
Regulation 19 Consultation Representations

Woking Borough Council
Draft Site Allocations Development Plan Document

Land at Woking Football Club and Nursery Land
adjacent to Egley Road, Woking

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1. Executive Summary

- 1.1. GolDev Woking is undertaking the coordinated promotion of two key sites in the Borough, in order to realise a Community Stadium which, given the expanded fanbase of Woking Football Club and the absence of modern stadia of this scale in the County, will be a benefit for both Woking and Surrey. The sites form two key allocations in the emerging Site Allocations Development Plan Document (SADPD), allocations UA44 and part of allocation GB7 and will enable significant regeneration, social and economic benefit.
- 1.2. The approach to the SADPD in principle is fundamentally sound. It forms the 'local level' policies based on the already adopted 2012 Core Strategy. The delivery of a Community Stadium and associated residential, commercial and leisure uses will realise a significant number of Core Strategy plan objectives, within the period to 2027.
- 1.3. Some objections, on matters of technical detail have been made, and these will require resolution ahead of plan adoption. Notably, with respect of the evidence base underpinning the sites, the capacity of the sites and the effectiveness of the policies as worded. GolDev makes the case that the policies are intrinsically linked, to enable the delivery of a Community Stadium and the associated benefits.
- 1.4. Those significant public and wider benefits arising from delivery of a new stadium for Woking and Surrey include: -
 - A modern Community Stadium that can support a range of different sports and act as a focus for residents, both existing and new, in the local area;
 - The opportunity for this facility to support a significant enhancement of the quality of sport to both participate in and spectate at, with the new Stadium likely to be attractive to a wider range of participants and spectators than the existing facility;
 - A significant enhancement to the quality, quantum and range of community services and facilities that can be provided to local residents compared to that achievable from the existing stadium;
 - A new David Lloyd Centre that can work in conjunction with the new facilities at Hoe Valley School Campus to provide a second hub for sporting activity in the south of Woking;
 - A significant contribution to the Borough's supply of required housing in a brownfield location that will greatly reduce pressure or demand to release Green Belt land to meet residential development requirements; and
 - The opportunity to link the sporting and residential aspects of the development together to provide an identity to the new homes and integrate the development within the existing local community through a shared facility.



- 1.5. These benefits will be expanded upon in detail as part of the preparation of the planning application(s). They justify the exceptional circumstances required to release site GB7 from the Green Belt, and enable the delivery of exemplar, high quality, and higher density development at Kingsfield. The exceptional circumstances are considered to be;
- The enabling benefits that the delivery of part of allocation GB7 will contribute towards the provision a new Community Stadium on UA44;
 - The extensive range of health, economic and social benefits of providing a new Community Stadium for the town and the requirement to relocate the David Lloyd Centre from UA44 to GB7;
 - The need for regeneration and making efficient use of brownfield land;
 - The absence of a credible and viable alternative sites;
 - The unlocking of value to enable the provision of the new Stadium and other related community facilities, including wider social benefits;
 - A significant contribution towards the Borough's housing needs, whilst providing the basis for further long term protection of other Green Belt land.
- 1.6. To support the promotion, these representations are supported by technical evidence with respect of land area, transport, and environment (see **Appendices 1 - 4**).
- 1.7. These representations seek to provide observations on specific policies and paragraphs in the emerging SADPD, in addition to the Proposals Map modifications (to reflect site allocations) and the various evidence base documents to the SADPD, in the context of the promotion of the two sites.

2. The Sites

- 2.1. The two sites being promoted and their general context are introduced in this Section.
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Land at Woking Football Club

- 2.2. Land at Kingsfield, referred to hereafter as the 'Woking FC site', comprises the present location of the Football Club and forms the emerging allocation UA44. A site plan for the Woking FC site is included at **Appendix 1**.
- 2.3. The site area is approximately 4.7 hectares and includes the existing football ground, a David Lloyd Centre, a gymnastics club, a snooker centre, parking and ancillary land. It is located within the urban area of Woking, outside of the Green Belt. The Woking FC site is not at a high risk of flooding and there are no other site specific land designations that apply to the site.
- 2.4. The Woking FC site is surrounded on most sides by residential properties and is accessed via Kingfield Road to the north and Westfield Avenue to the west.
- 2.5. The Woking FC site is within 20 minutes walking distance of the town centre and Woking station and is already served by public transport. It is also brownfield land, the majority of which (including the football stadium) has been included on Woking's Brownfield Register 2017 Part 1. This means that the Council has assessed it as being appropriate, in principle, for residential development.
- 2.6. These representations are supported by an Environmental Baseline Report (EBR) (**Appendix 3**) which has been prepared by Trium Environmental Consulting LLP (Trium).
- 2.7. The EBR sets out, in relation to the Woking FC site, that there are no significant constraints in or around the site in relation to air quality, heritage, archaeology, ecology or ground conditions. With regard to water and flood risk, the EBR has found that the Woking FC site does not lie in a Nitrate Vulnerable Zone (NVZ) or a groundwater Source Protection Zone (SPZ). The vast proportion of the site is at low risk of surface water flooding, with a small area to the north west of the site that is subject to a high risk of surface water flooding. It is considered that the surface water flood risk on site can be mitigated through the incorporation of suitable Sustainable Drainage Systems (SuDS).
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Nursery Land adjacent to Egley Road

- 2.8. The land at Egley Road, referred to hereafter as the 'Egley Road site' forms part of the emerging allocation GB7. A site plan for the Egley Road site is included at **Appendix 2**.



- 2.9. The development of the site is necessary to accommodate the relocation of the David Lloyd Centre from emerging allocation UA44, together with 50 – 80 new homes, to enable the development of the Woking FC site and the provision of a new Community Stadium.
- 2.10. The Egley Road site is approximately 4 hectares in size and is situated within the Green Belt, located between the new Hoe Valley School Campus to the north (the construction of which was recently completed following approval under planning permission reference: PLAN/2015/0703), the railway line to the west, existing homes to the south and a Garden Centre / Nursery to the east. A small parcel of the site to the south east comprises a plantation woodland historically associated with the neighbouring Garden Centre Nursery.
- 2.11. Whilst the Egley Road site is presently within the Green Belt, it has become a distinct, enclosed parcel of land, with development on all sides, the Woking to Guildford mainline railway to the west and Egley Road to the east, so its function and contribution to the purposes of the Green Belt has been significantly diminished.
- 2.12. In determining the Hoe Valley School Campus application, which is also in the Green Belt, the Local Planning Authority concluded that the development of the school and sports facilities would not significantly undermine the purposes of the Green Belt and the development constituted very special circumstances. Therefore, a similar case will be made regarding the allocation of GB7, in conjunction with the wide range of community benefits that an enhanced Community Stadium will deliver relative to Woking FC's current offerings.
- 2.13. The EBR prepared by Trium sets out, in relation to the Egley Road site that there are no significant constraints in or around the site in relation to air quality, heritage or ground conditions. The EBR confirms that the woodland on the site is not yet determined as any Habitat of Principal Importance. The land is not formally designated nor protected. Savills understands that the trees formed a commercial plantation associated with the adjacent nursery. On the basis of the present evidence these trees can be used for commercial purposes.
- 2.14. The EBR has found that there is an Area of high Archaeological Potential to the north of the Egley Road site, however the report concludes that it is unlikely to be affected by the development of the site. In the event that the Egley Road site was found to have potential for archaeology then it is considered likely that an archaeological evaluation and any necessary surveys could be required through conditions and therefore would not preclude the development of the site in principle. As such the potential for archaeology at the site should not impact upon its allocation through the SADPD.
- 2.15. In relation to water and flood risk, the EBR has found that the site does not lie within a NVZ or a groundwater SPZ. Furthermore, the site is entirely located within flood zone 1 and therefore is at a low risk of flooding. Similarly, the majority of the site is at a low risk of surface water flooding, however a few small pockets of the site to the east are at a higher risk of surface water flooding. It is considered that the surface water flood risk on site can be mitigated through the incorporation of suitable SuDS.



3. Proposals

- 3.1. The development proposed for the two sites are intrinsically linked. It is proposed to redevelop the Woking FC site for a new Community Stadium with a capacity of circa 10,000. In order to deliver a high quality new Community Stadium of this scale, it will be necessary to also provide a significant quantum of residential development on the site, in the region of 950 to 1,000 units.
- 3.2. Initial site capacity studies indicate that the delivery of the proposed 950 – 1,000 residential units, alongside the delivery of a new Community Stadium is achievable on the site without detriment to the character of the area, or neighbouring uses. It will be necessary to develop the site at a higher density than the surrounding residential areas to deliver the required quantum of housing.
- 3.3. Given the location of the site, firmly within the urban area of Woking, surrounded by residential development of varying scales and densities, it is not considered that a high density development at the site would appear incongruous. This is particularly as the residential development would be seen in the context of the whole site, framing the proposed stadium, and also in the context of its setting, close to the higher density (and height) town centre.
- 3.4. The Woking FC site currently contains the Woking David Lloyd Centre. The Woking FC site however is not large enough to retain a David Lloyd Centre and provide the proposed new Community Stadium and the required enabling residential development. In light of this, it is proposed to relocate the David Lloyd Centre to the Egley Road site, thereby ensuring that this important community facility is retained in the area.
- 3.5. It is proposed that the Egley Road site will not only provide a new David Lloyd Centre but will also provide between 50 and 80 residential units, making a further contribution towards meeting the housing need of the Borough. Initial capacity studies indicate that it will be possible to provide the new David Lloyd Centre and associated facilities, alongside 50 – 80 residential units at a relatively low density of approximately 35 dwellings per hectare.

4. National Planning Policy Position

- 4.1. This section sets out the National Planning Policy context in which the SADPD has been prepared and will be examined.
- 4.2. National Planning Policy and Guidance is contained in the National Planning Policy Framework (NPPF). The NPPF came into force in March 2012, a revised NPPF was published more recently in July 2018. Annex 2 of the NPPF (2018) sets out transitional arrangements for plans currently being prepared, allowing for plans that are submitted before the 24th January 2019 to be examined against the old NPPF (2012).
- 4.3. The Council's Local Development Scheme (LDS) published in October 2018 states that it is WBC's intention to submit the SADPD for examination in June / July 2019. In light of this, the Plan will be examined against the 2018 National Planning Policy Framework (NPPF) as it will be submitted for examination after the 24th January deadline. Consequently the policies of the NPPF (2018) are reviewed and referred to throughout these representations.
- 4.4. In the event that the Plan is submitted before the 24th January 2019 deadline we reserve the right to comment further on the SADPD in the context of the NPPF (2012).

National Planning Policy Framework (2018)

- 4.5. The NPPF (2018) is a material planning consideration in the Plan making and decision-taking processes. As a result, WBC are required to have due regard to National Policy as contained in the NPPF and associated Planning Practice Guidance (PPG) when preparing its Plan
- 4.6. Paragraph 11 of the NPPF (2018) sets out that:

“Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

 - a) *Plans should positively seek opportunities to meet the development need of their area, and be sufficiently flexible to adapt to rapid change*
 - b) *Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless;*
 - *The application of policies in the framework that protect assets or areas of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework when taken as a whole.*

4.7. Chapter 3 *Plan Making* of the NPPF (2018) clearly sets out the approach that should be adopted by Local Authorities in the preparation of their new Local Plan. Paragraph 16 sets out that plans should:

- *Be prepared with the objective of contributing to the achievement of sustainable development*
- *Be prepared positively, in a way that is aspirational but deliverable*
- *Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees*
- *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.*

4.8. Paragraphs 28 of the NPPF (2018) sets out new requirements for non-strategic policies in plan making which are applicable to the SADPD as a supporting document to the Core Strategy (2012). Paragraph 28 states:

“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies”.

4.9. Paragraph 31 of the NPPF sets out that the preparation of all policies should be underpinned by relevant and up to date evidence which is adequate, proportionate and focused upon supporting and justifying the policies concerned.

4.10. Paragraph 35 of the NPPF (2018) sets out the four tests to ensuring a sound Plan:

*“a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework”*

- 4.11. It is recognised in Chapter 5 *Delivering a sufficient supply of homes* that to support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The housing requirement for WBC has been set through the Core Strategy. The relevance of housing policies is therefore limited to factors including matters of scale, location and mix.
- 4.12. Paragraph 67 states that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment, and that planning policies should identify a supply of:
- a) *"Specific, deliverable sites for years one to five of the plan period; and*
 - b) *Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."*
- 4.13. Chapter 8 *Promoting healthy and safe communities* sets out how:
- "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*
- a) *promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
 - b) *are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*
 - c) *enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling."*
- 4.14. Paragraph 92 sets out that:
- "To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*
- a) *plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
 - b) *take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*

- c) *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*
- d) *ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and*
- e) *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."*

4.15. Paragraph 96 states that:

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision".

4.16. In relation to the existing Green Belt, WBC has already ascertained through the Core Strategy the necessity for a review. Therefore the need arises for land within the Green Belt to be considered in the formulation of the emerging SADPD in order to ensure that identified development/ housing needs can be met.

4.17. Chapter 13 *Protecting Green Belt land* emphasises the importance that the Government places on the Green Belts, and clarifies that the aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, with the essential characteristics of Green Belts being their openness and their permanence. Paragraph 134 identifies the five purposes of the Green Belt as follows:

- a) *"to check the unrestricted sprawl of large built-up areas;*
- b) *to prevent neighbouring towns merging into one another;*
- c) *to assist in safeguarding the countryside from encroachment;*
- d) *to preserve the setting and special character of historic towns; and*
- e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

4.18. Paragraph 136 states that:

"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."

4.19. Paragraph 137 sets out that:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”*

4.20. Paragraph 138 provides guidance on the review of Green Belt boundaries, and outlines:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

4.21. Paragraph 141 states:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

4.22. The guidance contained in the NPPF (2018) regarding the release of land from the Green Belt, and need for Exceptional Circumstances to be demonstrated, has been utilised to shape the proposals which are presented with these representations. Emerging allocation GB7 would represent a sustainable urban extension to Woking. As outlined in these representations, the credentials of the land as Green Belt is significantly diminished.

- 4.23. The weight of the argument as to why the Egley Road site should be released from the Green Belt is covered in Section 6 of this representation, where the key points are elaborated on and greater detail provided. Where applicable, the above policy paragraphs, and other relevant sections of the NPPF (2018) are referred to in these representations.

Planning Practice Guidance

- 4.24. The Planning Practice Guidance sets out additional guidance to support the policies and guidance contained in the NPPF (2018). The section on *Housing and Economic Land Availability Assessments* sets out guidance for Councils seeking to identify appropriate land to meet development needs. Paragraph 019 (Reference ID: 3-019-20140306) states that:

“Plan makers should assess the suitability of the identified use or mix of uses of a particular site or broad location including consideration of the types of development that may meet the needs of the community. These may include, but are not limited to: market housing, private rented, affordable housing, people wishing to build or commission their own homes, housing for older people, or for economic development uses.”

- 4.25. The PPG goes on to advise that when assessing the suitability of sites or broad locations for development, LPAs should be guided by both the development plan, emerging policy and national policy, and; *“market and industry requirements in that housing market or functional economic market area.”*

- 4.26. The PPG continues to advise that the following factors should also be considered when assessing the suitability of a site for development now or in the future:

- *“physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;*
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;*
- *appropriateness and likely market attractiveness for the type of development proposed;*
- *contribution to regeneration priority areas;*
- *environmental/amenity impacts experienced by would be occupiers and neighbouring areas”*

- 4.27. The guidance offered in Paragraphs 026 (3-026-20140306) 044 (3-044-20141006) and 045 (3-045-20141006) are relevant to these proposals as the SHLAA prepared as part of the evidence base of the Draft Local Plan has shown that there are insufficient sites to meet the required housing need. The PPG paragraphs offer guidance that outline that whilst the Green Belt should be protected, housing need should be met unless the impacts of doing so would result in adverse impacts that would significantly outweigh the benefits. These paragraphs state the following:

“It may be concluded that insufficient sites/broad locations have been identified against objectively assessed needs. Plan makers will need to revisit the assessment, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements. If, following this review there are still insufficient sites, then it will be necessary to investigate how this shortfall should best be planned for. If there is clear evidence that the needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas in accordance with the duty to cooperate”. (Paragraph: 026 Reference ID: 3-026-20140306)

“The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to; land designated as Green Belt. The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”. (Paragraph: 044 Reference ID: 3-044-20141006)

“Assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need”. (Paragraph: 045 Reference ID: 3-045-20141006)

Case Law - Exceptional Circumstances

- 4.28. Over recent years there have been a number of important legal and appeal decisions concerning the Green Belt. This section focuses on the relevant case law in respect of Green Belt and demonstrating ‘Exceptional Circumstances’ to support the release of the site at Egley Road from the Green Belt.
- 4.29. In IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin) Mr Justice Patterson held that *“for revisions to the green belt to be made exceptional circumstances have to be demonstrated”* and *“whether they have been is a matter of planning judgment in a Local Plan exercise ultimately for the Inspector”* (paragraph 96).
- 4.30. In Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin) Mr Justice Jay identified the following matters to ascertain whether Exceptional Circumstances exist (paragraph 51):
- (i) *The acuteness/intensity of the objectively assessed need (matters of degree may be important);*
 - (ii) *The inherent constraints on supply/availability of land prima facie suitable for sustainable development;*

- (iii) *(on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
- (iv) *The nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and*
- (v) *The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.*

- 4.31. This judgment provides the most detailed consideration in establishing the test for Exceptional Circumstances to justify amendments to the Green Belt boundaries.
- 4.32. More recently, the NPPF (2018) paragraph 137 identifies the process of justifying whether Exceptional Circumstances exist (this follows on from the test contained in the Housing White Paper 2017). LPAs must have examined that the strategy:
- Makes as much use as possible of suitable brownfield sites and underutilised land;
 - Optimises the density of development; and
 - Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.
- 4.33. Section 6 contains the justification necessary to constitute the Exceptional Circumstances, with reference to the NPPF (2018).

5. Local Development Plan Context

- 5.1. The Development Plan for WBC currently consists of the Core Strategy 2012, the Development Management Policies Development Plan Document (DMDPD) (2016), the Proposals Map, various made Neighbourhood Plans.
- 5.2. The purpose of the Woking Site Allocations Development Plan Document (SADPD) is to allocate development sites to meet the housing, employment and retail requirements of the Core Strategy. It will sit alongside the Core Strategy and Development Management Policies DPD to form the Development Plan for the Borough.

Woking Core Strategy 2012

- 5.3. The Woking Core Strategy was adopted on the 25th October 2012. It is the overarching document within the Council's Development Plan which sets out the vision and strategy for the Borough over the plan period which runs until 2027.
- 5.4. The Core Strategy (2012) sets 'core policies' which guide how development will come forward in the Borough over the plan period. Importantly, the Core Strategy sets the housing, employment and retail targets for the Borough over the Plan period but does not allocate any specific sites for development, instead setting out a broad vision as to where development should be directed.
- 5.5. It is the role of the SADPD, alongside Neighbourhood Plans, to allocate housing, employment and retail sites to meet the targets set out in the Core Strategy.
- 5.6. Policy CS1: A Spatial Strategy for Woking Borough of the Core Strategy sets out WBC's housing, employment and retail targets over the Plan period 2010 – 2027. The policy sets out a requirement for at least 4,964 dwellings, 28,000sqm of additional office floorspace, 20,000 sqm of warehouse floorspace and 93,900 sqm of additional retail floorspace.
- 5.7. Policy CS10: Housing provision and distribution of the Core Strategy sets out where WBC anticipate new housing development will be provided, based on the findings of the Councils Strategic Housing Land Availability Assessment (SHLAA). It also sets proposed densities for development in the various areas identified through the policy.
- 5.8. Policy CS10 identifies that 550 dwellings will come forward on Green Belt sites (to be released after 2021/22) at a density of 30 – 50 dwellings per hectare (dph).
- 5.9. Paragraph 5.67 of the Core Strategy sets out that policy CS10 will be delivered through the production of a Site Allocations DPD.

- 5.10. Policy CS6: Green Belt of the Core Strategy sets out that the Green Belt in the Borough will be protected from development, as per National Policy. However policy CS6 also states:

“The Green Belt has been identified as a potential future direction of growth to meet housing need, in particular, the need for family homes between 2022 and 2027. A Green Belt boundary review will be carried out with the specific objective to identify land to meet the development requirements of the Core Strategy. The Council will ensure that any release of Green Belt land for development will not undermine its overall purpose and integrity. It will also ensure that it will not have any significant adverse effects on the SPA, SAC and Ramsar sites. A Habitats Regulations Assessment will be carried out as part of the review to determine whether there is a need for an Appropriate Assessment”

- 5.11. The Core Strategy continues in paragraphs 5.9 and 5.10 that Green Belt release is necessary to ensure that the Core Strategy housing requirements are met. It states that a Green Belt Boundary Review will be undertaken in order to inform the SADPD, to identify where it is appropriate to release land from the Green Belt.

Development Management Policies DPD 2016 and Proposals Map

- 5.12. The Woking DMDPD was adopted on the 20th October 2016. It sets out detailed development management policies which supplement the ‘core policies’ of the Core Strategy and National policies, providing further guidance as to how the policies will be applied in the Borough and how development management decision within the Borough will be made.
- 5.13. The Proposals Map sits alongside the DMDPD, its sets out where certain policies will apply.
- 5.14. The Proposals map which accompanies the DMDPD identifies that the Egley Road site falls within the Green Belt as well as an area of Escarpment and Rising Ground of Landscape Value. The Woking Football Club site is identified as falling within the urban area of Woking.
- 5.15. It is important that any allocations made through the SADPD comply with the development management policies contained in the DMDPD, in order to ensure that any allocated sites are capable of coming forward.
- 5.16. The DMDPD sets out 22 development management polices under the following broad headings:
- Green Space Policies
 - Policies for a Healthy Environment
 - Housing and Economic Policies
 - Design Policies; and
 - Community and Communications Infrastructure Policies



5.17. Only policy DM13: Buildings in and Adjacent to the Green Belt is considered directly relevant to the proposed site allocations at Woking Football Club and Egley Road.

5.18. Of relevance to the proposed allocations, policy DM13 of the DMDPD states:

“Unless very special circumstances can be clearly demonstrated, the Council will regard the construction of new buildings and forms of development other than those specifically identified on allocated sites in the DPD as inappropriate in the Green Belt”.

5.19. As outlined in these representations both the very special circumstances to justify the planning application and exceptional circumstances to justify an allocation can be demonstrated.

6. Evidence Base

- 6.1. Paragraph 31 of the NPPF states that planning policies should be underpinned by relevant and up to date evidence. WBC have prepared a substantial evidence base against which the policies and allocations contained in the SADPD have been developed. This section reviews the parts of the evidence base that are relevant to these representations, notably the Green Belt Review (2014), the Five Year Housing Land Supply Position Statement and AMR (2017), the Strategic Housing Land Availability Assessment (2017) and the brownfield Land Register (2018).

Green Belt Boundary Review (2014)

- 6.2. The Green Belt Boundary Review was commissioned by WBC in order to review the land beyond the existing urban area within the Borough, with a view to finding areas of land suitable for housing and which could accommodate Gypsy and Traveller sites for the plan period and beyond.
- 6.3. The Review divided the Borough's Green Belt into 30 parcels of land, draft allocation GB7 forms a small part of Parcel 20. Parcel 20 is identified in the Green Belt Review having a moderate capacity for change in certain areas. The Review highlights at paragraph 3.5.18:
- "Whilst the parcel lies within an area identified as 'Escarpment and Rising Ground of Landscape Importance' this local designation is not substantiated through any published or ratified study. Whilst some parts of Parcel 20 are on rising land, much of this is relatively shallow sloping or quite level (such as directly north of Saunders Road)".*
- 6.4. Paragraph 3.5.18 concludes that: **"Parcel 20 is recommended for removal from the Green Belt, although parts of it are constrained"**.
- 6.5. The Green Belt Boundary Review established in paragraph 4.3.4 that for sites in parcel 20, parts of sites which fall on flatter land (such as the Egley Road site) are suitable for built development whilst the upper slopes and ridgeline are more suited to the provision of Green Infrastructure and recreational needs.
- 6.6. The Review then breaks Parcel 20 down into smaller parcels of land comprising WGB020a to WGB020g. Draft allocation GB7 forms parcel WGB020a. The Egley Road site forms the southern part of parcel WGB020a. Parcel WGB020a is identified as being suitable for development, in the northern part only in table 4.1 of the Review. The Review continues to provide an estimated yield of 188 dwellings on the site at a density of approximately 40 dwellings per hectare. This factors in the delivery of a school on the site, and 1.56ha of open space.
- 6.7. The Review concludes by recommending that Parcel 20 is removed from the Green Belt, along with a small number of other parcels as shown in figures 9 and 11 of the Review.

- 6.8. In addition to the information contained in the Green Belt Boundary Review, and its conclusions that the Egley Road site is suitable for removal from the Green Belt, these representations contest that the site is performing poorly against the five purposes of the Green Belt (as set out in the NPPF) and therefore **the removal of Parcel 20, and in particular the Egley Road site, is fully supported**. An overview of the site against the five purposes of the Green Belt is provided below.
- 6.9. The five purposes of the Green Belt are:
- a) to check the unrestricted sprawl of large built-up areas;*
 - b) to prevent neighbouring towns merging into one another;*
 - c) to assist in safeguarding the countryside from encroachment;*
 - d) to preserve the setting and special character of historic towns; and*
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*
- 6.10. In the immediate context, the Egley Road site is contained to the north, south and east by existing development and is bordered to the west by the railway line. The presence of development on three sides and the clear defensible boundary to the west mean that the development of the site would not erode any existing green gaps which serve purposes a) or b) of the Green Belt.
- 6.11. Furthermore, due to its enclosure on three sides by existing development, it is not considered that the Egley Road site serves to safeguard the countryside from encroachment in any way and therefore does not contribute towards purpose c) either. Indeed, the development of the site would protect more vulnerable parts of the Green Belt, which are performing well against this purpose from development.
- 6.12. In the wider context, the site forms a small undeveloped island surrounded by development, with Woking to the north, stretching down to the east and west of the site through the suburbs of Westfield and Hook Heath, while the small settlement of Mayford lies to the south. The development of the site would simply infill the small remaining parcel of undeveloped land, with the land to the south of Mayford forming the current edge of the Wider Woking urban area and serving purpose a) of the Green Belt.
- 6.13. The Egley Road site is not in a Conservation Area, nor is it in close proximity to any Listed Buildings, as such it is not considered to preserve the setting or special character of historic towns or contribute towards purpose d).
- 6.14. In relation to purpose e), through the SADPD, WBC have sought to allocate land to brownfield sites as a priority. The evidence base underpinning the SADPD has concluded that, if developed at an appropriate density, there are not sufficient brownfield sites within the Borough to meet its housing need. Consequently, it is not considered that the protection of the site from development would encourage any greater use of derelict urban land.

- 6.15. Indeed, the protection of the Egley Road site is likely to result in other land, which is meeting the purposes of the Green Belt being developed. In this context, it is worth reiterating that the development at Egley Road would directly enable the appropriate and best use of a major previously developed site at Kingsfield. The development of the site would therefore directly contribute to purpose e).
- 6.16. The comprehensive review of the Green Belt Boundary has demonstrated that the Egley Road site is suitable for removal from the Green Belt. Furthermore, due to the flat nature of the site, in comparison to the wider area, and the fact that it is well contained on three sides, the Green Belt Boundary Review has found that the site is suitable for residential development at a density of approximately 40 units per hectare.
- 6.17. The proposed development of the Egley Road site, which includes the provision of a new David Lloyd Centre, to enable the redevelopment of the Woking FC site for a new Community Stadium and 950 – 1,000 dwellings, which would be a significant contribution towards the Borough’s housing need, is also considered to be an exceptional circumstance which further justifies the removal of the site from the Green Belt and its allocation for development.
- 6.18. Parcel WGB20a is assessed as having capacity to provide 188 dwellings through the Green Belt Boundary Review. This is a larger parcel of land than the Egley Road site alone, including the land to the north upon which the new school has been built, and the adjacent field to the north of that. The identified capacity for the site of 188 dwellings is in the context of the delivery of housing on whole parcel of land. The Council propose through the SADPD that the northernmost parcel of WGB20a is to be retained as a gap, whilst the central parcel has already been redeveloped for a school. Consequently, the housing capacity for the whole site (188 units) does not reconcile with the capacity of the Egley Road site alone. In this context, the delivery of between 50 – 80 homes on the Egley Road site is considered justified.
- 6.19. **In summary, the conclusions of the Green Belt Boundary review, that the Egley Road site, and the wider parcel of land, are suitable for removal from the Green Belt are fully supported.**

Five Year Housing Land Supply Position Statement (2017) & AMR (2017)

- 6.20. The 2017 Five Year Housing Land Supply position statement makes no reference to either Egley Road or Kingsfield (emerging allocations GB7 and UA44). This is not surprising given the production ahead of this consultation. The position of the Council, based on a housing requirement of 292 dwellings per annum is a land supply of between 8.8 – 10 years.
- 6.21. Moving forwards, WBC will need to prepare a housing trajectory to demonstrate robustly the maintenance of a five year housing land supply.

Strategic Housing Land Availability Assessment (2017)

- 6.22. The Strategic Housing Land Availability Assessment (SHLAA) (2017) assesses the suitability of site within the Borough for housing development. It has informed the draft site allocations taken forward in the SADPD.
- 6.23. The SHLAA has identified sites for residential development (including completions in the period 2010/11 – 2016/17 and sites under construction / with planning permission) to deliver 6,062 dwellings over the period to 2032/33 and 4,996 dwellings over the Core Strategy Plan period (to 2027). This demonstrates that whilst the Borough’s housing need will be met over the Core Strategy plan period, a shortfall of 362 dwellings will arise in the first five years after the plan period has ended.
- 6.24. The SHLAA identifies the northern part of the Woking FC site (SHLAAHOE001) as a suitable, available and deliverable site, to come forward in the 6-10 year period for a development of circa 40 units.
- 6.25. The SHLAA identifies draft allocation GB7, including the Egley Road site (SHLAAHEA013), as only being considered to be deliverable or developable if it is considered suitable to be released from the Green Belt, through the SSDPD. The assessment does not provide an anticipated yield of dwellings or potential density.
- 6.26. It is proposed that the entirety of the Woking FC site and the land comprising the Egley Road site should be included in the SHLAA for development in the 1 – 10 year period. Planning application(s) are currently being prepared for both sites for submission in summer 2019, to support the SADPD and the early delivery of the sites. These representations demonstrate that the Woking FC site is capable of delivering in the region of 950 – 1,000 units and the Egley Road site is capable of delivering approximately 50 – 80 units (see Sections 2 and 7). These figures should be reflected in the SHLAA assessments and both sites considered available, suitable and deliverable.

Brownfield Land Register (2018)

- 6.27. WBC has produced a Brownfield Register in accordance with the requirements of the Town and Country Planning (Brownfield Land Register) Regulations 2017. The Register produced to date consists of Part 1 of the Register which contains sites that the Council has assessed as meeting the NPPF (2018) definition of previously developed land. All sites included on the Register, Part 1 are considered suitable for residential development.
- 6.28. The northern part of the Woking FC site is included on the Register under the SHLAA reference SHLAAHOE001. The Brownfield Register repeats the yield of 40 units cited in the SHLAA.



6.29. The inclusion of the northern part of the site on the Brownfield Register demonstrates its suitability for housing development.

6.30. The glossary to the NPPF (2018) defines previously developed land as:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time”.

6.31. The southern portion of the Woking FC site is occupied by a David Lloyd Centre, and associated areas of hardstanding forming a car park and tennis courts. Consequently this portion of the Woking FC site also clearly meets the definition of brownfield land as it is previously developed land, comprising the David Lloyd Centre which is a permanent structure and the car parks and tennis courts which are considered to be fixed surface infrastructure. As such, the entirety of the Woking FC site should be included on the brownfield register. In addition, the yield of the site should be increased from 40 units to 950- 1,000 units, based on the evidence provided in these representations (see Sections 2 and 7).



7. Representations to the Draft Site Allocations Development Plan Document (DPD)

7.1. The purpose of the SADPD is to allocate sites to deliver the Core Strategy targets of:

- At least 4,964 new dwellings;
- 28,000 sqm of office floorspace;
- 20,000 sqm of warehouse floorspace, and
- 93,600 sqm of retail floorspace.

7.2. In terms of housing the SADPD sets out that 1,789 homes have been delivered between the 1st April 2010 and the 31 March 2017. This leaves a residual housing target of 3,175 homes to be found through the SADPD. This would be at an annual rate of 139 dwellings per year (1,386 dwellings over 10 years). The SADPD does not provide approximate unit yields for any of the proposed allocations. As such, it is difficult to determine whether the proposed allocations in the SADPD would meet the residual Core Strategy requirements.

7.3. **Change sought:** In order to be effective, positively prepared and consistent with National Planning Policy, it is recommended that approximate site yields are included in the SADPD for each proposed allocations. This will help to robustly and clearly demonstrate that the SADPD will meet the full residual Core Strategy housing requirement.

7.4. These representations support the draft SADPD and the allocations contained therein, in particular the allocation of the two sites that are the subject of these representations, allocation UA44 – Woking Football Club and part of allocation GB7 - Nursery land adjacent to Egley Road.

7.5. Whilst these representations are generally supportive of the SADPD and the allocations proposed, they do provide specific comments in relation to allocations UA44, policy SA1 and allocation GB7, and suggestions as to where these specific allocations and policies could be improved. The identified allocations and policies are reviewed in detail in the following parts of this section.

Allocation UA44 – Woking FC Site

- 7.6. **The principle of the allocation for the re-use and redevelopment of the site for a new Community Stadium is strongly supported.**
- 7.7. Draft allocation UA44 allocates the Woking FC site for a mixed use development, comprising a replacement football club, commercial use and residential dwellings, including affordable housing. The allocation of the site is supported in principle, however a number of technical amendments to the policy are proposed, to ensure that it better reflects the vision for the site and to ensure that it is sufficiently precise so as to demonstrate certainty of delivery are required.
- 7.8. A fundamental part of the emerging allocation, and justification for it, is the positive change to create a new Community Stadium for Woking. In order to enable the delivery of the new stadium the site will also need to deliver residential and commercial development; the following positive and effective planning policy measures are required:
- Enabling development on and off-site (on land at Egley Road, part of emerging allocation GB7), including on-site residential;
 - An appropriate level of affordable housing and appropriate mix of market housing to generate the necessary value;
 - An appropriate level of commercial development to support the Community Stadium and redevelopment of UA44 as a whole; and
 - The relocation of the David Lloyd Centre to enable enough land for the redevelopment, and enable a more suitable facility and location (on land at Egley Road, part of emerging allocation GB7).
- 7.9. As presently worded, policy UA44 would not achieve these objectives.
- 7.10. **Land Availability & Delivery:** The site is available for development and should it remain an allocation in the adopted version of the SADPD, it would be possible to submit a planning application rapidly, with determination of the application in time for the site to begin delivering by 2022, with the development completed by 2027. As such, the development of the site is clearly capable of meeting the requirement for housing within the Borough in the period 2022 – 2027.

- 7.11. **The Proposal:** It is proposed that the site could be comprehensively redeveloped to provide a new, high quality Community Stadium with a capacity of circa 10,000, towards the east of the site, with new residential development of 950 – 1,000 units situated to the southern and western edged of the site. It is anticipated that the proposed development would take the form of apartment blocks of varying heights and scales. It is also proposed to provide a degree of commercial floorspace within the proposed Community Stadium.
- 7.12. **Access:** Enclosed with these representations at **Appendix 4** is a Movement and Mobility Report for the site, produced by Vectos which includes drawing of the proposed access. A single integrated access point is proposed to the north of the site onto the A247.
- 7.13. Policy UA44, as drafted does not provide a capacity for the site in terms of residential development or the proposed commercial floorspace. Initial capacity studies have demonstrated that the site is capable of delivering between 950 and 1,000 residential units, a circa 10,000 person capacity stadium and approximately 500 sqm of commercial floorspace.
- 7.14. Without an indication of a capacity it is not possible to predict the housing trajectory nor provide robust evidence of the feasibility or delivery of the Community Stadium. **It is recommended that, to ensure that the policy provides certainty with regard to the site allocation and the development to be brought forward policy UA44 provides a proposed approximate site capacity for housing, commercial space and the new stadium as a key requirement.** The policy must also recognise that there is no future for neither a snooker club nor gymnastics club on-site. This would demonstrate positive planning and ensure certainty for the delivery of the site.
- 7.15. **Change sought:** In order to be effective and positively prepared, any reference to the ongoing use for snooker club or gymnastics club should be deleted and suitable policy wording should be included to make clear that the following is allocated:
- New Community Stadium with capacity for approximately 10,000 people
 - Associated Commercial uses, approximately 500 – 1,000 sq m
 - Approximately 950 – 1,000 residential dwellings
 - Associated new parking
 - Relocation of David Lloyd Centre to part of allocation GB7
- Delete any reference to the ongoing use for snooker club or gymnastics club.
- 7.16. Policy UA44 lists key requirements that the development of the site should provide.
- 7.17. The first key requirement of policy UA44 is to *“Retain, and improve where feasible, the football stadium as part of any redevelopment scheme”*. The wording of this particular requirement is considered ambiguous. Whilst it is appreciated that the preceding text references a replacement football stadium, it is considered that the use of the word ‘retain’ and ‘where feasible’ in the policy wording is misleading and should be removed. It should be made clear in the first key requirement that it is acceptable to replace the stadium.



- 7.18. **Change sought:** In order to be effective, the policy wording should be amended to state: **The site is allocated for the delivery of a new Community Stadium, with associated commercial uses, at a capacity of approximately 10,000 people.**
- 7.19. The fourth key requirement of policy UA44 is to “Contribute towards Affordable Housing provision in accordance with Policy CS12: Affordable Housing of the Core Strategy, in this case 40% to be provided on site”. On the basis of the uses allocated, and clear objective to provide a new Community Stadium (with associated social and economic benefits), this requirement is likely to be unviable. Core Strategy CS12 provides for flexibility of provision. This should be recognised in either the policy or supporting text. Appropriate evidence of viability will be produced and shared with the planning applications that are currently being prepared.
- 7.20. **Change sought:** In order to be effective and justified, the policy or supporting text should be amended to make clear that the primary objective of the allocation is to achieve the delivery of a Community Stadium, and that as part of this objective an appropriate level of affordable housing will be sought, subject to the provisions of Policy CS12.
- 7.21. Emerging policy UA44 key requirements 7, 9 and 18 relate to the scale and height of the proposed development. Key requirement 7 reads “The scale of development should not detract from the general character and appearance of surrounding streets”, key requirement 9 reads “Building heights should respect adjoining properties, provide appropriate levels of daylight and sunlight for internal environments and be of a high quality design that enhances the local character” and key requirement 18 states “Building heights should consider the local context whilst ensuring there are no adverse environmental effects in terms of micro-climate, wind, overshadowing and glare”.
- 7.22. Whilst it is appreciated that a relevant factor is that the proposed development integrates well with the surrounding context, it may be appropriate to provide taller buildings on site than those in the immediate context in the overall planning balance, noting that the context includes some taller buildings already, and when viewed on the basis of the primary objective to provide a Community Stadium. The redevelopment of the site is grounded on the Stadium, and hence the design concepts will frame the Stadium and incorporate a design suitable to both its own context within the site, whilst respecting the wider context.
- 7.23. Initial design concepts for the site, indicate that a taller development than that found in the immediate vicinity of the site, in certain portions of the site, may be required in order to deliver the quantum of residential floorspace required to fund the new Community Stadium.
- 7.24. On the basis of the design evidence, the key requirements of the policy or supporting text should specifically allow for taller buildings than those in the immediate surrounds of the site, this will ensure that the development of the site is deliverable and the required quantum of development can be achieved. In this regard, it may be suitable to provide a specific range of building heights that would be acceptable on the site.
- 7.25. **Change sought:** In order to be effective and positively prepared, additional policy wording should be included which states that **‘the primary objective of the allocation is the provision of a new Community Stadium and appropriate enabling and high quality residential development, to meet local identified needs’.**

- 7.26. Key requirement 13 of the policy is for *“Appropriate and adequate provision of car, coach and cycle parking in accordance with the adopted car and cycle parking standards but that takes into account the sites sustainable location and will not compromise on highways safety”*. Whilst the requirement acknowledges the sustainable location of the site, it is considered that, given the location of the site, it would not be appropriate to strictly apply the car and cycle parking standards to the proposed development, as indicated by the available transport and highways evidence, the site is well connected (see **Appendix 4**).
- 7.27. **Change Sought:** In order to be effective and justified, the requirement should be reworded to remove the specific reference to car parking standards.
- 7.28. Key requirement 14 of the policy states *“Highway improvements may be required at the junction of the site with Knaphill Road and Westfield Avenue to ensure an effective access arrangement to ensure highway safety”*. The accompanying Movement and Mobility Report prepared by Vecots (Appendix 4) has set out that access to the site it to be provided off of Kingfield Road to the north, via the existing access point, with the secondary access off of Westfield Road to be closed.
- 7.29. Vectos highlight that there has only been one slight accident at the Kingsfield Road junction in the most recent five year period, demonstrating that the junction operates safely. Vectos conclude that the number of trips anticipated to be generated by the development would not result in the need for any improvements to the existing junction.
- 7.30. **Change Sought:** In order to be justified, key requirement 14 should be removed from the draft policy as it has been demonstrated through Appendix 4 that junction improvements will not be required to serve the development of the site for the quantum of development proposed.
- 7.31. Other aspects of the policy provide relevant technical and environmental considerations. The evidence base to justify the allocation related to these factors is included in **Appendices 3 and 4**. The accompanying Environmental Baseline Report (**Appendix 3**) has identified that there are no significant constraints in terms of flooding, air quality, heritage, archaeology, ecology or ground conditions which would render the site unsuitable for development.
- 7.32. Additional evidence is also included in the Sustainability Appraisal of the SADPD and the Habits Regulations Assessment of the SADPD regarding elements such as the impact of the site allocation on the Thames Basin Heath and the overall sustainability of the site, the relevant parts of which are reviewed in sections 8 and 9 of these representations.
- 7.33. As outlined, in addition to the existing policy wording, **it is considered prudent to include a link in the policy wording to policy GB7 and the allocation of the Nursery Land adjacent to Egley Road**. Allocation GB7 is intrinsically linked to allocation UA44 as it is to be the location of the new David Lloyd Centre. The provision of a policy link will provide clarity that the David Lloyd Centre is to be relocated and additional certainty as to where the new club will be provided.



- 7.34. **Change Sought:** In order to be effective and justified, appropriate policy or supporting text referencing the role of part of Allocation GB7 in enabling the delivery of the Community Stadium should be provided.
- 7.35. **In summary, the principle of the allocation for the re-use and redevelopment of the site for a new Community Stadium is strongly supported. A number of alterations to the policy however, are required to ensure that it provides certainty of delivery and will fully support the provision of the Community Stadium as proposed.**

Policy SA1: Overall policy framework for land released from the Green Belt for Development

- 7.36. Emerging policy SA1 provides the overall policy framework for land released from the Green Belt for development and provides a summary of the proposed Green Belt development sites and a brief justification of the reasons for the Green Belt release, as well as a timeframe for each site to be brought forward.
- 7.37. In relation to the allocation of Land adjacent to Egley Road, Mayford (draft allocation GB7), which includes the Egley Road site. As currently worded, policy SA1 sets out that the whole site is allocated for future residential development, both market and affordable and a school to meet the educational needs of the area, as well as recreational / open space. It highlights that the northern part of the site is designated as an *'area of local separation'* to provide a visual separation between Mayford and the rest of the urban area.
- 7.38. Policy SA1 clarifies that until the land is released for the proposed uses, the development of the site will only be acceptable in principle if it would not prejudice the proposed uses or would be an acceptable form of development in the Green Belt.
- 7.39. Policy SA1 continues that the land is expected to be released for residential development between 2022 and 2027, at such a time as a significant under provision of housing in the Borough can be demonstrated which cannot be met on previously developed land.
- 7.40. Policy SA1 also clarifies that the release of part of the land for a school has also taken place and the school has been developed. GolDev Woking understands that the school site has now been delivered.
- 7.41. Policy SA1 does not mention the scope of potential D2 leisure uses to be located in GB7. As outlined the David Lloyd Centre is to be relocated from the Woking Football Club site as a fundamental part of enabling and realising the delivery of a new Community Stadium.
- 7.42. **Change sought:** In order to be effective and justified, clarity as to the re-provision of the community facility, as well as a strengthened link between the two policies should be provided. It is recommended that the policy wording is altered to include reference to the provision of D2 Assembly and Leisure uses as well as residential and educational uses in regard to policy GB7.
- 7.43. **Change sought:** In order to be justified and positively prepared, it is also recommended that the policy wording is strengthened to emphasise that there are clear Exceptional Circumstances to justify the release of the site from the Green Belt. The appropriate re-use of land, and delivery of a new Community Stadium for Woking FC are clearly part of the overall package of Exceptional Circumstances.

Allocation GB7 – Egley Road site

- 7.44. **The allocation of the site is supported in principle and the site is certainly deliverable in the period to 2027**, however a series of amendments to the policy are required, to ensure that it better reflects the vision for the site and to ensure that it is sufficiently precise so as to demonstrate certainty of delivery.
- 7.45. Emerging policy GB7 (Nursery Land Adjacent to Egley Road) provides a 18.65 ha site area for release from the Green Belt for a mixed use development including residential, both market and affordable, recreational open space and a school. The site allocation includes an area to be retained as an area of local separation to provide a visual gap between Mayford and the rest of the urban area which is not to be developed.
- 7.46. **The release of the site from the Green Belt is fully supported, for the reasons outlined previously in these representations** (Section 6 – Evidence base – Green Belt Boundary Review).
- 7.47. **Land Availability & Delivery:** The site is available for development and should it remain an allocation in the adopted version of the SADPD, it would be possible to submit a planning application rapidly, with determination of the application in time for the site to begin delivering by 2022, with the development completed by 2027. As such, the development of the site is clearly capable of meeting the requirement for housing within the Borough in the period 2022 – 2027.
- 7.48. **The Proposal:** In respect of the land promoted by GolDev Woking, the initial concept plans indicate that the southern portion of the site can accommodate a development of 50 - 80 dwellings at a density of approximately 35 dwellings per hectare (dph) and a new David Lloyd Centre, which is anticipated to occupy approximately 5 hectares of the site.
- 7.49. **Access:** Access to the site is to be provided through the existing access onto the A320 that has been delivered as part of the development of the school site which forms the central part of draft allocation GB7. The access is considered sufficient to also serve the proposed development, and potentially the development of draft allocation GB9, subject to the provision of a crossing over the railway, as confirmed by the accompanying mobility and movement note prepared by Vectos (**Appendix 4**).
- 7.50. It is mentioned in policy SA1 that the school that is allocated on the site has been completed already, this occupies the central portion of the site and reflects GolDev's understanding that the school has been built out and is now operational. Taking into account the separation gap to be retained, the remaining area of the allocation to be developed comprises the southern portion (the Egley Road site), the question arises as to the purpose of including this larger area within policy GB7.
- 7.51. Draft policy GB7 also fails to provide a quantum of development for the allocation. As stated above, it is anticipated that the site could deliver 50 – 80 residential units, alongside a new David Lloyd Centre.



- 7.52. It is also noted that the proposed policy does not provide reference to the proposed D2 Leisure and Community uses. **It is recommended that the policy is reworded to include reference to the provision of Assembly and Leisure uses on site, and to link to policy UA44.** This will provide certainty regarding the development to come forward on the site and will also provide clarity as to the relocation of the David Lloyd Centre from the Woking FC site, therefore also helping to justify the allocation of site UA44 through the SADPD.
- 7.53. **Change sought:** In order to be effective, justified and positively prepared, the area of change should be clarified in the policy wording. Whilst the entire area of GB7 should be removed from the Green Belt, and this is supported, elements of the allocation could be broken down, to aid plan effectiveness, and be justified in respect of the evidence base. In addition, the policy should provide an anticipated quantum of development for each policy area, this would offer certainty with regard to the delivery of the site, the scale of the development and the suitability of the allocation. The policy areas could read as follows:
- GB7 a) Land north of the Secondary School – identified open gap;
 - GB7 b) Land safeguarded for the ongoing operation of a Secondary School/ Education purposes; and
 - GB7 c) Land allocated for approximately 50 - 80 dwellings, and the relocation of the David Lloyd Centre from allocation UA44, with associated access and parking.
- 7.54. In a similar way to draft policy UA44, draft policy GB7 also includes a list of key requirements for the delivery of the site. In addition to the general comments on draft policy GB7 above, specific amendments to the key requirements of the policy, in relation to the Egley Road site (proposed GB7c) are also recommended.
- 7.55. Key requirement 3 is for the protected trees and tree belts on site to be retained and strengthened. The EBR prepared for the site by Trium has highlights that the small area of woodland on site is a Habitat of Principle Importance. It also highlights that the site is covered by a group Tree Preservation Order (TPO) which protects all of the trees on site. However, this woodland appears to largely comprise a plantation woodland associated with the Nursery.
- 7.56. In light of the designations on site, additional surveys of the woodland are required in order to determine whether its current designation is justified, which trees if any should really and how significant a constraint to the development of the site the trees represent.
- 7.57. **Change sought:** In order to be effective and justified, the key requirement should be altered to reference that the plantation woodland to the south of the site could be removed as part of the comprehensive redevelopment of the site, subject to:
- further investigation to determine the significance and ecological / amenity value of the woodland;

- the retentions of any significant or valuable trees on site;
 - the provision of additional planting elsewhere on the site (or financial contributions towards off-site planting) to offset any trees to be removed; and
 - the provision of ecological and biological benefits on site (or financial contributions towards off-site improvements) following its development.
- 7.58. Key requirement 6 states that an Area of High Archaeological Potential (AHAP) is situated on the northern part of the draft allocation. This is the area that is identified as being retained as a 'green gap', the central portion of the site has already been developed and the southern parcel, which forms the Egley Road site is situated outside of the AHAP. Consequently the only part of the site which is to be developed, following the allocation is the Egley Road site, (GB7c). This area falls outside of the AHAP and therefore it is not considered necessary to provide additional protection to any archaeological features that may be present on site than that which policy CS20 of the Core Strategy provides.
- 7.59. **Change Sought:** In order to be justified, key requirement 6 which states *"This site features an Area of High Archaeological Potential in the north of the site. To ensure full information about heritage and archaeology informs its development, the developer will need to undertake an archaeological investigation and submit full details of this to the Local Planning Authority, in accordance with Core Strategy Policy CS20"* should be removed. The requirement is not relevant, given the archaeological potential of the portion of the allocation that is to be developed.
- 7.60. Key requirement 9 raises the requirement for a new site access onto the A320 as a potential issue. Similarly, key requirement 12 states that there is potential for the development to share access with any later development on the adjoining proposals site GB9. These requirements should be removed from the policy wording as a new access to serve the school has already been built. It is anticipated that access to the Egley Road site will utilise the existing access onto the A320, as confirmed by the Movement and Mobility report prepared by Vectos (**Appendix 4**).
- 7.61. **Change sought:** In order to be justified, key requirements 7 *"New site access required onto A320"* and 9 *"Potential for development to share access with any later development on the adjoining Proposals Site GB9"* should be removed.
- 7.62. Key requirements 12 and 16 relate to the delivery of the adjacent draft allocation. GB9. Requirement 12 raises the potential for a joint access to the two sites whilst 16 states that the development of GB7 should not prejudice the delivery of GB9. It is anticipated that the development of the Egley Road site will utilise the existing access point onto the A320, provided for the school. It is possible for this access to also serve the development of draft allocation GB9, subject to the provision of a railway crossing, however, it is considered more likely that draft allocation GB9 will take access from Hook Hill Lane to the south. Given that GB7 would not result in any additional access points onto Hook Hill Lane to the south and as there is potential for both sites to utilise the existing access onto the A320, it is not considered that the delivery of the Egley Road site would jeopardise the delivery of GB9.

- 7.63. In addition, due to the presence of the railway running north to south between the two sites, and the need for appropriate buffers to the railway on both the east and west, it is highly unlikely that the development of GB7 would jeopardise the delivery of GB9 in terms of amenity impacts.
- 7.64. **Change sought:** In order to be justified, the key requirements related to the delivery of draft allocation GB9, points 12 and 16, should be removed from the policy as they are not relevant to the delivery of either site.
- 7.65. Key requirement 17 is for the site to provide 50% affordable housing. Similarly to UA44 and on the basis of the relocation of the David Lloyd Centre to enable the delivery of a new Community Stadium (with associated social and economic benefits) on allocation UA44, this requirement is likely to be unviable. Core Strategy CS12 provides for flexibility of provision. This should be recognised in either the policy or supporting text. Appropriate evidence of viability will be produced and shared with the planning application(s).
- 7.66. **Change sought:** In order to be justified and effective, the policy or supporting text should be amended to make clear that the primary objective of the allocation is to enable the delivery of a Community Stadium (and hence enable the delivery of UA44), and that as part of this objective an appropriate level of affordable housing will be sought, subject to the provisions of Policy CS12.
- 7.67. In addition, a number of the key requirements, notably 2, 13, 19 and 21, regarding: school playing fields; school drop off points; a pedestrian crossing linking the school to the nearby Barnsbury Primary School; and the relocation of the Sheerwater athletics track to the site, relate specifically to the development of the school on the central portion of the allocation. The requirements are written as though the school development has not yet taken place, when it has been completed and the various requirements have been delivered.
- 7.68. **Change sought:** In order to be effective, key requirements 2, 13, 19 and 21 should be removed from the policy as the school has now been completed and the requirements have already been delivered
- 7.69. Other aspects of the policy provide relevant technical and environmental considerations. The evidence base to justify the allocation related to these factors is included in **Appendices 3 and 4**. The accompanying Environmental Baseline Report (**Appendix 3**) has identified that there are no significant constraints in terms of flooding, air quality, heritage, archaeology, ecology or ground conditions which would render the site unsuitable for development.
- 7.70. Key Requirement 22 highlights that noise and air quality may be constraints to the development of the site, due to the proximity of the railway line. It requires a Noise Impact Assessment and an Air Quality Assessment to be submitted with any planning application for the site. The EBR prepared by Trium has not highlighted any noise or air quality concerns on site and therefore it is considered that these matters would not restrict the development of the site. Given the proximity of the railway to the site it is accepted that a noise impact assessment will be required, to ensure a suitable level of amenity for future residents however as the site is not located in an AQMA, the policy recommendation for the submission of an Air Quality Assessment with any application is questioned.



- 7.71. **Change sought:** In order to be justified and effective, the recommendation for an Air Quality Assessment to be submitted as part of an application for the development of the site should be removed. A review of the baseline data highlights that air quality is unlikely to be an issue on the site.
- 7.72. Additional evidence is also included in the Sustainability Appraisal of the SADPD and the Habitats Regulations Assessment of the SADPD regarding elements such as the impact of the site allocation on the Thames Basin Heath and the overall sustainability of the site, the relevant parts of which are reviewed in sections 8 and 9 of these representations.
- 7.73. As outlined, in addition to the existing policy wording, **it is considered prudent to include a link in the policy wording to policy UA44 and the allocation of the Woking FC site.** The two allocations are linked as the Egley Road site is to deliver a replacement David Lloyd Centre which will enable the delivery of the Community Stadium on the Woking FC site (UA44). The provision of a policy link will provide clarity as to where the David Lloyd Centre is to be relocated and will support the provision of the new Community Stadium on allocation UA44.
- 7.74. **Change sought:** In order to be effective and positively prepared, appropriate policy wording or supporting text should be included to reference the role of part of Allocation GB7 in enabling the delivery of the Community Stadium.

Proposals Map

- 7.75. The updated Proposals Map which accompanies the SADPD reflects the polies and allocations in the SADPD.
- 7.76. The allocation of the Woking FC site through policy UA44 is supported in principle.
- 7.77. The removal of the Egley Road site from the Green Belt through policy GB7 is also supported in principle.
- 7.78. The boundaries for both sites have been reviewed for compliance with land ownership and it is confirmed that both allocation boundaries are supported. As outlined in the representations on GB7, GolDev Woking would prefer that the area of change be amended.
- 7.79. **Change sought:** In order to be justified, effective and positively prepared, whilst the entire area of GB7 should be removed from the Green Belt, and this is supported, elements of the allocation should be broken down. The policy areas could read as follows:
- GB7 a) Land north of the Secondary School – identified open gap
 - GB7 b) Land safeguarded for the ongoing operation of a Secondary School/ Education purposes
 - GB7 c) Land allocated for approximately 50 - 80 dwellings, and a D2 Assembly and Leisure with associated access and parking

8. Sustainability Appraisal of the Site Allocations Development Plan Document

- 8.1. The Sustainability Appraisal (SA) of the SADPD assesses the environmental, social and economic impacts of the proposed allocations and policies proposed in the SADPD. The recommendations of the SA have been taken into account when determining which sites are to be allocated in the SADPD.
- 8.2. The SA of the SADPD uses a scoring system to appraise each site against 17 sustainability objectives. The scores range from a very positive impact (++) to a very negative impact (--). The SA of the SADPD has appraised each of the site allocations in the document, the SA for allocations UA44 and GB7 are reviewed below.

Draft Allocation UA44

- 8.3. The SA for UA44 is contained within Appendix 11 – Sites Currently within the Urban Area.
- 8.4. The SA scored the site positively against 8 of the 17 SA objectives and neutrally against 8 of the remaining objectives in the long term with long term negative impacts only identified against objective 5 (accessibility to services). Short term negative impacts were identified against objectives 12 (consumption of resources) and 13 (waste generation and disposal), however these became neutral or positive in the medium and long term.
- 8.5. The results of the SA show that the site is a highly sustainable site for development, which would have broadly positive impacts across a number of different areas. The only long term negative impact is associated with the loss of the snooker and gymnastics clubs. Whilst the loss of these facilities is regrettable, it is considered that the wider benefits to access to services associated with the provision of the new Community Stadium should weigh heavily in favour of the site when considered against this objective, and should offset the negative impact of the loss of the snooker and gymnastics clubs.
- 8.6. The SA concludes in relation to the site that it should be allocated for mixed use development to comprise a replacement stadium, residential development including Affordable Housing, and commercial and retail uses. The overall conclusions of the SA are supported. The site has rightly scored very positively which demonstrates that it is a highly sustainable site, suitable for development and therefore allocation through the SADPD.

Draft Allocation GB7

- 8.7. The SA for GB7, including the Egley Road site is contained within Appendix 12 – Sites Currently within the Green Belt.
- 8.8. The SA scored the site positively against 9 of the 17 Sa objectives and neutrally against 4 of the objectives, only identifying long term negative impacts against objective 10 (conservation of natural and historic landscapes), with short to medium term negative impacts against objectives 7 (light and air pollution), 9 (biodiversity) and 13 (waste generation and disposal).
- 8.9. Whilst it is accepted that there would inevitably be some form of negative impact upon the natural environment resulting from the development of any greenfield site, it is considered that this site, in particular due to its contained nature, and low level, would have relatively little impact upon the natural environment. Furthermore, the negative score appears to relate largely to the AHAP towards the north of the allocation, this does not actually cover the Egley Road site. If, as previously suggested in these representations, the allocation is divided into 3 parcels of land, it is likely that the Egley Road site would score more positively against this objective, given the lack of an AHAP on the site.
- 8.10. The SA concludes in relation to the allocation of GB7:
- “The proposal will enable the delivery of housing, including Affordable Housing. It will make a contribution towards the overall housing requirement. The development of the site would provide recreational, sports facilities to service the school and the local community. It will provide an educational facility (secondary school) to service the local and the wider area. The provision of the school could have a positive overall bearing on poverty and social exclusion. Site is within reasonable walking and cycling distance to the Mayford Neighbourhood Centre. Consequently, it will help reduce the need to travel by the car. Site is also adjacent to a bus stop. Site is in flood zone 1. However, it is acknowledged that the eastern boundary is adjacent to flood zone 2”.*
- 8.11. The findings of the SA are considered to be largely positive for the site, with relatively little areas of concern, limited to the flood zone adjacent to the site. These findings are largely supported, however it is considered that, through suitable Sustainable Drainage Systems (SuDS), the development of the site could result in an improvement with regard to flooding in the wider area, this should therefore also be reflected in the SA.
- 8.12. The broad conclusions of the SA are supported. The site has scored positively against a number of objectives which demonstrates that it is a highly sustainable site, suitable for development and therefore allocation through the SADPD.

9. Habitats Regulations Assessment of the Site Allocations Development Plan Document

- 9.1. WBC commissioned AECOM to undertake a Habitats Regulations Assessment (HRA) of the SADPD. The purpose of the HRA is to identify whether any aspects of the SADPD would cause a likely significant effect on Natura 2000 sites (Special Areas of Conservation SACs), Special Protection Areas (SPA) and Ramsar Sites).
- 9.2. The Core Strategy was also the subject of an HRA that concluded that the quantum of development proposed would not have a likely significant effect on Natura 2000 sites. As such, the quantum of residential development contained in the SADPD has already been found not to have a likely significant effect. Therefore, the HRA of the SADPD considers specifically the impact of the development of the draft allocations on the Natura 2000 sites within and surrounding the Borough.
- 9.3. The HRA confirms that development within 400m and 5km of the Thames Basin Heaths SPA will need to develop or contribute to SANGS. Table 5 of the HRA confirms that draft allocation GB7 is 2km from the SPA and draft allocation UA44 is 1.8km from the SPA. Whilst the distance for GB7 is correct, it appears as though in Table 5 the details under draft allocation UA44 are incorrect, referring to Somerset House rather than the Woking FC site. Confusingly, the Woking FC site is referred to under site reference UA51. The Woking FC site (draft allocation UA44) is approximately 2.9km from the SPA, as confirmed under site allocation reference UA51 in Table 5 and therefore it does fall within the 5km zone of influence.
- 9.4. **Change sought:** It is recommended that Table 5 of the HRA is updated to ensure that all site references and distances to the SPA are correct, this will ensure the robustness of the HRA. The Woking FC site should be referred to in the HRA as site allocation UA44 to ensure consistency with the SADPD and all other evidence base documents.
- 9.5. **Change sought:** The HRA should be updated to account for the provision of between 950 – 1,000 dwellings on the Woking FC site (allocation UA44), rather than the 40 dwellings referred to for site allocation UA51. Updating Table 5 will ensure that the SANG capacity of the Borough to accommodate development is accurately reflected and assessed through the HRA.
- 9.6. The HRA confirms that *“Woking have identified sufficient SANG across the Borough to cover the quantum of development committed to in the Core Strategy”* (pp.27). It continues that *“Woking Borough Council has confirmed in its SADPD that sufficient SANG exists at a rate of 8ha/1000 population to mitigate for the delivery of 4,964 new dwellings over the lifetime of the Core Strategy”*.
- 9.7. Whilst sufficient capacity is available within the Borough to provide SANG for the development proposed in the SADPD, the HRA recognises that *“Natural England state in early discussions over this HRA that before the plan is submitted to the Secretary of State it will be necessary for each housing site to be explicitly allocated to a particular SANG, or for it to be able to confirm that it can provide a bespoke SANG”*.



- 9.8. **Change sought:** In order to be effective and justified, it is recommended, that the HRA is updated to confirm which SANG is to support each of the proposed allocations, in order to ensure that the capacity of available SANGS for each site is clearly demonstrated and therefore that the HRA of the SADPD is sufficiently robust.
- 9.9. The HRA concludes that it is possible at this stage to confirm that there will be no adverse effect on the integrity of the Thames Basin Heaths SPA as a result of the policies and allocations contained in the SADPD.

10. Conclusions

- 10.1. GolDev Woking is undertaking the coordinated promotion of two key sites in the Borough, in order to realise a Community Stadium for the town and Surrey. The sites form two key allocations in the emerging Site Allocations Development Plan Document (SADPD), allocations UA44 and part of allocation GB7, and will give rise to significant regeneration and social and economic benefits.
- 10.2. The approach to the SADPD in principle is fundamentally sound. It forms the 'local level' policies and allocations based on the already adopted 2012 Core Strategy. The delivery of a Community Stadium and associated residential, commercial and leisure uses will realise a significant number of Core Strategy plan objectives, within the period to 2027.
- 10.3. Some objections, on matters of technical detail are proposed. The following positive and effective planning policy measures are required:
- The correct site capacities for both Kingsfield and Egley Road are required and should be stated in the policy;
 - The recognition of enabling development, including on-site residential / commercial uses at Kingsfield, and further residential at Egley Road (and hence policy links between UA44 and GB7);
 - The relocation of the David Lloyd Centre facility to enable enough land for the redevelopment, and enable a more suitable facility and location (and hence suitable recognition in GB7);
 - Flexibility should be provided through the policy text regarding the level of affordable housing to be provided, recognising the wider community benefits of the delivery of the two sites and the need to fund the delivery of the proposed Community Stadium.
 - An appropriate mix of market housing should be allowed on both sites, to generate the value required to enable the delivery of the Community Stadium;
 - A more appropriate policy boundary to GB7 should be drawn, to reflect the land uses, and promotion;
 - The correct technical and environmental baseline and evidence base should underpin each site allocation (see the Baseline **Appendix 3**);
 - The correct evidence on highways / transport should also inform each allocation (see the technical report, **Appendix 4**); and
 - Policy GB7 should be updated to reflect the delivery of the school. All references to potential measures to be provided on the central portion of the site, in relation to the school, should be removed as the school has now been completed.

- 10.4. These will require resolution ahead of plan adoption, notably with respect of the evidence base underpinning the sites, the capacity of the sites and the effectiveness of the policies as worded. GoDev makes the case that the policies are intrinsically linked, to enable the delivery of a Community Stadium, with the significant benefits arising.
- 10.5. Those significant public and wider benefits arising from delivery of a new stadium for Woking and Surrey include:
- A modern Community Stadium that can support a range of different sports and act as a focus for residents, both existing and new, in the local area;
 - The opportunity for this facility to support a significant enhancement of the quality of sport to both participate in and spectate at, with the new Stadium likely to be attractive to a wider range of participants and spectators than the existing facility;
 - A significant enhancement of the quality, quantum and range of community services and facilities that can be provided to local residents compared to that achievable from the existing stadium;
 - A renewed and upgraded David Lloyd health club facility that can work in conjunction with the brand new facilities at Hoe Valley School Campus to provide a second hub for sporting activity in the south of Woking;
 - A significant contribution to the Borough's supply of required housing on a brownfield location that will greatly reduce pressure or demand to release Green Belt land to meet residential development requirements; and
 - The opportunity to link the sporting and residential aspects of the development together to provide an identity to the new homes and integrate the development within the existing local community through a shared facility.
- 10.6. These benefits justify the exceptional circumstances required to release site GB7 from the Green Belt, and enable the delivery of exemplar, high quality, and higher density development at Kingsfield. The exceptional circumstances are considered to be, inter alia;
- The enabling benefits that the delivery of part of allocation GB7 will have to contribute to the provision a new Community Stadium on UA44;
 - Hence, the extensive range of health, economic and social benefits of providing a new Community Stadium for the town and the requirement to relocate the David Lloyd Centre from UA44 to GB7;
 - The need for regeneration and making efficient use of brownfield land;
 - The absence of a credible and viable alternative sites;



- The unlocking of value to enable the provision of the new Stadium and other related community facilities, including wider social benefits; and
- A significant contribution towards the Borough's housing needs, whilst providing the basis for further long term protection of other Green Belt land.

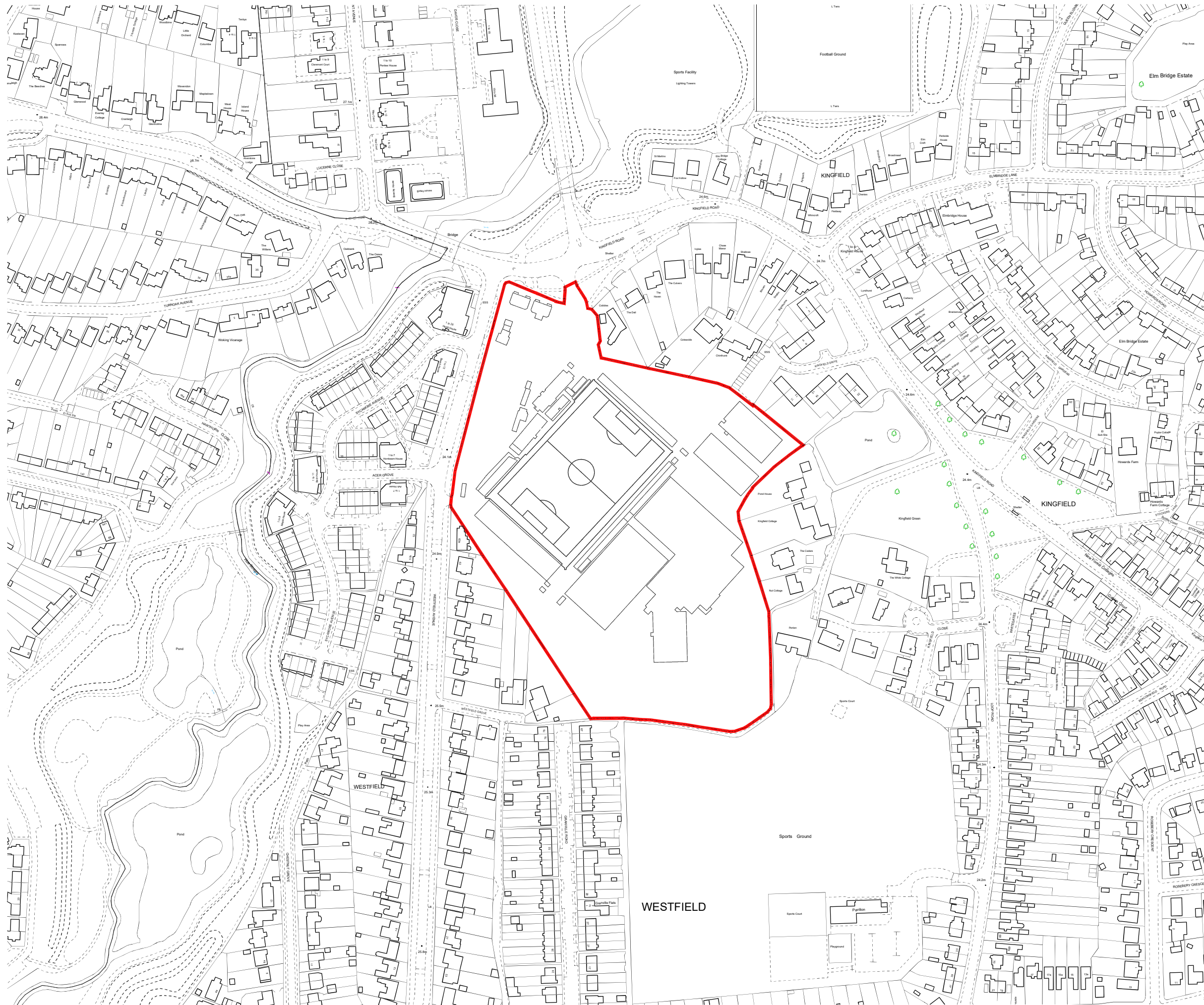
10.7. These representations have sought to provide observations on specific policies and paragraphs in the emerging SADPD, in addition to the proposed allocated sites Map and the various background documents which have informed the SADPD, in the context of the promotion of the two sites.



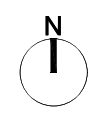
Appendices



Appendix 1 – Site Plan – Woking FC Site (LRW Architects)



LEGEND
 — SITE BOUNDARY



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 SCALE @ 1:1250

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DO NOT SCALE OFF THIS DRAWING © LEACH RHODES WALKER 2007				

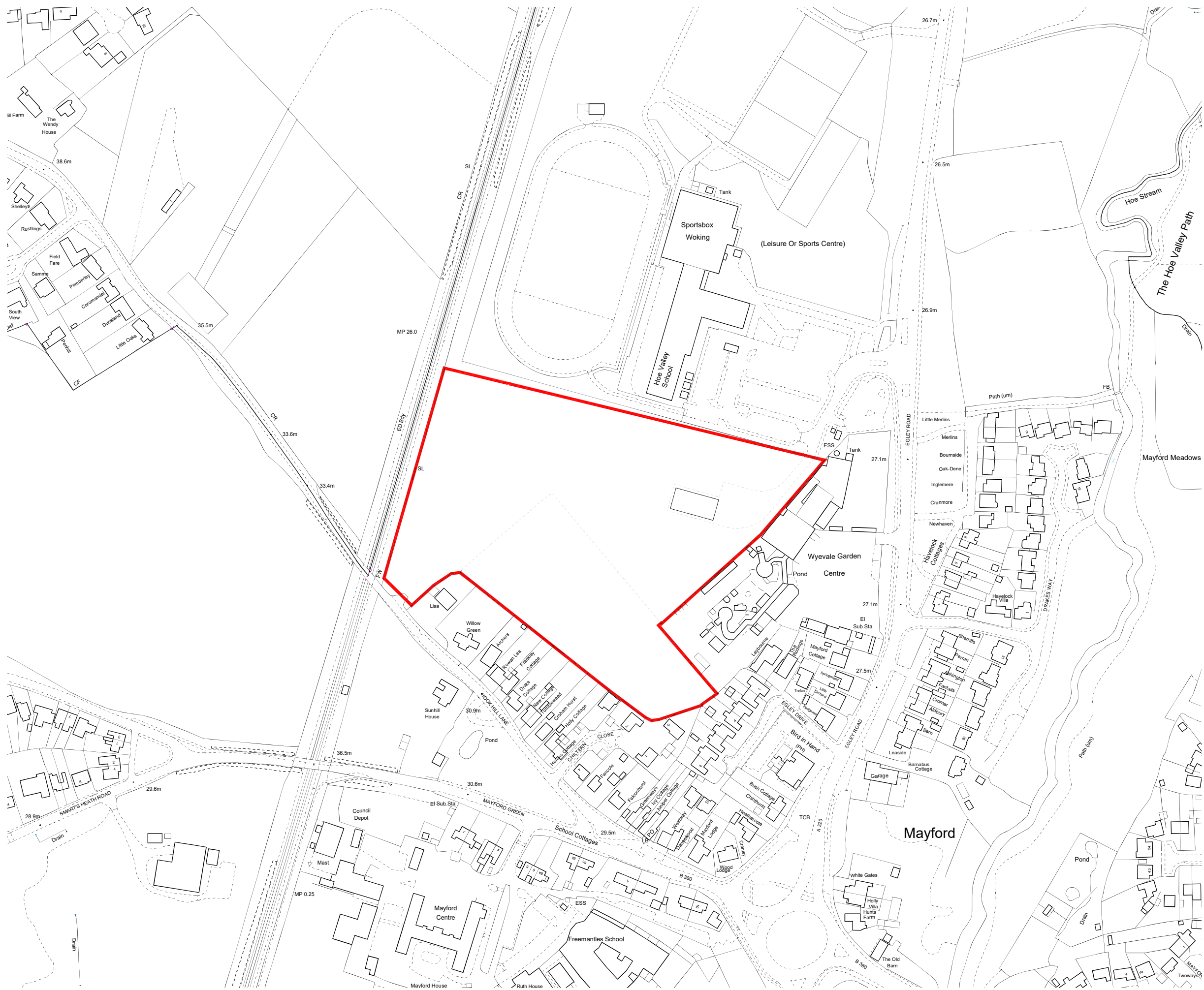
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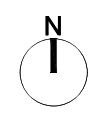
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project WOKING FC		
project no. 7884	drawing no. L(00)184	rev. A
description Kingfield Road Site Existing Site Plan		
scale 1:1250@A1	date drawn 12.12.18	drawn by RB
checked by CJG		authorised by CJG
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Appendix 2 – Site Plan – Egley Road Site (LRW Architects)



LEGEND
— SITE BOUNDARY



0 20 100m
 SCALE @ 1:1250

rev	description	drawn	auth	date
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client MCR PROPERTY		
project WOKING FC		
project no 7884	drawing no L(00)185	rev A
description Egleby Road Site Existing Site Plan		
scale 1:1250@A1	date drawn 12.12.18	drawn by RB
authorised by CJG		checked by RB
purpose of issue <input type="radio"/> planning <input type="radio"/> building regs <input type="radio"/> tender <input type="radio"/> comment <input checked="" type="radio"/> approval <input type="radio"/> construction		



Appendix 3 – Environmental Baseline Report (Trium)



TRIUM

Land at Woking Football Club and Nursery Land adjacent to Egley
Road ('Woking FC & Egley Road')
Environmental Baseline Report

Prepared for:
Goldev Woking

Date:
December 2018

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Introduction

- 1.1 Golddev Woking is undertaking the coordinated promotion of two key sites in the Borough, in order to realise a Community Stadium for the town and Surrey. The sites form two key allocations in the emerging Site Allocations Development Plan Document (Site Allocations DPD), allocations UA44 and part of allocation GB7 and will enable significant regeneration, social and economic benefit.
- 1.2 Trium Environmental Consulting LLP (Trium) has been commissioned by the Applicant to undertake this Environmental Baseline Review in relation to the Kingfield Road site and Egley Road site, in support of the representations regarding the final draft Site Allocations DPD.
- 1.3 The final draft Site Allocations DPD: Regulation 19 Consultation and below listed accompanying reports have been reviewed for the purposes of this report.
 - Sustainability Appraisal;
 - Habitat Regulations Assessment; and
 - Proposals Map.

Kingfield Road Site

- 1.4 The Kingfield Road site (hereafter referred to as the 'Kingfield Road site') is located within Woking Borough Council (WBC) in the north-west of Surrey (centred around National Grid Reference (NGR): TQ 00560 573330). The Kingfield Road site is bound to the north by a dense boundary of trees and Kingsfield Road (with Hoe Stream and residential properties further beyond); to the east by a thick row of trees, residential properties and open space; to the south by a thin row of trees, Loop Road Sports Field and Old Wokingians Football Club; and to the west by Westfield Avenue, a substantial group of trees and residential properties.
- 1.5 The Kingfield Road site itself currently comprises a football stadium (Woking Football Club); a collection of large-footprint low-rise buildings, including Woking Snooker Centre, David Lloyd facilities (including tennis courts); car parking; and a small number of residential properties situated in the north of the Kingfield Road site.
- 1.6 The wider surrounding context of the local area is predominantly comprised of residential dwellings, open spaces and waterbodies (such as Chestnut Pond and Willow Pond), with commercial and retail uses becoming more prominent further to the north of the Kingfield Road site, where Woking town centre and Woking Station are based (approximately 1km to the north of the Kingfield Road site).
- 1.7 The Kingfield Road site is well connected, being 1.2km south of Woking Station, which provides services directly to London Waterloo Station within 25 minutes. The Kingfield Road site is situated approximately 25 minutes away from London Heathrow Airport by car and is easily accessible from the M3 and M25 motorways. Several bus routes are located within an approximate 10-minute walk from the Kingfield Road site, including (but not limited to) the No. 73, No. 134, No. 446, No. 462, No. 463, No. 690 and No. 856 bus routes.

Egley Road Site

- 1.8 As per the Kingfield Road Site, the Egley Road site (hereafter referred to as the 'Egley Road site') is located within WBC (centred around NGR: SU 99419 56363). The site is located approximately 2.5km south-west of Woking Town Centre. The site is bordered to the north by Woking Athletic Club (including a sports field) and Hoe Valley School; to the east by large retail warehouses (Woking and Wyevale Garden Centre, Maidenhead Aquatics Woking), with Egley Road (A320) further beyond; to the south by residential dwellings; and to the east by railway tracks and open fields.
- 1.9 The Egley Road site itself currently comprises open fields, with a number of small outbuildings and a larger outbuilding. There is a large area of trees in the southern portion of the Egley Road site and access to the Egley Road site is via a small road off Egley Road (A320). The Egley Road site is located

within an area of Green Belt.

- 1.10 Situated approximately 1.4km to the south-west of the Kingfield Road site and approximately 2.3km to the south-west of Woking town centre, the surrounding context of the local area is predominantly comprised of residential properties, open fields and groups of trees, along with some schools / learning centres and commercial properties located here and there.
- 1.11 The Egley Road site is well connected, being approximately 1.2km to the north-east of Worplesdon Station, which provides services directly to London Waterloo Station within 35 minutes. The Egley Road site is situated approximately 30 minutes away from London Heathrow Airport by car and is easily accessible from the M3 and M25 motorways. Several bus routes are located within an approximate 15-minute walk from the Egley Road site, including (but not limited to) the No. 33, No. 134, No. 135, No. 520 and Max 35 bus routes.
- 1.12 Figure 1 illustrates the locations and indicative planning application boundaries of the Kingfield Road site and Egley Road site.

Figure 1: Kingfield Road and Egley Road Sites – Location and Indicative Planning Application Boundary



Technical Disciplines Considered

- 1.13 It should be noted that for the purposes of this report, the following technical disciplines have been considered in relation to the draft Site Allocations DPD and accompanying report:
 - Socio-Economics;
 - Air Quality;
 - Noise and Vibration;
 - Townscape and Visual;

- Daylight, Sunlight, Overshadowing and Light Pollution;
- Archaeology;
- Ecology;
- Arboriculture;
- Ground Conditions; and
- Water Resources and Flood Risk.

Environmental Baseline and Policy Review: Kingfield Road

Socio-Economics

- 1.14 The final draft Site Allocations DPD refers to conditions attached specifically to the Kingfield Road site (referred to as proposal site reference UA44), which would need to be consistent with the proposed redevelopment of the Kingfield Road site, including (but not limited to) the following:
- Community Infrastructure Levy towards infrastructure provision (p. 229);
 - Development should provide outdoor amenity space in line with local standards (p. 230);
 - Development should provide a range of housing sizes as set out in Core Strategy Policy CS11: Housing mix (p. 229); and
 - Building(s) should be designed to be adaptable or capable of being adaptable to allow scope for changes to be made to meet the needs of the occupier. Lifetime homes will be encouraged for the residential element of the development (p. 230).

Air Quality

- 1.15 WBC have designated two areas within the borough as Air Quality Management Areas (AQMA); the first one covers the junction at the top of Anchor Hill and was declared in 2014, and the second is for a section of Guildford Road, which was declared in 2017. The Kingfield Road site is not located within an AQMA.
- 1.16 Air Quality Consultant (AQC) have undertaken a review of the policy relevant to Air Quality and have not uncovered any contentious issues, particularly as there is no mention of air quality included, in relation to UA44 – Woking Football Club site.

Noise and Vibration

- 1.17 As previously noted, the Kingfield Road site's wider surrounding context is primarily comprised of residential dwellings, open space and waterbodies; given that the Kingfield Road site itself currently comprises a football stadium (Woking Football Club) and would provide a redeveloped football stadium, it is considered likely that the key noise source within the area would be the Kingfield Road site's football stadium and associated road traffic noise.
- 1.18 A review of the relevant policy relating to Noise and Vibration has highlighted the following:
- The final draft Site Allocations DPD states that *"...development would need to consider the impacts on noise and light pollution and ensure mitigation measures are implemented to protect residential amenity"*, which would apply to existing and proposed residential receptors, and objectively to internal and external noise levels. This is crucial when considering the future match day noise levels due to the proposed stadium capacity; however, mitigation (in the form of appropriate façade specification) could be adopted for the introduced residential receptors.

Appropriate façade specification would take into account the predicted external noise levels when the stadium is operational along with other environmental noise sources. At the same time, it would be recommended that noise levels in the external amenity spaces are reviewed and, further to this, it could be necessary to provide additional external amenity space (where the guideline noise levels are achieved) for residents who are adversely affected by match-day noise e.g. access to communal and external amenity.

In terms of existing receptors, it is often not considered practical to introduce façade specification mitigation measures and it is preferred to avoid / minimise the severity of any potential impact through other measures, such as the following:

- Noise generated by spectator egress and ingress: Encourage pedestrian journey along different routes to avoid congestion. Do not adopt loudspeaker announcements as a usual crowd management strategy. The traffic strategy is not currently clear, though the routes used and carparking facilities need considering with respect to the noise produced.
 - Noise generated outside the stadium by match day activities: Position external retail / food and beverage (F&B) stalls away from receptors – do not allow amplified sound. Encourage spectators into the stadium complex so as to avoid visitors congregating outside residential receptors.
 - Noise generated within the stadium by match day activities: Encourage sound to stay within the stadium as much as possible. Appropriate design of the Public Address and Voice Alarm (PAVA) system, so that sound leakage is minimised.
- The Sustainability Appraisal highlights that noise is one of the most reported complaints to Environmental Health Officers (approximately 400 last year). In relation to whether noise levels will increase from their baseline level once the proposed development is in place, it should be noted that the majority of a new development's potential operational effects are assessed with respect to changes (usually increases) in the baseline noise levels, so this is nothing of concern.

Townscape and Visual

- 1.19 The immediate surrounding buildings of the Kingfield Road site are predominantly of 2-3 storeys in height (with a couple of 4-5 storeys buildings), whereas Woking town centre is characterised by a number of tall buildings up to 20 storeys high, including (but not limited to) Guildford Road Apartments, Station Approach Apartments, Guildford Road New Development and Bridgewater Place, Victoria Way.
- 1.20 No listed buildings are located on-site, although Elmbridge Cottage (Grade II listed) is situated approximately 100m to the north-east of the Kingfield Road site, and Howard's Farm (Grade II listed) is located approximately 240m to the west of the Kingfield Road site. The nearest Grade I listed building is the Church of Saint Peter, located approximately 1.5km to the east of the Kingfield Road site. In addition to this, the Kingfield Road site is not situated within a Conservation Area; the closest Conservation Area to the Kingfield Road site is the Mount Hermon Conservation Area, located approximately 430m to the west of the Kingfield Road site.
- 1.21 Arc have undertaken a review of the policy relevant to Townscape and Built Heritage, and note the following (which are subject to the design of any scheme propose but will not create any obstacles in terms of developing the site):
- In relation to UA44 – Woking Football Club site, the associated policy (pages 228 to 231) within the final draft Site Allocations DPD establishes the following requirements relevant to Townscape and Built Heritage:
 - Density of development should maximise the efficient use of the site without compromising the general character of the area;
 - The scale of the development should not detract from the general character and appearance of surrounding streets;
 - Strong boundary treatments should be designed into the development to respect and enhance local character; and
 - Building heights should respect adjoining properties, provide appropriate levels of daylight and sunlight for internal environments and be of a high design quality that enhances the local character.
 - The Character Study (2010) identifies that:
 - UA44 is located within 'Character Area 13: Westfield', which it describes as predominantly Inter-War / immediate Post-War development with some Post-War development. It recognizes that Woking Town Football Club is a landmark within the area and that the

“boundaries of Westfield are relatively defined to the east, south and west as they form the edge of the urban area, with open countryside beyond. This allows views towards Westfield from the surrounding countryside.”

1.22 Additionally, the following will also need to be considered in relation to the development of the Kingfield Road site and proposed layout.

- Public Art Strategy (2007); and
- Natural Woking: Biodiversity and Green Infrastructure Strategy (2016).

Daylight, Sunlight, Overshadowing and Light Pollution

1.23 The immediate surrounding buildings of the Kingfield Road site are predominantly of 2-3 storeys in height (with a couple of 4-5 storeys buildings). As previously noted, these are primarily residential properties to the north, east and west of the site, beyond the immediately adjacent row of trees.

1.24 A review of the relevant policy relating to Daylight, Sunlight, Overshadowing and Light Pollution has highlighted the following:

- The final draft Site Allocations DPD states that:
 - *“Building heights should respect adjoining properties, provide appropriate levels of daylight and sunlight for internal environments and be of a high design quality that enhances the local character;*
 - *... Building heights should consider the local context whilst ensuring there are no adverse environmental effects in terms of micro-climate, wind, overshadowing and glare;*
 - *... Due to the proximity of the stadium to existing and proposed residential properties the development would need to consider the impacts on noise and light pollution and ensure mitigation measures are implemented to protect residential amenity”.*

1.25 As it is proposed that the redevelopment of the Kingfield Road site will include a redeveloped stadium, the stadium would be floodlit and have potential to affect nearby residential properties and ecological receptors.

1.26 Additionally, where an area is earmarked for development / increased massing (such as the Kingfield Road site), it is reasonable to assume a degree of adverse impact. Therefore, consultation of the Site Allocations DPD should provide an opportunity to comment on the above listed related requirements of Policy UA44 of the final draft Site Allocations DPD; in particular, it may be prudent to suggest an amendment to the policy wording (i.e. changing the wording from *“Building heights should consider the local context whilst ensuring there are no adverse environmental effects in terms of... overshadowing and glare...”* to ‘Building heights should consider the local context whilst ensuring that the environmental effects are balanced with the benefits of the development’).

Archaeology

1.27 The Kingfield Road site is not located within an Area of High Archaeological Potential. The closest Area of High Archaeological Potential is located approximately 450m to the south-west of the Kingfield Road site; however, this would unlikely be affected by the redevelopment of the Kingfield Road site.

1.28 MOLA have conducted a review of the relevant policy regarding UA44 – Woking Football Club site and noted nothing of concern.

Ecology

Designated Sites

1.29 There are no ecological statutory designated areas within the Kingfield Road site; however, Hoe Stream Site of Nature Conservation Importance (SNCI, a non-statutory designated site) is located approximately 30m to the north-west of Kingfield Road site, separated by Kingfield Road and Westfield Avenue. Westfield Common SNCI is located approximately 600m to the south-west of the Kingfield Road site.

- 1.30 The Thames Basin Heaths Special Protection Area (TBH SPA), a European protected site, is located approximately 2.6km from the Kingfield Road site. The Kingfield Road site is situated outside of WBC's TBH SPA Strategy's 400m inner exclusion zone, but is located within the 5km outer exclusion zone. The Thursley, Ash, Pirbright & Chobham Special Area of Conservation is located approximately 4.5km from the Egley Road site. No other European sites are located within 5km of the Kingfield Road site [note: potential effects on European sites are addressed in the Site Allocations Habitat Regulations Assessment (HRA) – please see the 'Policy Review' section below].

Habitats

- 1.31 A review of aerial photography and a brief walk through the site in November 2018 indicates that the Kingfield Road site primarily comprises buildings and hardstanding, with a large amenity grassland football pitch. Trees and shrubs dominate the boundaries. These habitats are unlikely to be considered ecologically important (in their own right) to the extent that they would constitute a constraint to redevelopment of the Kingfield Road site.

Potential for Protected and Otherwise Notable Species

- 1.32 As noted above, a review of aerial photography and a brief site walkover in November 2018 suggests that the buildings and trees on-site are likely to have the potential to support roosting bats [note: a Preliminary Ecological Appraisal would likely recommend further surveys for roosting bats]. The tree lines bounding the Kingfield Road site are considered likely to form commuting corridors and a foraging resource for bat [note: further surveys in the form of bat activity surveys, to understand how bats use the Kingfield Road site, may be required].
- 1.33 The trees and scrub, and to a lesser extent the buildings, on-site are likely to have the potential to support breeding birds.
- 1.34 Based on the information currently available, no other species are considered likely to be present on-site, although this would need to be confirmed through a Preliminary Ecological Appraisal.

Policy Review

- 1.35 The Ecology Consultancy has undertaken a review of the relevant policy relating to Ecology and note the following:
- Policy UA44 of the final draft Site Allocations DPD states that the following requirements are relevant to ecology:
 - Contribution towards Strategic Access Management and Monitoring to mitigate the impacts of residential development of the site on the Thames Basin Heaths Special Protection Area (please see below regarding the Site Allocations HRA);
 - The development should retain any trees of amenity value; and
 - Proportionate on-site measures to support the creation, protection, enhancement and management of local biodiversity and Green Infrastructure.
 - The Sustainability Appraisal has an objective (Objective 9) to Conserve and Enhance Biodiversity.
 - The Site Allocations HRA concludes that there will be no likely significant effects on European sites as a result of recreational pressure or air quality derived from the site allocations (such as UA44 – Woking Football Club Site, referred to as the Kingfield Road site within this report). It confirms that each site allocation has sufficient suitable alternative natural greenspace (SANG) capacity to serve the increased population.
- 1.36 It is considered that the consultation of the Site Allocations DPD should provide an opportunity to comment on the ecological / aboricultural related requirements of Policy UA44 of the final draft Site Allocations DPD.

Arboriculture

- 1.37 The Kingfield Road site is bound to the north, east, south and west by trees, with the northern, eastern and western boundaries each being bound by a dense row of trees. The Kingfield Road site is bound to the south by a thin a thin row of trees. It has been noted that there are trees located approximately 30m to the west, approximately 50m to the north-east, and approximately 140m to the west with Tree Preservation Orders (TPOs) attached. However, there are no trees / tree groups with TPOs attached on-site.
- 1.38 A review of the relevant policy regarding UA44 – Woking Football Club site has been undertaken and nothing of concern has been noted, although, the opportunity could be taken to comment on the policy stated below, to read ‘The development should retain any trees of amenity value, where possible’.
- *“The development should retain any trees of amenity value.”*

Ground Conditions

- 1.39 Geological information available indicates the Kingfield Road site to be underlain by superficial deposits of sand and gravel (Kempton Park Gravel Member). These superficial deposits are further underlain by the bedrock geology of the Bagshot Formation comprising of sand. According to the Environment Agency (EA), both the superficial deposits and the bedrock geology are classified as Secondary A Aquifer, which are defined as: *“permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers”*.
- 1.40 Soilscape online mapping identifies the site to have an overall soil type that is sandy, loamy and acidic and is considered to be freely draining.
- 1.41 A policy review for Ground Conditions is not considered necessary.

Water Resources and Flood Risk

- 1.42 The Kingfield Road site does not lie within a nitrate vulnerable zone (NVZ) or a groundwater Source Protection Zone (SPZ). The Kingfield Road site is situated in Flood Risk Zone 1 (low risk of flooding). Flood Zone 1 relates to land that has ‘little or no flood risk’, with an annual probability of flooding of less than 0.1% from rivers or the sea. Land in Flood Zone 2 (medium risk) and Flood Zone 3 (high risk) is located approximately 60m to the south-west of the Kingfield Road site. Based on relative elevations, it is concluded that the proposed redevelopment of the Kingfield Road site would remain in Flood Zone 1 for its operational lifetime.
- 1.43 The EA’s surface water flood map identifies that the majority of the site has a very low to low risk of surface water flooding. There is a small pocket with up to a high surface water flood risk within the north-western boundary of the site (within hardstanding areas).
- 1.44 A review of the WBC’s Strategic Flood Risk Assessment (SFRA) and the EA’s flood mapping has identified that the site is not at risk from reservoir flooding. From reviewing the SFRA, the site is located within an area with limited potential for groundwater flooding to occur. The SFRA states that according to Thames Water the postcode area for the site has 16 to 19 historic records of sewer flooding within the past 20 years. The site does not lie within a Critical Drainage Area (CDA).
- 1.45 The EA’s Water Stressed Areas-Final Classification Report (2013) identifies that the local potable water supplier (Affinity Water) has a current and future scenario stress classification of ‘serious stress’. Serious water stress is *“when the demand for water exceeds the available amount during a certain period or when poor quality restricts its use. Water stress causes deterioration of fresh water resources in terms of quantity”*.
- 1.46 The main river, Hoe Stream runs from the south-west to the north-east on the north-western side of the Kingfield Road site, and lies approximately 40m north of the Kingfield Road site (at the closest point).

1.47 Water and flood risk related policy requirements of note to the Kingfield Road site (and Egley Road site) include:

- Site Allocations DPD report (2018): states that *“The security of water supply as an important resource against a background of growth. There are some areas liable to flooding. Planning to avoid development in a flood zone and/or ensuring that further growth does not exacerbate the existing situation is an important issue for consideration”*. Both the Kingfield Road and Egley Road sites are located within Flood Zone 1 and, therefore, are at a low risk of flooding.
- Objective 3 of the Sustainability Appraisal (2018): aims to *“Reduce vulnerability to flooding and harm from flooding on public well-being, the economy and the environment”*. Both Kingfield Road and Egley Road sites are located within Flood Zone 1 (low risk) and will remain within Flood Zone 1 for their operational lifetime. Both Kingfield Road and Egley Road sites, therefore, meet the SA3 objective for reducing vulnerability to flooding.
- Section 3.5 of the Site Allocations DPD Appropriate Assessment: states that, even though the Kingfield Road and Egley Road sites are in *“an area of high water stress”, “a Water Resource Zone... in deficit “, “The determination of surplus or deficit does take account of environmental limits and the implication is that there should be no requirement for damaging levels of abstraction from any of the aquifers...”*. Both sites would, therefore, be accounted for within current water surplus / deficit calculations and not negatively impact upon regional/local water stress or demand.
- WBC’s Sustainability Appraisal report (2018): states that *“Negative effects on flood risk and associated negative effect on water quality can be reduced through use of Flood Risk Assessments (FRA) and Sustainable Drainage Systems (SUDS)”*. The redevelopment of the Kingfield Road site provides the opportunity to significantly reduce surface runoff rates compared to the existing (brownfield) use. Furthermore, the implementation of SuDs at both the Kingfield Road and Egley Road sites ensures that they will meet SA objectives 3 and 9, in that the SuDs strategies will reduce the risk of flooding and provide improvements in local water quality.

1.48 Additionally, further to the above and in relation to both the Kingfield Road and Egley Road sites, the Habitat Regulations Assessment states that *“The Council has confirmed that each site allocation proposed will have sufficient Suitable Alternative Natural Greenspace (SANG) to serve the increased population that will occupy the development”*.

1.49 Figure 2 illustrates the Kingfield Road site’s surrounding context.

Figure 2: Kingfield Road Site – Existing Environmental Context



Environmental Baseline and Policy Review: Egley Road

Socio-Economics

- 1.50 In terms of redeveloping the Egley Road site (referred to as proposal site reference GB7), it is not clear whether the described uses proposed for GB7 account for the re-location of the David Lloyd facility from the Kingfield Road site (referred to as proposal site reference UA44).
- 1.51 The final draft Site Allocations DPD refer to conditions attached specifically to GB7, which would need to be consistent with the proposed redevelopment of the Egley Road site, including (but not limited to) the following:
- Shared school and community sports playing fields positioned within the central portion of the site (p. 265);
 - Contribution towards infrastructure delivery in accordance with the Community Infrastructure Levy (p. 266);
 - Provision of pedestrian and cycle facilities (including a pedestrian crossing) and linkages, particularly east to Barnsbury Primary School and beyond to services in Westfield, and south to Mayford Neighbourhood Centre and to recreation space beyond (p. 266);
 - Contribution towards Affordable Housing provision in accordance with Policy CS12: Affordable Housing of the Core Strategy, in this case 50% to be provided on site (p. 266);
 - Opportunity to provide a pedestrian crossing on Egley Road, linking the existing primary school and proposed secondary school, plus existing (Hoe Valley Linear Park) and future green infrastructure corridors (p. 266);
 - Opportunity for playing field facilities to be shared by the new school and the local community through a Community Use Agreement (p. 266); and
 - Opportunity for the relocation of the Athletics Track from Sheerwater if it is not retained on that site (UA32) (p. 266).
- 1.52 With regards to access, the Egley Road site is located to the west of Egley Road (A320), which connects to the B380 (Guildford Road and Westfield Road). Worplesdon Rail Station is located approximately 1.2km to the south of the Egley Road site and is generally serviced by one train per hour northbound (calling at Woking, Clapham Junction and London Waterloo), and one train per hour southbound (calling at most stations to Portsmouth and Southsea). Woking Station is located approximately 2.5km to the north-east of the Egley Road site, which is served by regular trains to central London. As per the Kingfield Road site, the Egley Road site is approximately 30 minutes away from London Heathrow Airport by car, and is easily accessible from the M3 and M25 motorways.

Air Quality

- 1.53 Similar to the Kingfield Road site, the Egley Road site is not located within an AQMA.
- 1.54 AQC have conducted a policy review in relation to Air Quality and note that, in relation to GB7 – Egley Road site, an air quality assessment is recommended.

Noise and Vibration

- 1.55 As previously noted, the site is bordered to the north by Woking Athletic Club (including a sports field) and Hoe Valley School; to the east by large retail warehouses (Woking and Wyevale Garden Centre, Maidenhead Aquatics Woking), with Egley Road (A320) further beyond; to the south by residential dwellings; and to the east by railway tracks and open fields.
- 1.56 The Egley Road site itself currently comprises open fields, with a number of small outbuildings, a larger outbuilding, and a large area of trees. Given that the proposed redevelopment of the Egley Road site will comprise the relocated David Lloyd facilities and a minimal number of residential properties (approximately 60), it is considered that the redeveloped Egley Road site itself will contribute to noise levels to a certain extent; however, it would not be a key noise source within the area (as it is anticipated that the railway tracks to the east of the Egley Road site would likely generate more noise than the

redeveloped site).

1.57 Refer to paragraph 1.18 for the policy review with regards to Noise and Vibration; however, please see the following from the final draft Site Allocations DPD, specifically in relation to the Egley Road site, which is not considered to be an issue for concern:

- *“Due to the proximity to the road and railway line, the development would need to consider the impacts on noise and air quality and ensure mitigation measures are implemented to protect residential amenity. A Noise Impact Assessment would be required.”*

Townscape and Visual

1.58 The majority of buildings in the local and wider area appear to be low level buildings, at 2-3 storeys in height.

1.59 No listed buildings are located on-site, although Sunhill House (Grade II listed) is located approximately 80m to the south of the Egley Road site and Hunts Farm House (Grade II listed) is situated approximately 180m to the south-west of the Egley Road site. Additionally, the Egley Road site is not located within a Conservation Area; the closest Conservation Area to the Egley Road site is the Mount Hermon Conservation Area, located approximately 430m to the west of the Egley Road site.

1.60 Arc have undertaken a review of policy in relation to Townscape and Built Heritage and have not identified any unexpected obstacles with regards to developing the Egley Road site; however, they note that the Egley Road site falls within an area designated as *“Escarpment and Rising Ground of Landscape Importance”*, as shown in the Policy Map and supported by Policy CS24 (Woking’s Landscape and Townscape) of the adopted Woking Core Strategy 2012. Policy CS24 recognises that such features should be conserved and the supporting text establishes that *“Development will not normally be permitted on the slopes of the escarpments which are shown on the Proposals Map, or which would result in a significant reduction in the amount of tree cover”*.

1.61 As the Egley Road site includes an area of trees, Arc would need to undertake a field study to identify: the nature and characteristics of the escarpment; how the site contributes to the escarpment; and the implication of the loss of the trees to the character of the escarpment. This designation could be an obstacle to the layout of the site; however, subject to the findings of Arc’s field study, the development proposed could be designed to avoid adversely affecting the character of the landscape.

1.62 The desk-based review has also established the following policy requirements in relation to GB7 – Egley Road site, which are subject to the design of the development proposed but will not create any obstacles to developing the site:

- Policy relating to GB7 – Egley Road site (pages 263 to 268) – in the Site Allocations DPD sets out the following requirements relevant to the above matters:
 - *Density of development should maximise the efficient use of the site without compromising the general character of the area;*
 - *Conduct landscape assessment / ecological survey / tree survey to determine levels of biodiversity and valuable landscape features on site and adjacent to site;*
 - *Appropriate landscaping, potentially to include landscaping to provide a buffer to the road, railway lines, Hillside and Chiltern Close [note – this is currently not possible with the current layout shown in the Sept 2018 ref:7884 _L(00)109A LRW document due to back to back housing];*
 - *Careful design of layout to take into account environmentally sensitive sites and vegetation forming ‘Escarpment and Rising Ground of Landscape Importance’ on adjacent land, to preserve their integrity; and*
 - *Take opportunities to make positive contribution towards biodiversity through the creation of green infrastructure, retention/enhancement of any features of nature conservation value on-site, and creation of linkages with GI network, the design solution should build in wildlife features/corridors.*

- The Surrey Landscape Character Assessment – Woking Borough (2015), which forms part of the Local Plan evidence base, has identified that:
 - GB7 forms a small part of the landscape character area of ‘SS12: Wyke to Mayford Settled and Wooded Sandy Farmland’. The area’s key characteristics; positive landscape attributes; forces for change / sensitives / pressures; landscape strategy; and landscape guidelines are set out in pages 52 to 56.
- The Character Study (2010) highlights that:
 - GB7 falls within the settlement edge and is not covered by this study, but ‘Character Area 12: Hook Heath East’ and ‘Character Area 13: Westfield’ fall to the north and north-east; ‘Character Area 14: Mayford Village’ falls to the south, and ‘Character Area 7: Hook Heath’ falls to the west.

1.63 As per the Kingfield Road site, the following will also need to be considered in relation to the development of the Egley Road site and proposed layout.

- Public Art Strategy (2007); and
- Natural Woking: Biodiversity and Green Infrastructure Strategy (2016).

Daylight, Sunlight, Overshadowing and Light Pollution

1.64 The wider surrounding context of the Egley Road site is predominantly comprised of residential properties, open fields and groups of trees, along with some schools / learning centres and commercial properties located here and there.

1.65 A review of the relevant policy relating to Daylight, Sunlight, Overshadowing and Light Pollution has highlighted the following:

- *“Any flood lighting should be sensitively designed to minimise impact in landscape/townscape terms. Screening/bunding to create a buffer between the development, railway and the escarpment landscape beyond”.*

1.66 As it is proposed that the redevelopment of the Egley Road site will include the re-location of the David Lloyd facilities (including outdoor tennis courts) from the Kingfield Site to the Egley Road site, it is likely that the tennis courts would be floodlit, which may have the potential to affect nearby residential properties and ecological receptors.

1.67 Given the above listed policy relating to Daylight, Sunlight, Overshadowing and Light Pollution, it is anticipated that the requirements set out in relation to GB7 will not create any obstacles with regards to developing the site.

Archaeology

1.68 An Area of High Archaeological Potential is located to the north of the Egley Road site; however, this would unlikely be affected by the redevelopment of the Egley Road site. Policy CS20: *Heritage and conservation*, will apply to the Egley Road site, states the below; however, this does not suggest field evaluation (prior to determination of planning) would be required. Archaeological evaluation and investigation under a condition may be required, depending on the results of a Desk-based assessment.

“On all development sites over 0.4 hectares an archaeological evaluation and investigation will be necessary if, in the opinion of the County Archaeologist, an archaeological assessment demonstrates that the site has archaeological potential.

Within Areas of High Archaeological Potential (as illustrated on the Proposals Map), development will not be permitted unless the following are satisfied:

- *Submission of an archaeological assessment of the site; and*
- *Where archaeological importance of the site has been identified, a programme setting out a full archaeological survey of the site has been submitted and agreed with the Council.”*

Ecology

Designated Sites

- 1.69 There are no ecological statutory designated areas within the Egley Road site; however, Mayford Meadows Local Nature Reserve is situated approximately 250m to the east of the Egley Road site, and Smarts and Preys Heath (a Site of Special Scientific Interest (SSSI)) is located approximately 580m to the south of the Egley Road site. The adjacent commons of Smarts Heath and Prey Heath lie either side of Hoe Stream, south of Woking. They consist of a mosaic of heathland habitats including wet and dry heath, scrub, and fringing woodland.
- 1.70 The Thames Basin Heaths Special Protection Area, a European protected site, is located approximately 2km from the Egley Road site. The Kingfield Road site is outside of Woking Council's TBH SPA Strategy's 400m inner exclusion zone, but is situated within the 5km outer exclusion zone. The Thursley, Ash, Pirbright & Chobham Special Area of Conservation is located approximately 3.1km from the Egley road site. No other European sites are located within 5km of the Egley Road site.
- 1.71 There are no non-statutory designated sites within the Egley Road site; however, the Barnsbury Meadow & Bonsey Lane Wood (including Barnsbury School) SNCI is located approximately 90m to the east of the Egley Road site, separated by Egley Road, and the Mayford Meadows SNCI is situated approximately 180m to the east of the Egley Road site (also separated by Egley Road).

Habitats

- 1.72 A review of aerial photography and viewing parts of the Egley Road site from available public rights of way in November 2018 indicates that the Egley Road site contains a parcel of woodland in the south-east which is shown on the Department for Environment, Food and Rural Affairs' (DEFRA's) MAGIC Map application¹ as a Habitat of Principal Importance, Lowland Mixed Deciduous Woodland. However, the northern extent of this woodland parcel appears to be plantation woodland. Other habitats on-site appear to be short-mown grassland, with boundary trees and scrub. The Egley Road site is bound to the west by railway lines and associated vegetated margins.
- 1.73 The woodland parcel within the Egley Road site would require further survey work to assess its quality and justify its classification, but is likely to be a constraint on any developments proposed on the Egley Road site (due to its status), and any removal would likely require compensation with replacement habitat or financial contribution.

Potential for Protected and Otherwise Notable Species

- 1.74 Based on the habitats anticipated to be on the Egley Road site, it is considered likely that the Egley Road site will have the potential to support the following protected species / species groups:
- Bats (roosting, commuting and foraging);
 - Great crested newt;
 - Dormouse;
 - Reptiles; and
 - Badger.
- 1.75 A Preliminary Ecological Appraisal would be required to determine the potential for the above listed species on the Egley Road site and, if confirmed, further dedicated surveys would be required to confirm their presence / likely absence on the Egley Road site.
- 1.76 The trees and scrub on-site are considered likely to have the potential to support breeding birds.
- 1.77 The Egley Road site is also likely to support hedgehog, a Species of Principal Importance, and a notable assemblage of birds, which may include Species of Principal Importance.

¹ <https://magic.defra.gov.uk/MagicMap.aspx>

Policy Review

- 1.78 The Ecology Consultancy has undertaken a review of the relevant policy relating to Ecology and note the following:
- Policy GB7 (for Nursery Land adjacent to Egley Road) of the final draft Site Allocations DPD identifies the following requirements for the Egley Road site which are of relevance to ecology:
 - Retain protected trees and tree belts and strengthen with planting to create a wide landscape frontage along Egley Road, to enhance the sense of separation between the two settlements;
 - Proportionate on-site measures to support the creation, protection, enhancement and management of local biodiversity and Green Infrastructure;
 - Conduct landscape assessment / ecological survey / tree survey to determine levels of biodiversity and valuable landscape features on-site and adjacent to the site; and
 - Take opportunities to make positive contributions towards biodiversity through the creation of green infrastructure, retention / enhancement of any features of nature conservation value on-site, and creation of linkages with the green infrastructure network (the design solution should build in wildlife features / corridors).
 - The Sustainability Appraisal has an objective (Objective 9) to Conserve and Enhance Biodiversity, and identifies that that:
 - '[Cumulative] impacts on this objective are balanced. The urban sites would generally have neutral impacts on this objective. However, it is predicted that the Green Belt sites could have negative impacts. Appropriate mitigation measures such as the provision of SANGs and adequate integration of green infrastructure in development will help minimise any negative impacts.'
 - Based on the above, any development on-site would likely be expected to retain and protect or appropriately replace important habitats, and encouraged to incorporate thought-out soft landscaping and green roofs to create green infrastructure.
 - The Site Allocations HRA concludes that there will be no likely significant effects on European sites as a result of recreational pressure or air quality derived from the Site Allocations (such as GB7 – Nursery land adjacent to Egley Road, referred to as the Egley Road site within this report). It confirms that each site allocation has sufficient SANG capacity to serve the increased population.
- 1.79 A Preliminary Ecological Appraisal should be able to confirm whether the woodland on-site qualifies as Habitat of Principal Importance; however, at this point, it is considered likely to be. If the woodland does not qualify as Habitat of Principal Importance, it is still likely to be of ecological importance / nature conservation value by virtue of the number of trees and its suitability for a wide range of species.
- 1.80 It is considered that the consultation of the Site Allocations DPD should provide an opportunity to comment on the ecological related requirements of Policy GB7 of the final draft Site Allocations DPD.

Arboriculture

- 1.81 The Egley Road site is bordered to the north by Woking Athletic Club (including a sports field) and Hoe Valley School; to the east by large retail warehouses (Woking and Wyevale Garden Centre, Maidenhead Aquatics Woking); to the south by residential dwellings; and to the east by railway tracks and open fields. Therefore, there are not a large number / groups of trees surrounding the site; however, the Egley Road site itself currently comprises a large area of trees in the southern portion of the Egley Road site and the entirety of the Egley Road site (and the wider area surrounding the Egley Road site) has a group TPO (reference: 626/0154/1973) attached to it.
- 1.82 It should be noted that a TPO is issued by a Local Planning Authority (LPA) to protect specific trees, groups of trees or woodlands as they're in the interests of the wider community. A TPO prohibits the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of trees without the LPA's

written consent. If consent for works to a tree / tree group with a TPO attached is given, the works would be subject to conditions which would have to be followed.

- 1.83 A review of the relevant policy relating to Arboriculture has highlighted the following:
- Policy GB7 of the final draft Site Allocations DPD identifies the following arboriculture related requirements for the Egley Road site:
 - *“Retain protected trees and tree belts and strengthen with planting to create a wide landscape frontage along Egley Road, to enhance the sense of separation between the two settlements;*
 - *...Conduct landscape assessment / ecological survey / tree survey to determine levels of biodiversity and valuable landscape features on site and adjacent to site”.*
- 1.84 In view of the above, an Arboricultural Impact Assessment (tree survey and impact assessment) would be required to identify and assess the arboricultural value of the trees. Additionally, it is considered that the consultation of the Site Allocations DPD should provide an opportunity to comment on the arboricultural related requirements of Policy GB7 of the final draft Site Allocations DPD.

Ground Conditions

- 1.85 Geological information available indicates the Egley Road site to be underlain by superficial deposits of sand and gravel (Kempton Park Gravel Member). These superficial deposits are further underlain by the bedrock geology of the Bagshot Formation comprising of sand. According to the Environment Agency (EA), both the superficial deposits and the bedrock geology are classified as Secondary A Aquifer, which are defined as: “permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers”.
- 1.86 Soilsmap online mapping identifies the site to have an overall soil type that is sandy, loamy and acidic and is considered to be freely draining.
- 1.87 A policy review for Ground Condition is not considered necessary.

Water Resources and Flood Risk

- 1.88 The closest watercourse to the Egley Road site is an unnamed tributary leading into Hoe Stream, located approximately 100m to the east of the Egley Road site. Hoe Stream is situated approximately 250m to the east of the Egley Road site and is classified by the EA as an ordinary watercourse. The closest ‘main river’ is the River Wey, located approximately 1.5km to the east of the Egley Road site and flows in a north-westerly direction towards the River Thames.
- 1.89 The BGS online Geology of Britain viewer identifies that there is no record of any superficial deposits on-site. Geological information available indicates the Egley Road site to be underlain by bedrock comprising Bagshot Formation (Sand, Gravel, Clay), classified as Secondary A Aquifer. The Egley Road site does not lie within a NVZ or a groundwater SPZ.
- 1.90 The Egley Road site is in Flood Risk Zone 1 (low risk of flooding), with the main river (Hoe Stream) located approximately 250m to the east of the Egley Road site. Flood Zone 2 (medium risk of flooding) and Flood Zone 3 (high risk of flooding) is located approximately 15m to the east of the Egley Road site. Based on relative elevations, it is concluded that the redevelopment of the Egley Road site would remain in Flood Zone 1 for its operational lifetime.
- 1.91 The EA’s risk of flooding from surface water mapping identifies that most of the site has a very low risk of surface water flooding; however, there are some small pockets of up to a high surface water flood risk along the eastern boundary of the site.
- 1.92 A review of the WBC SFRA and the EA’s flood mapping has identified that the Egley Road site is not at risk from reservoir flooding. From reviewing the SFRA, it is noted that the Egley Road site is located within an area with limited potential for groundwater flooding to occur. The SFRA states that, according

to Thames Water, the postcode area for the site has 16 to 19 historic records of sewer flooding within the past 20 years.

- 1.93 The site does not lie within a Critical Drainage Area (CDA).
- 1.94 Refer to paragraph 1.47 for the policy review with regards to Water Resources and Flood Risk.
- 1.95 Figure 3 illustrates the Egley Road site's surrounding context.

Figure 3: Egley Road Site – Existing Environmental Context



Conclusion

- 1.96 Following the Environmental Baseline Review in relation to the Kingfield Road site and Egley Road site, it is considered that the key potential issues to take into consideration (with regards to the redevelopment of both sites) are as set out below and would benefit from the consultation of the Site Allocations DPD, which will provide an opportunity to comment on any major points of concern.

Kingfield Road Site

- 1.97 **Noise and Vibration** – Whilst the noise related policy is generic, the Kingfield Road site will require careful consideration in terms of impact on noise pollution and will need to ensure mitigation measures are implemented to protect residential amenity. This is crucial when considering the future match day noise levels.
- 1.98 **Townscape and Visual** – The relevant policy associated with UA44 (pages 228-231) states that the “scale of development should not detract from the general character and appearance of surrounding streets... Building heights should respect adjoining properties...”.
- 1.99 **Daylight, Sunlight, Overshadowing and Light Pollution** – In relation to the requirements of Policy UA44 of the final draft Site Allocations DPD, it may be prudent to suggest an amendment to the policy wording (i.e. changing the wording from “*Building heights should consider the local context whilst ensuring there are no adverse environmental effects in terms of... overshadowing and glare...*” to ‘Building heights should consider the local context whilst ensuring that the environmental effects are balanced with the benefits of the development’).
- 1.100 **Ecology** – A Preliminary Ecological Appraisal (PEA) would need to be undertaken for the Kingfield Road site, with potential species-specific surveys to follow [**note**: survey timings could be seasonally

constrained].

Egley Road Site

- 1.101 **Socio-Economics** – It is not clear whether Policy GB7 accounts for the re-location of the David Lloyd facilities. The final Site Allocations DPD should be consistent with the redevelopment of the Egley Road site, as per the socio-economic points mentioned in paragraph 1.51.
- 1.102 **Townscape and Visual** – The WBC’s Core Strategy (2012) states that the Egley Road site is located within an area designated as “*Escarpment and Rising Ground of Landscape Importance*”, which could be an obstacle to the layout of the site. As the Egley Road site includes an area of trees, Arc would need to undertake a field study to identify: the nature and characteristics of the escarpment; how the site contributes to the escarpment; and the implication of the loss of the trees to the character of the escarpment. Additionally, policy relating to GB7 also refers to appropriate landscaping, potentially to “*provide a buffer to the road, railway lines...*”, which is not currently possible with the proposed layout.
- 1.103 **Ecology** - A Preliminary Ecological Appraisal (PEA) would need to be undertaken for the Egley Road site, with potential species-specific surveys to follow [**note**: survey timings could be seasonally constrained].
- 1.104 **Arboriculture** - An Arboricultural Impact Assessment (tree survey and impact assessment) would need to be undertaken on the Egley Road site, to identify whether any of the trees on-site are protected and determine the arboricultural value of the trees. The PEA should be able to confirm whether the woodland on-site qualifies as Habitat of Principal Importance; however, if the woodland does not qualify as Habitat of Principal Importance, it is still likely to be of ecological importance / nature conservation value, by virtue of the number of trees and its suitability for a wide range of species.

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Appendix 4 – Movement & Mobility (Vectos)

Woking FC

Mobility Overview

12/12/2018

183923/N01

Introduction

1. The thrust of planning policy in the mobility context is about promoting healthy and safe communities¹ and promoting sustainable transport².
2. To best achieve this, new developments must be located in the right place and designed in the right way.
3. Mobility is achieved in these ways and in this general order of priority in the policy context:
 1. Virtual mobility (mobility through use of the internet, including social media, internet shopping and home working);
 2. Active travel (walking and cycling);
 3. Shared travel (including private and public shared travel networks, often app based, and bus travel); and
 4. Single occupancy car travel.
4. Local living is a key trait of socially inclusive and sustainable communities, and means that where mobility occurs, it occurs more at the higher priority virtual and active travel end of the scale. Local living also promotes social interaction, creating opportunities for people who might not otherwise come into contact with each other to meet³.
5. Woking FC is a great opportunity for good design to take advantage of the excellent location to create policy compliant high-density mixed-use development.
6. The elements that make this such a good location for mixed use residential led development include:
 1. It is situated within the existing urban area;
 2. Day to day facilities, such as schools, friends, leisure facilities, healthcare and others are, and can be, all within easy reach by all modes of travel, including the higher priority active travel;
 3. The site size is of sufficient critical mass to provide the type and scale of social facilities for the surrounding community, that are not currently available, improving local social interaction and sustainable mobility; and
 4. There is a significant advantage in the site also being accessible by all modes of travel, including the higher priority active travel, to the higher order centre at

¹ NPPF Chapter 8

² NPPF Chapter 9

³ NPPF Para 91

Woking Town Centre, providing more extensive employment, shopping and mass transit public transport.

7. The same traits also make this a good location for an expansion of Woking FC, and the mobility elements that a mixed-use scheme can bring to the site will provide betterment to users of the proposed new Stadium.
8. In particular, football supporters will typically walk significant distances to a football match. The events at the Stadium will be managed, consistent with events at other larger clubs. We expect a substantial proportion of supporters to arrive in, or make use of, facilities in Woking Town Centre, and then to walk from there to and from the event or match.
9. The elements of design that will accentuate the characteristics of the location include these:
 1. High density residential development;
 2. A Social Hub, providing food and day to day shopping and healthcare;
 3. A Community Concierge team in a shop front location in the Social Hub;
 4. A Micro Consolidation Centre in the Social Hub administered by the Community Concierge team;
 5. A Work Hub within the Social Hub, providing offices and desks for 'home workers', administered by the Community Concierge team;
 6. Vehicle hire, including bikes, electric bikes, cargo bikes, car and vans;
 7. Last mile of travel systems to complement virtual mobility; and
 8. IT platforms administered by the Community Concierge team to enable private and public shared travel.

Local Facilities and Local Living

10. In the morning peak period between 08:00-09:00 about 51% of movement is education related, 24% travel to work related, and the remainder mainly leisure related⁴. Across the day, movement has historically been⁵ linked more towards Leisure and Shopping making up 35% of movements in comparison to 16% of movement education related and 22% travel to work related.

Table 1: Daily Movement by Journey Purpose

Journey Purpose	Daily
Commuting & Business	22%
Education Related	16%
Personal Business	19%
Leisure	18%
Shopping	17%
Other	8%
Total	100%

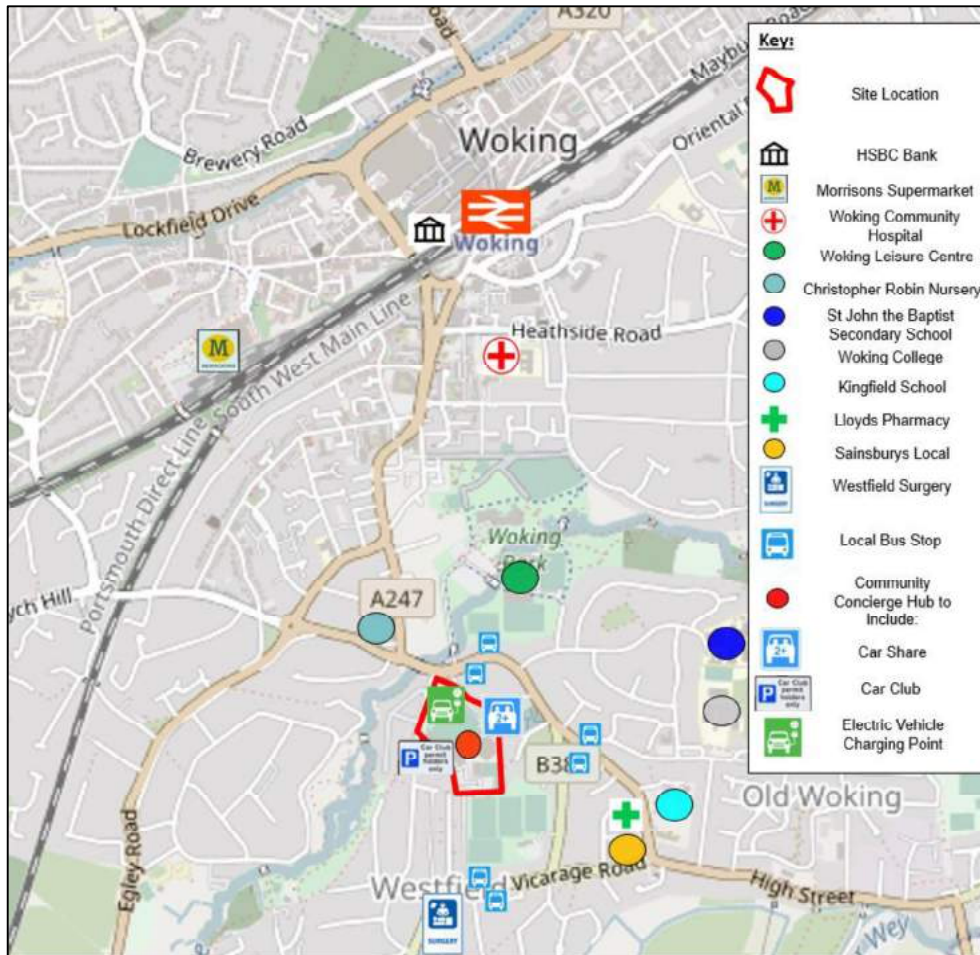
11. We design for movement throughout the day.

⁴ NTS Tables 0502 <https://www.gov.uk/government/collections/national-travel-survey-statistics>

⁵ NTS Tables 0502 <https://www.gov.uk/government/collections/national-travel-survey-statistics>

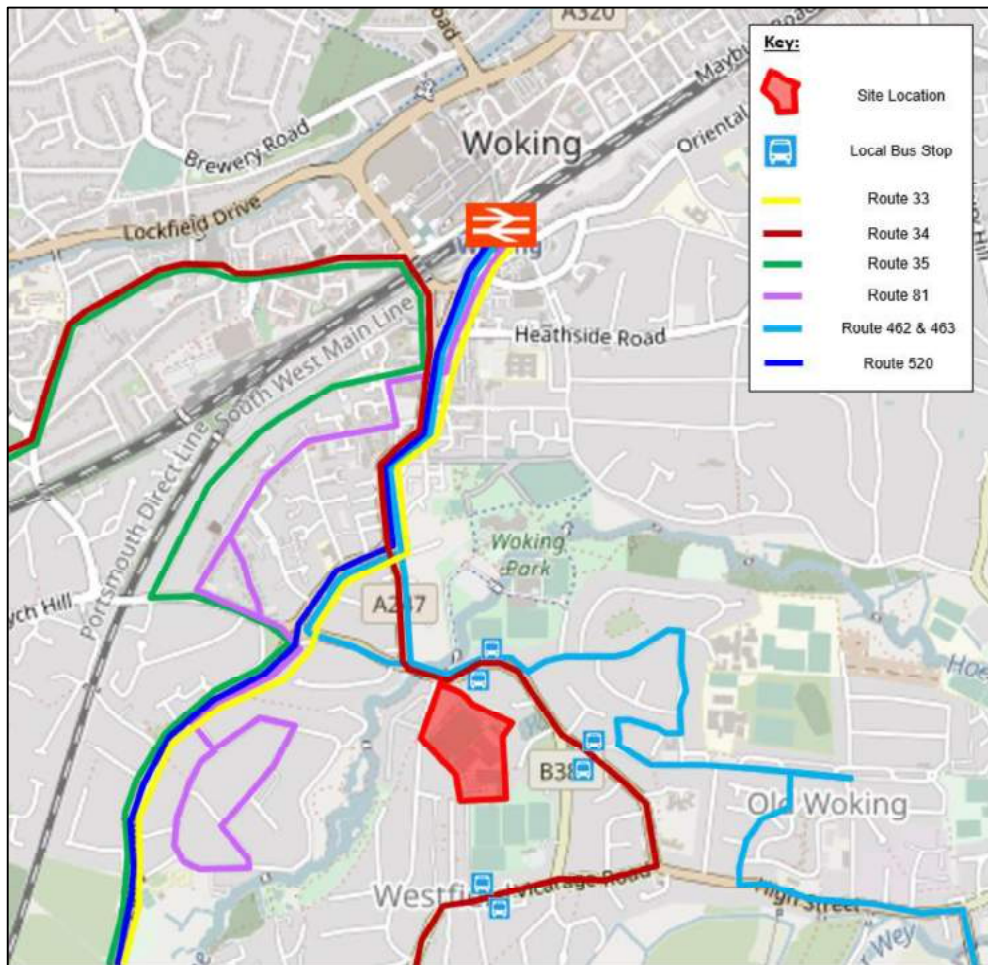
12. The local facilities nearby the site, augmented by the facilities that will be provided on site, are summarised in **Figure 1**.

Figure 1: Local Facilities Plan



13. Shared travel includes, but is not limited to, buses. The Community Concierge will administer a private carpooling IT platform, and provide car sharing facilities. This will include demand responsive facilities.
14. In addition, as the site is within the existing urban area, it does have access to existing bus facilities, and it has the opportunity to enhance those facilities if that proves desirable in addition to, or instead of, the other shared travel facilities that it will provide. The existing local bus routes are shown in **Figure 2**.

Figure 2: Existing Local Bus Routes



On Site Facilities

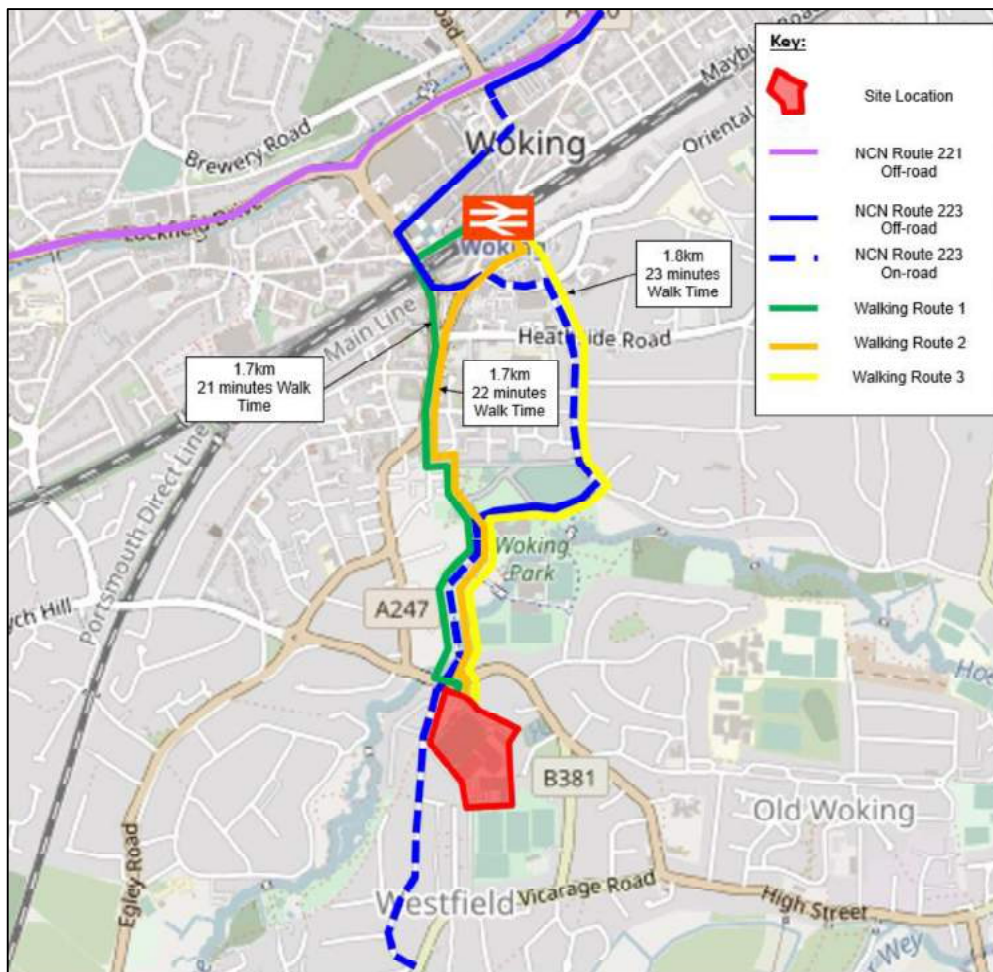
15. A Community Concierge team is a team that provides for all things mobility in an obvious location at the heart of the development. It is available to the entire community. It promotes and explains mobility by a choice of means, accentuating methods that are higher priority in the planning context.
16. It fixes bikes, or provides space for individuals to fix their own bikes. It rents bikes and electric bikes. It operates a car share scheme, enabling people to use cars where the asset is owned by the Concierge Team, not the individual.
17. It operates a café, and organises leisure walks and rides. It organises walk buddy and cycle buddy schemes. Importantly, it liaises with local schools to maximise sustainable access.
18. It looks after the micro consolidation centre. This centre is a central location for parcel and delivery drop. These are then either picked up by individuals, or sent out on a last mile of travel system to individual properties.

19. The Work Hub is a place for working, either on an hourly or daily basis, for those choosing on occasion to work from home. Occasional home working is increasing. This provides a pleasant and active environment, whether or not one is working for a few hours to avoid the peak commuter period, or for longer periods.
20. Parking on site will be limited for both the mixed-use development and the Stadium, consistent with the aim of a modern socially inclusive and sustainably led scheme. The scheme will not be reliant for mobility on the private car. It will be one of the choices for movement, but not a necessity for most, and therefore limiting parking is a benefit in the context of influencing sustainable living.

Local Access to Woking Town Centre

21. There are a choice of routes and modes for access to Woking Town Centre and the extra employment and facilities that it provides.
22. Some of the walk and cycle route options are shown in **Figure 3**.

Figure 3: Walking and Cycling Routes between Woking Town Centre and the Site



23. All of these are pleasant, hard surfaced, active and perceptibly safe.

24. The propensity for people to choose to walk and cycle depends on a plethora of factors which include:
1. The quality of the environment;
 2. The activity and overlooking along the route;
 3. The constraints to the use of alternatives (for instance parking constraint or congestion);
 4. The attitude of the individual (for instance the degree to which healthy living is a high priority);
 5. Cost (for instance the availability of a car);
 6. Time; and
 7. Distance.
25. In terms of time and distance, the site is approximately 1.7km and a 20 minute walk (9-minute cycle) from Woking town centre. Given that the routes are also pleasant and perceptibly safe, walking and cycling is both achievable for most people, and likely for many people. The evidence from the National Travel Survey⁶ is that, particularly for journeys to work people are prepared to walk longer distances than this (the NTS makes no distinction for quality of environment).
26. The travel trends are such that individual car driving mileage per adult is declining significantly, that there is an intergenerational divide in travel habits, with younger generations less focussed on private car travel, and an increase in the aspiration for shared travel and healthy living⁷. One might reasonably expect that if policy is not to inherently fail that, the likelihood of people walking will increase.
27. This site, designed in the way proposed, is very well placed to accentuate that trend, in association with measures that one might expect the local authority to introduce over time to also promote healthy and sustainable living.
28. Visitors to the Stadium will be managed, consistent with management that already occurs at other large football clubs. These events will be such that many people will arrive in the town centre by public transport, or by car, and will walk or used shared travel to the Stadium. It is 'observed effect' that walking and bussing these distances, and more are typical for football supporters and Stadium goers⁸.
29. This existing vehicular access to the site off Westfield Avenue is to be closed as part of the scheme. The northern access off Kingfield Road will serve as the primary access and is presented in **Appendix A**. A review of the Crashmap data shows that there has been one slight accident at this junction in the most recent five-year period. This displays that the

⁶ NTS <https://www.gov.uk/government/statistics/national-travel-survey-2017>

⁷ Independent Transport Commission: Recent Trends in Road and Rail Travel December 2016 <http://www.theitc.org.uk/wp-content/uploads/2016/12/ITC-Road-and-Rail-Travel-Trends-England-December-2016.pdf>

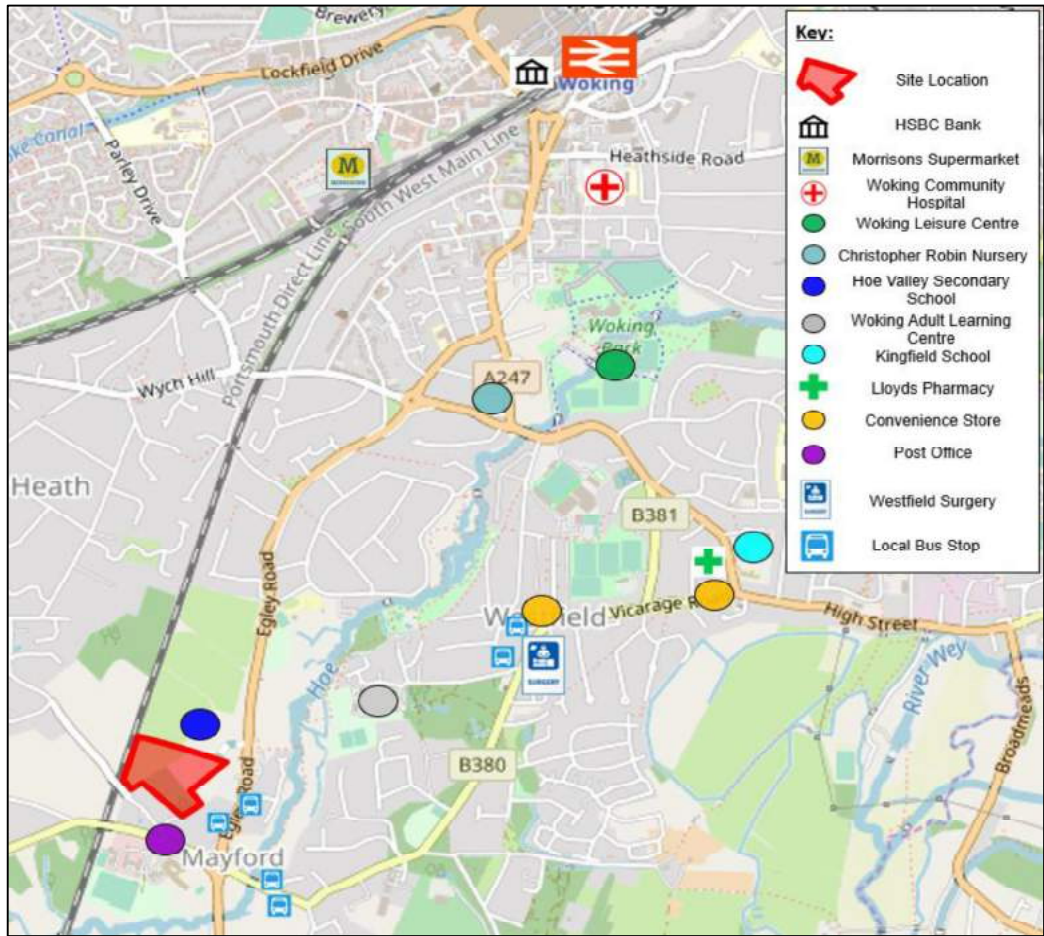
⁸ Websites for Bristol FC and Cardiff FC which involve up to 30- and 40-minute walks from the City or Town Centre <https://www.cardiffcityfc.co.uk/club/visit-us/> <https://www.bcfco.co.uk/travel/>

junction operates safely as existing and is able to accommodate the vehicle trips associated with the new development. Therefore, no improvements are proposed at this junction.

Egley Road Site

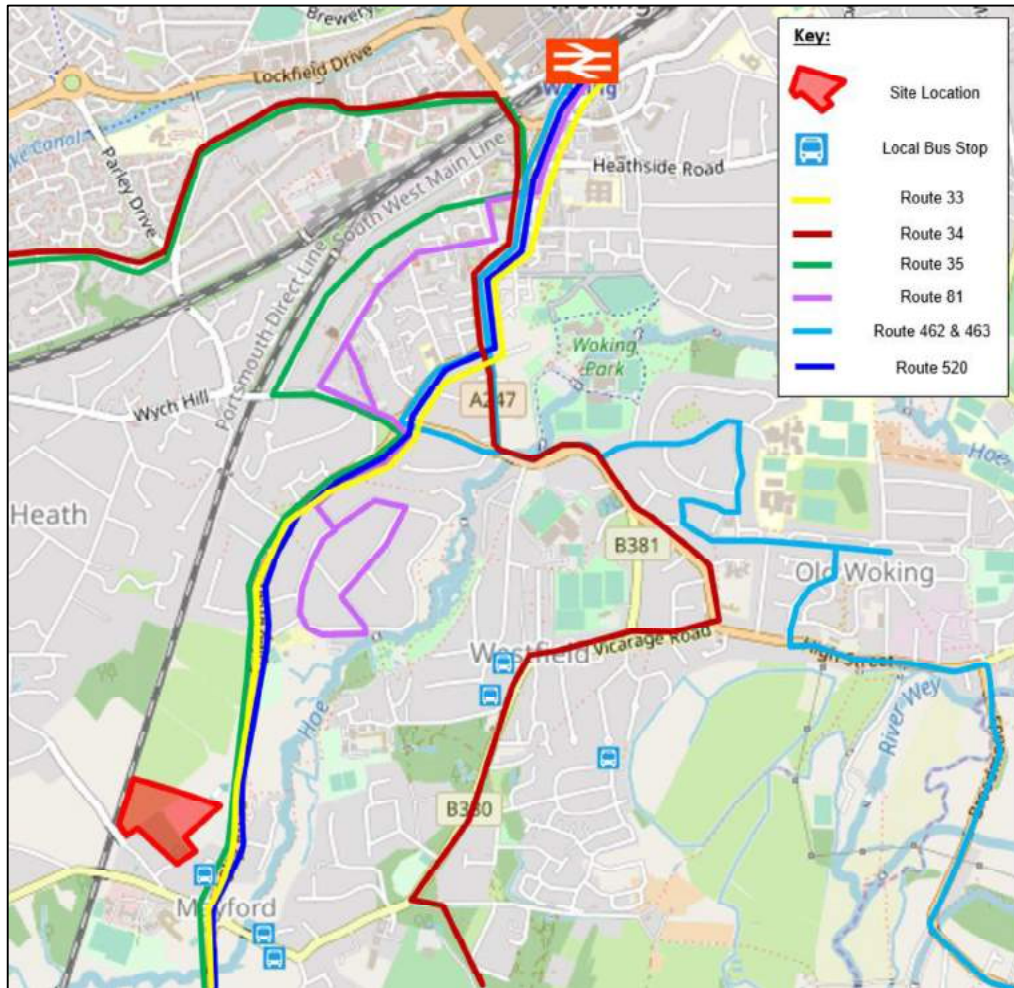
30. As part of the development proposals the existing David Lloyds sports facility is to be relocated to a vacant plot of land west of Egley Road and to the south of Hoe Valley School. The development proposals will include a smaller residential mix in comparison to the Woking FC site.
31. The relocated sports facility provides a great opportunity for good design to take advantage of the excellent location to create policy compliant mixed-use development.
32. The Egley Road site will be accessed via the access onto the A320 Egley Road provided for the new Hoe Valley School, as can be seen within **Appendix B**. A review of Crashmap data shows that there have been no accidents at this junction in the most recent five-year period.
33. The land to the west of the Egley Road site has been identified as draft allocation GB9. Woking Council have requested the investigation of the possibility of a joint access from the A320 Egley Road. On condition that a suitable link over the railway line which dissects the sites can be provided, the site access onto the A320 via the new school could be shared with the GB9 allocation. However, there may be significant challenges in providing a crossing across the railway line.
34. The most feasible site access for the GB9 allocated site would be to the south west of that site on Hook Hill Lane, and this would not be prejudiced by the development of the Egley Road site.
35. The local facilities nearby the site, augmented by the facilities that will be provided on site, are summarised in **Figure 4**.

Figure 4: Local Facilities Plan - Egley Road Site



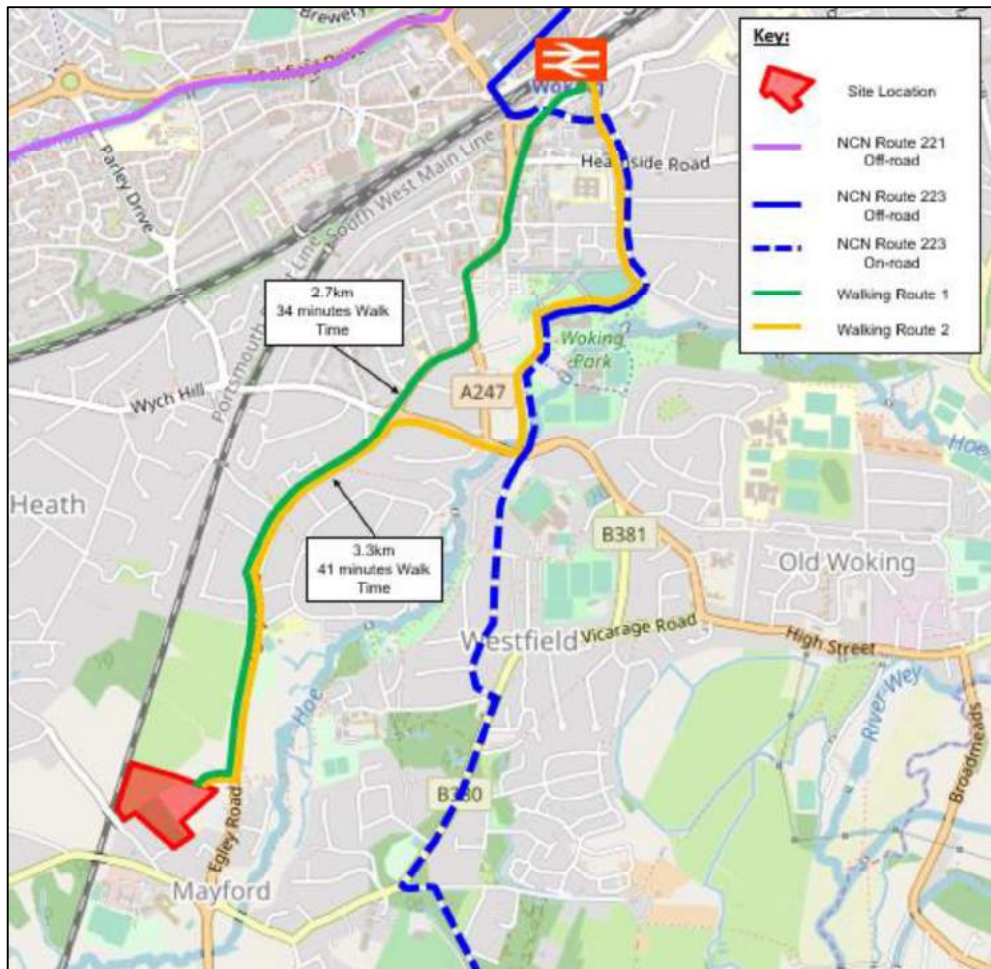
36. The existing local bus routes in relation to the Egley Road site are shown in **Figure 5**.

Figure 5: Existing Local Bus Routes – Egley Road Site



37. There are a choice of routes and modes for access to Woking Town Centre and the extra employment and facilities that it provides.
38. The key walk and cycle route options are shown in **Figure 6**.

Figure 6: Walking and Cycling Routes between Woking Town Centre and the Egley Road Site



39. All of these routes are pleasant, hard surfaced, active and perceptibly safe.

Traffic Impact

40. It is not the purpose of planning policy to protect the convenience of the car commuter, and there is no expression of policy that requires urban road networks to be increased in size in order to attract and accommodate more movement by private car.

41. As a sustainable development in a sustainable location there is no reason to expect there to be an effect on the road network that changes its character. At planning application stage, transport impact assessments will determine the degree to which any road network changes are desirable, which may for instance focus on improving active travel convenience and connectivity as well as safety.

APPENDIX A

APPENDIX B

Notes:
 1. This is not a construction drawing and is intended for illustrative purposes only.
 2. While being indicative only.

Key:
 - - - Site Boundary
 → Woking FC Access

REV	DETAILS	DRAWN	CHECKED	DATE

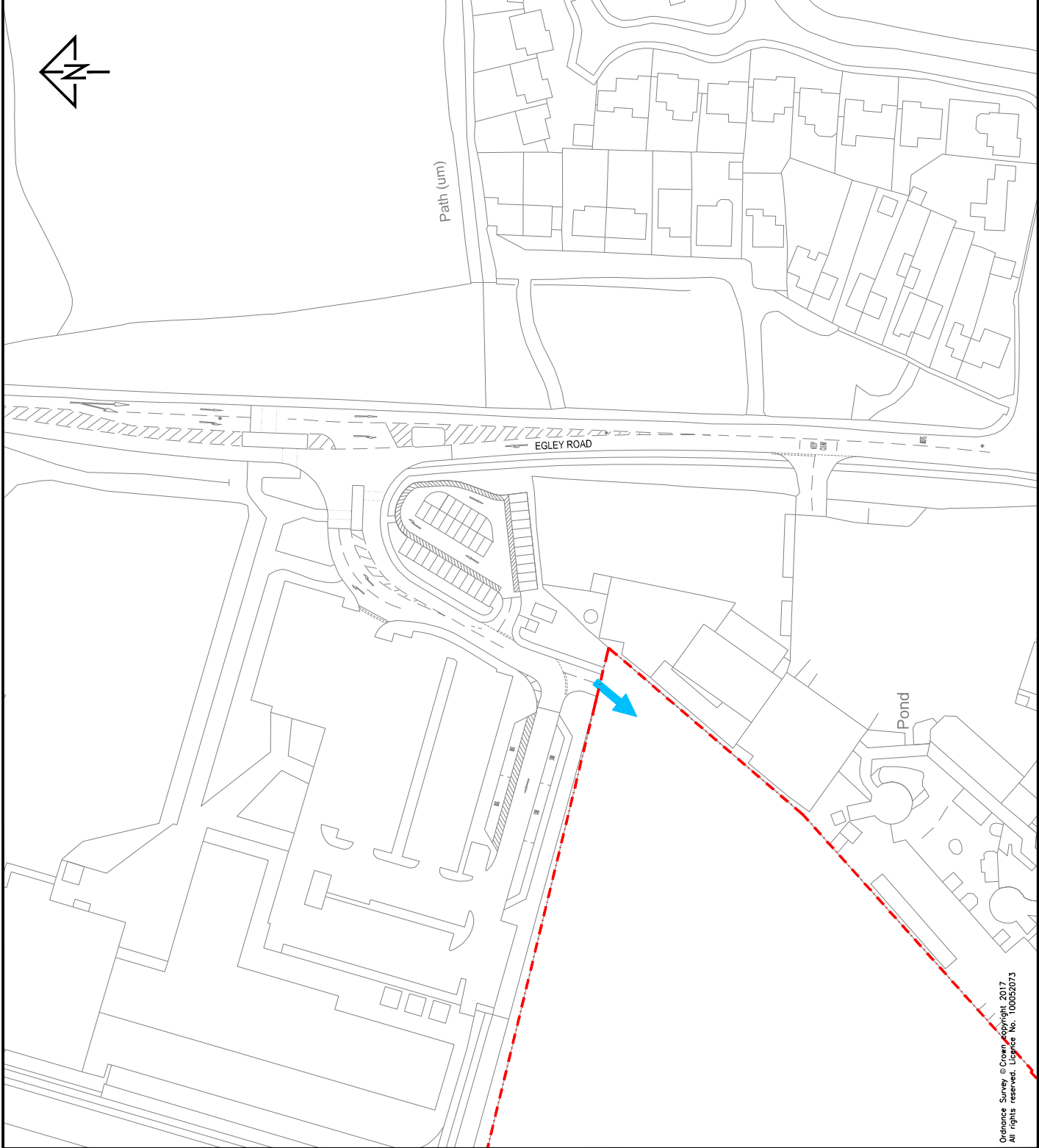
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PROJECT:	Woking FC
DRAWING TITLE:	Proposed Egleley Road Layout
SCALES:	1:1000 at A3
DRAWN:	JB
CHECKED:	DS
DATE:	12/12/2018



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