


WOKING BOROUGH COUNCIL SITE ALLOCATIONS DPD
INDEPENDENT EXAMINATION
WRITTEN STATEMENT RELATING TO MATTERS 3 and 5
MCLAREN SERVICES LTD (rep ID: 081)
NOVEMBER 2019



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1.0 Introduction

- 1.1 This examination statement is submitted on behalf of McLaren Services Limited (McLaren) in respect to Matters 3 and 5 of the Woking Borough Site Allocations Development Management Document (SADPD) examination. The comments provided respond directly to the Planning Inspector's questions set out in the *Inspector's matters, issues and questions* document. The responses should be read in conjunction with McLaren's Regulation 19 consultation report and associated appendices (WBC/SA/004A; Southgate_T3 to Southgate_T8), copies of which can be re-provided on request.
- 1.2 In responding to the Inspector's questions, due regard is had to the NPPF (paragraph 35) in assessing the SADPD's soundness and whether it is:
 - a) Positively prepared
 - b) Justified
 - c) Effective
 - d) Consistent with national policy.
- 1.3 McLaren wishes to outline its overall support for the proposed SADPD, though its specific interest relates to the proposed allocation of the McLaren Campus, north of Woking town centre (draft policy GB13). McLaren's response to the Inspector's matters, issues and questions therefore focusses directly on the proposed allocation. McLaren fully supports the proposed allocation of the McLaren Campus, and considers that the proposal meets the NPPF's tests of soundness.
- 1.4 For over 50 years McLaren has operated at the forefront of British automotive engineering and design from its base in Woking, and it is renowned as one of the world's most prominent high-technology brands. Its Formula 1 success has led to its automotive components being incorporated into other race team cars, the success of the McLaren Formula 1 road car, the Mercedes-Benz SLR McLaren road car, and the Group's confidence in its expanding range of Automotive road cars, the most recent being the McLaren Senna, McLaren Speedtail and McLaren GT. McLaren now has an annual turnover in excess of £1bn.
- 1.5 McLaren's success in the motor racing industry has in part resulted from the continued excellence in engineering and design achieved at its campus in Woking, and the skills and associations built up within the local population. McLaren is a global brand, a major part of the national motorsport cluster, and a nationally significant exporter. McLaren, therefore, is a significant contributor to the local, regional and national economy.
- 1.6 McLaren's automotive success has in turn fed through to McLaren Applied Technologies in delivering creative and technological solutions to many divergent sectors of British industry, such as UK sport, energy, healthcare, pharmaceuticals, transportation and consumer brands.
- 1.7 McLaren is a major part of the national motorsport cluster, and is one of Woking Borough's largest employers, with in excess of 3,000 staff working at the campus. McLaren makes a major contribution to diversifying the economic offer of Woking, making the borough's economy and jobs profile more balanced and more competitive, and therefore more resilient.

- 1.8 The motorsport cluster, which extends in a crescent from Norwich through Northampton and Oxford to Surrey, is one of the UK's few success stories in the area of high value manufacturing. It is hugely valuable to the economy, in its contribution to GDP, to export performance, to jobs and to the UK's international reputation as a location for innovative, technology-led businesses.
- 1.9 The McLaren Campus is located just under 3km (as the crow flies) north east of Woking town centre, and is accessed off the A320 at the Paragon Roundabout. The site comprises of the McLaren Technology Centre (MTC) and McLaren Production Centre (MPC), and benefits from an extant permission for the McLaren Applied Technology Centre (MATC). The campus also contains formal landscaped areas, staff parking and open parkland. The open parkland is publicly accessible and comprises a man-made landscape to the west of the built development. A public right of way (PROW footpath 1) runs through the site in a north-south direction.
- 1.10 The planning history of the campus dates back to the mid 1990's, when planning permission PLAN/1995/0641 was granted for a c. 37,160sq m corporate headquarters with research, development and automotive production (MTC). The MTC has been operational since 2003 (16 years). Following this, McLaren established its own road-going sports and hyper car range (McLaren Automotive) which required a bespoke production facility. Planning permission PLAN/2009/0440 for the MPC, comprising 37,838sq m of floor space was subsequently granted in September 2009. McLaren's continued growth and success, including within divergent sectors through McLaren Applied Technologies, meant that further floor space and facilities were required, which resulted in planning permission PLAN/2014/1297 being granted in March 2016 for the MATC, comprising 52,000sq m for an aerodynamic research facility, workshops, research and development space, offices, meeting rooms, teaching and training space, and vehicle preparation and assembly space. As indicated in the table below, the campus comprises a total of c. 127,000sq m of built and extant floorspace. The campus therefore already represents a significant strategic employment site in Woking.

Campus development	Floor area (GIA) sq m
MTC	c. 37,160
MPC	c. 37,838
MATC	c. 52,000
Total	c. 126,998

- 1.11 In addition to the campus, McLaren also occupies further commercial premises in Woking, within the town centre and Woking Business Park.
- 1.12 McLaren would be happy to facilitate a site visit, should this be required. This will have to be arranged in advance of the visit.

2.0 Matter 3: Is the SADPD's approach to allocations and safeguarded land in the Green Belt (GB) justified and consistent with national policy?

Issue (ii) Do the SADPD's GB allocations and policies accord with national policies and guidance, and do exceptional circumstances exist sufficient to justify the alteration of the GB's boundaries?

Question 3. Has the spatial distribution of the SADPD's GB allocations and safeguarded sites taken into account the need to promote sustainable patterns of development?

2.1 The NPPF requires sustainable patterns of development, and alternative options to be considered prior to looking at Green Belt sites for development and/or removal from the Green Belt boundaries.

2.2 With regard to the proposed allocation of the McLaren Campus, this is clearly not applicable, as the campus already comprises a strategic employment site of significant importance. As such the consideration of the spatial distribution of the allocation is not relevant in this instance.

Question 7. Do the allocations contain appropriate provisions to mitigate adverse effects to landscape character where this has been highlighted as an issue in the Green Belt Review?

2.3 As part of the bespoke Martyrs Lane consultation, held over January and February 2017, McLaren submitted a detailed landscape and visual impact appraisal and Green Belt review of the McLaren Campus (report dated February 2017 – copies can be provided on request).

2.4 The findings of the landscape and visual impact appraisal identified that there is limited visibility of the campus, with viewpoints limited to within 1km of the site boundary. Of 19 receptors assessed, the only landscape and visual effects of any significance were identified from those within the campus itself. Furthermore, the landscape assessment highlighted that views of the existing buildings and their associated parkland have become part of the experience, and while the receptors' focus is on the landscape, they are also aware that as a man-made landscape it is subject to change, as has already occurred following the completion of the MPC and as approved for the MATC.

2.5 The Green Belt review identified that further development within the campus would only be in conflict with one of the Green Belt's five purposes, as defined in NPPF paragraph 134, namely countryside encroachment. However, the impact was considered to be moderate to less than moderate. The landscape assessment also confirmed that the McLaren Campus is an isolated and well contained site. Therefore, any future development would continue to be set within this well contained parkland setting, with additional landscape and design mitigation able to reduce the visual impact and sense of encroachment of development.

2.6 McLaren does not consider that further development within the proposed allocation boundary will lead to significant adverse impacts.

Issue (vi) are the SADPD's other GB allocations and policies justified and effective?

Question 4. Are the proposals for the McLaren Campus set out in GB13 of the July 2019 version of the SADPD justified and consistent with national policy?

- 2.7 McLaren considers that the proposed allocation of the McLaren Campus within Policy GB13 is overall positively prepared, justified, effective and consistent with national policy.
- 2.8 The LPA has proposed to allocate the site as a *Major Developed Site in the Green Belt*. This aligns with the approach established in the Core Strategy 2012 (policy CS6), which establishes the policy framework for Woking's Development Plan. Whilst it is acknowledged that the NPPF moved away from such allocations, the LPA sought to continue to allocate *Major Developed Sites in the Green Belt* as a local policy. This was proposed in the Core Strategy, which was examined and adopted post-NPPF. McLaren therefore considers that there is no conflict with national policy in this regard, and that it is entirely logical for the SADPD to align with the policy approach of the Core Strategy.
- 2.9 McLaren considers that, given the site's long and established development history, including the continued demonstration of very special circumstances, the unique nature of the group of companies and McLaren's local, regional and national significance, there is a clear and demonstrable rationale for the campus to now be formally recognised through local planning policy.
- 2.10 McLaren has therefore actively promoted the site through the plan-making process, submitting representations at each SADPD consultation stage held to date, copies of which can be made available on request.
- 2.11 The very special circumstances that were tested and accepted by the Secretary of State in granting permission for the MTC in 1996 still prevail, and in some respects can be considered stronger and more pertinent today. These relate to:
- The unique nature of McLaren and its operational needs
 - The track-record and reliability of McLaren
 - The quality and excellence McLaren promotes in all its products and operations
 - The important symbiotic relationship between McLaren and Woking whereby they depend upon each other for economic investment and a skilled workforce
 - The level of local and regional employment provided
 - The level of turnover and significant impact generated for the local, regional and national economy.
- 2.12 This was clearly explained in the 1997 Inquiry Inspector's conclusions which stated:

"This important proposal arises from unique circumstances, which would bring a range of positive benefits which significantly outweigh any degree of harm which may be caused by inappropriate development in the Green Belt."

- 2.13 McLaren's business needs and investment decisions often far outpace the planning process. This is exacerbated by the campus' Green Belt location, which requires each application to demonstrate the presence of very special circumstances, despite it being clear that the nature of McLaren's operations and global significance means that these will always be present. In addition to this, the majority of applications will also need to be referred to the Secretary of State (SoS) for potential call-in for determination, on account of divergence from Green Belt policy. This generates significant additional uncertainty and risk, not to mention time delays. In the event an application is called in, then the risk and costs associated with any subsequent public inquiry would increase exponentially.
- 2.14 This process creates a great deal of uncertainty and risk surrounding what should be straightforward investment decisions for McLaren in its campus. This hampers the expansion potential of the site, hindering further growth and leading to wider economic implications for Woking and the surrounding region.
- 2.15 McLaren strongly believes, therefore, that local planning policy should recognise and support the further sustainable development of important economic drivers. Accordingly, recognition of the campus within the SADPD, through supportive policy, represents the next logical step and would provide the certainty that McLaren requires to make long-term investment decisions in response to rapidly changing market opportunities.
- 2.16 McLaren's ability to continue to sustainably grow within Woking is vital to the ongoing and future success of the group. The campus' location within the Green Belt fundamentally frustrates and threatens the potential for sustainable expansion, and with it McLaren's growth potential. Allocation would clearly support the future sustainable growth of the company. McLaren is aware of a number of similar circumstances within local authority areas where the local plan-making process has considered similar cases and deemed that it would be justified and supportive to either allocate sites in the Green Belt, or remove them from the designation entirely. Specifically, the Three Rivers District Council Site Allocations Local Development Document identified the Warner Bros. studios site in Leavesden was suitable for Green Belt removal, as was the Peterhouse Technology Park through Cambridge City Council's Local Plan Review.
- 2.17 McLaren does not consider that the man-made campus serves any of the purposes related to the Green Belt, as prescribed in NPPF paragraphs 133 and 134. This is evidenced in the detailed Green Belt review and landscape assessment undertaken and submitted as part of the Martyrs Lane consultation (February 2017; WBC/SA/004A; Southgate_T5 to Southgate_T8). Therefore, McLaren considers that there would be no overarching harm caused from the removal of the campus from the Green Belt, and similar precedents have clearly been established. However, McLaren understands the LPA's position relating to maintaining strong Green Belt boundaries and not creating isolated pockets, in order not to risk undermining the overall integrity and purpose of Woking's Green Belt. McLaren supports the proposed recognition of the campus in the form of the proposed allocation.
- 2.18 McLaren considers that both the national and local policy support the allocation of the campus. At the national level, paragraph 80 of the NPPF is explicit in stating that (our emphasis added):

“Planning policies... should help create the conditions in which businesses can invest, expand and adapt. 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... This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”

- 2.19 Sections c) and d) of paragraph 81 are also fundamental as they require planning policies to address potential barriers to investment as well as requiring flexibility to ensure needs not anticipated in plans can be accommodated, enabling rapid responses to changing economic circumstances.
- 2.20 With regard to local policy, the Woking Borough Council Core Strategy (2012) sets out the development needs, spatial strategy and objectives for the borough to 2027. Supporting the economy is identified as being one of the key issues and challenges over the plan period, with paragraph 5.130 establishing the council's commitment to supporting sustainable economic growth. Paragraphs 2.16 and 2.18 identify that Woking's economy is mainly made up of the service sector, and that manufacturing is under-represented in the borough, reflecting the wider position within the south east region.
- 2.21 Policy CS1 establishes the overarching spatial strategy for the borough over the plan period, with policy CS15 setting out the economic needs and approach to delivering these. Policy CS6 relates to Green Belt, and is consistent with the NPPF in terms of assessing development proposals. However, the policy also identifies and allows for the allocation of *Major Developed Sites in the Green Belt*. McLaren considers that the Core Strategy does, therefore provide a framework for the identification and supportive allocation of key strategic sites in Green Belt locations.
- 2.22 The Regulation 19 draft of the SADPD is clear that its purpose is to deliver the spatial vision, development requirement and objectives of the Core Strategy. Supporting economic growth and increasing the level of manufacturing are such key objectives. The introduction to the SADPD states that its purpose is to provide a framework for clear and consistent decision making, giving greater certainty to both the local community and developers. It also states that development proposals submitted in line with the SADPD, would carry more weight in the planning and decision-making process.
- 2.23 The SADPD proposes to allocate a number of Green Belt sites, including supporting important employment sites. However, it is explicitly clear that such allocations will not lead to a loss of control regarding the development management of these sites (WBC/SA/002A, page 4):

“...allocation of a site does not replace the need for planning permission; developers will still need to submit a planning application for an allocated site, allowing the local community and other interested parties the opportunity to comment on the detailed proposals and the Local Planning Authority to ensure the development is in accordance with all relevant planning policy requirements.”

- 2.24 Instead, the allocation simply removes the need to assess Green Belt harm and demonstrate the presence of very special circumstances when there is obviously no benefit or need to do so.
- 2.25 McLaren does consider that there is a need for some minor revisions to be made to draft Policy GB13, and has set out some proposed revisions in its response to Matter 5. McLaren is liaising directly with the LPA on this matter, with a view to presenting an agreed position at the examination hearings.

Question 5. In relation to Policy GB13 of the July 2019 version of the SADPD, is its restriction of development to that “for the specific and sole use by McLaren Group Limited and solely for operations undertaken by the Group” justified?

- 2.26 As highlighted above, McLaren and Woking’s relationship is long-established and symbiotic. McLaren’s long-term strategy is to retain its headquarters and core operations at its campus and satellite sites within Woking.
- 2.27 The very special circumstances demonstrated in all planning permissions to date have been unique to McLaren, and the LPA has always sought to tie the permitted development to McLaren in order to provide certainty that the site cannot subsequently be developed without similar circumstances being present and demonstrated. McLaren understands that the LPA is seeking to achieve and retain similar control in respect to the allocation policy, to ensure that future development cannot be brought forward at the site, that does not demonstrate the presence of special circumstances.
- 2.28 McLaren has sought allocation of its campus to support its further investment and growth needs, and to provide greater certainty in the planning system. Accordingly, McLaren does not object to the proposed restriction in the draft policy, and considers the approach justified when assessed against the LPA’s rationale.

3.0 Matter 5: Are the SADPD's policies justified, consistent with national policies, and clearly written and unambiguous so it is evident how a decision maker should react to development proposals?

Issue (i) General Points

1. *Policies are repetitive and have overlapping requirements that would benefit from simplification and amalgamation in the interests of clarity. Some elements of policy text (e.g the points relating to CIL liability) would also be better incorporated in reasoned justification and supporting text.*
2. *Also to aid legibility of the plan, given the number of policy criteria related to each allocation, those criteria should be a numbered rather than a bullet point list.*

3.1 As outlined in the response to Matter 3, issue vi, question 4, McLaren does consider that the current wording of draft policy GB13 has the potential to create uncertainty and ambiguity going forward and should therefore be amended slightly to rectify this.

3.2 Principally, McLaren is keen to avoid the potential for the wording of the allocation to create confusion for decision-makers, elected Members and the local community at future planning application stages. McLaren fully accepts that there is a need to ensure a robust policy so the LPA can ensure control is retained. As such, the policy sets out a robust list of requirements that future development must address. However, the current wording reads as if these requirements will apply to all future planning applications. There are many instances when all of the requirements listed will not be applicable, which means that there is a real risk that the policy will require McLaren to progress significant additional and unnecessary technical work. Should McLaren agree with officers that elements are not necessary, there is also a risk that this could lead to confusion with elected Members and the local community that the policy requirements are not being complied with.

3.3 McLaren understands from discussions with the LPA that the intention is that the development requirements will only be applied to proposals where applicable. Therefore, McLaren is liaising with the LPA to amend the policy. The latest revised form of wording, to the final bullet points of the requirements section of the policy, being considered is set out below. It is the intention of both parties to present an agreed position at the relevant hearing session(s).

Current wording

"Any other site specific and other requirements will be determined on a case by case basis depending on the nature of the scheme that would come forward."

Proposed revised wording

"The scope of the key requirements that will be relevant to any proposal that is submitted for planning permission will be decided by the Council during pre-application discussions with the applicant, along with any other site-specific

requirements on a case by case basis depending on the nature of the scheme.”

- 3.4 McLaren considers that there is also a need to amend the requirement relating to the Thames Basin Heaths SPA, which currently states that evidence of consultation with Natural England is required for “any planning application” progressed at the campus. The nature of some of the planning applications and development proposals, as clearly highlighted by the campus’ recent planning history, demonstrates that such a requirement in these instances would be unduly onerous. McLaren therefore respectfully requests that this requirement be amended to apply only to relevant planning applications.
- 3.5 The policy stipulates that any loss of existing publicly accessible parkland is to be re-provided on/off site. Through development of the MTC, McLaren committed within the Section 106 Agreement (dated 7 March 1997), within the definitions and interpretation, that the parkland would comprise a minimum of 16.2 ha (40 acres). This is the only legal requirement relating to the provision of parkland within the campus. As such the policy requirement needs to be updated to stipulate that on/off site parkland re-provision is required in the event that the level of provision falls below that specified within the Section 106 Agreement (16.2ha).
- 3.6 The draft policy requires consideration of the potential of versatile agricultural land within the site. The McLaren Campus comprises significant built development and an area of man-made open parkland. McLaren does not consider the need to assess the agricultural versatility of a site that has not comprised any agricultural use for in excess of 16 years.
- 3.7 McLaren fully supports the Inspector’s proposal to change all bulleted policy requirements to numerical lists. This will support simpler referencing and discussion with regard to specific requirements at both pre-application and determination stage.

4.0 Conclusions

- 4.1 McLaren fully supports the proposed allocation of its campus as draft Policy GB13, subject to the proposed minor modification to the policy wordings. It is considered that the allocation will provide greater certainty regarding future investment decisions, and reflects the site's development history and status as a strategic employment site.