Wates Developments Ltd - Shackleford Mushroom Farm

Report on Alternative Development Potential

October 2008
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Executive Summary 1
1. Introduction 5
2. Site Background 6
3. Methodology 7
4. Assessment of Uses 11
5. Conclusions / Findings 43
6. Caveats 45

Appendices
Appendix 1 – Matrix of Suitability
Appendix 2 – Previous Viability Reports
Appendix 3 – Site Plan/ Location Maps
Appendix 4 – Comparable Site Particulars
Appendix 5 – Demolition Quote
Appendix 6 – Map of Local Riding Establishments
Appendix 7 – Swept Path Analysis
Appendix 8 – Map of Local Crematoria
Appendix 9 – Response from Aldro School
Appendix 10 – YHA Press Articles
Executive Summary

1. This report has been prepared by Drivers Jonas LLP, with specialist planning input from Broadway Malyan, and transport input from JNP Consultants.

2. The purpose of this report is to present a balanced and robust case on the suitability of alternative uses for the former Shackleford Mushroom Farm in Shackleford, near Goldalming, Surrey (the ‘subject site’).

3. In order to ensure the relevance, appropriateness and suitability of the uses considered, Guildford and Waverley Borough Councils were provided with a draft list of alternative uses. The two Councils in consultation with Broadway Malyan made additions to the list of alternative uses ahead of assessment to ensure this report addressed all areas comprehensively.

Methodology & Assessment of Uses

4. In order to provide a robust and balanced view of the viability and acceptability of all uses, each use was analysed against a range of factors. These factors allowed each use to be assessed equally and enabled a matrix of suitability to be produced, see Appendix 1.

5. In preparing the matrix and reviewing each use in turn, it became evident that most uses were constrained by similar factors. These key factors are summarised below together with the main reasons restricting development of certain uses.

Site Size / Layout

6. Whilst the site’s irregular shape does not present an issue to most potential uses, its size, at 2.83 ha (7 acres), is considered too small to accommodate a number of alternative uses in a viable manner and for some may be too large.

7. Those uses for which 2.83 ha (7 acres) is considered too small include:
   - Golf driving range
   - Paintballing

8. The use for which 2.83 ha (7 acres) is considered too large is:
   - Retirement housing

Transport

Site and Highway Access

9. The site benefits from two access points. Primary access is obtained from Shackleford Road and secondary access from Peper Harrow Lane.

10. Both the roads themselves and the access points present constraints to accessibility, for the key reasons outlined below:
   - Restricted Access - site access is restricted by the land available and the existing road geometry. As such both accesses are deemed to be unsuitable for large articulated lorries such as car transporters, mid-to-large delivery vehicles in high volumes, and other vehicles with poor turning circles.
   - Nature of Local Roads - the local highway network comprises predominantly unclassified (rural) roads which are characteristically narrow, lacking footways, road markings and street lighting. Furthermore, due to the historic nature of the road network, the road junctions are notoriously sub-standard suffering from poor visibility and tight turning radii.
11. For these reasons, it is considered that potential alternative uses which are either reliant upon the use of large vehicles or generate significant levels of HGV traffic, from an operational standpoint, or have high levels of car borne traffic from staff and/or visitors would not be suitable, due to the implications on operator requirements, highway capacity and safety.

**Transport Accessibility**

12. The site has poor transport accessibility, in particular by public transport and other non-car modes. The nearest train station is at Godalming, some 5.6 kilometres (3.5 miles) away. A bus service operates within walking distance of the site, with services between Guildford, Aldershot, Farnham and Godalming, however the service is irregular and does not offer a night service nor a service on Sunday's or Bank Holidays. This impacts greatly on operators requiring good access for a workforce.

13. Uses which need public transport access for staff, end users or customers and are therefore considered to be inappropriate for the site include the following:

- Abattoir
- Assembly and leisure (D2)
- Cemetery / crematorium
- Garden centre
- Hotels
- Non residential institution (D1)
- Care homes
- Retirement housing
- Secure residential institution

**Location**

14. The site’s location, set back from both Shackleford Road and Peper Harow Road and some distance from the main commuter roads, is likely to deter operators of uses which require prominence or high visibility in order to attract passing trade.

15. Its village location, although idyllic, also has a significant effect on the suitability and requirements of some users. For example, assembly & leisure uses are dependant on large local population centres, or easy accessibility – which this site does not offer.

16. In short, the site is too remote from larger urban areas and population centres which provide the target markets, labour markets, goods and services upon which some potential uses would rely.

17. Based on locational factors, the site is deemed inappropriate for the following uses:

- Assembly and leisure
- Caravan and campsite
- Education / training
- Holiday lodges
- Hotels
Planning and Environmental

18. Broadway Malyan has provided an assessment of the planning and environmental issues which have a bearing on the likely acceptability of the alternative uses considered in this report. In particular, it has advised that taking into account the rural character and visual amenities of the area, the sites’ proximity to Shackleford village and its Greenbelt and AONB status, the following uses are likely to be unacceptable on planning and environmental grounds;

- Car boot sales
- Education/ Training
- Storage and distribution (B8)
- Waste disposal and re-cycling
- Residential mobile home site

Cost versus Revenue / Economic Viability

19. Bringing forward the development of any site, save for some uses financed by public funding, is driven by economic viability – the end use must generate sufficient value to cover the costs of developing the site.

20. Operators will not purchase, develop out or locate on a site if it is not economically viable to do so.

21. Given the fundamental nature of economic viability, we have considered this for the majority of uses, save for those which are likely to be publically funded or for which information is not available.

22. Whilst some users may seek to utilise the existing hard standing and potentially re-use some of the buildings, most operators will require a cleared site, with many low value users requiring a combination of hard and soft landscaping, which would need to be created.

23. The commercial viability of various uses can effectively be divided into the following:

- Those which are suitable for locating at Shackleford but do not generate sufficient value to cover the site preparation costs – i.e. low value uses such as a nursery or car boot sale.
- Those which could potentially generate sufficient value however Shackleford is not a suitable enough location for the business to generate this value, due to accessibility, location, supply and demand factors – i.e. higher value uses such as a hotel or garden centre.

24. Throughout the report, for each of the uses, we have commented, as appropriate, on the potential site preparation costs versus likely revenue, or the operators likely return on investment if they were to consider locating at Shackleford.
Conclusion

25. As outlined and justified throughout this report, and summarised in the matrix of suitability, there are only a handful of uses which are value generating enough to warrant covering the costs of developing on the site. However the locational constraints of the site – primarily it’s rural nature and the traffic issues – prevent these businesses operating at a level necessary to generate such value. Hence operators and developers would not consider locating these uses on the site.

26. It is for this reason that we believe the most appropriate reuse of the site is as a low density residential development.

27. In drawing a conclusion from the evidence we have collated and our experience of the market in rural locations, it is important that the Council consider a holistic approach to suitable development on this site.

28. Whilst there may be merit in considering the extension of school sports facilities for Aldro School, this will bring with it health and safety related requirements due to the need to transfer pupils from one site to another across relatively fast moving single track road with no pavement. In addition Aldro School have expressed the fact they are not interested in purchasing the Shackleford site, as seen in the letter provided in Appendix 9.

29. Further to this, whilst an Arts and Crafts facility may sound idyllic and a good neighbour for Shackleford Village, it is not viable for an Arts and Crafts business to incur the site preparation costs, that would be required to construct and create a suitable and attractive premises necessary for the operation of such a business.

30. Overall, it is our consideration as independent property consultants, that the most suitable use, in terms of limiting adverse effects on the environment specifically the Greenbelt and AONB, improvements to the existing environment, and contributions both financially and socially to the local community – through the inclusion of some low cost homes and contributions through Section 106 payments – is the development of a low density residential scheme on the former Shackleford Mushroom Farm.
1. **Introduction**

1.1 Drivers Jonas LLP (DJ) has been instructed by Wates Developments Limited (Wates) to assess the economic viability and planning acceptability of a range of alternative uses for the former Shackleford Mushroom Farm (the subject site) in Shackleford, near Godalming, Surrey.

1.2 This report draws on our market knowledge and experience of the development industry, together with views of other specialist agents in the industry, to provide a comprehensive review of potential alternatives for the subject site.

1.3 Throughout this report, we have drawn on planning input from Broadway Malyan – the Planning Consultants on this project, and advice from JNP Consultants in relation to transport accessibility and adverse effects.

1.4 This report is intended to be read in conjunction with the following reports, contained in Appendix 2, which we understand the Council have reviewed and acknowledged:


   (b) Shackleford Mushroom Farm, Shackleford, Godalming, Surrey - Report on Agricultural Uses of the Site – prepared by John Catt BSc (Est Man) FRICS FAAV (John Catt Report).

   (c) A report on the demise of Shackleford Mushroom Farm and possible uses for the site – prepared by John L Burden of Mushroom Advice & Analysis, dated 7 May 2008 (John L Burden Report).

1.5 Based on the content and findings of the above reports, the re-use of the site for mushroom farming, other agricultural uses and employment uses such as B1 (offices and light industrial), B2 (general industrial) and B8 (specifically warehouse) has not been considered further.
2. Site Background

Location

2.1 Shackleford Mushroom Farm is located in the village of Shackleford approximately 11.2 kilometres (7.0 miles) south of Guildford and 5.6 kilometres (3.5 miles) to the west of Godalming.

2.2 Site plan and location maps are attached at Appendix 3.

2.3 The existing planning use for the Mushroom Farm is Sui – Generis, being a mixture of agricultural and nursery uses. Planning permission would therefore be required for any non farming related alternative use at the property.

2.4 Primary access to the site is provided at Shackleford Road with secondary access at Peper Harow Lane, both of which lead via unclassified roads to the A3 (Guildford and Goldalming Bypass Road).

2.5 Public transport to the site is provided by the number 46 bus route which has six daily services from Shackleford to Aldershot (via Farnham) between 11.30am and 6.00pm and six services from Shackleford to Guildford (via Godalming) between 7.45am and 3.30pm. There are no services on Sundays or public holidays.

2.6 The nearest rail links to Shackleford are located in the centres of Godalming (5.6 kilometres (3.5 miles)), Milford (6.4 kilometres (4.0 miles)), Guildford (11.2 kilometres (7.0 miles)) and Farnham (11.2 kilometres (7 miles)), all of which provide direct services to London’s Waterloo.

2.7 The site lies to the south of Shackleford village towards open countryside and is surrounded by a small number of residential properties, including two houses situated on either side of the Shackleford Road access point. There is agricultural land to the north – in the ownership of Wates Developments, a woodland area to the south and a cricket pitch to the west. Aldro School, a preparatory school for boys, is in the near vicinity to the north west, further along Peper Harow Lane.

Site Description

2.8 The site extends to approximately 2.83 ha (7 acres) and comprises circa 11,000sq.m (120,000sqft) of existing buildings varying in age, nature and quality of accommodation. The remainder of the site is largely concrete hard standing.

2.9 The Hurst Warne report contained in Appendix 2 provides a detailed description of each of the buildings located on site.

2.10 To summarise, the majority are bespoke for mushroom growing and it is therefore considered likely that they would need to be demolished by an incoming user. For those buildings which may be considered suitable for alternative uses, these are in a poor state of repair and outdated in terms of layout so are again unlikely to be utilised by an incoming occupier.
3. **Methodology**

3.1 In order to provide a robust and balanced view of the viability and acceptability of all of the alternative uses considered, each use was analysed against a range of factors which fall into the categories outlined below:

- **The Site** – including size, scale, accessibility and levelling.
- **Location** – including prominence, visibility and transport accessibility by all modes of transport.
- **Economic Viability** – focussing on market and viability issues such as demand, supply, operator requirements and likely income generation versus cost of delivery etc.
- **Planning** – drawing on relevant planning policy and development control issues.
- **Environmental** – Environmental pollution from a number of sources including light, noise and air pollution.

3.2 In preparing this report, the importance of some of the categories for all uses became apparent. Therefore, for ease, a summary of the key factors impacting on development have been reviewed below and cross-referenced where applicable throughout the report.

**Site Access and Levels**

3.3 In general, access to the site given the current site layout and levels is likely to prove difficult with the varying levels across the site likely to impact upon interest from most operators.

3.4 In summary, the entrance at Shackleford Road is relatively flat until approximately 100 yards inside the site where there is a steep gradient of 1/20 to the low point in the centre of the site. From the south-west to the centre of the site levels are relatively flat with an abrupt 1.5-2.0m drop into the centre of the site.

3.5 Alternative uses would therefore need to be compatible with the steep and varying site levels in terms of the construction of buildings and accessibility through the site for vehicles i.e. delivery vehicles, forklifts etc. For potential uses which require a relatively flat site it would be possible to import material to raise levels and flatten the site. However, the cost of importing material and undertaking the re-profiling operation would be significant.

3.6 We understand that levelling works were undertaken when the site was concreted for the mushroom factory, however, should the concrete be removed we anticipate that site levelling/ stabilising works would be required for the majority of uses.

**Large Vehicles and HGVs**

3.7 Due to the unclassified local nature of the roads in the surrounding vicinity of the site and Shackleford itself it is considered that any increase in the number and volume of HGV related movements would be inappropriate.

3.8 In general, it has been determined that large articulated vehicles would not be able to easily negotiate the site accesses within the land owned (which is demonstrated in subsequent sections) and as such any land use which requires the use of such vehicles would not be appropriate.
3.9 Off site, the junction of Elstead Road and Peper Harow Lane has been noted as having poor visibility due to the steep gradient along Elstead Road itself. This intersection in particular does not lend itself to an increase in the frequency or volume of either HGV or large vehicle movements due to the geometric constraints that currently exist.

3.10 Moreover, large vehicles, such as articulated lorries, will experience difficulties in completing turning manoeuvres through this junction and as such may be required to stop and manoeuvre within the junction itself. This is a hazardous manoeuvre and will increase the chance of a conflict occurring at this location as other road users may not have sufficient time or road space to avoid the obstruction.

3.11 For a residential development, larger vehicles would only be required in the form of refuse vehicles and potentially some delivery vehicles during development. It is envisaged in both instances that vehicles would make infrequent trips to the site. For the construction vehicles, the adverse effects would be minimal, and even then, would only arise during the construction period. If required, where appropriate, smaller vehicles could be used to minimise the adverse effects on the surrounding roads and environment.

3.12 For the ongoing refuse collection, these are not considered to be additional trips to the local network. Shackleford itself and the surrounding properties are all served by a refuse collection every Tuesday. It is therefore envisaged that, subject to agreement from the Council, the same refuse collection will serve the mushroom farm thus not increasing the number of refuse vehicle trips in the local area.

3.13 As demonstrated in the Transport Assessment report produced by JNP Group, the junctions within the immediate vicinity of the site all operate well within acceptable levels of capacity during the existing situation. The traffic count surveys commissioned and utilised in the junction assessments demonstrate that during the previous situation which included an operational mushroom farm, the surrounding roads experienced generally low traffic volumes.

3.14 The traffic surveys that were commissioned as part of the Transport Assessment demonstrated that the mushroom farm site usage generated 160 vehicle trips during the 12 hour period represented by 07.00-19.00 hours. During the hours of the traffic surveys, a total of 15 HGVs accessed the mushroom farm.

3.15 Where applicable throughout this report we have sought to test the likely effect of alternative uses on the existing road network in comparison to the mushroom farm.

3.16 The costs of undertaking the necessary works to deliver the site for an alternative use greatly affects its economic viability.

3.17 Given the bespoke nature and condition of buildings and the site’s configuration it is likely that all of the alternative uses considered within this report will require some form of site or building preparation either in the form of repair, refurbishment or demolition of part or all of the existing buildings, excavation and removal of concrete / hard standing, replacement of topsoil and / or site levelling.
3.18 The extent and therefore cost of work depends on the alternative use being considered.

**Refurbishment of Buildings**

3.19 Those buildings which are not bespoke for mushroom farming have the potential to be re-used for either storage or light industrial related uses. However, as detailed in the Hurst Warne report, substantial work would need to be undertaken to render the buildings suitable for the market.

3.20 In the absence of detailed information as to which buildings could be retained, it is only possible to estimate the likely costs of refurbishment at this stage. According to the Building Cost Information Service (BCIS), costs to refurbish light industrial accommodation lies in the region of £530 per m² (£50.00 per ft²). This cost does not however include the cost of reconfiguring the site or providing power which are likely to be necessary for an end user. The total costs are therefore likely to exceed this amount.

3.21 We understand from the Hurst Warne report and from recent supporting conversations with Hurst Warne and other agents in the area, that the take up for new and refurbished accommodation in the local area is low.

3.22 The local market is characterised by a high supply of new and newly refurbished properties relative to the rural nature of the area, so the low demand serves to compress the rental values of poorly located sites, assuming a rental is achieved at all. This situation is further exacerbated as a result of the current unstable national market conditions and is evidenced more recently by another key site in the vicinity which has received limited interest and remains on the market today after a number of months, see particulars in **Appendix 4**.

3.23 Given the refurbishment costs combined with the location and transport constraints discussed elsewhere in this report and supply of alternative, more suitable sites, we believe that the re-use of the existing buildings does not present a viable option for the future use of the site.

3.24 In light of the limited potential for re-using the existing buildings on the site, as detailed above, it is our view that the majority of alternative uses will require the buildings on the site to be demolished.

**Demolition and Site Clearance Works**

3.25 Where possible Wates have obtained quotes for work which is likely to be required for alternative uses. Where this is not possible, due to further detailed site information being required, we have estimated the likely cost. These are detailed below:

- **Demolition** - Wates have obtained a quote for carrying out the demolition and clearance of the site which is estimated at £395,000. A copy of the quote, from Sloane Demolition, is contained in **Appendix 5**.

- **Excavation of Concrete** – based on advice from our Construction Consultancy team at DJ in the absence of a detailed analysis, it is estimated that the likely cost of ‘breaking up’ the concrete hard standing will be in the region of £15 - £20 per m² (£1.40 - £1.85 per ft²). The approximate area of concrete as provided to us by Wates is 22,260 m² (240,000 ft²). Therefore the estimated cost for excavation the concrete is circa £335,000 - £445,000.

- **Concrete Removal** – Spon's Architects' and Builders' Price Book 2009 (Davis Langdon; 134th edition) estimates the cost of removing concrete from the site using lorries travelling no greater than 13km and including land tax to be between £19.00 - £21.00 per m³ (£0.54 - £0.60 per ft³).
Wates have informed us that the volume of crushed concrete on the site is in the order of 5,615m³ (198,300ft³). The estimated cost for removing concrete is therefore around £107,000 – £118,000. It is however possible that some of this cost could be offset by the re-cycling of concrete for the alternative use.

**Levelling/ Stabilising** - As noted earlier, in addition to the previous costs, we anticipate that site levelling/ stabilising works will be required for the majority of uses, in particular those necessitating the use of heavy goods vehicles. It is not possible to estimate the cost of these works until the concrete is removed and the volume of soil is ascertained, however, it is anticipated the costs will be significant.

3.26 It is evident from the summary above that Shackleford site has substantial potential site preparation costs **upwards of circa £830,000** to take it to the position of being redeveloped. Any potential alternative use will therefore need to generate sufficient value to overcome these costs in order to bring development forward.
4. Assessment of Uses

4.1 The following section reviews each of the alternative uses considered, drawing upon our own experience and research into specific sectors as well as discussions with operators and agents active in the relevant markets and Government Policy.

4.2 In order to ensure the relevance, appropriateness and suitability of the uses considered, Guildford and Waverley Borough Council’s were provided with a draft list of alternative uses ahead of assessment to ensure this report addressed all areas comprehensively. As a result, a number of potential uses were added and others removed.

4.3 For ease, the alternative uses are addressed in alphabetical order as outlined below:

1) Abattoir 12) Hotels
2) Assembly and Leisure (D2) 13) Non Residential Institution (D1)
3) Car Auction Centre 14) Nursery
4) Caravan and Campsite 15) Residential Institution (C2)
5) Car Boot Sales 16) Residential Mobile Home Site
6) Cemetery/ Crematorium 17) Retirement Housing
7) Education 18) Secure Residential Institution (C2A)
8) Garden Centre 19) Storage and Distribution (B8)
9) Golf Driving Range 20) Waste Disposal and Re-cycling
10) Gypsy and Travellers
    Accommodation 21) Youth Hostel/ Field Centre
11) Holiday Lodges

1) Abattoir

4.4 In assessing the site’s potential for redevelopment as an abattoir, we have contacted SEEDA, DEFRA, Dreweate Neate (agents who compiled a Report on Abattoir Provision in the South East Region of England in October 2000) Lee Booth Partners (independent consultants to the meat processing industry), and a number of local operators.

The Site

4.5 A 2.83 ha (7 acre) site such as Shackleford is capable of accommodating a small to medium sized abattoir.

Location

4.6 Abattoirs are subject to frequent two way traffic flows and therefore require direct access to a local road network of sufficient capacity and access to the wider road network.

4.7 An abattoir necessitates the use of large vehicles, mainly for the transportation of animals. As referred to in Section 3 of this report we
consider there to be significant constraints on the site in this regard. Our Highways consultant comments as follows:

"Due to the access requirements for large vehicles and the increase in the number and frequency of HGV movements over the mushroom farm or residential uses the site accesses are not judged suitable for accommodating the traffic movements associated with an abattoir. Additionally, any increase in the frequency and number of HGV or large vehicle movements on the local road network is not desirable given the rural nature of the roads in the immediate vicinity and the constraints of the local junctions which are all small priority intersections and would struggle to safely accommodate any increase in large vehicle movements".

4.8 Accessibility for staff is also an important consideration. We understand from Hurst Warne that when the site was previously a Mushroom Farm, the owners had difficulty attracting staff to the site due to poor transport links and the poor proximity and diversity of local amenities. A small/medium sized abattoir would require 40-50 staff and based on our knowledge of the site, we consider recruitment of this number of staff would be challenging.

Economic Viability

4.9 In 2000/2001 a number of reports identified significant problems associated with the abattoir/meat processing market. Business mergers and consolidations had resulted in a shift towards large scale operations which resulted in small to medium sized abattoirs requiring subsidies or closing altogether.

4.10 The lack of small to medium sized operations was identified as having a detrimental effect on the agriculture and meat processing industry, resulting in increased journey times for animals, quality of service, specialist skills and a reduction in quality of the cuts of meat.

4.11 Following these conclusions substantial public funding was secured and, the small to medium sized facilities expanded, so much so that SEEDA now considers the market to be saturated, particularly in the Surrey area.

4.12 There are currently two medium sized abattoirs within a 10 mile radius of Shackleford - Chitty’s in Guildford and Turners in Farnborough, therefore it is unlikely that operators will be acquiring in the area.

4.13 There are a number of costs attributable to building an abattoir on the site these include: improvement of site access for heavy goods vehicles, access to main sewers, treatment of effluent and, the need for a large, independent electricity supply which we understand would be costly to address at the subject site.

Planning

4.14 Whilst an abattoir may be considered an essential facility serving agricultural use of Greenbelt land, it is not classed as an agricultural use in planning terms so it therefore constitutes inappropriate development. By its very nature, it would be more suitably and sustainably located at or close to a transport nodal point.
4.15 In addition, the frequency of HGV traffic movements generated by an abattoir coupled with the noise, odour and public health issues, whether these are real or perceived, are likely to give rise to strong local opposition.

Environmental

4.16 The level of control over animal slaughter and meat preparation is considerable and is a major contributor to the capital and running costs of abattoirs. Even so, noise and air pollution from vehicle movements and possible odours from the animals could still arise.

Conclusion

4.17 We do not consider that the development of an abattoir on the subject site presents a viable option. This is on the grounds of limited demand, poor accessibility (by road and public transport) and the significant site preparation costs required relative to the perceived lack of demand for a new facility in the locality.

2) Assembly and Leisure (D2)

4.18 The D2 use class encompasses the following broad range of uses;

- cinema, concert hall, bingo hall dance hall, swimming bath, skating rink, gymnasium and areas for indoor or outdoor sport or recreation, not involving motor vehicles or firearms

The Site

4.19 The site meets the necessary size requirements for most Assembly and Leisure facilities.

Location

4.20 Whilst Assembly and Leisure is a broad category spanning a number of land uses and activities, the underlying fact is that unless there is good access to, and provision of, public transport, such uses will facilitate a significant increase in private vehicle movements within the locality. As discussed earlier in this report, public transport access to the site is low and certainly insufficient for this use.

4.21 The nearest train station is at Godalming, some 3.5 miles away. A bus service operates within walking distance of the site, with services between Guildford, Aldershot, Farnham and Godalming, however the service is irregular and does not offer a night service nor a service on Sunday’s or Bank Holidays. This impacts greatly on operators requiring good proximity to the general public and good access for a workforce which is dependant on non-car modes.

Planning

4.22 Indoor assembly and leisure uses are defined as town centre uses in PPS6 Planning for Town Centres to which a sequential approach to site selection must be applied. We consider that it is reasonable to assume that should such a use be proposed for the site, it would fail the sequential test given that there are more sustainable locations available within or on the edge of existing urban areas.

Environmental

4.23 Such uses often require large and utilitarian buildings which would have a significant adverse effect upon the Greenbelt/ AONB. Other characteristics
of such uses include extended opening hours, catering facilities and external illumination, advertising etc, which would not be acceptable in a rural area or consistent with the surrounding uses.

4.24 Despite our reservations regarding development of assembly and leisure facilities on the site we have been asked by the Council to consider the following outdoor sport and recreation uses.

**Arts & Crafts**

4.25 An Arts and Crafts centre in a remote location such as Shackleford would require an appropriate attraction to create tourist/customer demand, (e.g. an existing or historic cottage industry, association with a local artist, or a tourist attraction).

4.26 Arts and Crafts businesses are often associated with cottage industries or operated from character buildings – Shackleford does not carry with it any such associations or buildings and therefore any such facility on the site would operate from a new building.

4.27 Viability will be a key issue in considering potential redevelopment. Arts and Crafts based activities do not tend to generate sufficient turnover/income to cover the investment costs which would be required to construct and create a suitable and attractive premises for the operation of an Arts and Crafts business. Additionally this type of business operation is often subsidised by means of a third-party. We therefore do not believe that a business in this location is sufficiently viable or would be able to secure funding to cover both the site purchase and substantial development costs of building a facility on the site.

**Horsiculture**

4.28 There are two types of horsiculture use, those which purely exercise horses/ provide pasture and those which provide riding instruction.

4.29 There is a high availability of both Greenbelt and agricultural land in the area which is available to exercise horses on for a reasonable cost. Therefore, due to the subject site’s high preparation costs we do not consider it could compete with these existing facilities.

4.30 Equally, pasture land yields low rental levels so the high preparation costs would make this use unviable.

4.31 We have therefore concentrated on the viability of a ‘riding establishment’ which is defined as:

> ‘the carrying on of a business of keeping horses to let them out on hire for riding, or for use in providing instruction in riding for payment, or both.’

4.32 We understand that a licence, issued by the Local Authority, is required for such an activity.

4.33 We have not held discussions with the relevant Local Authority and cannot therefore comment as to whether or not a licence would be granted for a riding establishment at Shackleford.

4.34 There are currently more than ten licensed riding establishments in the Borough of Guildford and six in Waverley (please see the map at Appendix 6).

4.35 Similarly to other horsiculture uses, a ‘riding establishment’ requires a significant element of turfed area. For this to be provided at Shackleford,
demolition, concrete removal, topsoil replacement and turfing would be required, the substantial costs of which are detailed in Section 3 of this report.

4.36 Based on this, we believe that a riding establishment would not generate sufficient end value to afford the site preparation costs of development at the site. Equally given the availability of more ‘oven ready’ Greenfield sites within a relatively small geographical area, we believe that demand for development of a riding school on the site will be limited.

**Fishing Lakes**

4.37 Due to the nature of works required to create lakes, it is relatively common for new facilities to populate redundant aggregate sites, where the ground is effectively already excavated.

4.38 Creating a lake on site ‘from scratch’ at Shackleford would incur considerable excavation and landscaping costs (in addition to those detailed in Section 3) and as such would present a large upfront cost for what will be a relatively low rental value once complete.

4.39 Furthermore, we would question the demand for a fishing lake in this location, given that there are four established facilities within 5 km (8 miles) of Shackleford, namely: Gold Valley Lake, Albury Estate Fisheries, Frensham Trout Fishery and Shillinglee Coarse Fishery.

**Paintballing**

4.40 In discussing the site’s characteristics and location with potential operators, interest was low due to competition from existing facilities in the area, the sites physical constraints and the cost of preparation.

4.41 From our own research and initial discussions with the UK Paintballing Sports Federation and a number of operators we understand that companies typically require sites in excess of 2.83 ha (7 acres), with areas of varied terrain (including woodland areas) and good access to public transport. The site at Shackleford does not meet these requirements.

4.42 Operators usually rent sites which require little preparation, for example unused scrub and woodland, and for this reason and those stated above the Shackleford site would not be an appropriate location for a paintballing use.

**Conclusion**

4.43 On the basis of its rural location, which does not provide the necessary population catchment, Shackleford is not a suitable location for Assembly and Leisure and recreational activities.

3) Car Auction Centre

4.44 In order to assess the viability of Shackleford for a car auction or car showroom contact was made with British Car Auctions Limited (BCA), who operate 21 sites in the UK, and Autohouse Associates, a property firm specialising in the motor trade.

**Site**

4.45 A representative from BCA advised that the company would not consider sites of less than 6 ha (15 acres) due to the amount of space required for the following activities;

- the unloading/ loading of car transporters, (nearly 100% of their cars for auction are delivered by this means);
n the parking of cars to be auctioned;

n parking for visiting dealers and the public; and

n auctioning space.

4.46 In terms of size we were advised that the 2.83 ha (7 acres) of developable land available at Shackleford could accommodate a small auction operation however, it is considered to be too small in scale to generate optimum revenue for operators.

Location

4.47 A site’s proximity to a motorway or dual carriageway is a key consideration to enable efficient and easy delivery of vehicles to a site efficiently. Visibility is equally important should the auction centre comprise a retail or car showroom element. This is not provided at Shackleford.

4.48 A car auction centre also requires the use of large articulated delivery vehicles for the transport of stock. As discussed previously in this report there are significant constraints on the site in terms of site access geometry.

4.49 It is clear that the land owned would not provide sufficient site access for large articulated vehicles and as such could not meet operator’s requirements.

4.50 Additionally, as highlighted in Section 3, any increase in the frequency and number of large articulated vehicles on the local road network is not desirable given the rural nature of the roads.

Economic Viability

4.51 BCA operate Europe’s largest car auction centre at Blackbushe Airport in Camberley. This is less than 20 miles from Shackleford and would provide a superior facility than the relatively small operation that could be developed on the subject site.

4.52 Given the current economic climate it may be fair to say that rising oil prices and economic uncertainty is having a significant effect on the auto trade industry. Although it is difficult to predict the long term effect this will have, we consider that businesses are unlikely to be unwilling to commit to new operations at present.

4.53 Taking into account the potential lack of market demand and the site constraints noted above, we believe operators are unlikely to consider sub-prime sites such as Shackleford as a car auction location.

Planning

4.54 A car auction would be inappropriate development in the Greenbelt. The scale of activity, size and appearance of any building(s) required, security lighting and traffic generation are likely to render such a use unacceptable on policy grounds.

Conclusion

4.55 We do not consider a car auction to be a suitable use at Shackleford due to the site’s limited road access, combined with the articulated vehicles necessary to transport cars, and the lack of market demand, due to the limitations of site size.
4) Caravan & Campsite

4.56 In considering the suitability of the site for use as a caravan and/ or campsite, we contacted the Camping and Caravanning Club who own a large number of sites around the country.

Site

4.57 The Camping and Caravanning Club suggested that a 2.83 ha (7 acre) site would be suitable for 90 – 100 pitches. Of these, 40-50 would be on hardstanding and 65% would need to have their own electricity supply.

4.58 A new site would also require motorhome service points, an amenity block and a reception building. In addition a level site would be preferable to house larger vehicles.

4.59 The quality of site and highway access is an important consideration. Site access must enable cars towing caravans, and motorhomes to enter and leave safely and easily.

4.60 A Swept path analysis has been carried out for the motorhomes and car towing caravans, see drawings S81408-Sk-031, 32, 35 & 036 in Appendix 7. Whilst it is possible for these vehicles to negotiate the site accesses within the land available, the manoeuvres would require use of the full width of the access roads and wide swinging vehicle tracks on the existing road network.

4.61 The swept path analyses undertaken for the 4x4 and twin axle caravan vehicle represent the worst case scenario for the site accesses and in particular the movements at the junction of the site access with Peper Harow Lane. The movement demonstrating a vehicle turning right out of the site access onto Peper Harow Lane requires the vehicle to cut across the site access for inward vehicles and also requires the manoeuvre to start a significant distance back from the junction itself. Such a manoeuvre would increase the chances of a conflict between other road users as the visibility along Peper Harow Lane would be hampered for the vehicle turning out of the site access and would also reduce the chances of the vehicle being seen by other road users travelling along Peper Harow Lane.

4.62 Similar situations occur for the analyses undertaken using the car with a caravan attached and the motorhome vehicles whereby the vehicles have to begin the manoeuvre from further back on the access road thereby reducing visibility for both the manoeuvring vehicle for other road users travelling along Peper Harow Lane.

4.63 It is therefore judged that the site accesses are not suitable given the relative frequency of movements that would be made by such vehicles in association with a caravan or campsite land usage.

Location

4.64 A key consideration is the quality of local amenities. The Camping and Caravanning Club confirmed that access to a range of local amenities is an important factor and suggested that, given the rural nature of Shackleford there would be insufficient demand to support a new campsite.

Economic Viability

4.65 In order to house a camping and caravanning facility extensive site works would be required and therefore significant costs would be incurred, as...
detailed in Section 3 of this report. On top of this the site would need to provide on-site amenities at an extra cost.

4.66 Due to the seasonal nature of the tourist industry, caravan and camping facilities are not generally high turnover businesses. As such they are generally located on surplus farmland for example.

4.67 The lack of amenities within Shackleford, coupled with the fact that the area is not a tourist destination will result in low income generation.

4.68 The combination of high development costs and low returns render development of the site for this purpose unviable.

Planning

4.69 If used for recreational or leisure purposes, a camping or caravan site could be considered an appropriate use of the Greenbelt, depending upon circumstances e.g. whether the caravans are static/fixed. However, in terms of both Greenbelt and AONB policy, the main factor to consider will be the visual impact of both permanent buildings and other structures. On this basis, we consider that any such use, other than as a camping site only, would be unacceptable.

Conclusion

4.70 Due to the high site preparation costs of developing a caravan and campsite relative to the level of likely turnover (the nature of caravan sites are not high value generators) and concerns over highway safety, we do not consider this would be a viable and therefore realistic development proposition at Shackleford.

5) Car Boot Sales

4.71 Based on our experience of land for car boot sales we are aware that a Council issued licence is required to hold a car boot sale. However, given the sensitive nature of this report, a discussion with the relevant authority to ascertain whether or not this would be granted in this location has not been undertaken.

Site

4.72 Car boot sales by their very nature can be held on sites as small as local car parks and as large as farmers fields. It is therefore considered that the subject site’s size is acceptable for this use.

Location

4.73 The site is some distance from a population centre and lacks any visual prominence so is difficult to locate. It would therefore require substantial advertising and signposting, at an additional cost, and is unlikely to acceptable in a Greenbelt/ AONB location.

4.74 Whilst no traffic survey data was obtained for the Mushroom Farm usage over the course of a weekend the interrogation of the TRICS database demonstrates that during the 12 hour period between 07.00 and 19.00 hours a total of 3,085 trips are likely to be generated by a 250 pitch car boot sale. Such a volume of trips would have an adverse effect upon the capacity of the roads and junctions within the vicinity of the site. The peak hour represented by 10.00 – 11.00 hours would experience a total of approximately 1,045 vehicle movements. This very high number and intensity which would put a great deal of pressure on the surrounding roads...
and junctions in this quiet, rural area in relation to their operational capacities.

**Economic Viability**

4.75 Car boot sales are part-time and seasonal in nature and therefore not generally considered as a high value generating use. As such they are generally held as a dual use with other established uses such as car parks, schools and recreation grounds.

4.76 Due to the limitation on the frequency of sales taking place, the use would not generate sufficient revenue to cover the purchase of the Shackleford site, undertake demolition of the buildings and improve other necessary access works.

**Conclusion**

4.77 Based on the limited revenue of a car boot sale, illustrated by the fact that most sales take place on sites with a secondary income yield, we do not consider car boots sales to be value generating enough to cover the cost of site purchase and preparation. It is not therefore an economically viable use for the subject site.

### 6) Cemetery/ Crematorium

4.78 In considering the subject site’s alternative use as a cemetery or crematorium, we have contacted a number of operators active in the local market including Brookwood Cemetery and Guildford Crematorium and Cemeteries. We have also referred to guidelines provided by the Local Authority Cemetery Order, 1977 (LACO).

**Site**

4.79 The subject site’s size provides for a relatively small sized cemetery with additional space allocated for separate burial space, roads, landscaping, services and amenities. Provision of a crematorium in isolation would require less site area.

4.80 The development costs of a crematorium and a cemetery will be high. A crematorium will require demolition of existing buildings together with access and landscaping improvements. A cemetery will require the removal of all hard standing. All of the aforementioned site preparation works are in addition to the cost of developing the facility.

**Location**

4.81 The LACO guidelines provide criteria for locating a cemetery or crematorium. They state that the roads need to be easily accessible and that public transport is required - Shackleford falls short on these two criteria.

4.82 The site is surrounded by residential properties and the development of a cemetery/crematorium is likely to generate significant local opposition. This is dealt with in further detail below.

**Economic Viability**

4.83 There are a high number of private, Council and church run cemeteries within the Guildford / Godalming area. These include Brookwood and Guildford Crematorium and Cemeteries, the Park Crematorium and Woking Crematorium (illustrated on the plan attached at Appendix 8).
4.84 Privately run Brookwood is the largest facility in the local area and we understand this has sufficient burial provision for the next 300 years. In contrast, Guildford Cemetery has provision for only the next 10 years and is currently investigating the potential for further provision.

4.85 Assuming there is demand for additional burial or crematorium space, we still do not consider the subject site presents a viable development proposition because of the delay required in bringing the land forward for development.

4.86 In summary the Environment Agency, requires that land under consideration as a burial ground is subject to one year's worth of ground testing. Equally the planning process is likely to be protracted given the perceived level of public opposition.

4.87 Should the site remain dormant this will present significant costs to the landowner not only in maintenance costs but also in terms of security (the presence of water tanks means a minimum of two staff are required on site). These costs will need to be recouped by the landowner through the sale of the land, thus further adding to the already high cost of developing out the site.

**Planning**

4.88 Although not specifically a planning matter, cemeteries and crematoria are disliked by local residents and this may lead to potentially significant local opposition and delay. This is likely to further affect the viability of the site.

**Environmental**

4.89 Local opposition may be based upon concerns about fumes and/or particulates arising out of crematoria operations.

**Conclusion**

4.90 Although privately run cemeteries and crematoriums generate significant revenue, given the high costs to develop, the potential for local opposition and the fact that other cleared sites with less preparation costs are likely to be considered more favourably, we do not consider a cemetery or crematorium to be a viable development proposition for the site.

**7) Education**

4.91 The key reason for the inclusion of Education use in the list of alternative sites relates to a previous approach by Roger Bunnett, a director of Shackleford Mushrooms, to Aldro School, the private preparatory boys school located at the end of Peper Harow Road. An approach which the Council are aware of.

**Aldro School**

4.92 The letter contained in Appendix 9 outlines the reason for the approach and Aldro School’s response.

4.93 To summarise, Aldro School were approached to ascertain whether it was interested in acquiring part or all of the land when the Mushroom Farm closed in order to meet its long term aspirations to build additional school facilities.

4.94 After much consideration from its Board, Aldro School declined the offer on the grounds of distance from the site and health and safety (i.e. there was concern over children, aged 7-13 years, crossing Peper Harow Lane to get to the site).
4.95 In recent conversations, the Headmaster of Aldro School has indicated that the position has not altered in relation to a requirement for the site for additional facilities; however, he would be in favour of the site being developed for key worker accommodation in order to attract teachers to the school.

Other Local Schools

4.96 We are informed that there is a need for additional school places at both infant and junior level however we understand that there is not a need for a new school facility in the area but simply a contribution to allow existing schools to increase their capacity.

4.97 In relation to school facilities for existing state schools in the area, it is considered that the schools are located too far from the subject site to utilise the land. In addition, whilst we have not been in a position to speak directly to the local schools, it is envisaged that they would find similar issues to those outlined by Aldro School which would make the site an expensive and unlikely option for them to consider.

8) Garden Centre

4.98 We have consulted national agents who specialise in garden centres and are commonly retained by operators to assist in acquiring new sites, to ascertain the potential for development of this use. We have also contacted national and local operators direct.

Site

4.99 A site of 2.83 ha (7 acres) would be sufficient to house the larger garden centre formats such as Wyvale or Dobbies. These generally comprise a main retail unit (anything from 2,800 - 9,300m² (30,000 – 100,000ft²), additional franchise units, café facilities, surface car parking and traffic infrastructure such as a roundabout and servicing roads. Smaller formats tend to occupy sites of circa 0.8 – 1.0 ha (2.0 – 2.5 acres).

4.100 All formats of garden centres require access for large articulated vehicles which as outlined previously, the subject site is not appropriate for.

4.101 An initial trip generation assessment has been undertaken to determine the likely number of vehicle trips that would be generated by a Garden Centre. JNP Group has based the trip generation calculations upon an average store size of 4,650m² (50,000ft²).

4.102 Vehicle trips have been calculated to represent a weekend and weekday scenario for both a peak hour and 12 hour period.

4.103 On a typical weekday, it is likely that a Garden Centre of 4,650sqm in size will generate approximately 2,478 vehicle trips during the period 17.00-19.00 hours. During the weekday AM peak (08.00-09.00), there would be approximately 23 arrivals and 5 departures which is likely to reflect staff arriving at work. The PM peak (17.00-18.00) sees a significant increase in the number of vehicle movements associated with a Garden Centre whereby 19 arrivals and 57 departures occur. This is to be expected as it is appreciated that visits will often be made to a Garden Centre during the evening and after work.

4.104 During a typical day at the weekend, a Garden Centre would generate approximately 6,146 total trips over the 12 hour period represented by 07.00-19.00 hours. During the weekend peak hour, represented by 14.00-15.00 hours, there would be approximately 477 arrivals and 437 departures resulting in a total of 914 trips.
4.105 Whilst no information is held for the number of vehicle movements associated with the mushroom farm usage during a weekend, 160 trips were counted during weekday operation which can be seen to be a peak for that site usage. Therefore a Garden Centre will generate a significantly higher amount of vehicle movements than the mushroom farm usage and would therefore have an adverse effect on highway safety in the local vicinity due the large number of vehicle movements associated with a Garden Centre site use of the site.

4.106 JNP Group believes that the addition of 6,146 vehicle trips onto the local road network would not be appropriate. Whilst it is accepted that there are no major capacity issues relating to the junctions tested as part of the Transport Assessment for the mushroom farm usage or the proposed residential development the addition of 6,146 trips on a typical day at the weekend will have a negative effect on the operation of these local junctions, which have always been exposed to relatively low volumes of traffic.

4.107 Furthermore, all formats of garden centres require access for large articulated vehicles and large vehicles for deliveries, the constraints of the site accesses are discussed in Section 3.

4.108 Due to the access requirements for articulated and large delivery vehicles and the increase in the number of HGV movements over mushroom farm or residential uses the site accesses are not judged suitable for accommodating the traffic movements associated with such a land use.

4.109 Additionally, the trip generation undertaken for a Garden Centre usage has shown that the site accesses junctions will become heavily trafficked. The combination of this substantial increase in vehicle movements coupled with the swept paths required by the larger vehicles (see diagram SK-020 in Appendix 7) required for delivery purposes means that the site accesses are not suitable for a Garden Centre land use.

Location

4.110 National and local garden centre operators generally require visibility from a main road however this is not essential.

4.111 A road network which is sufficient enough to support both the volume and nature of traffic from customers and deliveries is however required and concern was expressed from all the agents/operators we contacted regarding the vehicular access to the site.

4.112 Retail uses such as this require access to a local labour pool and as documented in the Hurst Warne report the site is poorly served by public transport and is remote from centres of population which will impact on the desirability to work at the site.

Economic Viability

4.113 The viability of a garden centre on the site depends on the amount of retail square footage achieved. New build formats of both national and regional operators tend to require a minimum of 2,800m² (30,000ft²). However, a number of operators have reservations as to whether or not the road network and public transport provision can support this scale of operation.

4.114 Formats of a more appropriate scale already have a local presence and are therefore unlikely to generate sufficient income to cover the costs of development.
Planning

4.115 Garden centres (as opposed to nurseries) are considered inappropriate development in the Greenbelt since the primary use is retail and not agriculture. Whilst in overall terms the amount of built development required to accommodate a garden centre may be less than currently exists on the site, this scale of retail operation would generate significant amounts of HGV, staff and visitor traffic, which would have an adverse effect on the capacity, operation and safety of the local highway network and rural location.

4.116 The remoteness of the site from population centres and the dearth of public transport links within the area further support our view that alternative sites within the area are likely to provide more suitable locations for this use.

Environmental

4.117 The noise and air pollution associated with the high level of traffic generated by a large garden centre in a remote location would not be acceptable.

Conclusion

4.118 In order to generate sufficient revenue to cover the site’s development costs a garden centre at Shackleford would need to be of such a scale that it would be unsustainable in terms of traffic generation and planning. We therefore consider this to be an unsuitable alternative use for redevelopment at the site.

9) Golf Driving Range

4.119 Whilst the Local Authority has indicated that this use is unacceptable on planning grounds, for completeness, we have investigated the requirements of driving range operators to see whether or not the Shackleford site would be suitable.

Site

4.120 Based on discussions with operators, we understand that the site is too small to accommodate their requirements for a full length driving range. In addition, its remote location in Shackleford as well as the site’s east-west axis would also act as a significant deterrent to potential users.

4.121 From a site levelling perspective, this also presents a possible deterrent, with a level site being essential for this use. A considerable amount of earthworks as described in Section 3 would therefore be required in order to meet operator’s requirements.

Location

4.122 Most users travel to driving ranges by car and therefore ease of access is an important consideration. Despite Shackleford’s relative proximity to the A3, its situation amongst narrow country roads with their sub standard junctions would not provide a sufficient quality of access, certainly not for the large volume of cars associated with this use.

4.123 From a traffic capacity perspective, an estimate of trips generated by a golf driving range with approximately 40 bays has been carried out (this represents the approximate number of bays which could be accommodated on site). This shows that during the 12 hour period between 07.00 and 19.00 hours on a typical weekday, a golf driving range site usage would
generate approximately 339 vehicle trips. This is a significant increase over the number of vehicle movements generated by the mushroom farm usage and consequently higher than a residential development.

4.124 Approximately 426 vehicle trips would be generated by a 40 bay driving range during the same 12 hour period during the weekend, which represents a significant generator of vehicle trips.

**Economic Viability**

4.125 Golf driving ranges in the vicinity include the Tri-Golf Practice Centre in Grayshott, Top Golf at Addlestone and World of Golf in New Malden.

4.126 Arguably there is scope for additional provision in the locality however our discussions with operators indicated their requirement for the following:

- 3.5 – 4.0 ha (8.5 - 10.0 acre) site
- Good visibility from a main road to attract passing trade
- Good accessibility
- Close proximity to a large catchment area

4.127 The Shackelford site does not meet these requirements and therefore operator interest will be minimal. Couple this with the costs associated with comprehensive demolishing and redevelopment works and the site as a golf driving range also becomes financially unviable.

**Planning**

4.128 Golf is an appropriate recreational use of Greenbelt land and therefore an acceptable use in principle. However, a driving range in such a remote location away from population centres could give rise to large numbers of car journeys over long distances. This would not be sustainable. Furthermore, a commercially viable operation would require evening use under floodlights and the resulting high level of light pollution would adversely affect the visual amenities of the Greenbelt and AONB.

**Environmental**

4.129 An important consideration is the requirement of operators for floodlighting. Whilst the site is well screened visually (by trees) they do not provide an effective barrier to light pollution which we consider would have a significantly detrimental effect on the amenity of neighbouring properties, (in particular those situated at the Shackelford Road entrance) and the Greenbelt/ AONB as a whole. As such we consider that floodlighting would be met with a considerable amount of local opposition and a strong planning objection, this in turn will affect the opening hours and therefore viability of the operation.

**Conclusion**

4.130 Due to the subject site’s level, size and remote location, operators would not consider Shackelford a suitable location for a golf driving range. Furthermore, the adverse environmental effect together with the detrimental affect on Shackelford Village and the surrounding area would not make it a suitable neighbouring use.
10) Gypsy and Travellers Accommodation

4.131 The Council requested that we investigate the potential of the site for gypsies and travelling showpeople. The two groups form distinct cultural categories with varying site requirements:

- **Gypsies** - characterised by a culture of nomadism and/or caravan dwelling, however increasingly occupy sites on a more permanent basis due to the health and education needs of dependents or those of old age. In land use terms the sites are classed as a residential use.

- **Showpeople** – historically showpeople utilise sites for 'winter quarters' for the storage, maintenance and repair of equipment and caravans, however, in a trend mirroring those of the gypsy community, increasing numbers require less seasonal occupation and a more permanent base for older family members and younger members to assist in their education. In contrast to gypsies, showpeople’s sites combine both residential and commercial uses, and their requirements are therefore for larger sites.

4.132 In assessing the suitability of the Shackelford site for the above we have referred to guidance issued by the Showman’s Guild of Great Britain, and the Department for Communities and Local Government. In addition we have spoken to representatives from the aforementioned organisations along with the Irvin Leisure Group, who purchase sites for travelling showpeople. We have also referred to the West Surrey Gypsy and Traveller Accommodation Assessment 2006 Report by the DCA.

**Site**

4.133 As stated above, showpeople generally require larger sites than gypsies.

4.134 The size of site required varies according to the number of families being housed. Guidelines from the Showman’s Guild of Great Britain advise that densities should not exceed 60 caravans per hectare (circa. 24 per acre) with a separate area allocated for the storage, repair and maintenance of fairground equipment. Although the equivalent guidance is not available for gypsy accommodation, given the similarity in nature of the residential uses, we have assumed that the same density provision will be required.

4.135 The number of families locating on a site can vary from one extended family to as many as 44, as can be found at the Plantation site in West Park Road, Newchapel Road, Near Lingfield. It is therefore considered that a 2.83 ha (7 acre) site could be a suitable size to accommodate either gypsies or showpeople.

4.136 The Showmen’s Guild of Great Britain gives guidance on site suitability. The key points are quoted in italics below, along with a comment in respect of the site at Shackleford.

- **The site should be relatively flat** - from an initial site visit we believe that the site levels are such that they could potentially restrict the movement of larger vehicles containing for example fairground equipment.

- **the site may have existing buildings located on it, which could be used for the storage, maintenance and repair of equipment** - there are existing buildings on site however as referred to in the Maurice Johnson report, these are either in a poor state of repair or have been purpose built for mushroom farming and would not adapt easily to other uses.

- **Where possible, every caravan and item of fairground equipment should stand on a hardstanding of suitable material** - the majority of the site is hardstanding and therefore suitable for the parking of mobile homes and in
particular the storage of heavy machinery. However, as referred to in the Maurice Johnson report, the sloped topography of the site is such that there is a risk of commercial vehicles grounding on site.

- ‘The site should provide amenities normally expected for human occupation’; - we understand that there is electricity, waste supply etc on the site but that it is limited to part of the site. We anticipate that the site would need investment in order to provide the level of servicing required to sustain residential use.

- ‘A mature and natural landscaping is of benefit’ - this is to protect the amenity of the surrounding uses. Planting may be required, which will necessitate the removal of areas of concrete and replacement of topsoil

4.137 Other key requirements include:

- ‘The site should have good vehicular access, suitable for the ingress and egress of large vehicles’.

4.138 The report then details a minimum road access width of 3.7m.

4.139 Whilst the proximity of the site to the A3 would mean that the site could be deemed suitable in terms of accessibility to the wider road network, the local road network in the vicinity of the site does not lend itself to the movements of large vehicles and fairground equipment that are associated with Gypsy and Traveller Accommodation as previously mentioned.

Location

- “The site should be close to schools and other community facilities”.

4.140 The site is in close proximity to Aldro School. However this is a boys only private school with fees ranging from circa. £14,000 - £18,000 for day or boarding rates respectively and so would have limited accessibility to the travelling community.

4.141 The nearest non fee paying schools at primary level are St Marys school and Greenoaks both of which are Church of England, and the non-faith Milford School. We understand there is limited capacity at Primary level in the area.

4.142 Rodborough Technical College and Broadwater School are the closest secondary schools. The Council have confirmed that Rodborough School is currently at capacity although we understand that Broadwater School has space. Further investigation will need to be undertaken in respect of likely numbers of pupils, along with transport provision from Shackleford.

4.143 On initial investigation, it would appear that there is limited capacity to house a significant influx of pupils in the schools surrounding Shackleford. However further detailed investigation would need to be undertaken to establish the potential numbers of additional pupils created by providing travelling accommodation on the site. The capacity of the schools should also be investigated again at a later date.

- “The site should be in close proximity to a good road network”.

4.144 Whilst the proximity of the site to the A3 would mean that the site could be deemed suitable in terms of accessibility to the wider road network, the local road network in the vicinity of the site does not lend itself to the movements of large vehicles and fairground equipment that are associated with Gypsy and Traveller Accommodation as previously mentioned.
Economic Viability

4.145 The Irvin Leisure Group confirmed that they have requirements for land in and around the Godalming area and the West Surrey Gypsy and Traveller Accommodation Needs Assessment stated that there are waiting lists for sites in the West Surrey area. With new family formation increasing year-on-year this demand is likely to increase.

4.146 Gypsies commonly rent from the Local Authority whereas a higher proportion of travelling showpeople owner occupy given their higher income and cultural emphasis on property ownership within this community. We would however question the affordability of Shackleford given the potential site preparation costs.

4.147 The level of income or capital available to gypsies or showpeople is unlikely to be sufficient to cover the costs of the works required to provide accommodation (the minimum being demolition of existing buildings, and the cost of purchasing the site). Other redundant sites with less preparation costs and better local amenities are more likely to be considered before Shackleford.

4.148 The situation with regards to the ability of gypsies and travellers to afford sites is recognised in West Surrey’s DCA Report which states that; ‘there may be no real ‘market’ in sites as supply is generally very limited and low income and local hostility to the travelling community may effectively restrict the ability of Gypsy and Traveller households to exercise a free choice in the accommodation market’.

Planning

4.149 Local Planning Authorities are required to make adequate provision for gypsy and travelling showpeople in their Local Development Documents (LDD’s). The site is not allocated in either Council’s LDD’s or their existing adopted Local Plans.

4.150 Where such provision is inadequate and additional sites/land is required to meet needs, the suitability of sites is to be considered in line with normal planning considerations for housing, including the site suitability criteria set out in PPG3 Housing.

4.151 ODPM Circular 01/2006 and DCLG Circular 04/2007 provide more detailed guidance. In particular, sites should not:

- dominate the nearest settled community (in this case Shackleford),
- must have adequate access to public transport and local services such as GP’s surgery and schools; and
- must not place undue pressure on local infrastructure.

4.152 In all cases, the presumption against inappropriate development in the Greenbelt applies and alternative sites outside the Greenbelt should be considered first. Sites within or on the edge of existing urban areas are to be preferred.

4.153 Local public opposition is not in itself sufficient basis for rejecting the use of the site unless it is based on sound planning reasons, but such uses will nevertheless result in strong local opposition given the size and nature of the local settled community.
Environmental

4.154 Specifically in relation to accommodation for travelling showpeople, this tends to combine residential use with business activities such as storage and vehicle/equipment repair. As DCLG Circular 04/2007 states;

‘The nature of travelling showpeople’s business often means that equipment repairs and maintenance are necessary which can have a visual impact and can create noise in the immediate surrounding areas’

and

‘The site should respect amenities of any occupants of residential properties nearby’

4.155 The use is therefore not considered to be an ideal neighbouring use to the Village and is likely to encounter significant local opposition.

Conclusion

4.156 We do not consider the site to be viable for gypsy and showpeople’s accommodation on the basis of economic viability, planning and environmental concerns, and the likelihood of significant local opposition.

11) Holiday Lodges

4.157 Holiday lodges - chalets, cottages or standard houses - are differentiated from permanent residential dwellings by conditions attached to the planning permission; typically these include a limit on the occupation of units to a restricted number of weeks.

4.158 In assessing the site’s viability for a development of holiday lodges, we have drawn on our own experience and the knowledge of those agents active in the local market.

Site

4.159 A 2.83 ha (7 acre) site would be of a suitable size to house a low density holiday lodge complex.

4.160 Development would require the demolition of existing buildings and is likely to require the excavation and removal of the hard standing. In addition site levelling, service provision and landscaping may also be required along with the building of accommodation – in effect the works required for residential development of the site.

Location

4.161 As with any holiday destination, the greater the attraction of an area e.g. through a tourist attraction or large town, the greater the demand for accommodation. Unfortunately Shackleford does not have the characteristics to provide such a draw.

4.162 From a trip generation perspective a development of 18 holiday lodges has demonstrated that this use is likely to produce lower traffic volumes than the mushroom farm and residential land uses.

4.163 However, a development of holiday lodges would involve an influx of guests who are not likely to live in the area and would therefore not be aware of the constraints of the surrounding road network. The nature of the
surrounding roads and junctions could therefore lead to an increase in conflicts between vehicles travelling around the locality.

4.164 Residents who live in the local area are fully aware of the nature of the local road network and the small junctions with tight turning radii and the visibility issues at junction level and as such are more likely to bear these factors in mind when travelling to or from their homes.

**Economic Viability**

4.165 As discussed above, we do not consider that Shackleford has the necessary characteristics to draw sufficient demand to warrant the development of holiday lodges in this location.

4.166 This point is well illustrated by the dearth of interest in Tilford Woods, a 2.02 ha (5 acre) holiday lodge park around 4 km’s (6.5 miles) from Shackleford, which provides 4-star self-catering accommodation in 33 lodges and has been on the market since 2007.

4.167 We understand that the current business is in administration and is having to let a high proportion of units for temporary residential accommodation, rather than as holiday lets – this further illustrates the lack of demand for holiday accommodation in the locality.

4.168 The development costs for holiday lodges would be comparable to those for a residential development, however the income and subsequent profit levels generated would be considerably lower. This would render any development economically unviable at Shackleford and is likely to deter developers from promoting this use.

**Planning**

4.169 Holiday homes or short let holiday accommodation would be classed as inappropriate development in the Greenbelt.

4.170 Since holiday lodges would not be occupied on a permanent basis they would contribute relatively little to the local community, and therefore this may provoke local opposition.

4.171 It is possible (and this is borne out by the Tilford Village example) that providing a holiday home scheme on site may be seen as a way of achieving permanent residential use “via the back door” and in turn avoiding the need to provide quality accommodation and contributions to infrastructure, affordable housing etc. Despite being a condition of any planning permission, the enforcement of these conditions is onerous and sometimes difficult to control.

**Conclusion**

4.172 We consider that the site’s remote location, coupled with the fact that there are no visitor attractions or large towns in the immediate vicinity, will render the site unsuitable for holiday lodges.

12) Hotel

4.173 In order to assess the viability of building a hotel on the site we have contacted a cross section of hotel operators and specialist agents, including:

- Agents - Hotel Solutions, Knight Frank and Humberts;
- Budget Operators – Travelodge, Premier Inn and Purple Hotels;
Mid-range Operators - Holiday Inn, Intercontinental, Crowne Plaza, Copthorne and Abode; and

Luxury/Niche Formats – Millennium and Jury’s Inn.

Site

4.174 An issue raised by all the hotel operators/agents was site access. Hotels necessitate the use of large vehicles such as coaches for visitors and HGVs / articulated lorries for servicing.

4.175 As stated in previous sections and discussed in Section 3 an increase in the number of HGV and other large vehicle movements is highly undesirable given the site access constraints and the rural nature of the local road infrastructure consisting of narrow road widths and tight junction radii.

4.176 Due to the hotel's requirements for large vehicles and the potentially large number of trips by cars it is clear that the site accesses will not be able to safely accommodate the traffic generated.

Location

4.177 As with holiday lodges hotel operators require existing amenities/attractions to create the necessary demand. Most operators including Millennium, Copthorne, Abode Hotels, Jury’s Inn and Ibis, will only consider city centre locations or those providing a specific ‘pull’ such as a tourist attraction or airport.

4.178 A number of operators across all formats have requirements in both Guildford and Godalming, however they all felt that the site was too far from these target locations to be of interest.

4.179 The Real Hotel Company advised that this was not a site which would be suitable for any of their hotel brands (2-4 star) as:

‘...there is no commercial market (office space) within the immediate vicinity’.

4.180 As such the location is only likely to attract overflow custom from nearby Godalming or Guildford when the existing hotels are fully booked.

4.181 Humberts Leisure stated the following with regards to location:

‘From what we know of operator requirements, we do not believe this area would be of interest to hotel operators. Firstly, there is a lack of corporate demand which all operators require for new build hotel sites as the site seems to be in a purely residential area. This fact combined with poor access and poor local amenities would put off operators from locating at this particular site’.

4.182 Knight Frank suggested that a ‘stand-alone’ rural location such as the subject site could command interest from niche hotel operators who provide facilities for weddings, conferences and leisure. However, staff and large vehicle access were specifically cited as issues which would significantly deter this interest. Also, by their very nature niche hotel operators tend to redevelop existing character buildings rather than build from new, therefore the subject site at Shackleford is unlikely to satisfy the requirements/market expectations of a country hotel.
4.183 Budget and mid-range hotels require close proximity and visibility to a main arterial road. Given these considerations, the subject site is located too far from the nearest primary road (A3) to provide an attractive location.

4.184 Accessibility to and for staff was also of primary importance to a number of operators. The site is remotely located and public transport is limited — there is no labour pool nearby and access is poor for workers who would need to travel from further afield.

4.185 In terms of buses, Shackleford is served by the number 46 bus route which provides a highly limited service in terms of frequency and operating times and there are no services on Sundays or public holidays. The closest railway link to Shackleford is at Godalming some 5.6 km’s (3.5 miles) away.

4.186 The Report on Potential Commercial Uses by Hurst Warne states that the previous occupiers of the site had severe difficulty in attracting staff to the site and consequently had to transport them from as far afield as Woking and Slough. Hotels are relatively labour intensive uses and therefore this issue is likely to be a severe constraint for any operator wishing to locate here.

**Economic Viability**

4.187 It is evident from the above that the site is likely to be unattractive to hotel operators and therefore unlikely to generate sufficient value for the site. This is further justified by the following comment from a consultant firm Hotel Solutions:

“In light of my understanding of local demand, travel patterns and existing supply, it seems to me unlikely that this is a location for a future hotel. If access to the site is challenging I am further persuaded.”

4.188 Overall, to justify value, a high density hotel development would be required which is unlikely to have sufficient demand to support its presence in location.

**Planning**

4.189 A hotel constitutes inappropriate development within the Greenbelt. Whilst it is possible that an economically viable hotel development would result in a reduction in the current floor space on site, we are not aware of any other benefits which would justify the planning argument for special circumstances and therefore a departure from current planning policy. Furthermore, it is likely that an economically viable hotel would generate a significant amount of traffic, creating additional pressure on local infrastructure.

**Environmental**

4.190 Noise and air pollution would arise from the potential increase in traffic generated by the use. There may also be additional noise created from amplified music if organised events were held in the hotel grounds which would adversely effect nearby residential properties.

**Conclusion**

4.191 As with holiday lodges, hotel operators would not be interested in locating in the Shackleford area due to its rural location, lack of a labour pool and insufficient infrastructure — it is therefore not a viable use for the subject site.
13) Non Residential Institution (D1)

4.192 The D1 use class covers a broad range of uses. The Use Classes Order defines it as follows;

‘Clinics and health centres, crèches, day nurseries and day centres, museums, public libraries, art galleries and exhibition halls, law court, non-residential education and training centres, places of worship, religious instruction and church halls’.

4.193 A high number of these uses are non-value generating, public sector funded or voluntary sector led facilities which require a minimum level of usage or patronage to justify their provision.

4.194 We have not held discussions with the relevant Local Authorities, however in our experience, we consider that such uses require a sustainable and accessible location such as a town centre as well as a sufficiently large catchment area. The lack of local population and the sites distance from major towns means that such facilities are likely to be unviable.

4.195 Given the above, we have not undertaken a detailed analysis of the likely traffic generation of these uses, however we anticipate that any increase would be beyond the capacity of the existing road network and be unsustainable, given the lack of public transport within the area.

Conclusion

4.196 The types of uses which fall within the D1 Use Classes Order category typically require proximity to a town centre, to provide the necessary population catchment. Given the rural nature of the subject site, this does not present a viable proposition.

14) Nursery

4.197 In order to assess the viability of Shackleford as a Horticultural nursery we have contacted a number of local operators and agents active in the horticultural market.

Site

4.198 The scale of a nursery operation and therefore the size requirement varies considerably. The range stated by those contacted ranged from 0.8 – 6.1 ha (2 - 15 acres) with a number of nurseries operating from a small section of the site with the remainder set aside for potential expansion.

4.199 A significant level of site works would need to be undertaken in order to prepare the ground for planting. The hard standing would have to be removed and the existing buildings on site demolished.

4.200 Expenditure could initially be reduced by retaining the hard standing on site however in the longer term this would create higher running costs through the requirement of containers and irrigation and drainage systems.

Location

4.201 A nursery necessitates the use of large articulated and rigid delivery vehicles for the delivery and transport of products.

4.202 Due to the access requirements for large articulated/rigid vehicles and the increase in the number of HGV movements over a mushroom farm or
residential uses the site accesses are not judged suitable for accommodating the traffic movements associated with a nursery.

4.203 Additionally, any increase in the frequency and number of HGV or large vehicle movements on the local road network is not desirable given the rural nature of the roads in the immediate vicinity and the constraints of the local junctions which are all small priority intersections and would struggle to safely accommodate any increase in large vehicle movements.

4.204 Nurseries are likely to require frequent deliveries of either stock or products such as compost, which also had to be sourced off-site for the mushroom farm usage and would require large European lorries to make the deliveries in a cost-effective manner, as outlined in John L Burden's report (Appendix 2).

**Economic Viability**

4.205 In contrast to garden centres horticultural nurseries tend to be locally established businesses, rather than national operations and retail space only forms a maximum of 30% of gross turnover. As such nurseries tend to be less profitable and therefore create a substantially lower land value.

4.206 There are a high number of nurseries in the area, (17 within an 8km (5 mile) radius) and it could be argued that the market has reached saturation point.

4.207 By their very nature these locally established businesses begin at a small scale and expand in a piecemeal fashion. As such, a number are not operating at site capacity and retain the ability to expand at a later date without incurring future acquisition and site preparation costs.

4.208 Should a new site be required either by the relocation of an existing established business or a new one migrating to the area, we believe that, given the site constraints and preparation costs detailed in Section 3, a nursery would not generate sufficient value to be a viable proposition for the Shackleford site.

**Conclusion**

4.209 As illustrated by the John L Burden contained in Appendix 2, any nursery facility will require a degree of site clearance. The high development costs associated with the subject site, combined with a high number of nurseries situated in the vicinity potentially affecting operator demand for sites, render Shackleford an uneconomically viable use for the site.

4.210 The site meets the size requirement of a nursery but in its present form is not suitable for alternative horticulture. This view is confirmed in the report by

15) Residential Institution (C2)

4.211 Under the Use Classes Order Residential Institutions are defined as follows:

   ‘Hospital, Nursing Home or Residential School, college or Training Centre where they provide residential accommodation and care to people in need of care (other that those within C3 Dwelling Houses)’.

4.212 Whilst this Use Class includes the provision of residential accommodation, this must be associated with one of the following:
Education / Training; and
Healthcare / Nursing.

Education / Training

4.213 In assessing demand, this category needs to be sub-divided into residential schools and colleges and residential training centres.

Residential School or College

4.214 We have dealt with school education earlier in the report and will use this section of the report to cover the adult education sector. It is understood that a residential school would need a minimum of 600-800 boarding/day pupils to make it commercially viable, which in turn would require a site large enough to accommodate a variety of buildings and sports fields.

4.215 We are aware of approximately 25 residential adult education colleges across the UK which specialise in short-stay courses.

4.216 All of the above are situated in historic buildings - for example, Higham Hall in the Lake District, Knuston Hall in Northamptonshire and Burton Manor in Cheshire.

4.217 Given that Shackleford does not provide a historical or character building, we do not consider that it would be an attractive proposition for operators.

4.218 Should a college wish to provide a new build facility, the high development and landscaping costs required to provide the necessary setting would prevent developers from selecting the site at Shackleford for this use.

Residential Training Centre

4.219 The Manor House is located on a 3.6 ha (9 acre) estate within 3.2 km’s (2 miles) of the edge of Godalming. It caters for a range of corporate clients (including the Bank of England, Syngenta and AXA Healthcare) by providing a mix of conference, leisure and first-class hotel facilities.

4.220 Given the proximity and wide range of facilities that Manor House offers, we believe it to be unlikely that a competing operator would wish to locate in the Shackleford area.

4.221 The provision of bespoke training centres has been declining steadily over a number of years with companies choosing to hire venues as and when required rather than holding freehold properties. In addition hotels provide a significant proportion of the facilities available in the market.

4.222 Couple this with the general savings which companies are attempting to make as a result of uncertain market conditions and we believe that there would be limited demand for a training facility at Shackleford.

Healthcare and Nursing

4.223 In order to assess the viability of developing a care home on the site we have spoken to several key operators including BUPA Care Homes and Sunrise Senior Living, to gain an understanding of their criteria for the selection of new sites.

4.224 Operators of care homes require sites in residential areas, close to or ideally on a main road and within walking distance of local amenities and public transport. Shackleford is a rural village, with few local amenities and would therefore deter developers of residential of care/ nursing homes.
4.225 Care homes are widely accepted as being one of the lowest generators of trips, and it is likely that a care home on this site would generate no more trips than either the mushroom farm usage or a residential development.

4.226 However, steep site gradients are particularly undesirable for care home site usage given the reduced mobility of residents, placing either half the site out of use or requiring significant earthworks to level the site.

4.227 All operators cited staff access as a critical consideration in their evaluation of potential sites. The Development Manager from Sunrise mentioned that their homes should be accessible to all staff by public transport. Given the paucity of bus service to and from Shackleford and limited times of scheduled services, we do not consider that Shackleford fulfils these criteria – a point which is reiterated in the Hurst Wame report (Appendix 2).

**Conclusion**

4.228 Despite being of a suitable size, the access constraints, limited public transport, lack of amenity provision and topography of the render the subject site unsuitable for redevelopment as a residential institution.

**16) Residential Mobile Home Site**

4.229 In order to understand the requirements for a residential mobile home site, we spoke to a number of operators active in the mobile home market.

**Site**

4.230 The quality of access to the site and in the local area is crucial for a mobile home operator in order to accommodate the large vehicles used to move the homes.

4.231 A residential mobile home site necessitates the use of large articulated transporter vehicles that would be required to deliver and position the mobile home units on site.

4.232 As concluded in Section 3 the swept path analysis of the site accesses shows that a large articulated transporter vehicles would not be able to negotiate the junctions.

4.233 The vehicles would also need to negotiate the roads and junctions within the vicinity of the site, which as described throughout this report, is not desirable given the rural nature of the local roads and junctions.

4.234 Also steep site gradients are undesirable for any site use that requires careful negotiation by potentially unstable vehicles, therefore significant earthworks may be required to flatten areas of the site for development to accommodate mobile homes.

**Location**

4.235 Despite Godalming and Guildford being sought after areas for tourist accommodation, the essential requirement for a mobile home park is access to public transport.

4.236 The predominant buyers of mobile homes are either families on low incomes or the retired and elderly ‘trading-down’ from a larger property. As such, the occupants of these parks do not necessarily drive or have access to a car, hence the requirement for easy access to public transport

4.237 There are no specific requirements for residential mobile home sites as far as prominence/visibility is concerned.
Economic Viability

4.238 Due to the limited public transport facilities at Shackleford, interest from those mobile home operators contacted was limited. Without operator demand, there would be no demand for the site to be sold for use as a residential mobile home site. It is therefore not an economically viable proposition for the site.

Planning

4.239 Mobile homes are classified as dwellings and so constitute inappropriate development in the Greenbelt. Unlike conventional housing, the use would not generate sufficient value to ensure a high quality development in keeping with its rural/AONB surroundings nor would it deliver any of the potential benefits associated with a conventional housing scheme. Therefore we consider it most unlikely that the planning argument for ‘special circumstances’ could be demonstrated for such a scheme.

Environmental

4.240 We are not aware of any unacceptable environmental effects from such a use.

Conclusion

4.241 We do not consider Shackleford a suitable site for mobile homes primarily because there is not the necessary demand for such a facility in the area and the local roads are unsuitable to carry large vehicles.

17) Retirement Housing

4.242 In assessing the viability of the site for retirement housing we have contacted a number of operators active in the market to ascertain their site requirements. Those contacted include, Sunrise Senior Living, Churchill Retirement Living and McCarthy & Stone.

Site

4.243 The size of site required typically ranges from 0.16 – 1.01 ha (0.4 – 2.5 acres). All of the operators contacted confirmed that a 2.83 ha (7 acre) site would be too large for their requirements.

Location

4.244 The location of a site is of primary concern to developers of retirement housing. They normally demand a maximum distance of 0.8km (0.5 miles) from local amenities and ideally require close proximity to local centre.

4.245 Both Churchill and Sunrise supported the general desire to be situated in a high profile location with easy accessibility to a main road and good public transport provision. Shackleford does not meet these criteria.

Economic Viability

4.246 Given the required criteria which operators demand it is clear that retirement housing would not be an economically viable proposition for the site.
4.247 In planning terms retirement housing is deemed as inappropriate development within the Greenbelt and the lack of local amenities within close proximity makes the site unsustainable for such a use.

Environmental

4.248 Retirement housing is unlikely to give rise to unacceptable environmental adverse effects.

Conclusion

4.249 Due to the site size being too large for most operators, combined with the inappropriateness of such a remote location, which does not provide sufficient amenities within walking distance, retirement housing does not represent a realistic development proposition for the subject site.

18) Secure Residential Institution (C2A)

4.250 Use Class Order C2A includes:

‘Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks.’

4.251 We consider that many, if not all of the above uses would draw strong opposition from local residents.

4.252 All of the stated uses require significant numbers of staff and the lack of public transport which Shackleford has will create a key constraint for development of this type on the site. In the case of the secure residential institutions, the problem is exacerbated by staff working shifts and requiring 24 hour access.

4.253 We also assume that the majority of these uses would require security floodlighting, which would create light pollution and negatively effect the amenity of local residents.

4.254 Broadway Malyan has in the past been commissioned by the Home Office to undertake a nationwide search for suitable sites to house secure institutions. Proximity to existing housing was one of the main limitations and in general, proximity to an existing secure residential institution considered an advantage of any site.

Conclusion

4.255 Whilst a remote site away from existing housing may be considered ideal, our research concluded that the most suitable way of meeting the need for new secure accommodation is to annexe it to existing secure sites. In this context, the Shackleford site does not satisfy this criteria.

19) Storage & Distribution (B8)

4.256 The arguments against the conversion of the site to B8 use can be found in the Hurst Warne report on the potential commercial uses of the site. However, we have also been asked to consider the possible use of the site for self-storage and open air storage purposes.
Site

4.257 We understand from agents in the market that potential sites for self storage need to meet the following criteria:

- A minimum of 0.24 ha (0.6 acres) in size (although many require 0.32 ha (0.8 acres)).
- Main road frontage and prominence.
- Be in densely populated areas (i.e. 100,000 people within a 10 minute drive).
- Freehold, although Leasehold will be considered.
- Ideally located near to other facilities e.g. retail parks, shopping centres, garden centres, supermarkets or fast food outlets.

4.258 The site at Shackleford satisfies only two of the four criteria – size and tenure.

Location

4.259 A storage and distribution operation is likely to require large articulated vehicles and large delivery vehicles to transfer goods between destinations further afield and the storage areas. As discussed in Section 3 of this report there are significant constraints on the site in terms of site access geometry.

4.260 Due to the access requirements for large articulated vehicles and large delivery vehicles and the increase in the number of HGV movements over a mushroom farm or residential use the site accesses are not judged suitable for accommodating the traffic movements associated with Storage and Distributions uses.

4.261 Additionally, the site would be subject to any increase in the frequency and number of large articulated or large vehicle movements on the local road network. This is not desirable given the rural nature of the roads in the immediate vicinity and the constraints of the local junctions which are all small priority intersections and would struggle to safely accommodate any increase in large vehicle movements.

Economic Viability

4.262 In terms of open air storage, the site could, if cleared, lend itself to the outdoor storage of, for example, building materials, plant, caravans or pallets, however the level of rental achieved for such storage is unlikely to cover the costs of demolition. As a result activities such as open storage are generally located on land surplus to requirements, rather than as the primary income generating use of a site.

4.263 Alternatively storage could be contained within the existing buildings on site. However, as outlined in Section 3, the cost to refurbish the buildings is significant in relation to market rent. Therefore, assuming a rental of the space could be achieved, it is likely that the revenue will not cover the cost of refurbishment.

Planning

4.264 B8 use is inappropriate development within the Greenbelt and justification for such a use through the demonstration of very special circumstances is difficult to envisage. To be viable, an enclosed storage use would involve the re-use of existing buildings or their re-provision by large and utilitarian structures, neither of which would be desirable. Furthermore, the site is in...
an unsustainable location for a storage and distribution use unless the use is required to meet a local need. The noise and light pollution generated from such a use is unlikely to be acceptable in a rural/AONB location.

Environmental

4.265 Any form of B8 use is likely to give rise to noise pollution. Open storage is likely to require some form of security lighting and a larger storage and distribution use may require floodlighting to allow for extended operating hours.

Conclusion

4.266 Based on the lack of potential revenue versus site preparation costs, combined with its un-suitability from a planning and accessibility perspective, we do not consider storage and distribution to be a suitable alternative use for the subject site.

20) Waste Disposal and Re-Cycling

4.267 There are various forms of waste management and recycling facilities, namely civic amenity sites, recycling, storage, transfer, materials recovery and processing facilities, open windrow composting, thermal treatment facilities and landfill and land raising.

4.268 For the purpose of this report we have concentrated on planning policy issues and, given the strong planning arguments against locating a waste disposal or re-cycling facility at Shackleford, have not investigated economic viability issues.

4.269 We have referred to current government and local policy in the form of Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10) and the Surrey Waste Plan 2008 (the Waste Plan) respectively. Both documents give guidance as to where to locate waste disposal and recycling facilities.

4.270 To summarise, both PPS10 and the Surrey Waste Plan state that, where possible, facilities should be located on existing industrial sites in urban areas with good links to major roads. Failing the availability of sites fulfilling these criteria, a sequential test is to be applied with Greenbelt land being the least favourable.

4.271 In the unlikely event that an industrial site in an urban area, was not available then sequential testing would be applied to Shackleford. Although meeting certain criteria, such as its previously developed status, the site falls considerably short on other criteria, in particular, the need for good transport links and road capacity, along with its situation within the Greenbelt.

4.272 The Waste Plan further states the need for very special circumstances if development is to be considered in the Greenbelt, (i.e. close proximity to a source of waste or an ideal situation within an extensive road network). Given the rural nature and location of the site at Shackleford, we do not believe it fulfils these criteria.

4.273 The Waste Plan then deals with specific policy relating to individual types of waste function.
Civic Amenity Sites /Community Recycling Centres

4.274 These are primarily for use by local residents to deposit items of household waste that are not normally collected by the weekly collection service, e.g. bulky waste items such as beds, cookers and garden waste.

4.275 Planning policy states that civic amenity sites are most appropriately located either at existing or proposed waste management sites, or in urban locations to reduce the distance householders need to travel to recycle bulky goods. To this end the Plan has identified a number of preferred sites for development, the closest to Shackleford being Martyrs Land in Woking.

4.276 Given the preference to be located in an urban area, the fact that there are already a number of allocated sites and that Shackleford does not meet the general guidance for locating waste facilities, we do not believe that Shackleford is a suitable location for a civic amenity site.

Recycling, Storage, Transfer, Materials Recovery and Processing Facilities

4.277 It is often necessary to bring together waste collected from a number of sources prior to transport to another location for treatment or disposal. This activity is undertaken at a transfer station. The principle being that this would reduce the overall affect from transport movements.

4.278 Recycling, recovery and processing facilities cover a wide range of technology types that might include a materials recovery facility, mechanical biological treatment plant, autoclave or an in-vessel composting plant. In essence, these facilities are expected to enable and to encourage waste to be used as a resource, and to recover materials that will be put to beneficial use.

4.279 The Waste Plan states that Planning permissions for development involving the recycling, storage, transfer, materials recovery and processing (including in-vessel composting but excluding thermal treatment) of waste will be granted:

(ii) On land that is, or has been used, or is allocated in a Local Plan or Development Plan Document, or has planning permission for industrial or storage purposes;

(iii) If the proposed development is at one of sites shown on the Site Boundary Maps, most notably, Horsell Martyrs Lane, Woking; and

(iv) At existing or proposed waste management sites, subject in the case of landfill and land raising sites or other temporary facilities, to the waste use being limited to the life of the landfill, land raising or other temporary facility.

4.280 Shackleford does not fulfil the above criteria and, given the general guidance on transport and its Greenbelt status, is unlikely to be selected on the basis of a sequential approach should additional sites other than those allocated be required.

Open Window Composting

4.281 Open windrow composting involves the raw material (usually green and/or garden waste and cardboard) being arranged outdoors in long narrow piles on a hard and preferably impermeable surface.

4.282 Open windrow composting has quite different land use implications to other techniques. Experience in Surrey has shown that problems with odour...
nuisance can develop where there is poor management and particularly where higher levels of throughput are attempted.

4.283 In considering any application for open windrow composting, Surrey County Council will seek advice from the Environment Agency in regard to the appropriate distance to be maintained between the proposed facility and housing. Any proposal less than 250 metres from a sensitive receptor, such as the curtilage of a dwelling, would require a risk assessment.

4.284 Given that the relatively low level of composting associated with the mushroom farm gave rise to complaint and concern over odour nuisance, we believe that the proximity to the dwelling houses to the subject site makes open windrow composting on a larger scale unsuitable as a neighbouring use and that this is more suited to land which is surrounded by open countryside.

Thermal Treatment Facilities

4.285 Thermal treatment is a general term used for waste management technologies designed to generate power, and often to recover heat, through the combustion of waste.

4.286 The Waste Plan policy specifically refers to allocated land for use as a thermal treatment facilities, the closest to Shackleford is land at Martyrs Lane, Woking.

4.287 Given the above, combined with the general policies in respect of waste and the likely level of local opposition, we do not consider a thermal treatment facility to be a suitable use for the subject site.

Landfill and Land Raising

4.288 Landfill and land raising as a means of waste management is a policy of last resort for the council and commonly used to either fill voids left by mineral working or, in the rarer case of land raising, to bring land on a steep slope into agricultural use.

4.289 Planning policy does not allow for the provision of facilities in excess of need. The report of the Assessment of Need for Waste Disposal and Management in Surrey, December 2003 considers there to be landfill capacity requirements for both inert and non-hazardous wastes until 2015.

4.290 Given the lack of demand for such a facility, the likely level of public opposition, the detrimental effect on the surrounding residential areas and the general principles of sequential testing and transport criteria, we consider Shackleford is not an appropriate location for a landfill or landraising facility.

Conclusion

4.291 There are various types of waste disposal and recycling facilities. As can be seen from the above, for a combination of reasons, such as the site’s rural location, accessibility and lack of proximity to the source of waste, the site is unsuitable for such uses. An additional concern common to all types of facilities is the high level of potential local opposition.
21) Youth Hostel / Field Centre

4.292 Drivers Jonas is retained clients for a number of national institutions who own and operate field / activity centres around the UK.

4.293 Such organisations tend to obtain the majority of land through benefactors rather than through acquisitions in the open market. In addition they informed us that they are not acquiring new sites at present.

4.294 Other potential end users could include the YHA, however we understand that they are currently disposing of a number of hostel facilities due to financial difficulties (related press articles are contained in Appendix 10).

4.295 A high proportion of field centres are owned by and/or run by County Councils as part of their Social Services portfolio. Those situated in Surrey include Juniper Hall in Dorking and Sayers Croft Field Centre at Cranleigh. We have not held discussions with the Council regarding potential demand or requirements and therefore cannot comment on the viability of these particular formats on the site.

4.296 From our experience in dealing with such facilities however, these are not profit run organisations and funds are unlikely to be available to cover the site purchase, demolition, removal of part or all of the hardstanding, landscaping and other development costs necessary to develop such a facility on the site.

Conclusion

4.297 By their nature youth hostels and field centres are not high income generating uses and tend to acquire sites through benefactors. As such, on their own financial merit, they would not cover the cost of what are likely to be significant site preparation costs. As such youth hostels and field centres do not represent a viable use for the Shackleford site.
5. Conclusions / Findings

5.1 Throughout this report we have sought to provide a detailed, balanced and fully reasoned view on the potential for alternative uses at the Shackleford Mushroom Farm.

5.2 It has become clear from this work that whilst a number of the alternative uses may appear suitable from a planning and physical perspective, their ability to meet with operators objectives and to deliver sufficient value to the land owner is not balanced.

5.3 The site as a mushroom farm was proved unviable both within the John Catt Report and John H Burden reports and as such the site was sold and has remained vacant for approximately 2 years whilst a planning consent is pursued. As you will appreciate, a redundant site creates material problems for both its owner, through the significant costs involved in securing and holding the site, and for the surrounding area, in the form of potential vandalism and the loss of opportunity to enhance the village in both physical and socio-economic terms. It is therefore in the interest of both Wates and the village of Shackleford to present a viable alternative use for the site.

5.4 It is evident from the report that the primary constraints to development on site are the cost of developing an alternative use on the site and issues relating to transport accessibility and location.

5.5 When considering an appropriate alternative use for the site the significant development constraints/ costs in the form of demolition, concrete removal and site levelling highlight the importance of scheme viability. It was evidenced within the Hurst Warne report that the existing buildings are unsuitable in their current form and that any alternative use would require a generous income to cover the development costs of the site and the cost of the site purchase. It is clear from this report that any use which may deliver this value, such as potentially large scale hotel or garden centres are not deliverable due to planning constraints, operator requirements or accessibility.

5.6 For some public uses considered across the site, such as Waste Disposal/ Re-cycling and Assembly and Leisure etc. there may arguably be scope for a public subsidy to bring about development on the site. It is however clear that Shacklefords rural location serves to restrict the suitability of these uses. For Assembly and Leisure, Shackleford’s location some distance away from a population centre, combined with the limitations of the road network and lack of public transport provision would deter market operators or the Council from locating there. For Waste Disposal/ Re-cycling, the Greenbelt location of the site, combined with its proximity to an affluent rural village is likely to make this use wholly un-suitable from a neighbouring use perspective.

5.7 Based on all of the uses considered throughout this report it is apparent that the site is at a disadvantage relative to other similar sites on the market. From the discussions held with operators and agents in the market it transpired that when comparing Shackleford to other sites on the market, Shackleford would appear low on the list and is therefore likely to remain redundant.

5.8 Wates’ preferred land use for the site is low density residential. Based on the work carried out in the report and our understanding of Wates’ proposals for the site, we consider that the proposals offer the most
suitable use in terms of enhancing the local area, from both a financial perspective, through S106 contributions and the inclusion of some low cost housing, and an environmental perspective through the beneficial effects on the local environment and the village of Shackleford as a result of a reduction in traffic movements compared to the site's previous use as a Mushroom Farm.

5.9 It is therefore our opinion that the most suitable use of the site is low density residential development.
6. Caveats

6.1 Any figures contained within this report are included in order to provide an indication of potential development value for alternative uses on the Shackleford Mushroom Farm site.

6.2 In preparing figures we have relied upon information provided by Wates Developments Ltd, JNP Consultants and Broadway Malyan, so advise that the figures are totally dependent on the accuracy of the information supplied and/or assumptions made.

6.3 Drivers Jonas’ figures are not formal valuations and under no circumstances should be relied upon as such.

6.4 The figures are specifically excluded from the provisions of the RICS Appraisal and Valuation Standards (The Red Book). They should not therefore be construed as a formal valuation for accounts or lending purposes, rather the figures represent our opinion on the range of disposal receipts that may be generated, on the basis of our planning and market analysis, and information provided as at October 2008.

6.5 In preparing these figures, where stated, it is assumed that no contaminative substances are present on the site or neighboring sites so as to affect the same. Further detailed investigation of the site would be required to determine the extent of such costs and their effects on residual land values.

6.6 Drivers Jonas LLP has not tested any of the services information.

6.7 The figures in this note are for the benefit of Wates Developments Ltd only and should not be relied upon by any third party. Consequently, no responsibility is accepted to any third party for the contents of this report.

6.8 Before the report or any part of it may be reproduced or referred to in any document, circular or statement, our written approval to the form and content of such publication must be obtained.