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CHARTERED TOWN PLANNERS

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Woking Borough Council
Via email to:
Planning.policy@woking.gov.uk

Our ref: LA/4980

14 December 2018

Dear Sirs,

Representations to the Woking Borough Council Regulation 19 Consultation for the Site Allocations Development Plan Document

On behalf of our client, SJR KMN Woking LLP, we are pleased to enclose comments on the regulation 19 version of the Site Allocations DPD consultation in regard to Trizancia House and Woodstead House, 72 Chertsey Road Woking. The site is proposed for allocation for a mixed use of residential (including affordable housing) plus offices and has been given the reference UA2 in the emerging Plan. Our client is developing the adjacent site on Chertsey Road, Woking, as a 9,274sqm office scheme.

Introduction

We note that the main purpose of the DPD is to identify and allocate specific sites to enable the delivery of the Woking Core Strategy from 2012, therefore basically 'filling in the gaps' left by the Core Strategy. This is an unusual approach given the amount of time that has passed since the Core Strategy was produced – a more positive and proactive approach would have been to prepare a new Local Plan from scratch based on new and up to date evidence.

The Core Strategy sets the framework for the delivery of uses including 28,000sqm of additional office floorspace and 4,964 net additional dwellings in Woking up to 2027. We note that some of the evidence (for example the Employment Land Review from 2010) is very old and would benefit from an update which accords with the emerging housing need for the Borough and the need to look to plan for the longer term.



This is an insufficiently positive approach in terms of the NPPF, which sets out a need for a regular review of evidence and policy.

The focus of these representations is based around the tests of soundness and legal compliance as is necessary at this important stage of the process.

- Background information on the site, its history and the surrounding uses
- Comments on the evidence base including the employment land review
- Advice to the Council about the necessary changes to the proposed allocation in order to achieve a sound plan which responds to the evidence base.

Background to the site, its history and the proposed allocation

The site is located within Woking Town Centre, located on a main road into the Town Centre from Victoria Way and the M25. The site lies within the Woking Town Centre High Accessibility zone. The former buildings were in office use and were between three and four storeys in height. Both Woodstead House and Trizancia House have been demolished. Our client is currently developing the adjacent site (Kings Court/Thomson House) for an 8-storey office (B1a) building which will provide 9,274sqm of floorspace.

Within the emerging Plan, the site is proposed for allocation for a mixed-use development including at least 50 dwellings and 4000 sqm net office floorspace (5000 sqm gross). A previous application for mixed use, including residential was refused on appeal in 2015.

Whilst we agree that the site is appropriate for development and is in a highly sustainable location, we seek the amendment of the allocation for purely employment uses. This would be a more appropriate use of the site, would maximise the potential of the site for employment uses and is supported by the evidence base that underpins the plan (see following section) which demonstrates that a considerable loss of employment land has taken place both for residential development and also through permitted development rights conversions.

Evidence Base Issues

The Borough Council has published a range of evidence-based studies which support the emerging Plan. Those most relevant to our client's site are as follows:



Employment Topic Paper (2018)

Employment Land Review (2010)

In terms of the Employment Land Review from 2010, the role of this document is to assess the employment needs of the Borough in terms of land supply and land use over the Plan period. This document shows a considerable loss of B1 floorspace based on figures between September 1999 and (presumably) 2010 when the document was produced. There were a total of 66 permissions resulting in a potential loss of 35,666sqm of B1 floorspace. There were additional, but less significant losses of B2 And B8 floorspace over this same period.

The Employment Topic Paper was published in October 2018 but does not reassess the employment needs of the Borough. Within the Topic Paper Woking is noted as a 'high-performing town' with an undersupply of office space (particularly Grade A). The Council is concerned about the impact of, for example, permitted development rights, on the supply of office floorspace. Table 3 of the Topic Paper shows that there was a loss of nearly 20,000 sqm of B1 floorspace from April 2010 to March 2018. The majority of B1 loss is from B1a offices. In terms of committed floorspace, Table 4 of the Topic Paper shows that in terms of commitments for B1 use. The figure was -27,387 sqm at March 2018. The information is drawn together in Table 5, which shows an outstanding floorspace requirement still to be delivered at 31/3/2018 of 109,496sqm, of which the B1a office is 106,773sqm. The table is reproduced below for ease of reference.

Table 5: Outstanding floorspace requirement at 31/03/2018.

Use Class	Amount of floorspace to be delivered (sq m)	Progress to date, to end of March 2018 (sq m)	Outstanding floorspace to be delivered (sq m)
B1	62,115	-47,381	109,496
B2	26,775	28,682	-1,906
B8	23,097	-13,153	36,250
Mixed B class use	0	66,717	n/a

The quantity of B1 losses is reported as 'notable' and considerably increased from the last Employment Topic Paper of 2015.

Policy Response to the Evidence base

The Topic Paper makes a number of assumptions about how the outstanding need for B1a uses could be met, including comments about how an improved transport infrastructure would make a more attractive



business environment; however. Table 10 of the emerging Plan shows a deficit in the B1 use class of - 11,189sqm. This is an ineffective approach to addressing the evidence base, and one that is clearly unsound.

The most appropriate way to actually ensure delivery is to make firm allocations to address the outstanding requirements. This would be a sound approach in terms of all of the tests of soundness set out in para 35 of the NPPF, i.e., being positively prepared, justified, effective and consistent with national policy.

There is considerable scope to provide a comprehensive B1a scheme on the Trizancia House/Woodstead House site to respond effectively to the Council's evidence base. Our client is currently implementing an employment scheme on the adjacent site (Kings Court and Thomson House) for high grade office floorspace. This is an attractive location for employment uses, which can make a greater contribution to meeting high grade office requirements than currently proposed. The site is less attractive for residential purposes – we note that the draft policy for the site (UA2) refers to the potential for noise, due to the location of the site on a main road. This could be a particular issue in terms of residential amenity, as is accepted in the policy.

We note that the outcomes of the West Surrey SHMA show that the highest need for future residential development is three and four-bedroom dwellings, and that less than 10% of the forecast need for market housing is estimated as being for 1-bedroom accommodation. Despite this, the Council's proposed allocations appear to be largely urban redevelopments, many of which will provide small units. A more effective approach in order to deliver the evidenced need would be to allocate some additional sites for family homes, if necessary by making appropriate greenbelt releases in the Borough.

To ensure delivery of the site and to assist in delivering the Council's employment need, Trizancia House/Woodstead House should therefore be allocated for purely employment (B1a) uses.

On other policy matters, we note that policy UA2 of the emerging Plan is very long winded and needlessly repeats other policies of the Plan. Other policies in the Plan have been prepared in the same way. The Plan should be read as a whole; this is therefore unnecessary duplication.

In terms of the NPPF, chapter 6 sets out the need to build a strong, competitive economy. Paragraph 80 specifies that "significant weight should be placed on the need to support economic growth and



productivity, taking into account both local business needs and wider opportunities for development”. The NPPF goes on to set out, in para 81, that planning policies should meet the identified needs over the plan period. As set out above, we are concerned that the Council’s approach is not positive enough and that they should make firm allocations to meet the forecasts needs in full, particularly where a site is in a location which was previously in employment use and is evidently suitable for future employment use.

Conclusion

We welcome the opportunity to comment at this key stage of the Local Plan process, however, our view is that a different approach is needed by the Council with regard to site allocation UA2. This should be a simplified policy which allocates Trizancia House/Woodstead House for B1 use only rather than a mixed B1/residential allocation. This would respond more effectively to the Council’s employment land evidence base, which shows a shortfall of availability across the Plan period for B1 uses. The Council needs to be more positive in terms of responding to its evidence base and addressing the outcomes of it through firm allocations.

The Council is taking an unusual approach, in preparing the Site Allocations document as a stop gap to deliver the strategy of the Core Strategy, which in itself is already dated (2012). It would be more appropriate for the Council to instead prepare a new Local Plan, based on up to date evidence and looking longer term. This would, again, be a more positive approach which better accords with the NPPF.

We would welcome the opportunity to discuss these comments further with the Council through the next stages of the preparation of the Plan. Our current view is that we wish to be represented at the Examination into the Plan.

Yours faithfully,

BELL CORNWELL LLP



Liz Alexander
Senior Principal Planner



