

REP 1-035 PARK BARN FARM (“PBF”) – ALDERSON

SUBMISSIONS FOR DEADLINE 12 (10/7/20)

Comments in response to REP11-024: Post Hearing submissions requested by the ExA and Written summaries of oral contributions at the CAH (Surrey County Council).

Sanway / Byfleet Flood Alleviation Scheme

The objector is aware of the Environment Agency’s (‘EA’) possible interest in PBF1. However, it is also understood that the Sanway / Byfleet FAS is still at a relatively formative planning stage and no decisions have yet been made in respect of that scheme.

The view which the EA has expressed to Mr Alderson is that the two schemes are compatible. This must be right otherwise the EA would presumably not be considering this option at all. But there are also other land options available for the EA to consider, and presumably the EA will not make any final decisions about the potential availability and suitability of PBF1 until it has seen the recommendation for the current scheme.

In light of these factors we consider that no significant weight can be given to any of these matters.

Comments on SCC’s written summary of Oral Submissions at CAH1

Replacement Land matters

We agree with the general sentiment behind SCC’s comment that *“The Replacement Land in the north-west quadrant at Park Barn Farm provides a favourable location due to its proximity to the residential area of Byfleet which is in close walking distance.”* However, this factor is not of itself a good reason to confirm an Order for the compulsory acquisition of PBF because, whilst it does emphasise one particular (and significant) advantage of RL for users in this location, it is not the only RL location which offers significant advantages in the context of the scheme as a whole.

Agenda Item 5a

Issues surrounding the 'buffer zone' have been addressed elsewhere in our deadline 12 submissions. We agree that these areas tend to be less desirable for recreational needs, due to litter and noise, and tend to be zones which are passed through to get to other spaces rather being enjoyed for access in their own right.

Agenda Item 5b

We agree with SCC that the severance of the Commons was a significant factor historically, however this is clearly not a factor which bears upon the SCL required for the current scheme. It is however a reverse benefit which is provided by the RL for this scheme since it will merge with existing SCL to form larger blocks.

The fact that "*usage and need for available need for accessible Common Land is even greater today*" is a factor which weighs in favour of the value of creating other large usable blocks of RL as compared to the loss of relatively undesirable SCL at the fringes of the Commons, only small parts of which currently serve as through-routes to access the wider Commons.

Agenda Item 5c: Amount of RL provision

These points are dealt with fully elsewhere in our representations. SCC's comment is that the ratios were appropriate in the "*absence of other information*" but this need not have been the case at all. The applicant needed to prepare adequate evidence to judge an appropriate level of RL provision rather than choose to follow artificial historical precedents.

KEYSTONE LAW

(ON BEHALF OF MR ALDERSON)