation for 12b a condition of consent.  Please clarify how emergency access will work if Balfour Avenue and Westfield Road junction is blocked as in effect this is a single access route to existing and new housing development residents.
5.2	16	For assessment purposes? Object to the ongoing statement of 450 houses for assessment purposes.  The mix is unacceptable.  The density is unacceptable and not in keeping with the prevailing character of the surrounding area.	Please clarify why is the planning target of 270 affordable houses almost double the stated target of 190 homes?
5.3	12	No mention has been made of the upgrading of Westfield Way, Westfield Common or Balfour	

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		<p>Avenue, all of which are less than 5.5m in width.</p> <p>The effective width of the roads giving access to the development site is less than the 5.5m stated for the new access arrangements.</p> <p>The Mayer Brown report does not consider the width of existing roads leading to the development and their resultant associated vehicular capacity.</p>	
General		<p>Concerned about pedestrian cross Balfour Avenues and safety with increased traffic and construction access.</p> <p>There are children and infirm pensioners to consider.</p> <p>The road is in close proximity to a children's play area.</p>	<p>What safety features will be introduced to assist the young and the old crossing the road?</p> <p>Where will these be located?</p>

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General		<p>The traffic surveys used within the Mayer Brown report were undertaken in May 2006.</p> <p>As such, the junction modelling that has been undertaken, presents results for year 2006, effectively telling the reader how the junction would have worked if the development had taken place 3 years ago. No analysis has been undertaken for future year scenarios, such as the expected year of completion and 5 years post completion.</p> <p>Given that this application only relates to the access arrangements, we would not anticipate housing construction commencing until 2011 at the earliest.</p> <p>Therefore, housing completion may not be until 2015, some 9 years after the assessment year Mayer Brown have analysed. Mayer Brown's analysis is not therefore considered to be appropriate or valid.</p>	<p>This is a significant concern given that there are no realistic alternative future access routes and this junction has to work for decades into the future.</p>
General		<p>It is also noted that junction analysis without the development traffic provided. This 'without development' analysis would enable a results, in order to identify the impact of the development traffic.</p>	<p>This is a significant omission and we would request that this is included to allow for an objective assessment by local residents.</p>

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General		<p>Independent Traffic Assessment</p> <p>The independent review concluded that the junction will still operate over capacity for the predicted year of completion. Significant queuing and delay is predicted, even with the minor improvements suggested by Mayer Brown.</p> <p>The queuing on Balfour Avenue could extend to circa 20 vehicles in length, as there is insufficient highway width for 'right-turners' (11.5) and left turners (9.0) to queue alongside one another, other than at the give-way line perhaps.</p> <p>Further queuing and delay can be expected for the 'five years post completion' scenario, in say year 2020.</p> <p>Since the Westfield Road / Balfour Avenue junction has been shown to experience significant queuing as a result of the proposed development, it is expected that the development traffic will also have a significant impact on the Balfour Avenue / Westfield Common junction, and it is recommend that this junction should also be modelled for the current and future year scenarios.</p>	<p>The report can be requested from the WILLOW (WESTFIELD COMMON) MANAGEMENT COMPANY LTD.</p>

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General		<p>Spill-over Parking Off the Development Site</p> <p>Concern about the potential spill-over of parking in Moor Lane and other surrounding roads as a direct result of development residents attempting to bypass a congested and inefficient main exit route proposed for the junction of Balfour Avenue and Westfield Road, i.e. new development residents parking in Moor Lane (and other streets) and walking to and from their properties.</p> <p>In the case of Moor Lane, creating in effect an defacto alternative main access by without planning consideration and resident consultation.</p>	

### ***Ecological Appraisal***

Document = Ecological Appraisal			
Reference	Page	Objection / Comment / Observation	Action
Vegetation	3	Re: Proposal to mitigate loss of SNCI habitat.	<p>Request that recommendation to take wet woodland under management should be made a condition of consent.</p> <p>Said Management to operate for the 25-30 years of the housing association contract to manage the site.</p> <p>Also request that net loss of SNCI habitat is replaced by movement of the site red line, i.e. replacing the lost land elsewhere by moving the site boundary in the west.</p> <p>This should be a condition of consent.</p>
Bats	4	Re: Bat Survey	Request that Bat Survey is carried out prior as per the recommended timetable prior to granting of planning permission.
Badgers	5	Re: badger Survey	Request that Survey is carried out as a condition of approval.

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Reference	Page	Objection / Comment / Observation	Action
Reptiles	5	Re: Reptile Survey	Request that Survey is carried out as a condition of approval. Survey to take place in September.
Newts	6	Re: Next Survey	Request that Survey is carried out as a prior to approval. Survey to take place in March to early June.
Wet Woodland Management Principles	9	<p>Re: Bringing Wet Woodlands into Management</p> <p>Welcome this suggestion that an active management scheme be put in place. This would be seen as a positive outcome given the lack of management that has been applied by WBC in the past.</p> <p>Enhancing the management would go some way to addressing residents environmental concerns and improving the value of this green space.</p> <p>Management should be applied for the duration of the housing association contract.</p>	Request that this is made a condition of approval.

### ***Arbocultural Survey***

Document = Arbocultural Survey			
Reference	Page	Objection / Comment / Observation	Action
5.2	6	Re: Tree Risk Assessment Reports	Request that such reports are made a condition of approval.
10.3	11	Share the concern that the woodlands are not being actively managed.	Request that active tree management be made a condition of approval.