

RW/P6029  
31 July 2015

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

Dear Sir/Madam

**Woking Borough Council LDF – Site Allocations DPD  
Submission Draft Consultation**

On behalf of our client, Southern Star Property Investments Ltd, we set out our response to the current Site Allocation Submission Draft consultation. Southern Star has a significant land ownership in Woking including Systems House and Bridge House which lie within the red line of Site UA16 in the Draft DPD.

We welcome the inclusion of UA16 as an allocated site. In particular we note the Council's aspiration to see the delivery of a mixed use development comprising residential, retail and office uses. We also note that the allocation recognises the difficult site constraints imposed by the proximity of the railway. This will necessitate providing non-residential uses on the lower floors of any redevelopment scheme on this site.

However, there are elements within the draft document which we believe should be subject to more detailed scrutiny and alteration, as set out in this letter.

**Environmental Effects**

The draft states: *“Building heights should consider the local and wider Town Centre context whilst ensuring that there are no adverse environmental effects in terms of micro-climate, wind, overshadowing and glare.”*

Given the site constraints, any proposed redevelopment of this site could only deliver residential floorspace from the third storey upwards. With an expected density of more than 200 units per hectare, it will not be possible to deliver a regeneration scheme which has no adverse environmental effects.

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### Suggested change

We consider the wording of this particular bullet point should be amended to read:

- *Building heights should consider the local and wider Town Centre context whilst ensuring that any adverse environmental effects in terms of micro-climate, wind, overshadowing and glare are minimised and reasonable mitigation measures are put into effect.*

### **Building Footprints**

The draft states: *“Building footprints should be of an appropriate scale to reflect the grain and character of local development.”*

It is clear from the Ordnance Survey and from online aerial photography that this part of the Town Centre suffers from a fractured urban grain and has no predominant scale of footprint. The adjacent sites in the town centre are all regeneration sites: Victoria Square, MVA and Select House (UA13) and 1-29 Goldsworth Road (UA14). The entire purpose of allocating these sites is to encourage bold and imaginative redevelopment proposals to come forward in area which does not have constraints such as conservation area status or listed buildings. To deliver the housing, office and retail growth so clearly needed in the Town Centre, the vision must be to create buildings that actually challenge the grain and character of local development rather than reflecting it.

### Suggested Change

We suggest the bullet point is amended to state:

- *Building footprints should be of a scale and character to reflect the town centre location, the regeneration aspirations of Site Allocation and the large scale regeneration expected on adjacent sites.*

### **Trees**

The 22<sup>nd</sup> bullet point in the Draft DPD states: *“The development should retain any trees of amenity value.”* With respect, a development on the scale anticipated in the DPD should not be constrained by the presence of trees, regardless of their amenity value. Whilst any redevelopment should make provision for extensive landscaping, Site UA16 is likely to be excavated in its entirety to accommodate office car parking, servicing and the foundations of the buildings.

### Suggested Change

We suggest the bullet point is deleted.

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### **Density**

We welcome the fact that a density of at least 200 dwellings per hectare is recommended. However, at this density the site would deliver only 158 units. This is far short of the capacity of the site and therefore would fail to make the most efficient use of the land. Our pre-application discussions with the Council have demonstrated that the site is capable of delivering between 550 and 650 dwellings. This would deliver a significant number of the 1,980 dwellings in the Town Centre identified in policy CS10 of the Core Strategy.

In light of the fact that the Victoria Square permission permits a net density of 660 dwellings per hectare – and UA16 would form the companion development to this essential town centre regeneration scheme – we consider the Goldsworth Road site should aspire to provide a density well in excess of 200 dwellings per hectare.

### Suggested change

Amend the bullet point to state:

- *A density in excess of 200dph and of a broadly similar amount as the Victoria Square development is recommended. This is within the indicative density range established in Core Strategy Policy CS10 Housing provision and distribution for sites in Woking Town Centre.*

We also query the inclusion within the text of the reasoned justification of the sentence “It is anticipated that the site could yield at least 125 dwellings...” We consider this to be an unnecessary statement in light of the already stated density expectations and the figure of 125 dwellings will have the unintended consequence of driving down the expectations of the Council and giving third parties an easy ground of objection when a high density scheme – in excess of 200dph – is submitted as a formal planning application.

### Suggested Change

Amend the reasoned justification to state:

*“It is anticipated that the site could yield at least a similar density as the Victoria Square permission.”*

### **Affordable Housing**

Our initial discussions with Council officers have revealed that there is a desire to deliver family sized affordable accommodation across the borough. This is set out in paragraph 5.87 of the Core Strategy. In addition, we have been told that the town centre is not necessarily the preferred location for affordable housing, as borne out by the Victoria Square permission which includes no family sized housing and no affordable housing.

In accordance with CS12, therefore, it is likely that some (or all) of the affordable housing will be subject not only to a viability appraisal but also negotiation as to its location on or off-site. As currently drafted, the draft DPD does not make clear that such options exist and therefore could be considered misleading by any third party wishing to object to a scheme negotiated under the auspice of policy CS12.

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We are also greatly concerned about the onerous expectation to provide 50% of the housing as affordable, despite the fact that neighbouring town centre sites have an expectation to deliver 40%. Site UA16 is in private ownership, not public, and therefore fulfils none of the criteria under policy CS12 that would justify a higher proportion of affordable housing. Whilst we understand that affordable housing is likely to be subject to a viability assessment, our concern is that by setting the bar so high the regeneration of this site could be severely jeopardised.

Suggested Change

We suggest the bullet point is amended to state:

- *Contributions towards affordable housing should be provided in accordance with policy CS12.*

**Conclusion**

In short, we welcome the allocation of site UA16 and the fact that the allocation recognises some of the difficult site constraints. However, the current draft severely underestimates the potential of the site to deliver a high density housing and office-led redevelopment whilst unjustifiably overestimating the ability of the site to deliver affordable housing.

Yours faithfully



Robert Winkley  
Rolfe Judd Planning Limited

cc. Julian Hodnett – Southern Star Property  
Simon Taylor – Prime Place