

**Statement for the Woking Site
Allocations Development Plan
Document Examination**

Matter 2

Prepared For
**The Royal London Mutual
Insurance Society Ltd**

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bell cornwell

CHARTERED TOWN PLANNERS

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1 INTRODUCTION

- 1.1 We enclose representations to Matter 2 of the Woking Borough Site Allocations DPD Examination on behalf of our client, The Royal London Mutual Insurance Society Limited.
- 1.2 We have limited our response to the key issues of relevance to our client.
- 1.3 The particular concern of our client is the proposed allocation of Trizancia House and Woodstead House (**Policy UA2**) and Chester House (**Policy UA2**), both on Chertsey Road in Woking Town Centre. Our assessment of these allocations is that they are too restrictive and should be amended to include a greater flexibility of uses, including other main town centre uses. The site allocations, as currently worded, are unsound and should be amended accordingly.



2 RESPONSES TO ISSUES AND QUESTIONS FOR MATTER 2 – IS THE SADPD IN GENERAL CONFORMITY WITH THE WOKING CORE STRATEGY?

Issue (i) Are the requirements set out in the Woking Core Strategy (adopted October 2012) (the Core Strategy) justified, up-to-date and consistent with national policy?

2.1 No response.

Issue (ii) To what extent would the allocations, taken together, meet the requirements set out in the Core Strategy?

Q1: The Employment Land Review material which supports the Core Strategy requirements was published in 2010. Consequently, are the policies of the SADPD flexible enough to accommodate needs not anticipated in the Core Strategy, allow for new and flexible working practices, and enable rapid response to changes in economic circumstances?

2.2 Our focus is on Policies UA2 and UA3. Both policies are allocated the sites for a mix of residential and office uses. There is an identified need for these uses in the Core Strategy.

2.3 **Policy CS1** sets out that the Core Strategy will make provision for the delivery of the following scale of uses between 2010 and 2027:

- 4,964 net additional dwellings, with an overall affordable housing provision target of 35%.
- 28,000 sq.m of additional office floorspace and 20,000 sq.m of warehousing floorspace.
- 93,900 sq.m of additional retail floorspace.

2.4 This is supported by **Policy CS2**, which sets out that the Council will facilitate the delivery of specific proposals in the Woking Town Centre over the life of the plan, including:

- 2,180 homes.
- Approximately 27,000 sq.m office floorspace.
- Potential for up to 75,300 sq.m of additional A class floorspace (including 67,600 A1 retail).

2.5 The Core Strategy has not set out a specific quantum of need for other uses. However, there is in principle policy support for other main town centre uses, as demonstrated below.

2.6 Policy CS1 also sets out that *‘Woking Town Centre will be the primary focus of sustainable growth to maintain its status as an economic hub with a flourishing, diverse and innovative economy... The town centre is designated as a centre to undergo significant change and the provision of a range of shops, cultural facilities, jobs and housing to meet locally identified*



needs and the needs of modern businesses will be encouraged. Main town centre uses as defined in the NPPF, will be acceptable in principle, subject to the requirements of the policies of the Core Strategy.' (our emphasis).

- 2.7 Policy CS2 also sets out that *'The town centre will also be the preferred location for other town centre uses as defined in the Glossary including hotels and cultural and entertainment facilities. Proposals for such uses will be permitted where it can be demonstrated there is a need for the development and the proposals deliver the objectives of the Core Strategy and do not undermine the delivery of the specific proposals set out above.' (our emphasis).*
- 2.8 Policy CS2 also sets out that *'The Council recognises the importance to the well-being of the community of adequate community facilities and social and community infrastructure and will seek to safeguard existing facilities and promote new ones where appropriate, as set out in policy CS19.'* (our emphasis).
- 2.9 Therefore, the Council accept that the principle of town centre uses in Woking Town Centre is acceptable in principle.
- 2.10 The employment land review and retail evidence that supported the Core Strategy is now out-of-date. The Housing, Communities and Local Government Committee Report on High streets and town centres in 2030 (published February 2019) concluded that that the retail property market has changed, with online sales having nearly doubled in the last five years, it is almost certain that online shopping will continue to grow. The Report sets out that this will require a shift from the retail focused activities of high streets and town centres today to new uses and purposes which foster greater social interaction, community spirit and local identity and characteristics.
- 2.11 Therefore, there is a need for the SADPD policies to accommodate a flexibility of uses in order to protect and promote the vitality and viability of Woking Town Centre in the rapidly changing retail environment.
- 2.12 Sites UA2 and UA3 are in a highly sustainable location close to the primary shopping area of Woking Town Centre and excellent public transport links, making it ideally located for a range of town centre uses.
- 2.13 The Council should therefore amend Policy UA2 as follows:



This 0.15 ha site is allocated for mixed use development to comprise of **C3 residential**, including Affordable Housing, ~~and~~ **B1(a) offices**, and **C1 hotel and apartment hotels**, **together with other main town centre uses at ground floor level, including A1, A2, A3, D1 and D2 uses.**

2.14 The Council should also therefore amend Policy UA3 as follows:

This 0.15 ha site is allocated for **B1(a) offices**, **C1 hotel and apartment hotels** and **C3 residential**, including Affordable Housing, **together with other main town centre uses at ground floor level, including A1, A2, A3, D1 and D2 uses.**

Q2: Does the SADPD make sufficient provision of employment, retail and other commercial development of an appropriate range of types and scales?

2.15 The SADPD policies do not provided a sufficient range of uses in Woking Town Centre. The Core Strategy already establishes that the principle of main town centre uses in Woking Town Centre acceptable, therefore site allocations should reflect this.

2.16 Many sites in the SADPD, including sites UA2 and UA3, are allocated for only a limited range of uses. However, the evidence base used to support the Core Strategy policies relating to office and town centre uses is now out-of-date.

2.17 As set out above, the Housing, Communities and Local Government Committee Report on High streets and town centres in 2030 (published February 2019) concluded that that the retail property market has changed, and that this require a shift from the retail focused activities of high streets and town centres today to new uses and purposes which foster greater social interaction, community spirit and local identity and characteristics.

2.18 These trends are also recognised in the Council's Retail Topic Paper (November 2019). The Retail Topic Paper also highlights the increasing number of restaurants, health and beauty and leisure related uses in Woking Town Centre. The creation of new purposes for town centre visits has presented the opportunity for linked trips for other retailers, businesses and the wider leisure and entertainment offer.

2.19 Therefore, there is a need for the SADPD policies to accommodate a flexibility of uses in order to protect and promote the vitality of Woking Town Centre in the rapidly changing retail



environment and to support viable uses. A lack of flexibility could compromise the delivery of many of the sites in Woking Town Centre. Therefore, sites should be allocated for main town centres uses that complement residential uses.

2.20 Paragraph 85(d) of the NPPF sets out that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. This includes allocating a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.

2.21 In light of the rapidly changing retail environment, there is a need to provide a flexible range of uses in order to protect the viability of Woking Town Centre and to ensure that the delivery of the sites allocated in the SADPD remains over the remainder of the plan period.

Issue (iii) Does the SADPD's approach to flooding and water management accord with Policy CS9 of the Core Strategy and the Framework?

2.22 No response.

Issue (iv) Does the SADPD contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution?

2.23 No response.

Issue (v) is the SADPD based on a robust assessment of required supporting infrastructure?

2.24 No response.

Issue (vi) is the SADPD supported by adequate consideration of transport issues?

2.25 No response.



3 CONCLUSION

- 3.1 This Statement highlights that the Core Strategy has already established that main town centre uses are acceptable in principle in Woking Town Centre and that mixed used site allocations should reflect this. The evidence supporting the quantum of office and retail need is out-of-date and rapidly changing consumer habits reflect the need for the SADPD policies to accommodate a flexibility of uses in order to protect and promote the vitality and viability of Woking Town Centre in the rapidly changing retail environment. The Council should therefore amend Policy UA2 and UA3 to allow for other main town centre uses on the sites.
- 3.2 It has also been highlighted that there is a need for the SADPD policies to accommodate a flexibility of town centre uses in order to protect and promote the vitality of Woking Town Centre in the rapidly changing retail environment and to support viable uses. This is required in order to be consistent with paragraph 85 of the NPPF.
- 3.3 Therefore, Policies UA2 and UA3 do not meet the tests of soundness set out in paragraph 35 of the NPPF in relation to part d) – consistent with national policy. The policies should therefore be amended in line with the recommendations set out in this Statement for the SADPD as a whole to be found sound. Failure to do this could result in delay to the adoption of the SADPD and compromise the delivery of the suits that are suitable for development and the achievement of sustainable development in the Borough.