

30 July 2015

**Delivered by email and post**

Planning Policy Team  
Woking Borough Council  
Civic Offices  
Gloucester Square  
Woking  
Surrey  
GU21 6YL

Dear Sir / Madam

## **REPRESENTATIONS TO DRAFT SITE ALLOCATIONS DPD CONSULTATION**

We write on behalf of our Client, Prime Finance (JCo1) Limited, to submit representations to the draft Site Allocations Development Plan Document (“DPD”) consultation. The extent of land which our Client has interests in (the “Site”) is shown in the enclosed Site Location Plan. Our Client has exchanged unconditional contracts for the Site and is due to complete on the purchase on 12<sup>th</sup> August 2015. We welcome the opportunity to submit comments on the content of the publication.

The Site forms part of the allocation proposed by Policy UA51 of the draft Site Allocations DPD which comprises the wider redevelopment of West Byfleet District Centre. Our comments therefore respond to the policy insofar as it relates to the Site.

### **Policy Context**

The adopted Woking Core Strategy (October 2012) recognises West Byfleet as the second largest shopping centre in the Borough and its role as a transport interchange that connects the area with both Woking and other parts of the region. It is identified as a ‘District Centre’ where high density mixed-use development is encouraged. This is reflected by Core Strategy Policy CS3 (West Byfleet District Centre) which states that high density mixed-use development will be encouraged within West Byfleet District Centre to help the vitality and viability of the centre. The Council’s Employment Topic Paper, published in June 2015, specifically recognises that the Site “has potential for a mixed use development comprising commercial and residential uses” and considers it to be a ‘very sustainable location’.

The Woking Design Supplementary Planning Document (“SPD”) identifies at pages 60 to 62 that there is potential for further economic investment in the West Byfleet District Centre to strengthen its economic vitality. It therefore encourages the redevelopment of the Site comprising medium scale buildings (circa five to six storeys in height) in a clear block structure with good public space. Redeveloping the Site also provides the opportunity to enhance the streetscape and public realm.

9 Colmore Row  
Birmingham  
B3 2BJ

Paragraph 17 Bullets 8 and 9 of the National Planning Policy Framework (“NPPF”) encourage the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value, and promotes mixed use developments.

In light of national and local planning policy and our Client’s wishes to redevelop the Site, we support Policy UA51 (insofar as it relates to the Site), and the proposed mix of uses which comprises community (including retained or replacement library), offices, retail, leisure (including restaurants), residential development (including affordable housing) and hotel.

Consideration of the redevelopment of the Site is at a very early stage and it is our view that Policy UA51 should be sufficiently flexible to ensure the delivery of a viable scheme, which enhances the local environment, and meets the Council’s and the community’s aspirations for the Site. In this respect we are concerned that a number of the ‘key requirements’ of Policy 51 could be prohibitive, and ultimately compromise, the viability of redeveloping the Site.

## Viability

There is concern that the requirement to provide the equivalent existing office floorspace (Bullet two) could be prohibitive to the redevelopment of the Site. We are mindful of paragraph 22 of the NPPF which states that:

**“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose”** (underlining our emphasis).

Furthermore paragraph 23 of the NPPF specifies that planning policies should be positive, promote competitive town centre environments, and local planning authorities should:

**“...recognise town centres as the heart of their communities and pursue policies to support their viability and vitality”**.

Our Client’s intention is to provide a meaningful amount of office floorspace as part of any redevelopment of the Site; however should it be the case that the proposals include a net reduction in office we would seek where possible to offset this through the employment generated by the retail, hotel and leisure provision.

In the context of paragraph 23 there is also concern that the requirement for the provision of 40% on-site affordable housing (Bullet seven) could also be overly prohibitive to the redevelopment of the Site. Indeed we are mindful of the advice contained in National Planning Practice Guidance (“PPG”) which states that:

**“To incentivise the bringing back into use of brownfield sites, local planning authorities should: ...take a flexible approach in seeking levels of planning obligations and other contributions to ensure that the combined total impact does not make a site unviable”** (Paragraph: 019 Reference ID: 10-019-20140306).

The PPG goes on further to state that affordable housing contributions should “not be sought without regard to individual scheme viability” (Paragraph: 020 Reference ID: 10-020-20140306).

In light of the above we consider that Bullets two and seven could be subtly amended as follows to ensure that Policy UA51 includes sufficient flexibility to enable the viable redevelopment of the Site in accordance with the NPPF and PPG advice:

Bullet two: “***Existing office floorspace should ~~to~~ be re-provided within any redevelopment scheme, unless it is demonstrated that it is unviable to do so*”.**

Bullet seven: “***Contributions towards Affordable Housing provision, in this case 40% to be provided in-situ, unless it is demonstrated that it is unviable to do so*”.**

The supporting text to the policy would also need to be amended to reflect this.

## **Parking**

Policy UA51 requires the appropriate provision of car and cycle parking taking into account the Site’s sustainable location, and that car parking provision should not be reduced (Bullet 19). It is unclear whether the reduction in car parking provision is referring to the existing level of car parking at the Site, or the level of provision prescribed by the adopted Parking Standards SPD.

Mindful of Council’s aspiration to deliver a density in excess of 50-100 dwellings per hectare (Bullet nine) it is our view that the policy should include sufficient flexibility for reducing car parking provision below that prescribed in the Parking Standards SPD. It is our view that Bullet 19 could be amended as follows to provide this flexibility:

Bullet 19: ***Appropriate and adequate provision of car and cycle parking that takes into account the site’s sustainable location and the quantum of development, and will not compromise on highway safety;~~;~~ ~~(and comply All development should seek to comply with the Parking Standards SPD where it is appropriate to do so)~~. ~~Car parking provision should not be reduced and s~~Suitable provision for cycle parking should be provided”.***

## **Other Matters**

We note that Bullets 23, 32 and 33 repeat other bullets set out earlier within Policy UA51 and in this regard we would suggest that they can be deleted.

## **Summary**

We support the principle of Policy UA51 and its aims to deliver the redevelopment of West Byfleet District Centre. Our Client wishes to redevelop the Site identified in the enclosed plan for a mixed use development which enhances the local environment and meets the Council’s and the community’s aspirations. With some subtle amendments the policy will provide sufficient flexibility to enable the delivery of a viable development which will boost the vitality and promote the competitiveness of the wider District Centre, in accordance with national planning policy.

I trust that these representations will be given due consideration as part of the ongoing preparation of the Site Allocations DPD. Our Client would be pleased to meet with the Council to discuss further their proposals for the Site. In the meantime please do not hesitate to contact me should you require any further information.

Yours sincerely



Tom Armfield  
**Senior Planner**

