
Representations to the Woking Draft
Site Allocations Development Plan Document
Regulation 18 Consultation

On behalf of PegasusLife

July 2015

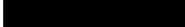
**REPRESENTATIONS TO THE WORKING DRAFT
SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT
REGULATION 18 CONSULTATION**

ON BEHALF OF

PEGASUSLIFE

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ANNEX 1- REVISED SITE PLAN

1.0 INTRODUCTION

- 1.1 These representations have been prepared on behalf of PegasusLife in respect of the allocation 73 Horsell Moor (hereafter referred to as 'the site') comprising a site area of 0.18 hectares in Woking Borough Council's Regulation 18 Draft Site Allocations Development Plan Document.
- 1.2 The site is allocated under policy UA27 for residential development of at least 16 dwellings with affordable housing at a density of 75 dph. These representations principally support the allocation of the site for high density residential development but seek specific reference to the retirement housing element of the C3 use class as a potential use of the site. This would recognise the delivery of retirement accommodation to meet the need of the Council's own evidence base. The contribution towards Affordable Housing must take into account that the development will provide specialist accommodation to meet the needs of the elderly, and vacant building credit for the existing buildings on the site. There is also a need for the site area to be enlarged to encompass a total of 0.29 hectares to reflect the land over which PegasusLife has control.

PegasusLife

- 1.3 PegasusLife is a specialist developer, on a mission to re-invent retirement housing. Employing the best award-winning architects, engineers, interior and landscape designers, as well as thought-leaders in the field, the company is developing exemplar communities in desirable locations throughout Britain and Ireland.
- 1.4 The company's central idea is that everyone, irrespective of age, shares the aspiration to live in a beautiful designed, socially inclusive environment, supported by first class services and maintenance regimes.
- 1.5 PegasusLife does not follow a 'cookie cutter' approach; preferring instead to adopt a nimble, flexible stance in the application of ideas to meet the specific attributes of the environment within which each project is located. The creation of caring, safe and secure environments, which promote healthy living and wellbeing, lies at the heart of these plans.
- 1.6 PegasusLife provides high quality apartments for the active retired, and is an independent company based in Winchester. The company research, acquire, plan, design, construct, market and sell apartments, and have a defined business strategy to achieve growth by expanding the number of developments, soundly based on the high level of quality and attention given to its Owners' needs.

2.0 ALLOCATION OF SITE UA27- 73 HORSELL MOOR, HORSELL GU21 4NL

- 2.1 The site proposed to be allocated under draft policy UA27 has a site area of 0.18 hectares. PegasusLife have control of a larger area of land than is currently proposed to be allocated as illustrated on the site location plan attached as **Annex 1** to this document. The enlarged site encompasses a portion of land which is allocated under policy UA27 of the Site Allocations Development Plan Document (SADPD) as part of the adjacent timber yard. As a consequence of this enlargement, the site has an area of approximately 0.29 hectares. The site is located in Horsell, 0.15km north-west of Woking Town Centre. The closest bus stops are located 200m to the north of the site and to the south is a footpath offering access to Woking Town Centre.
- 2.2 PegasusLife proposes to construct 37 retirement apartments on the site which are an age restricted (C3) residential use.
- a) Policy Overview
- 2.3 Policy UA27 allocates the site for at least 16 dwellings at a density of 75dph. The policy also seeks provision of 40% affordable housing on the site along with a Sustainable Urban Drainage System to reduce runoff rates to Greenfield levels, improvements to the quality of the public realm and appropriate levels of car parking provision.
- 2.4 The National Planning Policy Framework (NPPF) requires that Local Plans can only be found to be sound if they meet the following criteria:
- **Positively prepared**- based on a strategy to meet objectively assessed development and infrastructure requirements
 - **Justified**- the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
 - **Effective**- deliverable over its period
 - **Consistent with national policy**- enabling the delivery of sustainable development in accordance with the policies in the Framework.

b) Density

- 2.5 Policy CS10 of the Woking Core Strategy (WCS) (adopted October 2012) outlines housing distribution and densities across the Borough. This policy sets indicative densities within Woking Town Centre at in excess of 200 dph, and infill development within the rest of the urban area at 30-40 dph. This will make the total provision of at least 4,964 net additional dwellings in the Borough between 2010 and 2027. This policy acknowledges that the density ranges are indicative and will depend on the nature of the site, influenced by design in order to make the most efficient use of the land.
- 2.6 Paragraph 58 of the NPPF requires Local Plans to develop robust and comprehensive policies that set out the quality of development that will be expected for the area. These should be based on an understanding and evaluation of its defining characteristics and should aim to ensure to optimise the potential of the site to accommodate development. These points are an intrinsic part of good design which in turn is a key aspect of sustainable development.
- 2.7 The draft allocation site is identified as being able to yield a total of at least 16 dwellings at a density of 75 dph. The site area identified as part of the policy allocation is 0.18ha, to achieve a yield of 16 dwellings on the site is equal to a density of 89 dph, clearly above the 75 dph stated in the policy.
- 2.8 The site, although not located in the Town Centre, is located 0.15km from it. The site itself is populated and neighboured by industrial buildings, with a Builder's Merchants adjacent to the western boundary and with other commercial / industrial scale units further to the west. The local area is therefore not characterised by the medium density residential uses typical of more suburban areas. Given the scale of the neighbouring buildings, the established commercial character of the local area and the sustainable location, the site could accommodate high density development without causing harm to the established character of the local area.
- 2.9 In supplement to this, the proposed specific use of the site for retirement accommodation would provide the opportunity to further increase the density of development due to the reduced need for car parking provision within retirement development, coupled with the sustainable transport links to Woking Town Centre.
- 2.10 PegasusLife have already undertaken significant pre-application discussions with the Local Planning Authority with regard to the redevelopment of the site for retirement accommodation. Response from Officer's has indicated support for a scheme at a higher density than that allocated in the SADPD.

2.11 Based on the above, it is therefore considered that given the specific nature of the proposed use of the site and the prevailing character of the local area, the density of development on this particular site should be increased. A density range of 120-130 dph is considered to be appropriate in this location for retirement apartments which would achieve the most efficient use of the brownfield land whilst at the same time reflecting the local development pattern.

c) Retirement Housing

2.12 WCS Policy CS13 (Older People and Vulnerable Groups) confirms that the Council will support the development of specialist accommodation for older people and vulnerable groups in sustainable locations. It further states that the Council will allocate specific sites through the Site Allocations DPD (SADPD) to assist in bringing suitable sites forward to meet identified needs.

2.13 Paragraph 50 of the NPPF states that Local Planning Authorities must plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as.... Older people).

2.14 Paragraph 21 of the NPPG was updated on 26th March 2015. It now requires that plan makers consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they wish. The NPPG identifies that supporting independent living can help to reduce the costs to health and social services and provide more options for older people. Local authorities are required to identify particular types of housing as part of the assessment of future need for specialist older person accommodation. The WCS makes no such assessment due to the fact that it was adopted in October 2012; however, as recognised above, defers the allocation of sites to the SADPD.

2.15 Paragraph 5.96 of the WCS forecasts growth in the proportion of older people and older person households, and estimates that around 5,000 more people aged 65+ will live in Woking Borough by 2026. No analysis has been made by the Borough Council with regard to the type of accommodation that is required to meet the needs of the elderly and how this might be met.

2.16 The Woking Annual Monitoring Report (December 2014) confirms that during the monitoring period 1 April 2013 to 31 March 2014, no new older people accommodation was completed within the borough.

- 2.17 In the context of the above and the existing and increasing future levels of need, it is clear that Woking is likely to be underserved by specialist housing for older people.
- 2.18 The current Adopted Core Strategy and Draft Development Management Policies DPD lack any great detail on targets. Policy CS13 of the WCS states that specific sites for older people and vulnerable groups would be allocated through the SADPD. There is only one such site (GB16) identified within the SADPD which makes specific reference to housing for the elderly as part of a larger redevelopment of a strategic site. It provides no indication as to the amount of older person accommodation or what form this may take. It has not been demonstrated and considered unlikely that this one site would provide sufficient accommodation to meet an identified need for a greater level of new housing provision for older people, as required by paragraph 50 of the NPPF and paragraph 21 of the PPG.
- 2.19 The site is controlled by a specialist retirement housing provider. In light of the recognised need for accommodation for the elderly the site should be specifically allocated for this type of housing to ensure this need is positively met, consistent with national policy and the adopted Core Strategy.

d) Affordable Housing

- 2.20 Policy CS12 of the WCS establishes the overall target for affordable housing at 35% of all new homes. All new residential development on previously developed (brownfield) land providing 15 or more dwellings are expected to meet the requirement of 40% of the dwellings to be affordable.
- 2.21 In accordance with the above, Policy UA27 of the SADPD requires the provision of 40% of the dwellings on the site to be affordable. In this particular case, the development of retirement accommodation would meet the needs of a particular group for which there is an identified under provision of accommodation. In addition, there are existing industrial buildings on the site which will be unoccupied and vacant when the site is available for redevelopment. A vacant building credit should therefore be applied and a financial credit offered when calculating the affordable housing contribution. The requirement for 40% affordable housing provision on the site would not reflect the circumstances and realities of the site in this context. The policy should be flexible to allow for the fact that if the site is redeveloped for specialist retirement accommodation the affordable housing requirement arising is likely to be met through a financial contribution towards off-site provision the quantum of which, whilst having regard to the 40% policy target, will also have regard to the viability of the proposals and to the fact that the Vacant Building Credit would apply.

e) Site Area

2.22 Policy UA27 identifies the site area as being 0.18ha which is reflective of the fact that at the time the site was allocated no contact had been made with the site owner. The area of land within the control of PegasusLife measures 0.29 hectares and encompasses an area of land which forms part of the site allocation UA27. This land is located to the south western side of the site currently identified in policy UA27. A plan indicating the revised site area is attached as Appendix 1 to this document. Policy UA27 also allocates land for residential use and therefore altering the policy under which the site is allocated would not affect the total number of deliverable dwellings over the plan period.

3.0 SUMMARY

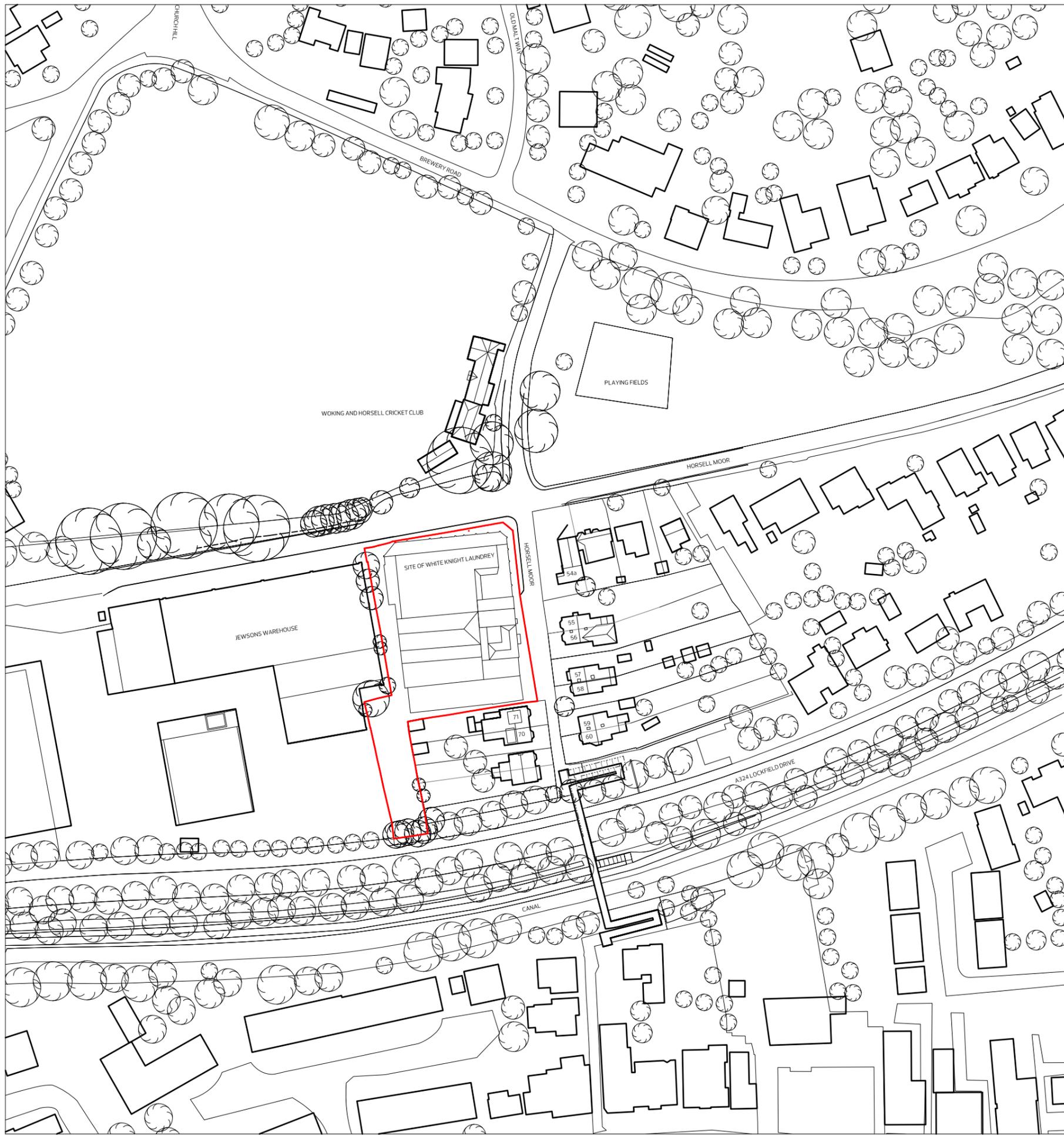
3.1 PegasusLife supports the allocation of site UA27 for high density residential development which makes most efficient use of this brownfield land without compromising elements of good design, including the need to reflect the character of the local area. PegasusLife also supports the Council's key priority to make sure that there is sufficient and adequate provision of housing to meet the needs of all sections of the community, including older people. However, the SADPD currently does not make significant allocations for housing for the elderly to meet the needs of the growing population of the elderly and therefore this site should be allocated specifically for residential development for retirement accommodation. Policy UA27 should be reworded as follows:

This 0.29 hectare site is allocated for residential development, with a preference for a development of retirement accommodation of approximately 37 dwellings. This 0.18 ha site is allocated for residential development, including Affordable Housing.

- **Core Strategy Policy CS10 provides an indicative density range for infill development within the rest of the urban area of 30-40 dph. Taking into account the existing built form on the site and its accessibility, a development density of 120- 130 dph ~~75 dph~~ is recommended for the site.**
- **Contribution towards Affordable Housing taking into account that the development will provide specialist accommodation to meet the needs of the elderly, and vacant building credit for the existing buildings on the site. ~~Contribution towards Affordable Housing provision in accordance with Policy CS12: Affordable Housing of the Core Strategy, in this case 40% to be provided in situ.~~**

3.2 In addition to the above, the site allocation plan should be amended to reflect the increased site area which PegasusLife controls.

Annex 1- Site Location Plan



— Site boundary. Application Area.

Location Plan - Scale 1:1250 - A3 Paper Size

PI	TBC	Planning Issue
Rev	Date	Description
Revision:		P1
Status:		PLANNING
<p>NOT FOR CONSTRUCTION DO NOT SCALE FROM DRAWING NOTIFY ARCHITECT IMMEDIATELY ON DISCOVERY OF DISCREPANCIES</p>		
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Project No:	1000	
Project Name:	HORSELL MOOR	
Drawing Name:	Location Plan	
Scale:	1:1250 @ A3	
Date:	09/07/2015	
Drawing No:	1000_001	