Statement by Woburn Hill Action Group (WHAG)

Subject: Woburn Park Farm (WPF)

This statement supports representations made on 20 February 2018 and 01 June 2018 copies of which are included at the end of this statement for reference.

The proposed Local Plan appears to misrepresent the status quo of this site and as such cannot provide a sound basis for some of its conclusions and forward assumptions. Examples as follows

1. The proposed Local Plan depicts WPF as Green Belt farmland. In reality it is an unauthorised industrialised and commercialised brownfield site of some 15-20 acres. However this site is not listed in the Brownfield Register.
2. The unapproved development of this site is being tolerated by RBC in that RBC has had full knowledge of the continuing development over the past 15 years by the current owners but have not taken action to limit the developments and activities. The basis of the plan does not appear to record this site as a tolerated development.
3. WPF is part of the Chertsey Meads and part of a Grade 2 listed park and garden. The proposed Local Plan does not appear to recognise this status thus leaving the door open for authorisation of inappropriate development and activities in this residential and recreational area.
4. RBC’s own investigations of WPF record in excess of 50 occupied Travelling showpeople pitches however the evidence based document GTAA Final Report January 2018 Appendix D indicates only 3 authorised pitches for this site and zero unauthorised pitches. Appendix D makes no reference to WPF being either an unauthorised development or a tolerated yard for travelling show people although it has been a gross encroachment onto the Green Belt for several years. It is as if RBC do not want this large unauthorised site to be given any visibility as part of its plan.
5. Is it acceptable from an HSE and humanitarian perspective that such a large residential population could be tolerated on this site? The Plan is not clear on this one way or the other.
Representation Form for the Runnymede 2030 Draft Local Plan

Please return to Runnymede Borough Council by Thursday 22\textsuperscript{nd} February 2018.

This form has two parts-

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Part A**

1. Personal Details*

   2. Agent’s Details (if applicable)

   *If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

<table>
<thead>
<tr>
<th>Title</th>
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<td>Email Address</td>
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**Part B – Please use a separate sheet for each representation**

Name or Organisation: Woburn Hill Action Group

3. To which part of the Local Plan does this representation relate?

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Policy</th>
<th>Policies Map</th>
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<tr>
<td>7.39</td>
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4. Do you consider the Local Plan is:

   | (1) Legally compliant | Yes | No |
   | (2) Sound | Yes | No |
   | (3) Complies with the Duty to co-operate | Yes | No |

Please tick as appropriate
5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This representation is regarding Woburn Park Farm which abuts Chertsey Meads which forms part of the natural flood plain of the Thames and Chertsey Bourne.

This plan does not depict the actual status of Woburn Park Farm which is a grade 2 listed park and garden on the Heritage at risk register as stated in Para 7.39 of the Plan.

Despite its status, this site has been allowed to become occupied by unapproved and unlawful industrial developments and operations.

The status quo of this site should therefore not be adopted as part of this plan as it does not conform with the stated policies which Runnymede Borough Council say they are committed to applying but as yet have failed to apply to this site.

A specific policy should be inserted into the plan governing an appropriate use for this site to ensure that this site is restored to a use commensurate with its surrounding environment.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

7. If you representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No

Yes, I wish to participate

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8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

| Woburn Hill Action Group | 20 Feb 2018 |

This is a fundamental issue regarding a Council's duty to perform in accordance with its stated policies and charters. Without proper representation we fear this issue will be inappropriately dealt with by the Council and swept under the carpet.
Part 2

*PLEASE NOTE, IF YOU HAVE MADE A REPRESENTATION TO THE DRAFT LOCAL PLAN CONSULTATION IN JANUARY/FEBRUARY 2018, YOU DO NOT NEED TO MAKE YOUR REPRESENTATION AGAIN UNLESS YOU ARE MAKING NEW COMMENTS. YOUR EARLIER COMMENTS WILL BE FORWARDED TO THE PLANNING INSPECTORATE*

Please return to Runnymede Borough Council by Friday 29th June 2018 (midnight).

This form has two parts-
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent’s Details (if applicable)

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Part B – Representation 1 - Introduction & EE3 Heritage

Name or Organisation: Woburn Hill Action Group

3. To which part of the Local Plan does this representation relate?

<table>
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<th>Paragraph</th>
<th>Policy</th>
<th>EE3</th>
<th>Policies Map</th>
<th>South</th>
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4. Do you consider the Local Plan is:

4. (1) Legally compliant
Yes [ ] No [ ]

4. (2) Sound
Yes [ ] No [ ]

4. (3) Complies with the Duty to co-operate
Yes [ ] No [ ]
Further to our representations made in February 2018 regarding Woburn Park Farm which is a 15-20 acre site abutting Chertsey Meads and forming part of the natural flood plain of the Thames and Chertsey Bourne.

The Local Plan depicts this site as being in the Thames Basin buffer zone and is part of a registered park and garden of special historic interest (see Policies Plan South Sheet).

This plan does not depict the current status of Woburn Park Farm which is part of a grade 2 listed park and garden on the Heritage at risk register as stated in Para 7.39 of the Plan.

Why is this site at risk? Because the Council has failed to enforce its policies and has allowed the site to become occupied by unapproved and unlawful industrial commercial and transient residential developments and operations.

Our representations concern Woburn Park Farm which is part of a park and garden of special historic interest. This park and garden was originally laid out and planted by Philip Southcote as an area of outstanding beauty and was known as a “ferme ornee” and his “Paradise”. His work is well documented and he was a forerunner to the well-known landscaper Capability Brown.

In recent times ancient healthy trees have been cut down as part of unapproved site clearance on Woburn Park Farm.

The proposed changes to the policies are contained in Part B Section 6 below.
Name or Organisation: Woburn Hill Action Group

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4. (1) Legally compliant  
Yes [ ]  No [ ]

4. (2) Sound  
Yes [ ]  No [ ]

4. (3) Complies with the Duty to co-operate  
Yes [ ]  No [ ]

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matters you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The policies as proposed in this plan need to be strengthened to support the protection and restoration of heritage sites such as Woburn Park Farm.

EE3 Policy wording requires strengthening – Current wording "The council will seek to avoid heritage assets becoming 'at risk' in the future.“ Proposed rewording “The council will address current heritage assets at risk in a timely manner to bring these in line with the objectives of this plan and seek to avoid heritage assets becoming ‘at risk’ in the future.”

EE6 Policy wording requires strengthening – In recent times ancient healthy trees have been cut down as part of unapproved site clearance on Woburn Park Farm. The policy requires strengthening to ensure that significant trees (eg over 30cm in diameter) are automatically preserved within sites such as this without the need for individual preservation orders.
Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐ No, I do not wish to participate at the oral examination
☐ Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

This is a fundamental issue regarding a Councils duty to perform in accordance with its stated policies and charters.

In the case of Woburn Park Farm the main policies which need to be applied are EE2, EE3, EE6, EE13, EE14, EE18 and EE19.

Without proper representation we fear that the unapproved developments at Woburn Park Farm will be inappropriately dealt with by the Council and swept under the carpet.

Woburn Hill Action Group

01 June 2018