

Site Allocations Development Plan Document (DPD)

Regulation 18 consultation questionnaire

18 June 2015 – 31 July 2015



How to respond to this Consultation

The Site Allocations DPD public consultation documents are available on the Woking2027 website (see www.woking2027.info), local libraries and the Council's Civic Offices.

You can use this form to let us have your comments on the draft Site Allocations DPD. Additional copies of this questionnaire can also be downloaded from the website.

Alternatively, the Woking2027 website features an online version of this questionnaire and an interactive map of the proposed development sites, through which you can let us know your views.

The public consultation is open to **5pm on Friday 31 July 2015**. Unfortunately we cannot accept responses received after 5pm on the closing date.

Data Protection: Please be aware that representations received by the Council will be made publicly available. If you have any questions about completing this form please contact the Planning Policy team by email planning.policy@woking.gov.uk or on **01483 743871**.

Your details

Please provide your contact details below. We are unable to accept anonymous or confidential responses.

Title: Mr / Mrs / Miss / Ms / Other (please specify) Mr _____

First name Andrew _____

Surname Jones _____

Position (if applicable) _____

Organisation (if applicable) _____

House name and/or number 26 _____

Street Smarts Heath Road _____

Locality Mayford _____

Town Woking _____

County Surrey _____

Post code GU220NP _____

Email address [REDACTED] _____

Telephone [REDACTED] _____

Please select your status or that of any party you are representing:

- Resident of Woking Borough
 - Someone who works in Woking Borough
 - Someone who visits Woking Borough
 - Someone representing a group or organisation

 - Owner of land in Woking Borough
 - Planning / land agent
 - Developer
 - Other (please specify)
-

If you are an agent representing another party, please state who:

Please note that everyone responding to this consultation will be notified of future Woking Borough planning policy consultations. If you would prefer not to be contacted in the future, please tick

Woking Citizens' Panel

Woking Citizens' Panel is comprised of a group of residents from across Woking from all backgrounds, ages and ethnicities. They are contacted a number of a times each year, via email or post, and asked to provide their views on all kinds of issues that affect local people.

Would you like to join the Woking Citizens' Panel?

Yes No I am already a member

Please provide your comments using the questions on the following two pages and return the whole questionnaire – including any additional comments pages – by 5pm, Friday 31 July 2015:

- By email to: planning.policy@woking.gov.uk
- By post to: **Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square, Woking, Surrey, GU21 6YL**

Please note that responses will not be individually acknowledged.

Thank you for taking the time to respond.

Your views

Please complete a separate copy of pages 3 and 4 of this questionnaire for each individual site or section that you wish to comment on.

Which consultation document does your comment concern? Please tick one option only:

- Site Allocations DPD Sustainability Appraisal Report Habitat Regulations Assessment
or General comment (not specific to any one of the consultation documents) Suggest a new site

Which site or section of the document does your comment concern? (if applicable)

Please state all that apply:

Site reference: (please select and note number) UA / GB 7 _____

Section title _____

Page number _____

Paragraph number _____

Are you? Supporting Objecting A combination of these Neutral

Your comment

Traveller Site, Ten Acre Farm (DPD 2015, GB7)

Objections to expansion of Ten Acre Farm by up to 12 Traveller pitches

KEY ARGUMENT

Site not currently deliverable

If letters sent to confirm availability with landowners have not established them as available, they have not been included in the assessment. If the landowner identified a site as not available, then the site is not considered further for Gypsy and Traveller use (WBC Green Belt Review 2014 – GBR)

Woking Borough Council (WBC) approached Mr Lee, owner/occupier of Ten Acre Farm to ask if the site was available. Residents understand that the site is not available and that Mr Lee has not, to date, confirmed availability. **With no written confirmation of availability, the site must be removed from the DPD.**

At the time of the GBR this land (Ten Acre Farm) was promoted for residential development but was unavailable for increased Traveller accommodation use (GBR). This has not changed and Mr Lee (owner/occupier) continues to seek planning approval for his own residential use.

The site has a low existing use value and residential development is likely to be economically viable at a low density (GBR). This is confirmed through Mr Lee (owner/occupier) continuing to seek planning approval for his own residential use.

The Council is acting contrary to its own Strategic Land Accommodation Assessment 2014 (SHLAA) by including Ten Acre Farm as an extended Traveller site. **The site should not be included in the DPD.**

IMPACT

1 Site Concentration

ALL of Woking's Traveller sites are concentrated in one part of the Borough - Ten Acre Farm, Mayford; Hatchington, Burdeshott Road (one mile from Ten Acre Farm); and Five Acres, Brookwood Lye (three miles from Ten Acre Farm). Mayford already provides a major contribution towards the Traveller Community.

There is no justification for further expansion in Mayford.

2 Inappropriate Development in Green Belt

The proposal is, by definition, inappropriate development in the Green Belt contrary to Policy CS6 (Development in the Green Belt) of the Woking Core Strategy Publication Document 2012 and Section 9 (Protecting Green Belt Land) of the National Policy Framework. These set out limited circumstances where development is considered to be appropriate within the Green Belt.

3 Special Circumstances

In the absence of Very Special Circumstances being demonstrated that would justify an exception, there is a presumption against such development. Unmet demand does not constitute 'very special circumstances'.

The previous Government (Communities and Local Government Minister, Brandon Lewis MP Statements July 2013, January 2014) made it clear that unmet demand for sites, whether for traveller sites or conventional housing, is unlikely to outweigh harm to the Green Belt and other harm to constitute very special circumstance justifying inappropriate development in the Green Belt. The Secretary of State wishes to re-emphasise this policy point to both local planning authorities and planning inspectors as a material consideration in their planning decisions.

It is therefore considered that even should the Council not be able to demonstrate a five year supply of Traveller sites, this need **would not outweigh the harm to the Green Belt by reason of inappropriateness** to amount to the very special circumstance to justify the development in the Green Belt.

4 Impact on Visual Amenity, Character and Local Environment

According to Woking Core Strategy 2012, Policy CS14 criteria states "The site should not have unacceptable adverse impacts on the visual amenity, character of the area and the local environment".

Policy H, paragraph 24b, of the PPFTS requires sites to 'positively enhance the environment and increase its openness'. Policy CS21 states that the new development 'should respect and make a positive contribution to the street scene and character of the area in which they are situated', and Policy CS24 states that any development proposal should conserve and where possible enhance existing character.

Smarts Heath Road is a residential road of some 22 houses, including two 16th Century Grade Two listed buildings in close proximity to Ten Acre Farm, leading directly through Smarts Heath Common onto open countryside.

The private traveller site at Ten Acre Farm was granted permission for 5 caravans for one family in 1987 (87/0282). **It was never envisaged that this traveller site would be expanded outside Mr Lee's immediate family.** They have lived in the road for well over thirty years, and for many years, before taking up residence at Ten Acre Farm, lived at number 22 Smarts Heath Road.

Additional pitches, will, according to the Council's Traveller Accommodation Assessment (TAA) comply with the design principles set out by Government practice guidance which is currently 'Designing Gypsy and Traveller sites, May 2008'. These guidelines state what each 'pitch' must have. **Up to twelve of these pitches each needing an amenity building, hard standings for a large trailer and touring caravan, and two vehicles WILL have unacceptable adverse impacts on the visual amenity, character of the area and the local environment, and certainly WILL NOT positively increase the openness of the area, nor the rural street scene."**

This will have an adverse impact on the openness, character and appearance of the area, dominate the nearest settled community and reduce the amenity value contrary to Policies CS6 (Green Belt), CS14 (Gypsies, Travellers and Travelling Show People), CS24 (Woking's Landscape and Townscape) of the Woking Core Strategy 2012, the Outlook, Amenity, Privacy and Daylight SPD.

It is worth pointing out that over the years, **successive planning inspectors have refused residential applications on this site because it would reduce the openness of a green belt area.**

5 Business Use

Gypsy and Traveller sites are essentially residential and those living there are entitled to a peaceful and enjoyable environment. Draft Communities and Local Government guidance on site management proposes that working from residential pitches should be discouraged and that residents should not normally be allowed to work elsewhere on site (Designing Gypsy and Traveller sites 2008). Yet the DPD states “Potential for inclusion of an element of business use, where this would support residents living and working on site.”

Woking Core Strategy 2012, Policy H, paragraph 24b, of the PPFTS requires sites to ‘positively enhance the environment and increase its openness’. Policy CS21 states that the new development ‘should respect and make a positive contribution to the street scene and character of the area in which they are situated’, and Policy CS24 states that any development proposal should conserve and where possible enhance existing character.

The inclusion of business use would inflict a small-scale industrial estate with associated noise, traffic, and nuisance to residents in the road which is totally out of keeping with the amenity and character of the immediate area.

SITE SELECTION

1 Sequential approach

A sequential approach must be taken in identifying suitable sites for allocation, with sites in the urban area being considered before those in the Green Belt. The GBR (Green Belt Review) recommended the following in priority order:

1. *Safeguard existing sites to prevent their loss to other uses;*
2. *Grant full planning permission for existing sites with temporary permission;*
3. *Allocate sites within or adjacent to the urban area*
 - a. *Potential new sites within the urban area*
 - b. *Potential new sites within the urban extensions recommended for the Green Belt release;*
4. *Allocate sites within the Green Belt*
 - a. *Potential intensification of existing sites within the Green Belt;*
 - b. *Potential new or expanded sites within the Green Belt*

The Council’s TAA states “the site and its immediate surrounding could be explored for its potential for future **expansion** to accommodate additional pitches”. The DPD uses the term from the GBR of ‘intensification’ of Ten Acre Farm which is incorrect. The TTA term of ‘expansion’ is the correct term for the DPD proposal. As pointed out earlier, it was never envisaged that this traveller site would be expanded outside Mr Lee’s immediate family. **The council has chosen to set aside the GBR recommendations, selecting the lowest priority rating of 4b when proposing to expand the existing site at Ten Acre Farm by up to twelve additional pitches.**

No independently verified evidence has been produced to demonstrate that Woking Council has exhausted Brownfield sites for Traveller site development in its Plan, nor as to why sites identified in the Council’s Green Belt Review as available and viable have not been included, whilst sites specifically excluded (Ten Acre Farm, Smarts Heath Road) and Five Acres (Brookwood Lye) are the ONLY sites put forward.

2 Other potential sites

In the GBR, Option to meet future need for pitches included WOK001 land south of Murrays Lane, West Byfleet – 4 pitches; and WOK006 land off New Lane, Sutton Green – 3 pitches. There are also sites identified adjacent to the urban area outside of the Green Belt with the capacity to deliver 15 pitches each combined with a mixed and balanced community: land identified to the west of West Hall, Parvis Road, West Byfleet (WGB004a/SHLAAWB019b) and land south of High Road, Byfleet (WGB006a/SHLAABY043). **These options have been omitted from the DPD with no explanation** other than “it is easier to expand existing sites in the Green Belt”, as stated publicly by a planning officer at the Mayford Community Engagement meeting on Monday 6 July 2015.

3 Accessibility

Woking’s Core Strategy 2012, and SHLAA 2014, state that Traveller sites should have safe and reasonable access to schools and other local facilities. **Smarts Heath Road is not currently close to schools and it does not have easy access to local facilities.**

SHLAAMSG025 Ten Acre Farm Desktop Survey indicates that... “*The site has average accessibility to key local services (schools, GP surgeries and to Woking Town Centre). Accessibility to the nearest village centre by bike and foot is good/average.*” In reality, **Mayford has no supporting infrastructure** in the form of shops, doctors, dentists, medical facilities, schools or employment opportunities. Due to a poor public transport system with infrequent and limited bus services residents living on any major development in the Village would be isolated unless they have a vehicle.

Further... *where a site is isolated from local facilities however, either by distance or through lack of adequate public transport facilities and/or is large enough to contain a diverse community of residents rather than one extended family, provision of a communal building is recommended (Designing Gypsy and Traveller sites 2008).*

Such a building, if located towards the front of the site as recommended, WILL NOT positively enhance the environment and increase its openness, respect and make a positive contribution to the street scene and character of the area, conserve and enhance the existing character.

4 Environmentally Sensitive Sites

Any proposal that will have an adverse impact on environmentally sensitive sites that cannot be adequately mitigated will be refused.

Ten Acre Farm has four boundaries – Smarts Heath Common, the Hoe Stream (with railway line behind), the B380 road, and a boundary with Number 1 Smarts Heath Road and adjacent nursery land. Smarts Heath Common is a SSSI (Special Sites of Scientific Interest), designated by Bird Life International as an “Important Bird Area”. The Hoe Stream is an SNCI (Site of Nature Conservation Importance), described as important in the Borough providing a valuable link and habitat corridor for other SNCI sites in the Hoe Valley.

A Ten Acre Farm extended **Traveller site WOULD have an adverse impact on the two environmentally sensitive sites that form the boundary of the land.**

SITE IS NOT SUITABLE

The SHLAA noted that there are a number of physical and environmental problems associated with this site.

1 Contaminated Land

In the GBR, sites (such as Ten Acre Farm) were REJECTED as a possible Traveller site due to concerns over contamination of land.

Designing Gypsy and Traveller Sites 2008 Health and Safety Considerations. *Sites must not be located on contaminated land. Only where land has been properly decontaminated should development be considered on that land. Remedial work should only be undertaken by approved contractors in accordance with relevant standards, to ensure the contamination has been remedied to the standard on which housing development would take place. These processes can be prohibitively expensive and should be considered only where it is financially viable from the outset.*

DPD states “Current or historical contaminative uses may have led to soil and groundwater contamination in and around this former farm that will need to be considered during any development of the site, dependant on detailed proposals and consultation with Environmental Health and the Environment Agency. **Investigation will be necessary and remediation likely to be required.”. Ten Acre Farm is unacceptable as an expanded Traveller site being sited on contaminated land. Only where land has been properly decontaminated should development be considered on that land.**

2 Risk of Flooding

*The Council will not allocate sites or grant planning permission for additional pitches for Gypsies and Travellers in the functional floodplain for Flood Zone 3a (DPD). The Council's TTA states “subject to overcoming any issues about flooding, the site and its immediate surrounding could be explored for its potential for future expansion to accommodate additional pitches”. Some 10% at the rear of the site is Flood Zone 3, whilst a further 15% is in Flood Zone 2. **This will push the proposed site closer to the road frontage which will have unacceptable adverse impacts on the visual amenity, openness and character of the area.***

3 Infrastructure, Services and Cost

Any site considered for allocation must be deliverable (including affordable to its intended occupiers) so as to ensure that needs are met. Policy CS14 criteria states that “The site should have adequate infrastructure and on-site utilities to service the number of pitches proposed”.

There is **little in the way of infrastructure** at Ten Acre Farm, no surface water and storm water drainage, no main sewer, a driveway that does not conform to present day ‘emergency vehicle’ requirements, no water hydrant, no site lighting, no mains gas, and it has minimal connection to water and electricity services.

The site is adjacent to the main railway line from Waterloo station to the south and west coasts and so **would require significant acoustic barriers** to be erected.

Pitches would have to be raised clear of any flood risk.

Similar sites have cost in excess of £125,000 per pitch to develop

Feb 2014 - Lower Bristol Road, Bath, 13 pitches cost £2.5 million

July 2014 - Weston-Super-Mare, 24 pitches cost over £3 million

The costs of preparation of Ten Acre Farm as a Traveller Site is likely to be in excess of £1.5 million.

4 Additional Health and Safety Considerations

Traveller Sites should provide visual and acoustic privacy, and have characteristics which are sympathetic to the local environment. When selecting locations for permanent sites, consideration needs to be given to the relatively high density of children likely to be on the site. When considering sites adjacent to main roads and railway lines, careful regard must be given to the health and safety of children and others who will live on the site; and the greater noise transference through the walls of trailers and caravans than through the walls of conventional housing, and the need for design measures (for instance noise barriers) to abate the impact on quality of life and health (Designing Gypsy and Traveller sites 2008).

Public usage of Smarts Heath Common means that there is **no visual privacy** on the site. The proximity of the main railway line from Waterloo to the south and west coasts means that it is **unlikely that acoustic barriers would alleviate the noise** of regular express trains. The road that borders the site is the B380, the approved **‘lorry’ route in the area**. There is **no footpath on the Ten Acre Farm side** and so children

would have to cross this road to reach a footpath.

In addition to the collective views of SHRRA with which I fully concur, I would also raise further issues regarding the suitability of access to the site from Smarts Heath Road. As joint of author of the Department for Transport's Guidance on Transport Assessment (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/263054/guidance-transport-assessment.pdf), I am surprised that the local planning and highways authorities have paid so little regard to the potential transport impacts of the proposal. At the least I would have expected the production of a Transport Statement or similar which should have identified the existing issues with excessive speeds and the serious accidents which have occurred within the vicinity of the site entrance. While the size of the development based on number of dwellings/pitches may not contribute significantly to the local traffic volumes, the unfettered nature of the business use is a major concern. Both the volume of traffic and the potential for long or heavy vehicles manoeuvring within the access should have been assessed (volumes, visibility, tracking etc) and appraised as part of the site selection multi-criteria evaluation. I have seen no evidence that this is the case (if I am wrong please provide the details) which I believe is unprofessional and a fundamental flaw in the development of the Plan by WBC.

Proposed modifications – please explain what changes you consider should be made, if any (for example, changes to the text, a site boundary, etc.)

The removal of GB7 Ten Acre Farm proposed expansion of the private Traveller site by up to 12 pitches from the DPD for the reasons stated above

These comments are page ____ of ____ pages.

More comments?

If you would like to make additional comments about other proposed sites or sections of any of the consultation documents, please complete further copies of pages 3 and 4 of this questionnaire. Please ensure that these are firmly attached with the main questionnaire - including pages 1 and 2 providing your details - and return this by email or post to the Council (contact details on page 2).

