

**Representations by Gordon and Elizabeth Bishop of Brook House, Rough Road,
Worplesdon Hill, Surrey GU22 0RB regarding the Site Allocations DPD**

We consider that the Site Allocations DPD ("the SADPD") is defective in a number of important respects. The defects are as follows:

- (1) The automatic rejection by the SADPD of sites that will yield less than 10 dwellings.
- (2) The failure to allocate any sites for the building of sizeable houses with sizeable gardens.
- (3) The proposal that the Five Acres Gypsy and Traveller site should contain a further 10 pitches plus a transit site.
- (4) The proposal that large swathes of land in Mayford should be released from the Green Belt to provide 569 dwellings, a secondary school for 800 children, an athletics track and a leisure centre without any proper consideration being given to or provision made for the effect the additional traffic will have on the surrounding roads.

The first 2 defects are fundamental and unless they are corrected by Woking Borough Council ("the Council") before submission to the Secretary of State for Communities and Local Government, the Inspector who examines the SADPD is bound to reject the whole of it on the grounds that it is unsound.

1. **The automatic rejection of sites that will not yield at least 10 dwellings**

1.1 In para 2.8 of the Report on the SADPD presented to the Executive on 4 June 2015 it is stated that the SA (i.e the Sustainability Appraisal) rejects sites that will yield less than 10 net additional dwellings or less than 500 sq.m of employment floorspace and in para 2.13 it is said that "the DPD does not allocate any site with a potential yield of less than 10 dwellings".

1.2 The reason for that rejection is explained in the penultimate paragraph on page 11 of the SADPD where it states "For practicality, a general site capacity threshold of 10 net additional dwellings ... has been used". The next paragraph states:

"The Site Allocations DPD does not seek to identify every development site that will come forward in the plan period. Other, smaller sites – those likely to deliver less development than 10 dwellings ... - will still contribute to delivery of the development planned by the Core Strategy and their forecast contributions are quantified in the evidence base. However, these more modest sites are not allocated given their number and often fluid nature. A significant number of these are in the Strategic Housing Land Availability Assessment (SHLAA) or will come forward in the form of windfall development".

1.3 The approach that has been adopted means that, whilst sites yielding less than 10 dwellings which are not in the Green Belt could come forward in the form of windfall development, any such sites in the Green Belt cannot come forward in such a way. If they are not allocated in the SADPD they will remain in the Green Belt, however appropriate it might be that they should be removed from it. Since they are automatically rejected by the SA and SADPD their suitability for removal from the Green Belt will never be considered.

1.4 That this is the result of the approach that has been adopted by the Council is clearly demonstrated by what is said in the SHLAA regarding a number of such sites including the site on the corner of Heath House Road and Rough Road (SHLAABRO34) which is owned by us. It says, under the heading "Suitability":

" The site is in the Green Belt, and so cannot be considered to be in a suitable location for residential development unless it is removed from the Green Belt and allocated for this use in the plan period through the Site Allocations development plan document."

It continues, under the heading "Conclusions":

" The site is only considered to be deliverable or developable during the plan period if it is considered suitable to be released from the Green Belt through the Site Allocations development plan document process."

1.5 Since our site (SHLAABRO34), because of the low density development around it, is suitable for a maximum of 2 houses (possibly with an annex each), the rejection by the Council in the SA and SADPD of any site not yielding at least 10 dwellings means that it has not been considered for development within the plan period even though, for the reasons given in paragraph 3 below, it is eminently suitable for such development. Insofar as there is any consideration of the site in the SA, it is meaningless as it is on the basis of its providing housing at a density of 30 dph, a density which is wholly inappropriate for such a site.

1.6 The failure or refusal by the Council to consider for allocation sites in the Green Belt yielding less than 10 dwellings prevents a number of suitable sites being available for low density housing. By failing to consider such sites the Council has robbed itself of the opportunity of complying with its obligations under the NPPF and the Core Strategy to provide sites on which sizeable houses can be built, as set out in paragraph 3 below. Further it is grossly unjust and unfair to those who have put forward such sites for consideration for development. It necessarily follows that the SADPD is in that respect fundamentally flawed and unsound.

2. **The failure to allocate any sites for the building of sizeable houses with sizeable gardens**

2.1 The National Planning Policy Framework requires local councils to deliver "a wide choice of high quality homes" (see section 6, p 12). That must necessarily include sizeable houses with sizeable gardens ("sizeable homes") as well as medium size and smaller ones.

2.2 This requirement is recognized in Woking's Core Strategy which states (para 5.71, p 68):

"Different households require different types of housing. It is important that the Council provide an appropriate choice and mix of housing across the Borough in order to create balanced and sustainable communities. Widening housing choice broadens the appeal of an area and assists in meeting the needs of existing residents as well as attracting new residents to the Borough".

2.3 Towns like Woking, which are seeking to encourage more businesses to move to the area, need a supply of high quality, sizeable homes to attract the owners and senior executives of those businesses. According to estate agents there is a demand for but lack of sizeable houses in the Woking area. Preventing the building of them in suitable areas restricts the supply and makes the existing houses more expensive. That in turn has a knock-on effect on smaller, less expensive houses.

2.4 Despite the Council's obligation to provide sites for the building of sizeable homes and the need for them (as set out in paras 3.1 to 3.3 above) the draft SADPD fails to allocate any such sites. The SADPD is fundamentally flawed in that respect and therefore unsound.

2.5 It is accepted that there are very few areas within the Woking Borough where sizeable homes can be built. In Brookwood itself there are no such areas. However, there are quite a number of suitable plots on or adjoining Heath House Road on which sizeable homes could be built, without in any way offending the purposes which the Green Belt serves, i.e. low density building on them would not result in "the unrestricted sprawl of large built-up areas", nor would it result in neighbouring towns or built up areas "merging into one another" (see para 80 of the NPPF). It would not amount to encroachment into the countryside, nor would building on them in any measurable way affect the openness of the area.

- 2.6 Most of the sites suitable for development in Bridley adjoin West Hill or Worplesdon golf courses and were originally intended to be built on (see "Worplesdon Golf Club – The First 100 Years: 1908 to 2008"). Many of them were sold in the early 20th century subject to covenants requiring houses to be built on them, the intention being, in respect of those adjoining Worplesdon GC, to create "the Worplesdon Golf Club Estate". The 2 acre plot we own, which adjoins Heath House Road, Brook House and Worplesdon Golf Course, is a prime example. When sold in 1908 it was subject to a covenant permitting 2 houses to be built on it and requiring construction of one of those houses to be commenced within 12 months. There is evidence that some building work was carried out on the plot. It is likely that the Great War, and the Great Depression which followed, resulted in the intended development not taking place.
- 2.7 In the last paragraph on page vi of their Executive Summary of their Green Belt Review dated January 2014, Peter Brett Associates ("PBA") state that "it is quite possible that individual sites might be sustainable and appropriate for removal from the Green Belt, despite the wider parcel within which they were being assessed, being considered inappropriate" and at page 54 of the Review itself they say that, although in their view Parcel 19 as a whole is not suitable for removal from the Green Belt, some development could be integrated along Heath House Road "without wider visual harm" as the parcel is "generally very well contained visually from surroundings due to the high level of mature vegetation".
- 2.8 PBA's description of the residential development along Heath House Road as being "scattered" suggests that there is a relatively small, randomly distributed number of houses; that is incorrect. In fact on the north side of the road there is a continuous line of houses, mostly on sites in excess of 1 acre; only the last plot on the corner of Blackhorse Road has not been built on. On the south side of the road, excluding the plots at each end of the road, there is a line of houses, with only 2 gaps, those being the plots on which houses were intended to be built at the beginning of the 20th century, but in fact were not; one is the land adjoining Brook House on the corner of Heath House Road and Rough Road (SHLAABRO34). The suggestion in the recently published SHLAA that the existing houses along Heath House Road constitute ribbon development is also incorrect. They were not "built along a road

radiating from a settlement" but around a golf course with the intention, at least in the case of Worplesdon Golf Course of forming the Worplesdon Golf Course Estate.

2.9 PBA do add that allowing such development might result in "adverse effects on landscape features and its existing character", but they do not identify what those adverse effects might be and in any event any risk of adverse effects could easily be overcome by imposing suitable conditions on any permission to develop that is given. Infilling on appropriate plots, if subject to appropriate conditions as to size, design, position and landscaping, will not change or damage the character of the area but enhance it. Planning conditions as to landscaping can improve the landscape by providing for the planting of trees to replace those which are reaching the end of their life.

2.10. Any houses built will not adversely affect the "openness" of the area because they would be on large sites and, as PBA say, they would be very well contained visually from surroundings due to the "high level of mature vegetation". The public have no access to such sites and can only see them from the road. If mature vegetation is retained and where necessary new trees planted, those views would not be adversely affected. Consequently it is not necessary to keep them "permanently open" and they should not be included in the Green Belt (see para 85 of the NPPF). They should either be removed as individual sites from the Green Belt as suggested by PBA (see para 2.7 above) or the relevant area should be inset within the Green Belt.

2.11 Excluding the relevant sites from the Green Belt will provide sites on which sizeable homes can be built and thus fulfill the Council's obligations under the NPPF and the Core Strategy.

3. The proposal that the Five Acres Gypsy and Traveller site should be intensified to include a further 10 pitches plus a transit site.

3.1 We strongly object to the proposal that Five Acres should have any more than 15 pitches. That is the maximum number which the Government, the police, the Green Belt Review and

the Council in its December 2013 Traveller Accommodation Assessment say should be on any site "to allow for effective management of a site". It would be quite wrong to put the "peaceful co-existence" which presently exists at risk by increasing the number of pitches.

3.2 It is also undesirable that all the gypsy and traveller sites in Woking should be in one small area of the Borough. It is not credible that suitable sites are not available elsewhere in the Borough.

4. **The proposal that large swathes of land in Mayford should be released from the Green Belt to provide 569 dwellings, a secondary school for 800 children, an athletics track and a leisure centre without any proper consideration being given to or provision made for the effect the additional traffic will have on the surrounding roads.**

4.1 We note that in the Core Strategy it is stated at page 51 that "The Council will ensure that any release of Green Belt land for development will not undermine its overall purpose and integrity" and at paragraph 5.7 on page 52 that "Mayford Village is a small and compact community where limited development within the village boundaries would not have an adverse effect on the character of the Green Belt. Within the village, only infill residential development will normally be acceptable." It is difficult to see how the development proposed in Mayford in the SADPD, in particular in policies GB10 and GB11, can possibly be in compliance with the policies set out in the Core Strategy. If put into effect Mayford will cease to be a village, separate from the town of Woking, and simply become a part of it. The proposals violate the first three Green Belt purposes (see para 80 of the NPPF).

4.2 The scale of the proposed development in Mayford will not only ruin that village but have a damaging effect on the surrounding area. It will cause serious traffic problems on the neighbouring roads, in particular Saunders Lane, Hook Hill Lane, Smarts Heath Road, Goose Lane, Blackhorse Road, Berry Lane and Heath House Road, all of which are narrow roads, unsuitable for heavy traffic (Heath House Road does not permit lorries of over 7.5 tonnes). The single lane railway bridges at Mayford on Smarts Heath Road and Hook Hill Lane are major restrictions on the flow of traffic.

4.3 The SADPD contains no explanation or proposals as to how those problems will be addressed other than saying that "The exact nature of these site specific requirements will be identified through pre-application discussion, informed by a Transport Assessment". The existing Transport Assessment is in very general terms and does not even begin to say how the traffic problems will be solved. It is wholly unacceptable to put forward proposals for such major development without detailed proposals as to how, amongst other things, the traffic problems it would cause would be dealt with.

Gordon Bishop

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Elizabeth Bishop