

our ref: **SOC/Q30195**

email: [REDACTED]

date: 31 July 2015



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

By Email: [REDACTED]

Dear Sir,

WOKING LOCAL DEVELOPMENT DOCUMENTS – SITE ALLOCATIONS DEVELOPMENT PLAN 2015
FORMER WOKING GAS HOLDER STATION, BOUNDARY ROAD, WOKING, SURREY
REPRESENTATIONS ON BEHALF OF SCOTIA GAS NETWORKS

We are instructed by Scotia Gas Networks (SGN) to submit details of the former Gasholder site located on Boundary Road, Woking, for consideration as part of the Woking Local Development Documents Site Allocations Development Plan Consultation July 2015 to ensure that the interests of the company are maintained; to ensure that we can be party to further consultations; and to enable the future development capacity of the site to be realised should the opportunity arise.

As such we now submit representations to the Local Development Documents Site Allocations Development Plan Consultation July 2015, in accordance with the specified consultation timescale which terminates on Friday 31th July 2015, 5pm. These representations are made with specific regard to the former Gas Holder site albeit the wider approach to development within Woking is commented upon. The wider development context is important, as it is recognised that the former Gas Storage site has an impact on the development potential of surrounding land uses by virtue of the restrictions set out in the HSE's land use planning methodology (PADHI).

We are aware that the site is allocated within an Employment Area of the adopted Core Strategy (July 2011) therefore this submission seeks to identify material considerations which promote a variation to this adopted allocation, and policies which support this allocation.

This submission does not in any way propose closure or retraction of the Hazardous Substance consent but seeks to ensure that there is the appropriate flexibility should this happen over the life of the plan. Consideration of the development capacity of this site by Woking Council as part of the emerging Site Allocations DPD is therefore now considered prudent.

a) Background

The site is approximately 0.65 hectares in size and is located within Monument Way West Industrial Estate comprising a small scale industrial and business park offering light and service industry and office uses. Terraced housing is located to the south of the site with medium rise Local Authority flats beyond.

The site was formerly used as a gas works which previously held a large gas holder. This has now been demolished albeit the former gas holder hard standing (pad) remains. The site derives its main access from Boundary Road.

Given the previous uses of the site, there are certain requirements upon SGN to remediate the site. These works, alongside dismantling of associated infrastructure, can result in significant costs, which in turn require value from future land uses to fund this process.

SGN is undergoing a strategic review of its portfolio owing to the OFGEM requirement to decommission obsolete terranean gas storage facilities in favour of a subterranean pipe network. This will result in a number of gasholder sites across the UK becoming available for development over the next 5-7 years and certainly within the development plan period. As such we believe that Woking Council should be proactively planning for this event.

b) Current adopted Woking Core Strategy and Proposals Map

The site is located within an Employment Area of the adopted Woking Core Strategy proposal map (July 2011), whereby employment uses (Class B) will be sought in accordance with Core Strategy Policy CS15: Sustainable Economic Development.

Core Strategy Policy CS15 identifies that the Council may permit the redevelopment of B use sites for alternative uses that accord with other policies in the Core Strategy where (i) the existing use of the site causes harm to amenity and/or (ii) it can be demonstrated that the location is unsuitable for the needs of modern business.



Adopted Core Strategy Proposals Map Extract (July 2011)

-  Scheduled Ancient Monument
-  Special Area of Conservation
-  Thames Basin Heaths Special Protection Area
-  Zone A of the Thames Basin Heaths Special Protection Area
-  Urban Area
-  Urban Open Space
-  Employment Area
-  High Density Residential Area

We are concerned that the Council has not given due regard to the significant costs related to the dismantling of associated infrastructure and decontamination of the site which thus would require uses of sufficient value to ensure the redevelopment of the site is viable.

c) Adopted National Planning Policy Framework

The adopted National Planning Policy Framework (NPPF), published in March 2012, seeks to avoid an unhealthy role-over of employment land allocations and recognises the clear need for viable developments to come forward to avoid stymieing brownfield development sites.

In particular, Paragraph 22 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. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

It is essential that the site is allocated for uses of sufficient value to ensure that redevelopment is viable, taking into account the significant abnormal costs of these enabling works. There are well rehearsed substantial costs related to the dismantling of associated infrastructure and decontamination of the site which prohibit traditional Class B employment uses from being viable alternatives. Therefore any approach which seeks the long term protection of this site as an allocation for employment uses when there is no reasonable prospect of the site being used for that purpose would be contrary to the adopted NPPF.

SGN are currently reviewing their site portfolio and recognise the development capacity of the former gas holder site at Boundary Road. As a result, the alternative future use of the site should be considered within this Plan.

The NPPF in addition requires Local Planning Authorities to pay careful attention to viability and the costs of development, to ensure that plans and site allocations are deliverable. Paragraph 173 states:

“To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

Paragraph 173 adds further weight to the need for the emerging Woking Development Delivery DPD to consider the viability of development, and in particular infrastructure contributions and standards to enable development to be deliverable.

The Woking Local Development Site Allocations Development Plan Document review needs to accord with paragraphs 22 and 173 of the adopted NPPF.

d) Emerging Site Allocations Development Plan Document July 2015

The current Draft Site Allocations Development Plan Document July 2015 allocates the site under Policy UA35 for redevelopment for industrial/warehousing, for road infrastructure in the form of a fourth arm to the Sheerwater link road.



Subject to appropriate remediation measures, SGN are currently working to make the site available for redevelopment. The material change in circumstance in respect of SGN's intent for the Gasholder site now needs to be reflected within the emerging Site Allocation Development Plan.

As such the following revisions should be undertaken. We object to this allocation based upon its failure to comply with the adopted NPPF paragraphs 22 and 173. As such we consider that the site should be de-allocated from this allocation under Policy UA35 and therefore this policy should not apply to the former Gas Holder Site.

We proposed that the site should be zoned as "white land" to allow for any future development proposal to ensure that the site is not stymied from future development potential, as is currently the case, or for other mixed use development including retail. Redevelopment for alternative uses would also remove the HSE PADHI zone limitation on surrounding development opportunities and therefore have a cumulative effect on development capacity in this location, a positive benefit to adjacent land holdings.



The site does not provide any permanent employment opportunities at present and its appearance does not make a positive contribution to the appearance of the area. Furthermore, as the site is bounded by a well-established residential area to the south, redevelopment for industrial/warehouse uses may cause harm to residential amenity.

These representations deal principally with the issue of land use, albeit do not preclude our ability to make representations pursuant to other development control matters in due course.

We would welcome the opportunity to remain informed about the outcome of this consultation process and any future consultation proposals and would be grateful if you could please contact

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Yours sincerely,

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Stephanie O'Callaghan
Planner