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# **MATTER 4 HEARING STATEMENT**

**WOKING BOROUGH COUNCIL SITE ALLOCATIONS DPD EXAMINATION**

**SUBMITTED ON BEHALF OF ECOWORLD LIMITED**

**NOVEMBER 2019**

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## 1 INTRODUCTION

- 1.1 Carter Jonas is instructed by EcoWorld Limited ('EcoWorld') to submit this Hearing Statement in response to the Inspector's Questions for the Site Allocations DPD Examination. The representations are made with regards to Site Allocations UA11, UA12 and UA13. EcoWorld has an ownership interest in each of these sites.
- 1.2 EcoWorld supports the fundamental aim and purpose of the Site Allocations DPD in seeking to identify sites sufficient to accommodate the identified levels of growth for the plan period. However, EcoWorld maintains that a flexible approach should be adopted to land uses that may come forward on the urban sites to ensure the end development is market facing and viable. Policies should not be prescriptive with regards the quanta of units and floorspace that may come forward.
- 1.3 EcoWorld agrees with the Inspector that the policies are repetitive and have overlapping requirements that would benefit from simplification and amalgamation in the interests of clarity. EcoWorld also agrees that some elements of policy text would be better incorporated in reasoned justification and supporting text.
- 1.4 EcoWorld is in the process of preparing a new detailed planning application for the development of the land at Goldsworth Road, Woking (Site Allocations UA12, UA13 and part of UA11). The new application builds on the precedent set by the resolution to grant achieved for the application submitted on site UA13 only. It is a shared vision between the Council and EcoWorld that a new neighbourhood can be achieved on Goldsworth Road, with EcoWorld's landholdings being the catalyst for a landmark new development. As part of this, EcoWorld has been in discussions with the Council and with local charity The York Road Project about the provision of a new homeless shelter for Site UA12. EcoWorld will be submitting a Screening Request shortly pursuant to the EIA Regulations. The timings for the preparation and submission of the planning application have been agreed through a Planning Performance Agreement confirming the deliverable nature of the proposals. An application will be submitted in 2020.

## 2 MATTER 4: ARE THE ALLOCATED SITES IN THE URBAN AREA JUSTIFIED AND DELIVERABLE?

### *Issue (i)*

2.1 We respond to the specific matters arising in relation to Issue (i) below.

***Question 2 – To what extent would housing sites anticipated to come forward in the next five years be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years?***

2.2 Yes, the sites in EcoWorld's ownership are available now and are located in a suitable location for development by nature of their highly sustainable positioning in proximity of the train station and the wider town centre offering. However, to ensure that homes can be delivered we would request that Site UA13 is amended with regards to the provision of affordable housing on the site from its current 50% target to 40%, in accordance with the Council's affordable housing Policy CS12 in the Core Strategy.

2.3 We maintain that this is an administrative error on the basis that Policy CS12 requires those sites either in public ownership or Greenfield in nature only to provide 50% affordable housing. Site UA13 is neither, and therefore falls into the Council's 40% requirement for sites over 0.5ha. This is consistent with other urban allocations that fall under the same category.

***Question 5 – Does reliance on mixed use sites in the urban area, with undefined quanta of differing uses, provide sufficient certainty that housing requirements would be delivered over the plan period? Is the SADPD sufficiently flexible to adapt to lower than expected housing delivery on mixed use sites?***

2.4 We agree that the policies should not define figures for land uses. Such flexibility allows applicants to make efficient use of the land in line with market requirements, in many cases maximising the amount of housing that could be delivered over and above other uses. This would ensure that the SADPD is consistent with NPPF paragraph 81 (d) to accommodate needs not anticipated in the life of the plan as well as enabling developers to rapidly respond to changes in economic circumstances.

***Question 6 – Is the mix of uses anticipated on urban sites (eg UA4, UA12, UA13) insufficiently flexible, and what effect could this have on the housing output of those sites?***

2.5 We consider that the proposed mix of land uses is too prescriptive and inflexible. Urban sites can provide for a range of 'town centre uses' with residential on upper floors. In respect of Site UA12 which is identified for office use, discussions with the Council have progressed to deliver the York Road Project's homes for the homeless shelter on the site which will be delivered as part of EcoWorld's forthcoming planning

application. Heads of terms have now been agreed between the parties for the delivery of the homeless shelter. It is therefore suggested that the policy is amended to allow for these changes.

2.6 With regards to the proposed land uses for allocation UA13, the site is the largest of the four contributing allocations in this location and therefore a major contributor to the creation of the new Goldsworth Road neighbourhood. The land uses associated with UA13 need to be flexible to limit vacancy of non-residential ground floor uses in the future. It is the appropriate time in which to factor in flexible unit sizes capable of appealing to a wide variety of end occupiers, thereby reducing the possibility of compromised unit arrangements in a future area of Woking town centre that is intended to generate significant economic income for the Borough.

***Question 7 – Would the amalgamation of sites UA12 and UA13 offer more flexibility as to how development could be brought forward?***

2.7 Yes, for the reasons set out in our Regulation 19 consultation response. Since the submission of those representations, significant progress has been made to bring forward a deliverable proposal on the sites. At present Site UA12 references the site's integration with UA10 and UA11; however, it is actually being brought forward in conjunction with part of Site UA11 and Site UA13. We propose that the policy is amended to reflect this relationship.

***Issue (ii)***

2.8 We respond to the specific matters arising in relation to Issue (ii) below.

***Question 1 – Is the delivery of employment, retail and other uses achievable and realistic over the plan period?***

2.9 Yes, however the exact quantum of each land use requires flexibility. Paragraph 81 (d) of the NPPF seeks to reflect the fluctuating economic circumstances facing town centres and it is therefore critical that Woking's own policies reflect the need for flexibility to avoid vacant units in the future. In particular, to enable a *rapid response to changes in economic circumstances (NPPF paragraph 48 (d))*. The existing evidence base supporting the SADPD is considered out of date and no longer representative of market conditions for office and retail in Woking.

***Question 3 – Would the allocations for residential development (UA6, UA10, UA11, UA13 and UA34), including the proposed modifications included in the July 2019 version of the SADPD, ensure that dwellings would be integrated effectively within the safeguarded rail aggregates depot, and ensure that unreasonable restrictions would not be placed on its operation?***

2.10 Yes, residential development on Sites UA11 and UA13 would be integrated effectively with the safeguarded rail aggregates depot. EcoWorld's proposals require effective design to mitigate the railway operation located to the south of the site in any case and furthermore, land immediately to the east of the depot has been identified within the SADPD (UA34) as being suitable for redevelopment, which is in closer proximity.

2.11 EcoWorld requests that it is notified of any proposed changes to the rail depot's operation in the future.

### 3 CONCLUSION

- 3.1 Technical analysis and assessment has already taken place for Site UA13 as a result of the extant resolution to grant for the site under application reference PLAN/2016/0742. It supports the principle of a cluster of tall buildings on the site at a higher density than anticipated in the SADPD.
- 3.2 Since representations were last made to the Regulation 19 consultation, EcoWorld has progressed with pre-application discussions on wider landholdings which has taken into consideration the constraints across sites UA11 (part of), UA12 and UA13 to deliver a brand new neighbourhood for Woking town centre. EcoWorld respectfully requests that flexibility is enabled within the policies to ensure the Borough reaps the economic benefits created by a higher level of footfall within the town centre.
- 3.3 By introducing flexibility the Council has adequately justified and evidenced its SADPD. Therefore the document is sound. The application is anticipated to be submitted in 2020 and would therefore be delivered within the identified timescale 2019-2024.