

# **Oaks and Vale Farm Road Residents Group**

## **Statement of Case – part 1 of 2**

APPEAL BY:

Goldsworth Road Development LLP

APPEAL SITE:

Land to the North And South Of Goldsworth Road, Woking, Surrey, GU21 6JT

APPEAL PROPOSAL:

Demolition of all existing buildings and redevelopment of the site for a phased mixed-use scheme, comprising 929 residential units (Class C3), communal residential and operational spaces, commercial uses (Classes A1/A2/A3/A4/B1/D1/D2) at ground floor and homeless shelter (sui generis) within 5 blocks of varying heights of between 9 and 37 storeys (including rooftop amenity) to the north and south sides of the site together with soft and hard landscaping including public realm works, highway alterations to Goldsworth Road, car parking, cycle parking, bin storage, ancillary facilities and plant.

Pins Ref: APP/A3655/W/21/3276474

LPA Ref: PLAN/2020/0568

16 August 2021

*Prepared by Bernadette Fischler Hooper, Linda Murray and Karen Woodland on behalf of Oaks and Vale Farm Road Residents Group*

# 1 Introduction

- 1.1 This is the Statement of Case on behalf of the Oaks and Vale Farm Road Residents' Group ("the Residents Group") in an appeal by Goldsworth Road Development LLP ("the Appellant") against the decision by the local planning authority which is Woking Borough Council ("the LPA") to refuse planning permission to application PLAN/2020/0568.
- 1.2 The Residents Group is an unincorporated informal body which exists since early 2019 and currently comprises around 60 residents of Woking, living in Oaks and Vale Farm Road and its immediate surrounding area. The Residents Group was formed to discuss areas of interest to our local area which soon turned out to be predominantly issues around the development. The Residents Group includes mostly residents that have lived in the area for many years. Some individual members have previously been involved in planning issues of public concern.
- 1.3 The Residents Group greatly welcomes thoughtful, appropriate and sustainable development in the area and wholeheartedly agrees with the approach to build in the town centre in order to protect the green belt. But based on the group members' personal experience of living and often raising families in the area, commuting to work from this area and using the local facilities such as shops, schools and GPs, the Residents Group strongly opposes mega developments that aren't necessary in that size and don't meet the needs of the community or the planning standards of the LPA.
- 1.4 During the planning application process for the proposed development, the Residents Group took a leading role in opposing the scheme. Coordination and consultation meetings were held online, due to the circumstances. A fundraising campaign was set up on go fund me<sup>1</sup> which raised £4,395 in order to commission a report by the independent consultancy Chestnut Planning<sup>2</sup>. The initial report<sup>3</sup> identified a number of areas of concerns which were communicated by the group to councillors, residents and the media<sup>4</sup>.
- 1.5 In preparation for the appeal, the Residents Group again fundraised to commission an updated version of this report ("the Report") which - alongside an accompanying letter - forms the main part of this Statement of Case and is included in Part 2. The areas of concern identified include:
  - The status of the resolution to grant the scheme
  - The need for a comprehensive masterplan for Woking Town Centre – now is the time to engage with the local community and key stakeholders
  - The appropriateness of the tall buildings in this location – in light of the concerns of Guildford Borough Council, the recent refused development elsewhere and the scale of the proposed development
  - The proposed layout of the scheme – including separation distances which fall below the Council's guidance
  - The impact on residential properties adjoining the application site – including daylight and sunlight standards below the BRE standard
  - Residential density – a significantly higher density than Victoria Square is proposed

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<sup>1</sup> <https://gf.me/u/yit6hu>

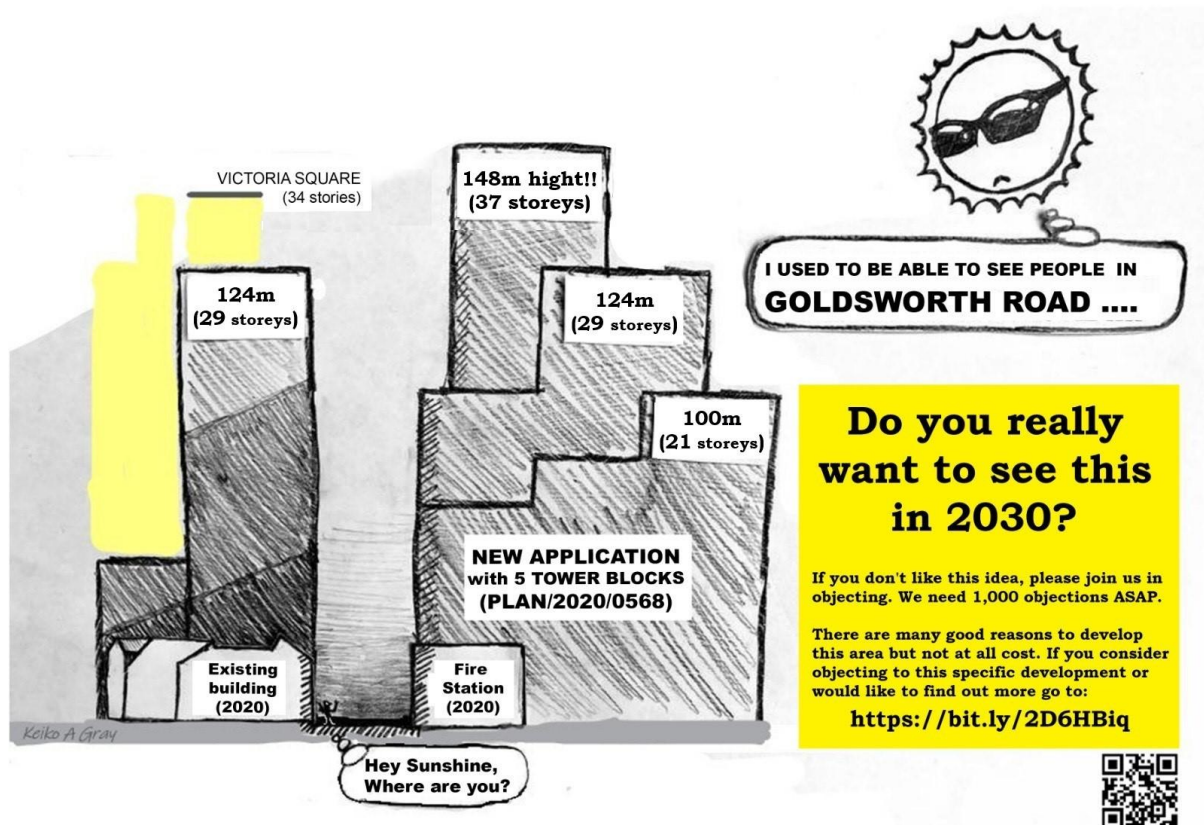
<sup>2</sup> <http://www.chestnutplanning.co.uk/>

<sup>3</sup> <https://bit.ly/3jH2f8x>

<sup>4</sup> see example: <https://www.wokingnewsandmail.co.uk/?p=29315> and <https://www.wokingnewsandmail.co.uk/?p=29515>

- due to the reliance on 1 bed and studio apartments
- The impact on residential properties within the site
- The under provision of affordable housing
- Dwelling mix – due to the over reliance on 1 bed and studio apartments which do not meet the Council’s Housing Need
- Impact on Thames Basin Heaths Special Protection Area (SPA)
- Loss of Commercial Floorspace
- Planning obligations

1.6 Further, the website [www.wokingobjectors.uk](http://www.wokingobjectors.uk) was created which provided information to residents on the planning application and how they could express their opposition. Many residents used the group’s briefings to assist them in composing their objections and the Residents Group kept interested residents up to date using an email list, twitter account @WokingObjectors, Facebook page and Nextdoor group. The Residents Group also introduced their objections at the planning committee meeting<sup>5</sup>, engaged with local media<sup>6</sup> and produced entertaining graphics to raise awareness, like the graphic 1 below:



Graphic 1 © Keiko A Gray

1.7 The Residents Group believes the application scheme represents over development of the site. The Residents Group will show that there is an accumulation of incidents where planning policy was stretched, nearly breached or breached. While each of them as isolated incidents might be permissible, in combination they result in gross overdevelopment.

<sup>5</sup> see: <https://www.getsurrey.co.uk/news/surrey-news/planning-consent-refused-wokings-tallest-19618238>

<sup>6</sup> see examples: <https://www.getsurrey.co.uk/news/surrey-news/goldsworth-road-woking-development-protest-18782880>; <https://www.getsurrey.co.uk/news/surrey-news/fears-woking-will-viewed-like-19463604>

- 1.8 The Residents Group considers the proposed scheme out of character with the nearby residential area they represent, having unacceptable negative impacts on surrounding existing dwellings, and not in keeping with its surrounding, including the Victoria Square development which is deemed to be the benchmark for town centre development.
- 1.9 The Residents Group also believes that neither the existing planning permission for the previous scheme PLAN/2016/0742 (Resolution to grant planning permission at Planning Committee on 18.10.2016) nor the fact that the York Road Project would be accommodated in one of the five towers are valid justification for this type of development.
- 1.10 The Residents Group is convinced that there is no need for a development of that size to fulfil the requirements of Woking's housing strategy. It does not meet the needs of residents or people wanting to move to that area, especially in post-COVID times.
- 1.11 The Residents Group agrees with and supports the LPA's case as set out in the reasons for refusal and will supplement the LPA's case by providing local experience of the site and surrounding area and further technical evidence where necessary. The Residents Group will strive not to repeat the LPA's evidence or unnecessarily add to inquiry time.

## 2 PART 1: Details of Evidence

### 2.1 Overall concerns with the proposed development

#### 2.2 The numerous breaches and stretches of planning policy add up to overdevelopment

2.3 The Residents Group is convinced that the issues with the proposed development such as

- bulk, massing and density which might be expected in inner city London but not Woking,
- lack of availability of day and sunlight within the development,
- too short separation distances,
- considerable impact on access to day and sunlight in surrounding properties,
- problematic flat layouts,
- underprovision of parking and cycle parking,
- etc.,

2.4 are all clear indications of overdevelopment.

2.5 While each of those breaches or stretches to planning policy taken individually might be acceptable (albeit only because of the town centre location), taken together they add up to gross overdevelopment that must not be permitted.

#### 2.6 The previously permitted scheme is too different to count as argument for the new scheme

2.7 The Residents Group rejects the notion that the proposed development is sufficiently comparable with a scheme previously granted permission on part of the site (PLAN/2016/0742) and that this would present an additional argument in favour of the proposed development. With two additional towers on the other side of the road and other significant differences, this is clearly not the same scheme. In fact, the height of the tallest towers is the only similarity and even there is a discrepancy between the number of storeys.

2.8 The proposed development nearly doubles the number of dwellings and towers, has a significantly higher density, yet fewer parking spaces and lower separation distances. All these are symptoms of overdevelopment and while the previous scheme might have been acceptable, this goes too far.

2.9 Table 1 below shows a comparison of the two proposals that further confirms that there is not enough similarity. The graphic 2 below shows the difference in sites and make up.

2.10 Further, one should consider that times and needs have changed since 2016 when the previous scheme was submitted and so has the LPA's approach to development since planning applications with lower towers have since been rejected.

#### 2.11 Table 1 with comparison

2016 SCHEME PLAN/2016/0742	2020 PROPOSAL PLAN/2020/0568	COMMENT
Only one side of Goldsworth Road	Both sides of Goldsworth Road	The new development is significantly larger, adding a 29 storey tower block and York Road premises at the other side of Goldsworth Road.

3 tower blocks	5 tower blocks	The two additional blocks are out of sync with townscape: one with 29 storeys plus the York Road premises (funded by council)
10 to 34 storeys high <ul style="list-style-type: none"> <li>Block A = ground plus 34 storeys</li> <li>Block B = ground plus 25 and 20 storeys</li> <li>Block C = ground plus 17, 14 and 10 storeys</li> </ul>	9 to 37 (previously 41) storeys high <ul style="list-style-type: none"> <li>T1 = 12, 16 and 21 storeys</li> <li>T2 = 20 and 29 storeys</li> <li>T3 = 37 (prev 41) storeys</li> <li>BA = 29 storeys</li> <li>BB (York Road project) = 9 storeys</li> </ul>	The height of the highest tower might be the same as the previous scheme (as per ecoworld's claim but the number of storeys is higher: ground plus 34 vs 37 storeys.  Also, the second highest towers are still much higher than the towers in the previous scheme (two 29 storey towers vs one 25 storey)
560 dwellings	929 (previously 965) dwellings	The number was reduced by 36 dwellings which is still 369 dwellings more or 165% of the previous amount.
Separation distance was 32 and 35 metres	Separation distance between the blocks is between 26.17m and 20.2m (violating planning policy)	The Outlook, Amenity, Privacy and Daylight SPD makes it clear that there should be a separation distance of 30m between buildings three stories and higher. At Victoria square it is between 30 and 40m.
Density: 746 dwellings per hectare (dph)	Density: 956 dph for same site (T1-3) 807 dph (previously 839 dph) for entire development	This density is significantly higher than the previous scheme and still something more alike to inner city development. Especially when looking only at the area that the previous scheme covers, i.e. tower T1 to T3, the density is nearly 1/3 higher. For comparison, the density of the two residential towers in Victoria square is 660 dph.
Impact on adjacent buildings: 34.19% falling below the BRE standard for Vertical Sky Component (access to sun) and 7% below for No-Sky Line (access to light)	Impact on adjacent buildings: 61.1% are below the BRE standard for Vertical Sky Component (sun) and 66% are below the standard for No-Sky Line (light).	The impact on access to sun and light for adjacent buildings is twice and six times higher in the new development than in the previous scheme.
Out of all habitable rooms, 86% have enough light and 80% enough sun.	Out of all habitable rooms, 1/5 don't have enough light and 1/4 don't get enough sun	Access to sun and light are worse than in the previous scheme. Satisfactory living conditions are not being provided through the site of the new development.
395 parking spaces	216 parking spaces	Even though the number of dwellings is much higher, there are nearly half the number of parking spaces provided.

Table 1: comparison of Plan/2016/0742 and Plan/2020/0568

# 2016 vs 2020 in pictures



Graphic 2 from presentations to councillors by Oaks and Vale Farm Road Residents Group  
© Bernadette Fischler Hooper

- 2.12 The York Road Project needs support but isn't an argument to build this proposed development
- 2.13 The Residents Group wholeheartedly supports the endeavour to find new premises for the York Road Project (YRP), but not at any cost. We believe the community benefit that new YRP premises would bring doesn't outweigh the costs on the community brought on by this overdevelopment. Since the developer will only provide the land, and Council will fund the development, the Council should explore alternative options. They have already resolved to do exactly that at the Council Meeting on 11 February 2021<sup>7</sup> which took place after the proposed development was rejected. Neither the York Road Project nor the Woking Railway Athletic Club should be used as leverage to push through further four tower blocks with dwellings that are to 95% unaffordable.
- 2.14 The LPA's obligations to the HIF must not count as argument for the proposed development**
- 2.15 As recently reported in local news<sup>8</sup>, the Woking Borough Council has committed to building further 4,500 dwellings through the HIF, without consulting sufficiently with councillors or at all with residents. This additional number is also not reflected in planning documents like the Site Allocation DPD.
- 2.16 Whatever the motivation for the LPA to enter such an agreement, this unconsulted decision should not be considered an argument in favour of this kind of development, even if it comes with additional incentives such as funding that bridges funding gaps arising from the LPA's decision on the HIF. Residents should not be made to suffer from overdevelopment based on Council decisions they did not have any say in.
- 2.17 The Residents Group strongly supports the development of this area and of course wants the LPA to live up to its commitments, but this can and should happen through thoughtful and proportionate development in line with housing needs.

<sup>7</sup> <https://moderngov.woking.gov.uk/documents/g1013/Printed%20minutes%2011th-Feb-2021%2019.00%20Council.pdf?T=1>

<sup>8</sup> <https://www.getsurrey.co.uk/news/surrey-news/woking-residents-finally-asked-views-21208429>

## 2.18 Points of particular concern for local residents regarding the proposed development

### 2.19 This development is not in keeping with the local residential areas

2.20 We appreciate that the LPA will delve into this topic deeper and wider as it is a reason for rejection from the Planning Committee. It is also unpacked in the Report.

Therefore, the below refers only to some specific points of greatest concern to local residents.

2.21 The Appellant's statement of case refers to tall buildings which can be found at two sides of the proposed development: on the short east side of the development (Victoria Square with up to 34 storeys) and to the South on the other side of the railway line, a certain distance away (New Central with 21 storeys and Centrium with 16 storeys). They are indicated in blue on the graphic 3 below.

2.22 However, the other two sides have much lower buildings mostly between 2 and 6 storeys which would be completely dwarfed by this massive development. Please see areas highlighted in green on graphic 3 below indicating their location. The residential roads in Oaks Road, Vale Farm Road, and adjacent roads outlined in red in graphic 3 below have only two storey buildings and have very much a coherent visual identity of Victorian-style semis and terraced houses - as we demonstrate in the photos in annexe 1.

2.23 It is also worth noting that since this development is at the very edge of the town centre border, most of the surrounding areas are already outside the town centre where certain exceptions to planning policy do not apply.



Graphic 3 (also bigger in Annex 2): screengrab of google map with highlighted areas © Bernadette Fischler Hoooper

2.24 This development is in no way in keeping with this residential area and its style. It violates CS21 that tall buildings should be well designed as well as CS1 which promotes developments that don't compromise the character of the surrounding area.

### 2.25 Residents reject high-rise buildings and their impact on the townscape of Woking



- 2.26 A short stint on Facebook, the Woking Live website and other social media outlets<sup>9</sup> shows that residents very much reject the already existing high-rise buildings and their impact on the townscape. A recent survey undertaken by the LPA when setting up its residents panel also led to the clear understanding that tall buildings are a core area of debate, necessitate a master plan<sup>10</sup> and further consultations with residents on the height of buildings in Woking are in order<sup>11</sup>.
- 2.27 We believe it is fair to assume that a new development that is higher, bigger, wider and more massive than anything that exists in Woking and probably in all of Surrey will not be considered a welcome addition to the townscape. Woking Core Strategy (CS) 23 states that all developments need to be carefully considered regarding height, design and location and Policy CS24 seeks to enhance the townscape character of Woking town centre. The views of residents on that seems that the towers are not an enhancement of the townscape. The fact that nearly all of the 194 objections from the public on this proposal (vs 49 supporting submissions) mention the height is a further indication of that.
- 2.28 And the fact that the proposed development which would provide the highest point of the town centre is at the very edge of the town centre suggests it is not a positive contribution to the townscape.
- 2.29 Graphic 4 below shows that the majority of comments on the towers were from the local residents. It also shows that the post code GU21 where the proposed development is located attracted a larger proportion of objections than the supporting comments while the only post code where only supporting letters came from is GU24 where the green belt is located and where people – in the Residents Groups’ view erroneously – think that this kind of mega development is the only way to protect the green belt.

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<sup>9</sup> a few examples:

comments in these FB posts on Woking Lives:

<https://www.facebook.com/groups/1234605133345166/posts/1897062617099411>

<https://www.facebook.com/groups/1234605133345166/posts/1946660102139662>

comments on these FB post on Voice of Woking:

<https://www.facebook.com/groups/1355963544614322/posts/1540247616185913>

<https://www.facebook.com/groups/1355963544614322/posts/1442270695983606>

and online articles of local news outlets:

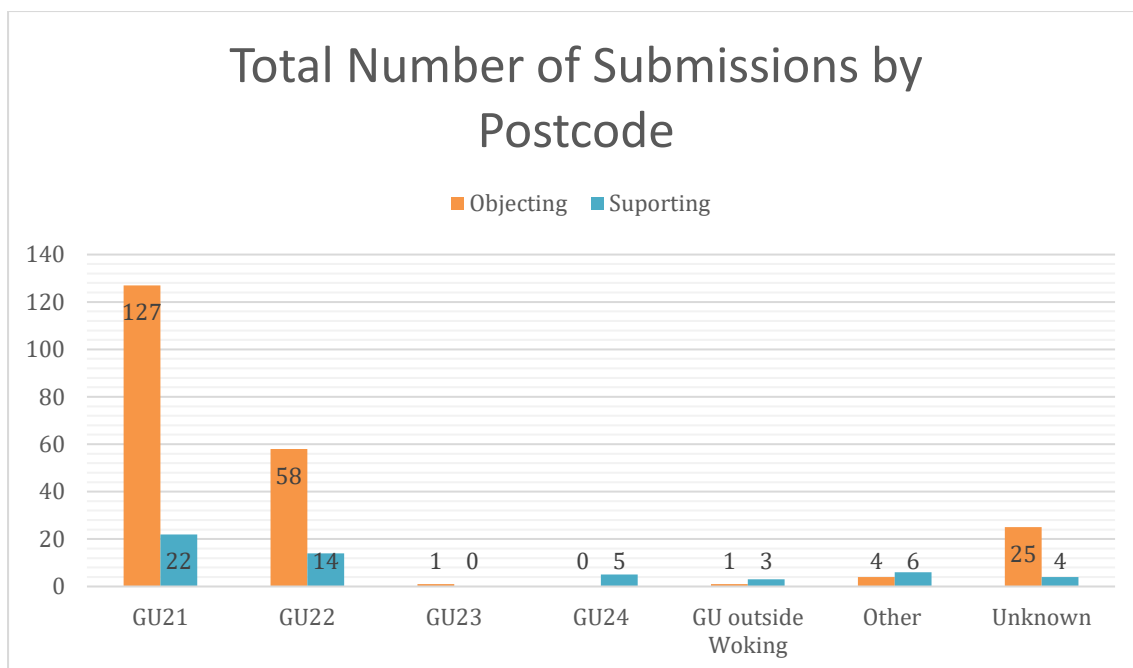
[https://www.wokingnewsandmail.co.uk/?p=31413&fbclid=IwAR1OzDqzJ1\\_OPIrT145VzdWVDvkS2\\_fNuK8vQ3jExG41xON\\_ZpWJ9V8BAuw](https://www.wokingnewsandmail.co.uk/?p=31413&fbclid=IwAR1OzDqzJ1_OPIrT145VzdWVDvkS2_fNuK8vQ3jExG41xON_ZpWJ9V8BAuw)

<https://www.getsurrey.co.uk/news/surrey-news/plans-two-more-woking-high-17945404>

<sup>10</sup> see report on town centre master plan EXE21/057

<https://moderngov.woking.gov.uk/documents/g1196/Public%20reports%20pack%2015th-Jul-2021%2019.00%20Executive.pdf?T=10>

<sup>11</sup> <https://communityforum.woking.gov.uk/woking-town-centre-masterplan-engagement-sessions>



*Graphic 4: objections and supporting comments on the proposed development by post code*  
© Linda Murray

2.30 This development will overshadow and outshine Victoria Square which was supposed to be the aesthetic focal point of the town centre and benchmark development. Even if the towers are not that popular with residents, Victoria Square at least is owned by the council and all dwellings will be rented with the intention to benefit the community, such as special schemes to help first time buyers to get on the property ladder, which is a welcome aspect of Victoria Square<sup>12</sup>. The same benefits for the community cannot be claimed of the proposed development.

2.31 Not only residents find that tall buildings are not in keeping with the area. The Site Allocation SPD, for example, says in site allocation UA12 that the recently built 10-storey hotel next to Synergy House dwarfs the 2-storey building<sup>13</sup>. Introducing a 29-storey building into the block will create even bigger imbalance within the block, will dwarf buildings to the north, and create an awkward juxtaposition with the building on the corner of Goldsworth Road and Victoria Way.

2.32 Further, Guildford Borough Council commented negatively on an application in that area of the town centre which was much lower: “The cumulative impact of high-rise buildings to the east and west of Woking town centre result in a cluttering of skyline that would have a harmful impact on sensitive, long range strategic views from Guildford borough”<sup>14</sup>.

### **2.33 This development does not meet the housing needs in general and in post-COVID times**

2.34 The Report unpacks the details about Woking’s housing need and strategy and we will just highlight some aspects here that are of particular concern to local residents.

#### 2.35 Housing Mix

2.36 Woking Core Strategy 11 states that the housing mix should meet local needs as per

<sup>12</sup> <https://www.facebook.com/groups/1234605133345166/posts/1697124520426556>

<sup>13</sup> <https://www.woking2027.info/res/uploads/Site%20Allocations%20DPD%20-%20Regulation%2019.pdf> page

80

<sup>14</sup> see the Report page 14

latest Strategic Housing Market Assessment (SHMA). The SMHA recommends around 40% should be 3 bed flats. This development offers only 2% 3 bed flats, but 61% studios and 1 bed flats. The proposed development is overly reliant on studio and 1 bed units also in comparison with the 2016 scheme (51%) and in violation to CS11. Woking's overview and scrutiny committee report from 14 Sep 2020<sup>15</sup> also identified a significant need for 2 and 3 bed homes at 31% and 20% respectively.

2.37 The provision of sufficient housing for larger families is of particular interest since the LPA's Annual Monitoring Report 2018-2019 states that "the average household size in the Borough is the second highest in the county with 2.49 persons per household and slightly above both the regional and national average. Woking has a fairly young population. It is the Borough with the second highest proportion of children under the age of 16 in Surrey."<sup>16</sup>

#### 2.38 Affordable Housing

2.39 Woking Core Strategy 12 states that 40% of new developments of this size should be affordable housing. This development includes only 5% of affordable housing which is in stark violation with CS 12. Even though the viability statement supports this number of affordable housing, the Residents Group questions if that is reason enough not to request better ways to develop the area that would provide more affordable housing and be better aligned with CS 12. Especially given the statement of the LPA that "the Borough is one of the most unaffordable areas of the country, both for rented and property purchase. Affordability is therefore a particular issue in Woking Borough."<sup>17</sup>

#### 2.40 Site Allocation SDP

2.41 The Residents Group wants to also draw attention to the fact that the Site Allocation DPD allows for 180 dwellings on the UA11 (55 dwellings) and UA13 sites (125 dwellings) allocated to the site of the proposed development<sup>18</sup>.

2.42 As the council has agreed - after a member of the Residents Group instigated a petition - the planning committee ought to take the Site Allocation DPD into account, and therefore it ought to have a certain weight also in the decision for this appeal. On 3 December the Council passed the motion moved by Council Leaders Ayesha Aziz "The Council agrees that decisions made by the Planning Committee and Planning Officers will take into account the proposed [Site Allocation] DPD"<sup>19</sup>.

#### 2.43 Changing needs in post-COVID times

2.44 In light of the current pandemic, now more than ever development should have good quality living space, good design to fit with the surroundings and be adaptable for the future economic needs as outlined in CS15. The economy of the Country has started to and will continue to change dramatically. This may affect the deliverability of the proposal and it may be necessary to review the details of the design, density and dwelling mix as well as the mix of commercial units – as the numbers of people commuting and choosing to work from home may change.

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<sup>15</sup> <https://moderngov.woking.gov.uk/documents/g935/Public%20reports%20pack%2014th-Sep-2020%2019.00%20Overview%20and%20Scrutiny%20Committee.pdf?T=10>

<sup>16</sup> <https://www.woking2027.info/allocations/sadpdxam/annualmonitoringreport1819>

<sup>17</sup>

<https://www.woking2027.info/supplementary/wwwwoking2027infoaffordablehousingdeliveryspd/affordablehousingdeliveryspd>

<sup>18</sup> the Report page 16 and <https://www.woking2027.info/res/uploads/Site%20Allocations%20DPD%20-%20Regulation%2019.pdf>

<sup>19</sup> <https://moderngov.woking.gov.uk/documents/g1012/Printed%20minutes%2003rd-Dec-2020%2019.00%20Council.pdf?T=1>

2.45 The council is aware of those concerns and writes in its Response to the Summary of Main Issues Received During the Consultation on the Main Modifications to the Site Allocations DPD in February 2021 “it is too soon to forecast or make projections on future need and demand based on them. The Council will carefully monitor local economic activity. The Core Strategy has in-built mechanism for monitoring and review to take into account future trends and respond accordingly.”<sup>20</sup> The Residents Group would be very concerned if a development with 8+ years building time goes ahead because it is now too soon to forecast and questions what it would look like for the Core Strategy’s in-built mechanisms for monitoring and review to kick into action as we would expect the ability to forecast will drastically improve over the building time of the proposed development.

**2.46 Residents are very concerned about the impact on the local parking situation**

2.47 The development expects to sell 216 parking spaces for the estimated 2,400 residents. Woking Parking SPD<sup>21</sup> allows to go below the minimum standard in the town centre but this falls very short of the required minimum of 676 spaces. The surrounding roads require residents permits and are already stretched beyond capacity. There is already great parking pressure on the surrounding roads and not enough parking is provided for the new residents and their visitors.

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<sup>20</sup> <https://www.woking2027.info/allocations/sadpdexam/mmissuesresponse>

<sup>21</sup> <https://www.woking2027.info/supplementary/parkingstandardsspd.pdf>

### **2.47.1 List of documents**

The Residents Group may refer to any documents cited in this Statement of Case but in particular:

- 1) National Planning Policy Framework 2019 & 2021
- 2) Planning Practice Guidance
- 3) Woking Core Strategy
- 4) The annual monitoring report 2018-2019
- 5) Woking Parking SPD
- 6) The developing Woking Site Allocations Development Plan Document and other documents associated with the examination process.
- 7) 2015 Strategic House Strategic Housing Market Assessment
- 8) Woking Design SPD
- 9) Woking proposals map 2016

## ANNEXES

### Annexe 1 - Photos of residential areas on Oaks and Vale Farm Road



Entrance to Oaks Road from Goldsworth Road © Karen Woodland



Oaks Road © Bernadette Fischler Hooper



Oaks Road © Bernadette Fischler Hooper



Oaks Road © Karen Woodland



Turning from Oaks Road into Vale Farm Road © Bernadette Fischler Hooper



Turning of Oaks Road into Vale Farm Road © Karen Woodland





East end of Vale Farm Road © Bernadette Fischler Hooper



Vale Farm Road © Karen Woodland



Vale Farm Road © Bernadette Fischler Hooper



Vale Farm Road © Bernadette Fischler Hooper



Vale Farm Road © Bernadette Fischler Hooper



Vale Farm Road © Bernadette Fischler Hooper



Wilbury Road (side street off Vale Farm Road) © Bernadette Fischler Hooper

