

### Development in the Green Belt – Additional Commentary on Very Special Circumstances

1. This Note has been prepared by Savills to support the development proposals by Woking Football Club and Goldev Woking at Land South of Hoe Valley School and East of Railway Tracks, Egley Road (ref: PLAN/2019/1177), 'the Proposal'.
2. A proposal for development of land that is currently designated as green belt should justify this development on the basis of very special circumstances (VSC). A full case for VSC is set out at paragraphs 5.21-5.41 of the originally submitted Planning Statement and the application has been assessed in that context.
3. In summary, the VSC applicable in this case are:
  - *Enabling a new Community Stadium at Woking FC, through funding and delivery, and the relocation of the David Lloyd Health and Sports Club to Egley Road;*
  - *Should the stadium not be redeveloped in-situ, then an alternative site would be required in the Borough. Given the land availability, it is very likely that this would need to be in the Green Belt and would require a larger area than is needed for the replacement David Lloyd facility. The delivery of a stadium at Woking FC's existing site in Kingfield would therefore act to protect the wider Green Belt;*
  - *The location at Egley Road is sequentially preferable, as it is within the same market catchment for David Lloyd. This is a relevant economic and delivery consideration;*
  - *Woking Borough is entirely Green Belt outside of the urban areas. There are, by definition, no sequentially preferable alternative Green Belt sites. In addition, there are no vacant, previously developed alternatives in the urban areas, which meet the scale required (2-3 hectares of land) as confirmed by a review of the Council's Brownfield Land Register;*
  - *Egley Road is identified within the proposed Site Allocations DPD for removal from the Green Belt as part of Allocation GB7 (which also incorporates the adjacent Hoe Valley School). This has passed the initial Examination of the Inspector assessing the Site Allocations DPD and should be provided some weight;*
  - *The proposal enables both the delivery of market and affordable housing across both the Egley Road and Woking FC's Kingfield sites with wider benefits arising.*
  - *There are a number of other benefits arising from the proposals, which in combination, contribute to the VSC case.*
4. As Woking BC will be aware, the NPPF test of VSC is not defined. This is purposely so, as each planning application is judged on its own merits.
5. Strong reasons (the VSC) are required to outweigh the protection to the Green Belt. It is worth noting the relevant 'harms' to the Green Belt:
  - *Definitional harm: Loss of Green Belt openness, which may be judged on the basis of the quality of the Green Belt. The Green Belt at Egley Road is judged to meet one purpose (as defined by the NPPF), of protecting the countryside from encroachment. Owing to existing built development on the immediate surrounds, it is not judged to meet any other purpose. This forms a further reason for the proposed allocation GB7 to remove the land from the Green Belt.*
  - *Other harm: A loss of some protected trees would result from the development. These trees may be judged to form a Green Belt parcel boundary, and therefore the loss should be viewed in the context of the existing*

*residential development to the south. The southern edge of this existing development would still form a defensible future Green Belt boundary with significant tree planting maintained on this boundary.*

6. There are no other harms.
7. Overall, the quality of the Green Belt at Egley Road is poor with limited contribution to the intended purpose of the Green Belt. Whilst significant weight should be provided to its protection as it is Green Belt by definition, the site specific evidence, and merits of the application, in this particular case outweigh this protection.
8. The Inspector's letter on the Site Allocations DPD (7 February 2020) confirmed allocation GB7 as sound with respect of the Egley Road aspects (housing). The Inspector's comments (at paragraphs 13-15 of his letter) related solely to the northern part of the allocation (north of the school), which had been proposed as an '*area of local separation*'. The Inspector has recommended that this is removed and alternative policy provisions imposed for landscaping measures.
9. The Inspector's comments confirm that GB7 is to be removed from the Green Belt.

**Savills**  
**3 June 2020**