

### Representations to the Woking Borough Council Site Allocations DPD

These representations are made on behalf of Prime Place Developments Ltd and be:here Ltd, and relate to Draft Policies UA44, UA45 and UA46 of the Site Allocations Development Plan Document (DPD).

#### Policy UA46: Somerset House, Heathside Crescent, Woking, GU22 7AG

##### **OBJECT**

We are generally supportive of the site allocation at Somerset House for a mixed use development to comprise of offices and residential, including affordable housing. However, we would suggest that this is amended to include reference to a *'residential-led'* mixed use scheme having regard to the overall housing need the Borough faces and the particular focus for housing growth in Woking town centre. We would also suggest that references to offices are only in the context of *'ancillary'* provision and that *'ancillary retail'* provision is referenced. Finally, we would suggest reference to *'high density development'*, as encouraged by Policies CS1, CS2 and CS10 of the CS.

##### Bullet point 4

The wording too restrictive as it does not recognise financial viability or opportunities to discuss on-site / off-site provision with the Council on a case-by-case basis, in accordance with Policy CS12 of the CS.

The importance of this flexible approach is emphasised by the number of recently consented high density town centre schemes providing an affordable housing commuted sum. Furthermore, this same approach was agreed in the extant consent on the nearby St Dunstan's which provided a sum of £879,870 to cover the off-site affordable housing requirement.

##### **Suggested change**

We recommend that bullet point 4 is amended to read: *"Contribution towards Affordable Housing provision to be provided subject to viability and discussions with the Council, in accordance with Policy CS12 of the Core Strategy."*

##### Bullet point 5

Extant planning consent exists for 91 dwellings on the nearby St Dunstan's site which would result in a density of 433 dph. This is arguably a more constrained site than Somerset House. However, the policy states that densities should be *at least 200 dph* which is less than half the extant consent on St Dunstan's and therefore fails to encourage the most optimum use of a highly sustainable brownfield site, in accordance with policy CS10 of the Core Strategy. On this basis, it is suggested that 400 dph would be more appropriate as a starting point. Furthermore, the wording *'at least'* should be revised to *'in excess'* to accord with the wording in the adopted CS.

##### **Suggested change**

The first sentence of bullet point 5 is amended to read: “Densities should be in excess of 400 dph” but it should be acknowledged that the actual figure delivered could be higher to secure the effective use of this highly sustainable brownfield site.

#### Bullet point 8

The prominent corner position of the site should be seen as a positive and highlighted as an opportunity to provide a high quality landmark building, rather than a constraint.

#### **Suggested change**

The text is revised to acknowledge the potential to deliver a high quality landmark building.

#### Bullet point 9

We agree that proposed building heights should consider the local and wider town centre context. However, given the varying nature of building heights in the immediate vicinity, further guidance should be given on scale, including acknowledgement that the site is situated in an area where higher densities and tall buildings are supported, as stated in policies CS1 and CS2 of the Core Strategy.

#### **Suggested change**

We recommend bullet point 9 is amended to read: “The site is situated in Woking town centre where tall buildings are supported in accordance with policies CS1 and CS2 of the Core Strategy. Building heights should consider the local and wider Town Centre context whilst ensuring there are no adverse environmental effects in terms of micro-climate, wind, overshadowing and glare;”

#### Bullet point 12

We support the statement that building footprints should be of an appropriate scale to reflect the grain and character of adjacent development. However, this statement should be consistent with the other requirements identified in the site allocation (such as high densities) and could be perceived to be unduly restrictive.

#### **Suggested change**

We recommend bullet point 12 is amended to read: “Building footprints should be of an appropriate scale to reflect their town centre location.” in order to secure the most effective use of brownfield land.

#### Reasoned justification

The last paragraph of this section identifies that the site could yield at least 10 additional dwellings. This density is far too low for such a highly sustainable and unconstrained town centre location. The potential yield should therefore be significantly increased.

Furthermore, it is considered that reference should be made to the fact that a comprehensive development of UA44, UA45 and UA46 could provide the opportunity to secure even higher densities and a more efficient use of this brownfield site.

#### **Suggested change**

The anticipated site yield should be significantly increased and reference should be made to the fact that a comprehensive development of UA44, UA45 and UA46 could provide the opportunity to secure a more successful and higher density development.