

Departure from the Development Plan

1. Planning officers have advised that they are now considering whether the planning application by Goldev Woking at Kingfield Road (ref: PLAN/2019/1176), 'the Application', should be advertised as a departure from the Development Plan.
 2. Savills have therefore undertaken a full review of the Development Plan documents to assess where such a departure may occur. This is provided in a summary table appended to this note.
 3. Our view is that opportunities for a departure are limited; where there is potential for a departure is discussed further below.
- **Where could a Departure from the Development Plan Occur?**
 - Firstly, Policy CS19 on Social and Community Infrastructure. The monitoring and review 'bullets' that form part of the policy refer to loss of Class D1 uses.
 - But, the Application as submitted has all of the existing floorspace (stadium, gym, snooker club) as Class D2 use. As such, this policy does not bite.
 - Plus, the Application actually provides an increase in D1 facilities via the medical centre which is welcomed by Policy CS19.
 - Secondly, Policy CS17 on Open Space, Green Infrastructure, Sport and Recreation. The key paragraph in this policy is
 - *'There will be a presumption against any development that involves the loss of a sport, recreation or play facility except where it can be demonstrated that there is an excess of provision, or where alternative facilities of equal or better quality will be provided as part of the development' (our emphasis).*
 - In this case, the replacement David Lloyd is not being provided as part of the development but secured through a separate development (note: there is no clause within the current proposed Heads of Terms requiring re-provision of David Lloyd prior to occupation of the Kingfield development in the same way that there is for the gym club facility). So arguably this falls outside of the alternative facility being provided as part of the development.
 - But under the monitoring and review bullets for Policy CS17 it is noted that:
 - *'Net change (positive or negative) in the amount of green infrastructure, public open space and built sports facilities'.*
 - This clearly takes a borough wide view which the Application would be in accordance with.
 - Also, another monitoring bullet is:
 - *'Number of planning applications approved contrary to objections raised by the statutory consultees and SWT'.*

- This works in our favour regarding Sport England not objecting but the other side is that Surrey Wildlife Trust (SWT) are continuing to object to the Egley Road application (though we know officers will balance this objection in the wider planning assessment).
- In summary, it seems to be CS17 that the Application differs from marginally. But when read as a whole the two applications maintain and enhance the existing sports and recreation facilities (stadium and David Lloyd) or there is a restriction to ensure replacement (gym club).

Savills
30 April 2020

Appendix – Summary of all Development Plan policies

Woking – Kingfield Road Site Summary of Potential Departure from the Development Plan

Core Strategy (adopted October 2012, reviewed by WBC and confirmed as still in conformity in October 2018)

Policy	Topic Area	In Conformity?
CS1	A spatial strategy for Woking Borough	Contributes housing, both market and affordable. Development is redevelopment of previously developed land within the built-up area and therefore acceptable in principle subject to assessment of impacts
CS2	Woking Town Centre	N/A
CS3	West Byfleet District Centre	N/A
CS4	Local and Neighbourhood Centres and shopping parades	N/A, fall outside of each of the designated centres
CS5	Priority Places	N/A, estate improvement policy
CS6	Green Belt	N/A
CS7	Biodiversity and nature conservation	Confirmed as having no impact. SANG contributions will be made to support continued protection of the SPAs
CS8	Thames Basin Heaths Special Protection Areas	SANG contributions will be made to support continued protection of the SPAs
CS9	Flooding and water management	Not in a flood zone. Subject to sign-off of final design, drainage all agreed by the Lead Local Flood Authority
CS10	Housing provision and distribution	Above 'indicative' density level of 30-40 dwelling/hectare within the wider urban area but policy clear that density is influenced by design and to ' <i>achieve the most efficient use of land</i> ' and ' <i>Wherever possible, density should exceed 40 dwellings per hectare and will not be justified at less than 30 dwellings per hectare, unless there are significant constraints on the site or where higher densities cannot be integrated into the existing urban form. Higher densities than these guidelines will be</i>

		<i>permitted in principle where they can be justified in terms of the sustainability of the location and where the character of an area would not be compromised</i>
CS11	Housing mix	Could be considered that scheme falls short on level of family-sized accommodation as a percentage of the overall proposal. But policy allows for a different mix where the viability of a scheme is taken into account, therefore links to the high fixed costs of delivering the replacement football stadium
CS12	Affordable housing	Exceed the policy target of 40% for larger sites. Reduced provision of larger affordable units?
CS13	Older people and vulnerable groups	No specific requirement to provide. No such existing accommodation lost.
CS14	Gypsies, Travellers and Travelling Showpeople	N/A
CS15	Sustainable economic development	N/A, not an employment-led proposal
CS16	Infrastructure delivery	Delivers a replacement stadium facility, housing, affordable housing, medical centre with capacity to meet wider local need and upgrades to local highways. Also significant CIL and S106 contributions to cover highways, education and SANG
CS17	Open space, green infrastructure, sport and recreation	Significant upgrade of the football stadium of a sport facility. Providing for additional on-site playspace and financial contributions for other facilities off-site, plus necessary SANG contributions. Theoretical 'loss' of the gym club facility but a replacement is secured elsewhere so this is not lost to Woking.
CS18	Transport and accessibility	All appropriate improvements and contributions being made. Car parking standards met and cycle parking standards exceeded, plus contributions being made to enhance local bus service. All agreed with Surrey County Council as highways authority.
CS19	Social and community infrastructure	Stadium provides for significantly improved facilities that are accessible to the community. Same point as CS17 regarding the gym facility.
CS20	Heritage and conservation	No material impact, local assets (none in immediate vicinity) have been assessed including views
CS21	Design	Positive steer from Design Review Panel responded to, proposal creates an integrated scheme with an identity. Materials and scaling down of proposal at edge of site intended to respond to local area. No technical impacts re: light, outlook etc, scheme incorporates biodiversity measures

CS22	Sustainable construction	All current standards met. Provision of electric vehicle charging points exceeds minimum requirements.
CS23	Renewable and low carbon energy generation	Incorporated into the scheme to meet current standards
CS24	Woking's landscape and townscape	Positive design, view studies to demonstrate that existing townscape is not impacted upon. No impact upon designated views
CS25	Presumption in favour of sustainable development	Sustainable development achieved given delivery of replacement stadium, housing and community facilities whilst adopting sustainable construction etc as per NPPF

Development Management Policies (adopted October 2016)

Policy	Topic Area	In Conformity?
DM1	Green Infrastructure Opportunities	No impact upon existing green infrastructure. Proposal incorporates significant landscaping, SuDS and tree planting plus emphasis placed upon walking and cycling within the site. Contributions also made via CIL.
DM2	Trees and Landscaping	No loss of existing protected trees. Boundary planting will be enhanced and a full landscaping proposal has been proposed for the site with emphasis upon walking and cycling.
DM3	Facilities for Outdoor Sport and Outdoor Recreation	Delivers a much improved facility with the new stadium
DM4	Development in the Vicinity of Basingstoke Canal	N/A
DM5	Environmental Pollution	All elements of air quality and related elements have been assessed and confirmed as acceptable

DM6	Air and Water Quality	All elements of air and water quality have been assessed and confirmed as acceptable, including contributions to the SANG capacity
DM7	Noise and Light Pollution	All matters addressed and agreed as not causing a material impact, subject to final sign-off on noise matters
DM8	Land Contamination and Hazards	Site assessed for contamination, response agreed and will form part of construction management plan
DM9	Flats Above Shops and Ancillary Accommodation	N/A
DM10	Development on Garden Land	N/A
DM11	Sub-divisions, Specialist Housing, Conversions and Loss of Housing	N/A
DM12	Self Build and Custom Build Houses	N/A
DM13	Buildings in and Adjacent to the Green Belt	N/A
DM14	Rural Workers' Dwellings	N/A
DM15	Shops Outside Designated Centres	Policy protects existing 'isolated' retail. None lost as part of our development but some additional capacity delivered to provide service to new homes
DM16	Servicing Development	Clear separation between access to service the stadium and retail facilities and access to residential car parking. All contained within development site and can be subject to a Servicing Management Plan.
DM17	Public Realm	Development will ' <i>create or contribute to a safe, attractive, high quality, inclusive and legible public realm that contributes positively to local character and identity and encourages appropriate levels of activity and social interaction</i> '. Includes links to the wider local area, limiting influence of residential car parking and providing for new access into, out of and through the site.
DM18	Advertising and Signs	N/A, any specific signage will be subject to separate consent

DM19	Shopfronts	Retail frontages address the new public realm and will provide equal access for all.
DM20	Heritage Assets and their Settings	No material impact, local assets (none in immediate vicinity) have been assessed including views. No loss of existing heritage assets from the site.
DM21	Education Facilities	N/A, policy relates to provision of new education facilities which are not part of this proposal
DM22	Communications Infrastructure	Though not proposing communications infrastructure specifically, development will ensure that modern requirements are provided for throughout.