

From

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To

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Gloucester Square  
Woking GU21 6YL

### **Objection to Planning Application PLAN/2020/0568**

To whom it may concern,

I would like to hereby lodge a host of objections against the planned development 'Greening Goldsworth Road' with the reference number PLAN/2020/0568.

While I agree that the area is in need of development, this planned development is not suitable in terms of size, massing and density, it is not at all in keeping with the surroundings. It does not make a positive contribution to the townscape. It does not provide the required amount of affordable housing (only 5% of 40% required) which by no means can be compensated by including the already existing York Road Project homeless shelter. The mix of dwellings does not meet the need for family homes (only 2% are 3 bed flats). It is thereby in multiple ways in violation with the Woking core strategy (<https://www.woking2027.info/developmentplan/corestrategy/adoptedcorestrategy.pdf>) as well as other regulations and policies.

I am aware that a planning application has been granted in 2016 with reference number PLAN/2016/0742 comprising 560 residential units, 10,582 sqm of offices, 843 sqm of retail and gym use (A1-A4 and D2) with 395 parking spaces, public realm improvements and highway works to Goldsworth Road. It would have been composed of block A to comprise ground plus 34 storeys, Block B comprising ground plus 25 and 20 storeys, and Block C comprising ground plus 17, 14 and 10 storeys.

The fact that this development (PLAN/2016/0742 ) was seemingly adhering to policies and standards at that time, is by no means an indication that the Greening Goldsworth Road development (PLAN/2020/0568) does as well. The latter is far bigger, has far too many dwellings and other violations to planning policy to be granted permission to be built. The fact that the newer and bigger development has fewer parking spaces is clearly another reason not to grant the scheme permission to build. It is certainly not 'just a bit bigger' as the comparison below shows:

	PLAN/2016/0742	PLAN/2020/0568
Number of dwellings	560	965
Density (dwellings per hectare)	746	839
Number of blocks	3	5
Number of storeys	10 to 34	9 to 41
Number of parking spaces	395	216

Please find the detailed objections listed below:

**Objections linked to CORE STRATEGY (CS = core strategy)**

	TOPIC	OBJECTION
1	Height scale massing	<p>CS 21 (design) says development should be attractive with their own distinct identity, should respect and make positive contribution to street scene and character of the area paying due regard to scale, height, proportions, layout and materials etc.</p> <p>=&gt; This development is higher than any other on the town centre (Victoria square is up to 34 storeys) and also higher than the previously approved scheme (up to 34 storeys). This is not a positive contribution to the street scene in terms of height and proportion.</p> <p>=&gt; any buildings in direct vicinity and adjacent (except the Premier Inn) are 2,3, 4 storeys high. Victoria Square is on the other side of the street, smaller buildings are in between. This is definitely not a positive contribution to the street scene.</p> <p>=&gt; this scheme is not paying due respect to scale, height, proportional and layout of the area. While there is Victoria square on the other side of the street and some tower blocks on the other side of the railway line, two sides are residential areas with family houses, many of them from Victorian era or in keeping with that style.</p> <p>=&gt; Victoria Square was supposed to be an aesthetic flagship/focal point for the town centre; this takes attention away from Victoria square and is thereby not a positive contribution to the street scene.</p>
2	Height scale massing	<p>CS 21 (Design) says that tall buildings could be supported in Woking town centre, if well designed and justified in the context.</p> <p>CS24 (Woking's landscape and townscape) states that development in this location should enhance the townscape character of Woking Town Centre, taking into account views and landmarks, appropriate building styles and materials.</p> <p>=&gt; note that the border of Woking town centre is right next to the edge of the development which puts it at the very edge of Woking town centre. It is not justifiable and well designed to have the highest town centre development right at the edge and directly adjacent to residential areas. The 'peak' should be in the middle and height declining towards the edges of the town centre.</p>

		<p>=&gt; this does not enhance the townscape character which should be well formed with a peak in the middle, not at the edge.</p> <p>=&gt; this also undermines plans for Victoria Square to be a landmark development which will impact on sales and rental income of private and commercial property for Victoria Square</p> <p>=&gt; this design is also not justifiable in the context of Victoria Square</p>
3	Height scale massing	<p>CS21 says that proposals for new development should achieve a satisfactory relationship to adjoining properties due to [...] an overbearing effect due to bulk, proximity or loss of outlook.</p> <p>=&gt; any buildings in direct vicinity and adjacent, except the Premier Inn are 2,3, 4 storeys high. Victoria Square is on the other side of the street, smaller buildings are in between. This is definitely not a positive contribution to the street scene and is most definitely overbearing nearby buildings.</p>
4	Height, scale, massing	<p>CS1 says in the town centre, well designed, high density development that could include tall buildings and which enhances its image will be encouraged, but without compromising on its character and appearance and that of nearby areas</p> <p>CS 24 (Woking's landscape and townscape) also states that future development should be well-suited and sensitive to its location to protect the Borough's different character areas.</p> <p>=&gt; Woking town centre border is right next to the edge of the development. It is not justifiable and well designed to have the highest town centre development right at the edge for residential areas, the 'peak' should be in the middle and height declining towards the edges of the town centre.</p> <p>=&gt; this is compromising the character and appearance of nearby areas in Goldsworth road, oaks road, Kingsway etc which consists exclusively of terraced and semi-detached houses, mostly from Victorian era</p> <p>=&gt; this is neither sensitive nor well-suited to protect the Borough's different character area next to the development</p>
5	Density, comparison to previous scheme	<p>CS 10 says that indicative density range should be 200 dwellings per hectare minimum.</p> <p>=&gt; There is no upper limit but this development is 4 times as many is surely too many. This development has 839 dwellings per ha.</p>

		<p>=&gt; the previous scheme from 2016 had dwellings per ha of 746 which would have been a lot more appropriate</p> <p>=&gt; The previous scheme from 2016 had approx same max height as victoria square and almost half as many dwellings</p> <p>=&gt; density seems a lot more appropriate and aligned with Victoria Square</p> <p>=&gt; the previous scheme would have been much better in this regard, there is no justification for this increase in massing, density, number of dwellings</p>
6	Density	<p>CS 10 states that higher density will be permitted where it can be justified in terms of sustainability and where the character of the area would not be compromised</p> <p>=&gt; the density of 839 dwellings per ha cannot be justified</p> <p>=&gt; it is clearly not in character with the area, the big developments nearby have a much lower density rate and the residential areas directly adjacent at two sides of the development are comprised of mostly terraced and semi-detached houses. The development absolutely compromises the character of this area</p> <p>=&gt; Although the development is still part of the town centre, the height of the new build far exceeds others, even the tallest middle of town centre building and is far in excess of reasonable relation to the adjacent residential area</p> <p>=&gt; This excessive build will radically change the character of the area</p>
7	Density	<p>CS 10 says that Woking will build 2,300 new homes in Woking town centre between 2010 and 2027 (over 17 years)</p> <p>=&gt; this development provides 965 of these new homes. Victoria Square provides around 400. But other developments have been already built since 2010 and likely there are further to be built in the next 7 years so this is likely overshooting these figures. Such a large development cannot be justified in that context</p> <p>=&gt; the Baseline assessment is that the population of Woking will increase by 5,600 people between 2016 and 2041</p> <p>=&gt; this development would cover already 2,464 people. Why would more than half this figure concentrated in one small area and how would this impact on other developments that are also providing homes? That is unjustifiable</p>

8	Affordable housing	<p>CS 12 (affordable housing) states that all new residential proposals of that size will require 40% of dwellings to be affordable</p> <p>=&gt; Affordable housing is only 48 out of 965 homes which is about 5%</p> <p>=&gt; The fact that there is a homeless shelter on site doesn't count as compensation - the only reason the homeless shelter is built, is because it was displaced by the development and homeless people are not the population that affordable housing is aimed at.</p> <p>=&gt; The applicant is required to state why they cannot meet the 40% requirement but do not give any reason. Affordable Housing was a key issue with their 2016 application, which suggests they have not learned or improved in the last 4 years and adds to the argument that there is no justification for just 5% of the homes to be affordable</p>
9	Housing Mix	<p>CS11 (housing mix) says that proposals are expected to provide a mix of dwelling types and sizes to address the nature of local needs</p> <p>=&gt; Only 24 of the 965 homes (2%) are 3 bed and therefore suitable for families - that is not a good mix and does not address the local needs</p>
10	Accessibility	<p>CS 21 (Design) states that proposals need to be designed to be accessible to all members of the community, regardless of any disability</p> <p>=&gt; The Design &amp; Accessibility Statement fails to give reassurance the build will be accessible to wheelchair users eg no threshold doors, signage for sight impaired, area to store wheelchair, push button opening doors.</p>
11	Biodiversity and nature conservation	<p>CS 7 (biodiversity) states that proposals are required to contribute to the enhancement of existing biodiversity and geodiversity features and if it has a potentially harmful effect or lead to a loss of features of interest for biodiversity it will be refused.</p> <p>=&gt; where is the proof that this contributes to the enhancement of existing biodiversity and will not have a potentially harmful effect?</p>
12	Biodiversity (Thames Basin Heath)	<p>CS 8 states that any proposal with potential impacts on the Thames Basin Heaths Special Protection Areas (SPA) are subject to habitats regulation assessments, a full and precise analysis must be carried out. This development also needs to make an appropriate contribution towards the provision of Suitable Alternative Natural</p>

		<p>Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) to avoid impacts on the SPA</p> <p>=&gt; has this full and precise analysis been carried out?</p> <p>=&gt; is this appropriately contributing to SANG and SAMM?</p> <p>=&gt; two smaller proposals in the town centre have been rejected on these grounds - how come this one is deemed appropriate? The rejected proposals were PLAN/2019/1141 Crown Place Chertsey Road, 5-28 storeys, 366 dwellings and PLAN/2019/0611 Commercial Way Woking, 2-39 storeys, 310 dwellings.</p>
13	Parking	<p>CS 21 says that proposals should encourage sustainable means of travel</p> <p>=&gt; The plan is to sell 216 parking spaces and work on the assumption that the estimated 2,464 residents will mostly not have cars. That seems very optimistic and surrounding areas which have already huge parking problems will not be able to service any additional need for parking.</p>
14	Transport and accessibility	<p>CS 21 says that proposals should encourage sustainable means of travel BUT CS 18 states that the council is committed to [...] sustainable transport systems which connects people to jobs, services and community facilities</p> <p>=&gt; About half of the over 2000 estimated dwellers are likely to be commuters. Have network rail been consulted and confirmed they can accommodate additional capacity at that level and in addition to those additional commuters that will be living in Victoria Square (while the railway bridge widening work is being completed).</p>
15	Loss of light	<p>CS 21 (Design) says that proposals should avoid any significant harmful impact in terms of loss of [...] daylight or sunlight</p> <p>=&gt; Daylighting assessment admits that adjacent dwellings will notice loss of daylight and minor solar reflections that would trouble road/train drivers were identified but no measures taken to address this.</p>
16	Sustainable economic development	<p>CS15 wants to accommodate predicted future growth and allow for flexibility to cater for changing needs of the economy</p> <p>=&gt; Given the new circumstances due to COVID, we believe that Woking policies on size of buildings, number of new homes, likely demand of what kind of homes, etc. need to be revised and the planning application accordingly adjusted</p>

		=> There is no detail in the plan how it will generate “sustainable economic development”
17	Social and community infrastructure	<p>CS 19 states that the Council will work with partners to provide accessible and sustainable infrastructure to support the growth of the Borough. It will do so by promoting the use of social and community infrastructure for a range of uses.</p> <p>=&gt; what are the Council’s plans to provide accessible and sustainable infrastructure such as schools, kindergartens, GP surgeries, youth clubs, community centres, etc. for the additional estimated 2,464 residents which will arrive on top of the additional residents from Victoria Square and other developments?</p> <p>=&gt; The plans do nothing to provide social and community infrastructure.</p>
18	Infrastructure delivery	<p>CS 16 states that the council will work in partnership with infrastructure providers to ensure the infrastructure is provided in a timely manner</p> <p>=&gt; where is the timetable and needs assessment from the council and their detailed plans how they will ensure infrastructure is provided in a timely manner?</p>
19	Open space, green space, sport	<p>CS 17 says that all proposals for new residential developments need to include children’s play areas, outdoor recreational facilities for young people, outdoor sports facilities.</p> <p>=&gt; The proposed homes do not have gardens and presents no plans for green space within the development (I do not believe that plant boxes or a roof garden on top of a tower block can be counted)</p> <p>=&gt; The plan does not provide children’s play areas</p> <p>=&gt; The plan does not provide any sport areas</p> <p>=&gt; It is understood large open space is not possible in a tower block, but these plans make no provision for children and youth space or outdoor recreational/sports facilities to help protect the health of residents</p>

#### OTHER OBJECTIONS

20	Amenity space	The “Environmental Statement Vol 4” states that following consultations: The residential amenity was expanded providing
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		<p>gardens and amenities at podium level and at the top of each building.</p> <p>=&gt; This is inadequate amenity space for such a dense proposal. No mention is made of servicing or the accessibility of the amenities</p>
21	Environmental factors, wind	<p>=&gt; Evidence of a wind study mentioned in design and access statement mostly looked at impact on the buildings themselves but not how the buildings will act as wind tunnels and increase the wind force, both of which will affect the tower residents, town centre users and local community.</p> <p>=&gt; Strategy admits that south western side would have unsafe wind conditions, we don't believe mitigation strategy is sufficient.</p>
22	Parking	<p>=&gt; there are known and persistend issues with parking in the adjacent residential areas: Oaks Road, Vale Farm Road, Kingsway, etc. There is no room to add additional resident parking in that area</p> <p>=&gt; Residents parking will be put under additional considerable pressure when residents and guests of the proposed development will 'cruise' the area for parking space</p>
23	Highway safety	<p>=&gt; increased traffic flow from residents and guests in the area will increase the risk for pedestrians, including elderly people from Vale Farm Road residents home, children on their way to school and resident commuters on their way to the train station</p>
24	Fire Safety	<p>Grenfell Tower was 23 floors high. Fire Services lacked the high rise rescue equipment to save the lives of so many in the upper part of this building. Surrey Fire Service has the highest rescue aerial platform in Britain, housed at Leatherhead, but it was unable to reach the top 10 floors at Grenfell. Yet here we are debating a building nearly twice that high for Woking. This should not be considered without full investment in Woking Fire service to provide the staffing and equipment to rescue people from such tall buildings.</p>

Yours sincerely,



Bernadette Fischler