

Statement for the Woking Site Allocations Development Plan Document Examination

Matter 4

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

November 2019



bell cornwell

CHARTERED TOWN PLANNERS

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CONTENTS

1	INTRODUCTION	1
2	RESPONSES TO ISSUES AND QUESTIONS FOR MATTER 4 – ARE THE ALLOCATED SITES IN THE URBAN AREA JUSTIFIED AND DELIVERABLE?	2
3	CONCLUSION	6
	APPENDIX A	7



1 INTRODUCTION

- 1.1 We enclose representations to Matter 4 of the Woking Borough Site Allocations DPD Examination on behalf of our client, The Royal London Mutual Insurance Society Ltd.
- 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 it 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 4 – ARE THE ALLOCATED SITES IN THE URBAN AREA JUSTIFIED AND DELIVERABLE?

Issue (i) is the SADPD's approach to the provision of housing in the urban area justified and deliverable?

2.1 **Q1: Are the policy requirements related to the sites informed by evidence of affordable housing need, infrastructure requirements, the inclusion of local and national standards and a proportionate assessment of viability?**

2.2 Policies UA2 and UA3 set out that to achieve the proposed mixed use development on the sites, 'a contribution towards Affordable Housing provision in accordance with Policy CS12 of the Core Strategy, in this case 50% to be provided on site' is required.

2.3 **Policy CS12** sets out that all new residential development on previously developed (brownfield) land will be expected to contribute towards the provision of affordable housing, with sites providing 15 or more dwellings, or on sites of over 0.5ha, the Council will require 40% of dwellings to be affordable. All new residential development on Greenfield land and land in public ownership will be required to provide 50% of the dwellings as affordable housing.

2.4 Neither sites are on Greenfield Land and no evidence has been published to justify a requirement of 50% affordable housing on site. Therefore, the policies are not justified and the test of soundness set out in paragraph 35 of the NPPF would not be met.

2.5 We therefore, recommend that the wording 'in this case 50% to be provided on site' be deleted from the policy text.

Q5: 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?

2.6 The Council has assessed sites in the a Strategic Housing Land Availability Assessment (SHLAA), 2017 (with an update in October 2018), that demonstrates that the combination of housing completions, sites with planning permission and sites with potential for residential development (excluding any Green Belt sites) will deliver 4,996 net additional homes between



the start of 2010/11 and the end of 2027/28 (see Appendix A). There is a surplus of 32 against the total housing requirement (4,964 homes) across the same period.

- 2.7 The sites in the SHLAA have been assessed in terms of deliverability, taking account of other potential other uses on the site. The indicative quantum of housing for each site allocation is not stipulated in the corresponding policy text, therefore there is scope to allow for higher housing delivery on sites, depending on the Council's housing land supply position. The Council can currently demonstrate 9.0 years' worth of deliverable housing sites.

Q6: Is the mix of uses anticipated on urban sites (e.g. UA4, UA12, UA13) insufficiently flexible, and what effect could this have on housing output on those sites?

- 2.8 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.
- 2.9 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.
- 2.10 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 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.
- 2.12 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.

2.13 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.

2.14 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.**

2.15 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.**

Issue (ii) is the SADPD's approach to the delivery of other uses in the urban area justified and deliverable?

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

2.16 The Council's Retail Topic Paper (November 2019) sets out that the retail sector has transformed and the wider economy has continued to evolved since the adoption of the Core Strategy in 2012. The Council's evidence base, the Town, District and Local Centres Study 2009, which informs the Core Strategy's retail requirement accounts for growth of Special Forms of Trading (which includes internet, catalogue and TV shopping) underestimated the rapid growth in internet sales that has taken place over the last decade, projecting an increase from 12.2% in 2009 to just 13.9% in 2026 for comparison goods, as opposed to the much larger (20%) sales share that has taken place to date.



- 2.17 The Retail Topic Paper highlights that 44% of the Borough's additional new homes for the plan period are expected in Woking Town Centre, with a significantly increased population which will support a range of retail, restaurants, leisure, social and community uses. A broader range of uses in town centres will help ensure its vitality, therefore allowing flexibility for a range of main town centre uses to be developed as part of site allocations will help ensure that the development of sites remain viable in order to allow them to respond to the rapidly changing retail and commercial environment.

What effect would residential amenity considerations related to housing included on mixed use sites have on the deliverability and flexibility of employment uses also anticipated for such sites?

- 2.18 Main town centre uses as part of mixed use development with housing are acceptable in principle, subject to meeting the requirements such as the 'agent of change' principle, as set out in the Noise section of the Planning Practice Guidance.



3 CONCLUSION

- 3.1 This Statement highlights that the requirements of Policies UA2 and UA3 to achieve an Affordable Housing contribution of 50% does not conform with the Core Strategy and is supported by evidence to support it. Therefore, the policies are unjustified.
- 3.2 Finally, it has been highlighted that there is a need for the SADPD policies to accommodate a flexibility of allowing a range of main 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 parts b) – justified and 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.



APPENDIX A

Table 7: Summary of the Woking Borough SHLAA 2017 (updated October 2018)

SHLAA period	Pre SHLAA 2010/11 – 2016/17	0 – 5 years 2017/18 – 2021/22	6 - 10 years 2022/23 – 2027/28	11 – 15 years 2028/29 – 2032/33 ¹⁷	
Source of supply/ potential					Total
Dwelling completions 2010/11 – 2016/17 ¹⁸	1,789	0	0	0	1,789
Units on sites under construction/ unimplemented planning permission ¹⁹	0	1,473	240	32	1,745
Sites with potential for residential development	0	181	1,313	1,034	2,528
Total	1,789	1,654	1,553	1,066	6,062
Core Strategy housing requirement (292 pa)	2,044	1,460	1,460	1,460	6,424
Surplus/ deficit against annual average requirement (excluding Green Belt)	-255	+194	+93	-394	-362
Broad location in the Green Belt ²⁰	0	0	550	395	945
Total including Green Belt²¹	1,789	1,654	2,103	1,461	7,007
Surplus/ deficit against annual average requirement (including Green Belt)	-255	+194	+643	+1	+583
Small sites delivery (estimate 40 pa) ²²	Counted in the figure above	0	0	200	200
Total including Green Belt and small sites	1,789	1,654	2,103	1,661	7,207
Surplus/ deficit against annual average requirement (including Green Belt and small sites)	-255	+194	+643	+201	+783