

Our ref: 150730 J034357 SADPD reps

Your ref:

Planning Policy Team
Woking Borough Council
Civic Offices
Gloucester Square
Woking
Surrey
GU21 6YL
Planning.policy@woking.gov.uk

31 July 2015

Dear Sir / Madam

**Letter of representation in respect of the Draft Site Allocations DPD consultation
Places for People**

I write in respect of the above consultation on behalf of Places for People in relation to their interest in land at Tulip Trees, and neighbouring Ascan Croft, Woking; as shown on the enclosed red line location plan.

Green Belt Review

The areas outlined on the enclosed location plan are located within the St Johns area of Woking, outside but adjacent to the Urban Area as defined on the Core Strategy Proposals Map and within the statutory Green Belt. With regards to the Green Belt, supporting paragraph 5.56 of Policy CS10 in the adopted Core Strategy states:

"In addition to the sites that will come forward in the Town Centre, there will still be the need to identify further sites in the Green Belt to meet both the national requirement for housing land supply and the nature of housing that is needed. The nature of the sites that are considered to be developable in the medium - long term are primarily in town centre locations that are likely only to be suitable for high density flatted developments. The implication of this is that the Council would not be able to achieve an appropriate mix of housing types and tenures to meet all types of local need and demand. To satisfy the above requirements, the Green Belt is also identified as a broad location for long term residential development. The specific sites that will be released will be informed by a Green Belt boundary review and confirmed through the Site Allocations DPD."

The Council subsequently commissioned a Green Belt Boundary Review, undertaken by consultants Peter Brett Associates and Enderby Associates. The purpose of the review was *"to review the land beyond the existing urban area with a view to identifying areas of land suitable for housing, and which could accommodate Gypsy and Traveller sites for the plan period (up to 2027) and beyond to 2040"*.

The Green Belt Boundary Review identifies areas within the Green Belt which may be appropriate for release and assesses them against the five purposes of the Green Belt as set out in paragraph 80 of the National Planning Policy Framework. The five purposes being:

1. *to check the unrestricted sprawl of large built-up areas;*
2. *to prevent neighbouring towns merging into one another;*
3. *to assist in safeguarding the countryside from encroachment;*
4. *to preserve the setting and special character of historic towns; and*
5. *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

Both parcels of land, identified on the red line location plan enclosed, are situated within a wider parcel of Green Belt land (Parcel 30) which was reviewed for potential release. The Green Belt Review document provides the following conclusion in relation to Parcel 30:

- “1. Provides local containment of urban area although other designations (Common Land; Conservation Area; SNCI) serve Purpose by preventing development.
2. Provides local separation of parts of urban area but makes no contribution to Purpose.
3. Separated from wider countryside by railway; other designations provide substantial constraint to development.”

For the above reasons, the document recommends that Parcel 30 is removed from the Green Belt to rationalise and create a robust edge; as shown in ‘Figure 10’ with the land in question identified as parcel ‘G’. However, the document does not propose its release from the Green Belt for development purposes. This is most likely because part of the area is covered other designations which prevent development.

St Johns Lye and Ponds Site of Nature Conservation Importance (SNCI) forms part of Parcel 30. However it is noted that the Woking Sites of Nature Conservation Importance (SNCIs) Summary Report (December 2005) states that, in relation to the St Johns Lye and Ponds SNCI, *“The conservation value of the site has declined”*. It is understood that as part of the monitoring plan for the Core Strategy, this information will be updated and the Council *“will work with the Surrey Wildlife Trust to carry out a rolling programme of SNCI surveys”* (Core Strategy para 5.30). Notwithstanding this, this designation would prevent the unrestricted sprawl of development, should the Green Belt designation for this area be removed.

Tulip Trees and Ascan Croft

It is accepted that the whole of parcel 30 is not appropriate for development. However, as outlined above, the area should be taken out of the Green Belt to rationalise and create a robust edge. The railway line to the south provides a natural boundary for the edge of the Green Belt; as it offers a sensible and natural development limit to the built environment.

The areas not suitable for development will be/are protected by other designations. However there are areas within Parcel 30 which are suitable for development and could make a valued contribution to housing within the local authority area.

It is considered that the two sites identified in the enclosed location plan would be appropriate for small scale development, in line with the overarching policies contained within the Core Strategy. Both sites are not located within the SNCI designation. It is proposed that the sites be considered by the Council for a small number of residential properties, or alternatively a specialist extra care residential allocation.

It is considered that this type of small scale, older person development would fit well into the existing environment of the sites, whilst respecting the surrounding natural habitats. Policy CS13 of the Core Strategy states in relation to such development:

“New specialist accommodation should be of high quality design, including generous space standards and generous amenity space.”

The existing residential curtilages which form the two sites would provide an appropriate setting for such development and the generous amenity space advocated in the Core Strategy. Through appropriate management and maintenance, the amenity space provided could also provide an additional enhancement to the neighbouring SNCI, which, as outlined above, is stated as being in decline.

Moreover, Tulip Trees and Ascan Croft are afforded good accessibility to the local centre of St Johns, wherein there is a range of services and facilities which serve the neighbouring community. It is therefore considered that, in line with the requirements of the Core Strategy (specifically CS13), ‘access to key local services such as public transport and community facilities’ is present.

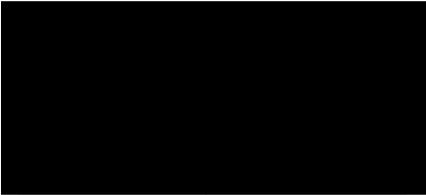
The Strategic Housing Market Assessment (SHMA) at paragraph S42 endorses a proactive approach to providing care homes to the elderly, rather than a reactive approach. As the SHMA states, this market

segment are not considered 'in need' in terms of affordability, however they do account for approximately 23.9% percent of the market, that will inevitably require extra care in the future.

In light of all the information and evidence outlined above, we would suggest that the sites as outlined are a sustainable and available delivery mechanism, for achieving a portion of the districts housing requirement and subsequently ask that it is strongly considered as part of this Site Allocations DPD consultation.

Please do not hesitate to contact us if we can provide any further specific information, in relation to the site or its context.

Yours sincerely



Dan Washington
Senior Planner

