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Mr Neil Praine

Surrey Heath Borough Council

By email: [neil.praine@surreyheath.gov.uk](mailto:neil.praine@surreyheath.gov.uk)

CC: [development.control@surreyheath.gov.uk](mailto:development.control@surreyheath.gov.uk)

5th March 2021

Dear Mr Praine,

**Objection to planning application 20/1070/FFU - St Margaret’s Cottage and The Ferns, Woodlands Lane, Windlesham, GU20 6AS**

Windlesham Parish Council, as a planning consultee, are submitting this formal objection to application 20/1070/FFU, following consideration of the application at their Planning Committee meetings held on 16th February and 2nd March 2021.

In May 2019, as part of the local elections, Windlesham ward residents voted to adopt the Windlesham Neighbourhood Plan (WNP) for their village and it was subsequently adopted by Surrey Heath Borough Council, the planning authority. The WNP allows residents to shape the future of their village, in particular any future developments and is a legally binding document which must be considered in any planning application submitted to the local planning authority. The above-mentioned application fails to meet key requirements set out in the WNP, contravening many of the points agreed when it was adopted. These failings should be reason enough to deny this application, however, to strengthen our objection please consider the material points detailed below.

Meaningful Community engagement was not undertaken

The application references public consultation prior to submission and a development of this size would normally warrant a formal exhibition for residents to view and engage with developers. This engagement did not take place and despite there being restrictions on holding such events due to the COVID-19 pandemic, there was still a responsibility for the developers to engage with residents, which they have failed to do.

The only communication received before the application was a single Facebook post on the Windlesham community Facebook page and a letter sent to Windlesham Society at the time their application was submitted to SHBC. In our view, this does not constitute meaningful public consultation, even taking into consideration the restrictions for public meetings during the COVID-19 pandemic. It is worth noting that following the WPC Planning Committee held on 16th February 2021, when the application was first briefly discussed and the lack of community engagement raised, the developer placed an advert in the Surrey Advertiser on 19th February. This newspaper, though read by some in the Parish, has a verified average circulation of 5,406 copies per edition across the whole of Surrey. Therefore, it cannot be stated that this constitutes meaningful, targeted community engagement.

**WPC objects to this application due to the lack of transparency and engagement with residents which contravenes best practice for planning applications, particularly one of this size.**

Exceeds the accepted % of dwellings to be built

Windlesham Neighbourhood Plan states no more than 1% to 2% organic growth rate is sought by the community, including in Policy WNP1 for the period 2018 -2028.

If this application were to be agreed by SHBC, the total number of properties for construction in Windlesham village (including infills) would exceed the maximum indicated in the WNP over ten years, of 50 dwellings maximum.

**WPC object to this application as it does not comply with the WNP and is a material reason to object.**

Rural Exception site

The area being proposed for development is not a Rural Exception Site and is classed as countryside beyond the greenbelt. According to the National Planning Framework, rural exception sites would normally be for 100% affordable housing, located in the Green Belt or countryside but adjacent to or close to a settlement area. They are intended for local people, either living or working within the village or having close family ties. There has been no evidence provided by the applicant that supports that there is a local need for the above. The plan states that a maximum 40% may be classed as affordable housing but does not quantify what that means in any detail. There is no commitment to ensure that 100% of homes that might be provided would be reserved for local people therefore without a legally binding commitment to that, **we do not agree to any further development on this land.**

Transport Assessment

The assessment supplied by Stantec fails to reference the WNP in any of its data used, there is no mention of increasing the bus service or proposing any new routes to accommodate the increase in population.

Trains – the report provided to support this development, assumes that residents would use Bagshot train station, yet residents in Windlesham particularly in the Heathpark Drive area, would use Sunningdale or Longcross because it has a faster and more frequent service.

Traffic Flow - the data used to calculate traffic flow refers to a survey undertaken in 2014. The consultant has used data produced for application 15/0590 - Heathpark Woods application. This survey is now seven years old and does not take into consideration that two developments – one at Broadley Green and the Heathpark Woods development - have been given planning consent. All new applications must consider those planning applications that have already been agreed.

Vehicle speed data used to support this application was used in relation to the Heathpark Woods development and no attempt has been made to ensure that it is relevant and accurate. We understand that no attempt has been made to obtain up to date information from Surrey County Council.

The TRICs data used in calculations has no substance to support its data. This is important information and the report does not demonstrate that it accurately reflects traffic in 2019-2020.

The proposal for 3 junctions onto Woodland Lane in a space of approximately 150 metres without the appropriate sight lines will raise serious safety implications for not only vehicles but other road users gaining access to and using this section of road.

The provision for EV numbers and specification does not reflect the current SCC standards.

Sustainable transport provision has not been included as part of this application.

**WPC object to this application on transport grounds based on the following:**

**Excessive junctions on Woodlands Lane leading to unsafe road conditions; use of old and inaccurate traffic flow data which does not reflect future journeys when this proposal and those of Heathpark Woods and Broadly Green are taken into consideration; no provision for sustainable transport and the EV provision does not meet current SCC standards.**

Parking Allocation

Section 5.4.3 of the Transport report for this development, quotes car parking numbers in line with Surrey County Council (SCC) specifications and the plans show allocation for 63 cars via parking spaces and garages. However, SCC quotas are superseded by the WNP which stipulates that 86 parking spaces should be provided for a development of this type.

This means insufficient car parking is being allocated in the application compared to the number required in the legally binding Windlesham Neighbourhood Plan.

**WPC object to this application as it does not comply with the legally binding WNP with respect to provision of parking.**

Street scene

The site measures 0.93 hectares and will house 34 dwellings, this density will not only constitute overdevelopment for the area but will also dramatically and adversely affect the street scene which currently has no sight of housing. The density and type of housing proposed are not in keeping with the village street scene.

**WPC object to this application as it is not in keeping with the character of the locale and would constitute over development of the site.**

Environmental Impact

The bat survey indicates activities on the site and in the two existing houses; officers are asked to consider this and the impact of the adjoining development.

According to the DEFRA ‘MAGIC’ interactive website, part of the area proposed for development is ancient woodland, yet this application will adversely affect that woodland if approved.

The plans appear to indicate removal of a large number of trees, including some with TPOs, yet there is no mention of how they would justify the removal of the trees that attract a TPO. The plan does mention that 85 trees will be replaced but replacement is not going to rectify the imbalance to the ecology that is being destroyed. There is no mention of the natural capital value being destroyed by this application or any mention of biodiversity net gain. Trees are used for the secretion of carbon, the absorption of noise, pollution, and water. Their loss will have a long-term effect on the environment and health of the residents (both physical and mental).

This application does not provide and detailed information on the felling and replacement of the trees.

The ecology report for this site application, dated 2019, ignores the extensive environmental work done for the neighbouring development site by Persimmon homes.

The proposed site impinges upon the biodiversity section included for the neighbouring Heathpark Woods site (Persimmon Homes) and will adversely impact it. Natural England were consulted with extensively on the neighbouring site and the formation of its biodiversity borders, this development has taken no account of that. The Persimmon Homes development on Heathpark Woods secured an application that supports wildlife and the environment, whereas this application does not.

Natural England has not been consulted in relation to this application, an application that has significant impacts on the environment due to its size and impact when taking into account other neighbouring developments.

We ask that serious consideration is given to the damage this proposed development will have, not just on our village but on the surrounding settlements and infrastructure, the loss of yet more woodland, further loss of habitat for wildlife already pushed to the edge of survival in one of the last areas in Surrey Heath where they have suitable habitat and the increased risk of flooding for the area.

Officers are requested to ensure that Natural England are consulted over this application and its cumulative impact with Heathpark Woods.

Officers are requested to require the applicant to provide greater detail on the planned felling and replacement of trees.

**WPC object to this application due to the damage to the environment and net biodiversity loss, loss of habitat and natural capital.**

SANGS

There is no provision for SANGS within this application other than the intention for SHBC to procure them using the CIL receipts. This is contrary to the WNP which requires large scale developments to provide a free standing SANGs within the same community to be maintained by the developer or appointed agent in perpetuity.

**WPC object to this application as the conditions of the WNP are not being adhered to as the applicant is not intending to supply or maintain a SANG area within the local community.**

Drainage

A report from SCC regarding flooding and a drainage report from Bright Plan Civils have been provided, but it fails to consider the adjoining approved development of Heathpark Woods (15/0590), which is already bringing adverse effects on drainage and increasing the risk of flooding. Even before the Heathpark Woods development is built, we have problems with localised flooding in the area of this application. Both WPC and our residents are concerned that when yet more trees are removed and concrete used, it will mean potentially serious issues for the whole area. More work is necessary to provide a comprehensive review of the flood and drainage risks faced from yet more drastic change to the topography of the areas proposed for development.

Combined development of both sites (this application and Heathpark Woods) should require a review of the drainage by the EA and inclusion of an enforced SuDS detail condition.

**WPC objects to this development on the basis that insufficient information has been supplied with regards to the cumulative effect of water and drainage of this application on top of the Heathpark Woods development and request that an independent report be prepared by the EA. WPC request that if the application is approved that a detail condition is applied requiring the delivery of SuDs .**

SHBC are asked by WPC to take note of the numerous objections made to them and others that have been posted on the planning portal. A summary of residents’ comments and reasons for objection are below:

• Increased traffic

• Over burden on local amenities

• Over population

• Loss of noise and pollution protection from the M3

• Biodiversity issues

• Environmental issues

• Loss of animal habitat

• Increase in noise pollution generally

• Out of date traffic information used

• Woodlands Lane can’t cope with the HGV

• Woodlands Lane floods anyway as is

• No public consultation

• Possible green belt land

• Loss of trees provides no flood protection.

• Not in line with WNP

Given the objections and matters raised in this letter we strongly urge Surrey Heath Borough Council to reject this application.

Yours sincerely,



Sarah Walker

Clerk to Windlesham Parish Council