

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

## **Proof of Evidence – 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

31 October 2021

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

# 1 Introduction

- 1.1 This is the Proof of Evidence building on the Statement of Case submitted 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 has existed 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 are not 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 in the Report 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

---

<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 Due to Covid and its ramifications much thought has been given to a changed way of working nationally and its impact upon our communities. Woking as a vibrant commuter town is in the throes of contemplating change and a major Residents Panel has recently been established to consider the future.
  - 2.3 Town Planning has always been a long-term process and the LPA has to focus upon today but also the years ahead. Not an easy process when the likes of Covid have necessitated a fundamental re-think of a system which we have generally had in place for many years.
  - 2.4 The foundation of most Core Strategies tends to be a local Master Plan or plans and that Core Plan currently applicable to Woking commenced in 2012 with the constituent Site Allocation DPD (SADPD) just recommended by the Planning Inspector and endorsed by Woking Borough Council at its meeting on 14th October 2021. The provisions for the Town Centre are governed by a 'red line' to encompass the actual centre where there is provision for high rise buildings but no specific limits to buildings. It is accepted that the town centre provides substantial amenities and that density and massing can be greater there.
  - 2.5 Outside the 'red line' there is no provision for high rise and local centres generally have a specific limit upon development with height restrictions. It is accepted that local DPDs are advisory but they are of considerable weight in the planning process.
  - 2.6 The Ecoworld Plans for Goldsworth Road which is within the 'red line' town centre area, albeit at the very edge of that area, provide for a massive density and height development which to many appears to be overdevelopment. Indeed, original plans lodged for a 41 storey high tower were scaled back to 37 storeys, still the highest in Woking Town Centre. When an LPA considers a planning proposal, density is significant and the Ecoworld proposal appears to be much denser than the adjoining Victoria Square towers and all of the rest of Goldsworth Road within the town centre. Taking into account restraints of the small site overall it appears that the proposed development is harmful in mass and bulk in its location.
  - 2.7 Also, it is clear from initial sounding that the new Residents Panel seem to believe that WBC should re-consider its high-rise policy. One might wish to refer to a WBC Town Centre Strategy DPD but none is available. However, a draft Strategy Plan has recently been produced. It is accepted that an LPA such as Woking does consider internal guidelines upon mass and bulk and next door to the area in question, Victoria Square with its 34-storey high tower was regarded as a flagship, described by the LPA as benchmark development and understood to be indicative of maximum height.
  - 2.8 It is disappointing to the Residents Group that key changes especially since Covid have taken place to our country and workplace for countless people but Ecoworld do not seem to have focused upon these matters and have not brought forward revised plans for their development taking changed circumstances into account.
  - 2.9 We will now proceed to explore specific points in more detail:
- 2.10 The numerous breaches and misinterpretation of planning policy corroborate the harm to the site and area due to overdevelopment**
- 2.11 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,
- and more,

are all clear indications of overdevelopment. For example, despite the provisions of increased housing density in the town centre the submitted plans illustrate excessive detrimental housing density.

2.12 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.

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

2.14 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.

2.15 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.

2.16 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.

2.17 Further, one should consider that times and needs have changed since 2016 when the previous scheme was submitted and several of the last 3 years' decisions of the LPA have seen town centre high rise towers rejected for a variety of reasons, including height and density..

2.18 The Residents Group would like to draw particular attention to the density outlined in Table 1 below. The 2020 scheme has an overall density of 807 dwellings per hectare (dph). Looking only at the site of the previously approved 2016 scheme, that area would have a density of 956dph – nearly 1,000! We acknowledge that the LPA in its Core Strategy allowed for development in the town centre beyond 200dph but it stands to reason that the authors of this policy did not envisage this threshold to be overstepped nearly fivefold. Squeezing that number of units into such a small space is for all intents and purposes excessive, harmful and detrimental levels of housing density.

2.19 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  • Block A = ground plus 34 storeys • Block B = ground plus 25 and 20 storeys • Block C = ground plus 17, 14 and 10 storeys	9 to 37 (previously 41) storeys high  • T1 = 12, 16 and 21 storeys • T2 = 20 and 29 storeys • T3 = 37 (prev 41) storeys • BA = 29 storeys • BB (York Road project) = 9 storeys	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 like an 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, 20% don't have enough light and 25% 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 (by 369 units), 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

### 2.20 The York Road Project needs support but isn't an argument to build this proposed development

2.21 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 2011<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.

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



**2.22 The LPA's obligations to the HIF must not count as argument for the proposed development and should have no bearing on development decisions**

- 2.23 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. Further, the LPA has received the HIF funding claiming that the site in Goldsworth Road is going to hold 1,340 dwellings – a bold and very likely unrealistic claim. These facts point to a series of misjudgements by the LPA but do not constitute a reason to allow gross and harmful overdevelopment.
- 2.24 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.
- 2.25 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.

**2.26 The LPA should apply the same level of concern for fire safety as they did for Victoria Square**

- 2.27 The tragic fire at 24 storey Grenfell Tower, Kensington, London occurred on 14<sup>th</sup> June 2017.
- 2.28 The Government undertook a quick assessment which indicated external building cladding was a main cause of the fire and its rapid spread. There was mention of only one staircase for such a high building and quickly it became clear that this staircase became hopelessly congested with those trying to escape from the building and those attempting to douse the flames and provide help. In a short time there was mention of legislation to provide two staircases for such a building and also a full water sprinkler fit for all high rise buildings. LPAs' were largely left to their own devices to decide upon action locally.
- 2.29 As a result, WBC decided to modify its two new key 34 and 27 storey high towers in Victoria Square at a cost of many million Pounds. It is understood the work was viable at that stage as the plans and arrangements could be adjusted to accommodate two staircases with relatively minor modification.
- 2.30 Today there is still no legislation to require two staircases for tall towers although external cladding issues have been tackled to some extent. Much seems still to depend upon the LPA and its Building Control Department.
- 2.31 This is important context in the light of what happened to the Ecoworld Project at Goldsworth Road. It was found out that only one Tower, out of five, had two internal staircases. It seems that despite the WBC earlier decision on its own two new high towers being modified with two staircases that officers were satisfied that the same proviso did not apply to all five new towers (four of them of similar or greater height than Victoria Square) at Goldsworth Road. It was suggested that only one new tower's plans (not the highest!) necessitated two staircases and there was no strict legal requirement for the other four towers to have more than one.
- 2.32 The Residents Group firmly believes that it is necessary for an LPA to have uniform

---

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

provisions as to safety, especially after Grenfell. After all, Goldsworth Road was new, at planning stage, and thus change would only have meant plan alteration with no later stage major cost increase due to matters being at an advanced stage.

- 2.33 Such has been the continuing controversy over high towers and safety it is thought that all LPAs should long ago have sorted out their treatment of safety with the setting out of matters perhaps by a specific DPD for new buildings.

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

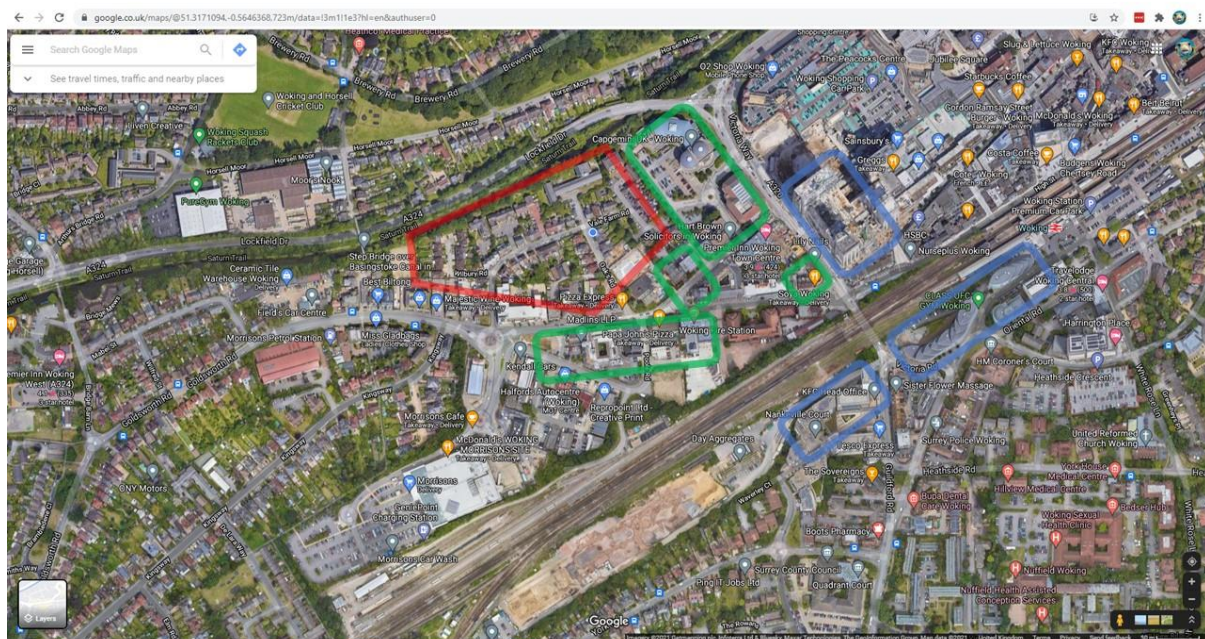
### 2.35 This development is not in keeping with the local residential areas

2.36 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 in part 2 of this Proof of Evidence. Therefore, the below refers only to some specific points of greatest concern to local residents.

2.37 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.

2.38 However, the other two sides have much lower buildings mostly between two and six 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.

2.39 It is also worth noting that since this development is at the very edge of the town centre border and to the west of Victoria Way which forms a more natural border to the town centre. 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 Hooper*

2.40 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.

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

## Woking

- 2.42 Earlier this year, Woking Borough Council installed its Residents Panel and part of the recruitment process was a survey that asked people what they thought about local development. The report prepared by Halo Works Ltd on the initial consultation commissioned by the LPA analysing 1335 survey responses shows on page 6 this quote for illustration “What an eyesore those tall buildings are in the Woking centre. They are a blot on the landscape for miles around”. Another document prepared by Halo Works Ltd about the LPA’s Residents Panel consultation shows that the second most commented on topic was on the tower blocks and town centre:

The table below shows the frequency of all of the comments:

	Frequency
SCC Highways: road and pavement repairs, pot holes, amenity tips	155
WBC Planning and Development: e.g. tower blocks, town centre,	152
WBC Perceptions Overall: e.g. transparency, listening, trust, democracy	137
WBC Neighbourhood Services: e.g., litter, fly tipping, dog poo, waste bins	134
WBC Communications: e.g. website, social media	81

- 2.43 The dominance of tower blocks in resident’s feedback prompted the LPA to include a specific questions solely on tall buildings in the town centre (“What do you really think about the towers that have gone up recently? And why? How do you feel about Woking developing up?” as one of the four questions in their subsequent round of residents outreach sessions that took place in August and September 2021. The Residents Group has not been able to access the results of these sessions yet but has reason to believe – based on the participation of group members in most of the six sessions – that the vast majority of comments are not in favour of the tower blocks.
- 2.44 This view can be further corroborated by 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>.
- 2.45 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

<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>

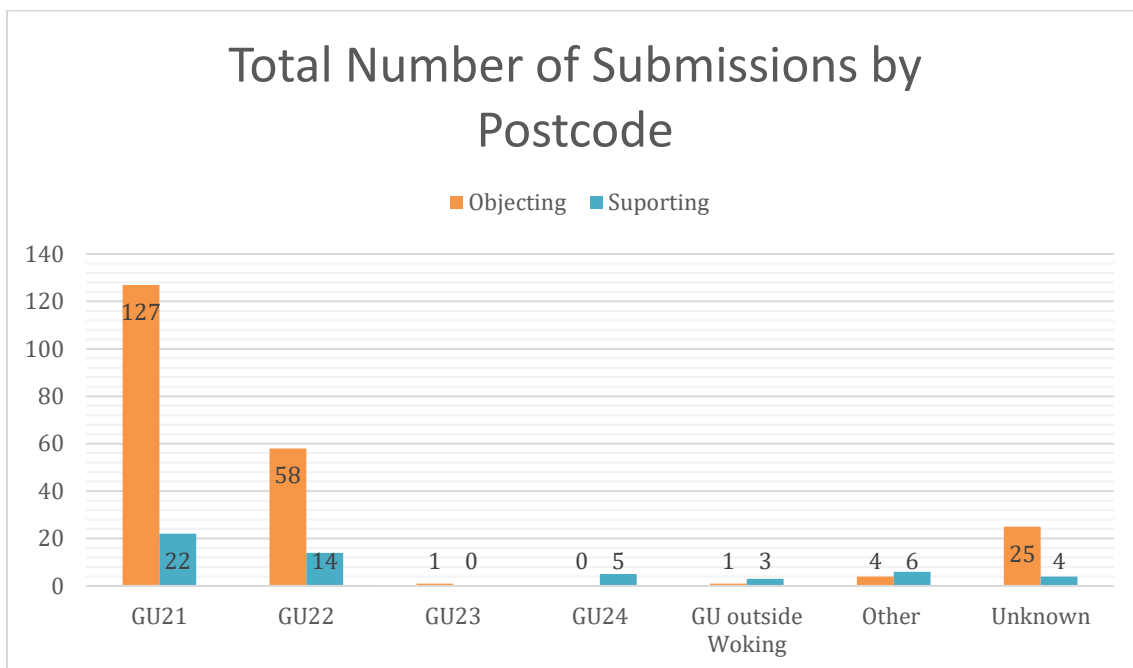
<sup>10</sup> see report on town centre master plan EXE21/057

<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>

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.

- 2.46 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.
- 2.47 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.



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

- 2.48 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.
- 2.49 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

<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

the corner of Goldsworth Road and Victoria Way.

2.50 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>.

2.51 Further, the Residents Group has severe doubts about the claim that this is the only way to go, given that there are towns all over the country thriving and growing and meeting government targets without the need to build this type of tall buildings in their town centres. As Table 2 below shows, there aren't other towns of comparable size and only big cities have buildings taller than 100m. In fact, the town of Woking (ca 99K population) even outranks cities with more than twice its size like Brighton (ca. 230K pop.), Portsmouth (ca 238K pop.), and Swansea (ca 246K pop.) as well as Sheffield (ca 584K pop.) which has nearly 6 times the number of inhabitants.

County (Borough)	number of buildings taller than 100m
Greater London (many)	107
Greater Manchester (Manchester and Salford)	15
West Midlands (Birmingham)	5
West Yorkshire (Leeds)	3
Merseyside (Liverpool)	2
Surrey (Woking)	2
East Sussex (Brighton)	1
Hampshire (Portsmouth)	1
South Yorkshire (Sheffield)	1
City and County of Swansea (Swansea)	1

Table 2 List of counties and Boroughs in the UK with buildings taller than 100m

Source: [https://en.m.wikipedia.org/wiki/List\\_of\\_tallest\\_buildings\\_in\\_the\\_United\\_Kingdom](https://en.m.wikipedia.org/wiki/List_of_tallest_buildings_in_the_United_Kingdom)

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

2.53 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.

**2.54 Housing Mix**

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

2.56 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

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

<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>

age of 16 in Surrey.”<sup>16</sup>

#### 2.57 Affordable Housing

2.58 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>

#### 2.59 Site Allocation SDP

2.60 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>.

2.61 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>.

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

2.63 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.

2.64 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.

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

---

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

<sup>17</sup>

<https://www.woking2027.info/supplementary/wwwoking2027infoaffordablehousingdeliveryspd/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>

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

2.66 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.

---

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



### **2.66.1 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
- 10) Halo Works Report for Residents Panel Initial consultation April 2021
- 11) Coding report for initial residents panel consultation

# 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



## Annexe 2: Graphic 3 (identical but bigger version)

