



Land South of Kingfield Road and East of Westfield Avenue, Westfield Avenue,
Westfield, Woking, Surrey, GU22 9PF.

Appeal by Goldev Woking Ltd

LPA Ref: PLAN/2019/1176

PINS Reference: APP/A3655/W/20/3265969

South Woking Action Group

Statement of Case

1.0 Introduction

- 1.1 This is the Statement of Case on behalf of South Woking Action Group (“SWAG”) in an appeal by Goldev Woking (“the Appellant”) against the decision by Woking Borough Council (“the LPA”) of 2nd July 2020 to refuse planning permission of a site South Of Kingfield Road And East Of Westfield Avenue, Westfield Avenue, Westfield, Woking, Surrey, GU22 9PF (“the Site”) for the redevelopment of site following demolition of all existing buildings and structures to provide replacement stadium with ancillary facilities including flexible retail, hospitality and community spaces, independent retail floorspace (Classes A1/A2/A3) and medical centre (Class D1) and vehicle parking plus residential accommodation comprising of 1,048 dwellings (Class C3) within 5 buildings of varying heights of between 3 and 11 storeys (plus lower ground floor and partial basement levels) on the south and west sides of the site together with hard and soft landscaping, highway works, vehicle parking, bin storage, cycle storage, plant and other ancillary works including ancillary structures and fencing/gates and provision of detached residential concierge building.
- 1.2 SWAG is an unincorporated body that was formed in 2019 to represent the interests of local residents greatly concerned about the proposals for the Site after they were first presented in July 2019 at public exhibitions at Woking Football Ground and in Mayford.
- 1.3 SWAG believes the application scheme represents over development of the site. We have aimed and continue to aim to work with Woking Football club, Woking Borough Council and the developers (Goldev) to find a solution that does not significantly impact Kingfield and the wider community.
- 1.4 During the planning application process SWAG took a leading role in opposing the scheme. Well attended public meetings were held. A website was created (<https://southwokingactiongroup.org.uk>) which provided information to residents on the application and how they could express their opposition to the planning application. Many

residents wrote objecting to the scheme using SWAG briefings to assist them composing their objections. The website was updated during the application process.

- 1.5 SWAG Support the LPA in their opposition to this planning appeal. SWAG will show that the proposed development does not comply with the adopted local planning policies nor with the developing Woking Site Allocations Development Plan Document (“SADPD”) and that there are no material considerations which outweigh this conflict such that planning permission should be granted.
- 1.6 SWAG considers the proposed scheme out of character with the area, having unacceptable negative impacts on surrounding existing dwellings, provides a housing mix unsuitable to the area and providing inadequate parking. This would impact upon local residents’ amenity and access to local education infrastructure, as well as provide inadequate facilities for users of the development.
- 1.7 SWAG includes residents that have lived in the area for many years as well as those that have been attracted to the area in recent years. Individual members have previously been involved in planning issues of public concern.
- 1.8 SWAG agrees with and supports the LPA’s case as set out in the reasons for refusal and will supplement the LPA’s case by providing local experience of the site and surrounding area and further technical evidence where necessary. SWAG does not wish to repeat the LPA’s evidence or unnecessarily add to inquiry time. SWAG will not call its own expert witnesses.
- 1.9 SWAG notes that the planning appeal is not supported by Woking Football Club. It is concerned as to the viability of the scheme and whether the Football Club would be financially sustainable.

2.0 BACKGROUND TO THE APPEAL SITE AND PROPOSED DEVELOPMENT

- 2.1 The appeal site comprises a football stadium (Woking Football Club), a newly refurbished David Lloyd Centre (including open-air tennis courts and surface car parking), two buildings accommodating Woking Snooker Centre and Woking Gymnastics Club, (with associated surface car parking) and nine residences (six flats and three houses) in the north-western corner of the site. The six flats were formerly a pair of semi-detached houses, consent for the conversion granted in 2011 (plan 2011/0705)
- 2.2 Also, on the western side of the site there were formerly nine bungalows. These were demolished some years ago (demolition consents Plan/2009/0651 and 2010/460). Following the demolition that site was used as a works compound supporting the redevelopment to the east side of Westfield Avenue (Willow Reach), then for storage and most recently by the Football Club (plan 2012/1045 and 2017/0976), being a hoarded storage compound with portacabins and carparking.
- 2.3 The football stadium includes one modern 2,000 seat stand constructed following grant of planning consent in 1995 (reference Plan/1995/0554). This stand was intended to represent phase 1 of a 4-phase development of the stadium to eventually create a 10,000 seat stadium on the site.
- 2.4 The residential development around the application site is mostly single and two storeys. To the west side of Westfield Avenue is the Willow Reach residential development. That site was formerly a waste tip plus several community buildings. In 1995 a proposal for that site to be used for a food supermarket was called in, with the application (Plan 95/0879) being refused following a public inquiry. Consent for the residential development was granted in 2007 (ref 2006/1237). This was consented at a residential density of 80 dwellings per hectare.
- 2.5 The scheme was subsequently amended, the constructed scheme (ref 13/0659) consisting of 149 dwellings being:

- 44 no. 4 bedroom houses
- 34 no. 3 bedroom houses
- 4 no. 3 bedroom apartments
- 45 no. 2 bedroom apartments
- 22 no. 1 bedroom apartments.

2.6 The apartment block on the north east corner of the site (Hazel House) is five storeys high and the adjacent Beech House is four storeys high. The remainder of the residences (houses and flats) are three storeys high. The scheme was part of a comprehensive development offering significant community benefits including:

- a) Flood protection works alongside the Hoe Stream south of Kingfield Road including protecting Barnsbury Estate, Westfield Avenue and its side roads, Hoebrook Close and Turnoak Avenue
- b) Replacement and widening of the Kingfield Road bridge over the Hoe Stream.
- c) Decontamination of the Westfield Tip site
- d) Construction of new community buildings within Woking Park
- e) Creation of the Hoe Valley Linear Park

2.7 Land directly to the north of the appeal site includes an area of common land

2.8 There are three state primary schools within 1km of the appeal site, those being Barnsbury, Westfield and Kingfield schools. The private Greenfields Primary School relocated from nearby Brooklyn Road to east Woking in the summer of 2019. There are two state secondary schools in south Woking. These are Hoe Valley on Egley Road and St John the Baptist (a Catholic school) off Elmbridge Lane. There are no private secondary schools in the vicinity. Woking College (a sixth form college) is just south of St John the Baptist School.

2.9 The football ground currently has a capacity of around 6,000. Prior to Covid, games were typically attended by crowds of around 2,000. Residents in the vicinity of the ground suffer from football supporters parking on adjacent residential roads at times inconsiderately. The

football club currently has only around 46 parking spaces of which 3 are marked for disabled use. Until 31st July 2019 the club had planning consent to also use the compound adjacent to Westfield Avenue which provided around a further 37 parking spaces.

3.0 SWAG' s CASE

3.1 SWAG agree with the LPA that planning permission consent should be refused for the reasons given in the reasons for refusal in the Decision Notice of 2nd July 2020. The following section sets out SWAG's case on each of the reasons for refusal as well as the overarching planning balance.

4.0 OUT OF CHARACTER OF THE AREA

4.1 The site lies some 700m beyond the southern edge of Woking Town Centre (as defined in the 2016 Proposals Map and Core Strategy). It is not suitable for tall buildings of up to 11 storeys in height. In the Woking Design Guide SPD advice is given on tall buildings. In 4.2 it advises:

"...tall Buildings are defined as buildings which are significantly taller than those around them"
and *"..any building two or more storeys higher than neighbouring properties could be considered tall"*

4.2 Clearly applicable to the appeal site, the SPD advises in 4.3:

"Areas with a predominantly low-rise character, which are outside the core of the town centre, are not considered suitable for tall buildings, regardless of a lack of recognised heritage assets."

4.4 SWAG will present evidence of building heights in the area around the football ground demonstrating how out of character of the area the appeal scheme is.

4.5 The residential density of around 380 dph (Report to planning committee paragraph 86) is very considerably in excess of densities in the surrounding area. At the examination in public

of the SADPD Savills, acting on behalf of Goldev Woking sought for the site (then known as UA44) to be allocated for 950-1000 dwellings plus the other facilities. This was however rejected by the Inspector who advised (ID/10 dated 7th February 2020) that for UA44 in relation to housing yield; *“The figure should be based on an assessment of the developable land available over and above the proportion of the site required for the football stadium and associated retailing and be in line with the indicative densities set out in Policy CS10 of the Core Strategy “*

4.6 CS10 gives an indicative density range for urban infill of just 30-40dph. Willow Reach has a higher density of 80dph, but that supported the considerable community benefits identified in Para 2.6. WBC’s draft revised SADPD text for the site (renamed UA42) only allocates 93 dwellings for the site.

4.7 SWAG will illustrate how the appeal residential development is out of character with the area, with the high density resulting in poor daylight/sunlight for some proposed and some existing dwellings.

5.0 HOUSING MIX

5.1 The appeal scheme offers mostly 1 and 2 bed dwellings, the proposed numbers and proportions being as follows, split between market and affordable dwellings, compared to needs identified in the 2015 Strategic House Strategic Housing Market Assessment (SHMA):

	Proposed market dwellings	SHMA need - market dwellings	Difference	Proposed affordable dwellings	SHMA need – affordable dwellings	Difference
1 Bedroom (inc. studios)	294 (51%)	10.9%	+40.1%	220 (47%)	50.3%	-3.3%
2 Bedroom	284 (49%)	28.1%	+20.9%	243 (52%)	24.4%	+27.6%
3 bedrooms	4 (1%)	38.3%	-37.3%	5 (0.5%)	22.3%	-21.8%
4+ bedrooms	0(0%)	22.7%	-22.7%	0 (0%)	2.9%	-2.9%
Total	580 (100%)			468 (100%)		

5.2 For the market housing the appeal scheme proposes a substantial over supply of 1- and 2-bedroom residences and undersupply of 3- and 4-bedroom residences. For the social housing there is a significant over supply of 2-bed residences and under supply of 3-bed residences.

5.3 The excess of 1- and 2-bedroom properties will put an undue demand on local resources for primary age and younger children in particular.

5.4 The annual monitoring report 2018-2019 showed that in the last 3 years 61% of housing completions in Woking were of 1- and 2-bedroom properties, so this site would add to that unbalance.

5.5 Within Woking Town centre future developments will mostly be 1- and 2-bedroom flats.

5.6 SWAG believe that a lower density residential development incorporating more 3 and 4 bed family homes would reflect the housing needs of the area.

6.0 PARKING

6.1 A total of just 60 parking spaces and one coach space is proposed to serve the stadium including the medical centre and retail at the east end of the stadium. Eight of those spaces will be for the medical centre. 852 parking spaces are proposed to serve the residences.

6.2 The parking SPD sets maximum parking standards as follows in relation to the stadium and commercial uses:

Use	SPD max. standard	Scheme space/capacity	Derived parking spaces for SPD standard
Retail (A1-A3)	1/30m ²	335m ²	11
B1	1/30m ²	429m ²	14
Doctor's surgery	1 per consulting room	8	8
Stadium (D2)	1 per 15 seats	9026	601
Total			634

6.3 In addition, there should be provision for accessible spaces as follows:

Use	SPD standard	Scheme standard for space/capacity	Derived accessible parking spaces required
Retail (A1-A3) and Stadium D2	4 bays plus 4% of total capacity	612	28
B1	2	14	2
Total			30

6.4 The parking provision is therefore wholly inadequate, being less than 10% of the appropriate SPD standard.

6.5 The application traffic assessment concluded that 2,959 cars would be parking in the area for a capacity game., although a 5% reduction could occur as a consequence of the Travel Plan implementation.

6.6 Local residents are disrupted by parking associated with the existing stadium use. Proposed use of town centre car parks for stadium users is not credible given the freely available street parking. Achieving the parking SPD standards at the site would contribute significantly to the control of street parking associated with the stadium and other uses. The stadium parking proposed on site is poorly located primarily in the northeast corner of the site.

6.7 There is also potential for local residents being disrupted by visitors to the proposed residences parking on roads outside the development. Whilst the parking SPD recommended provision for residents is to be provided there is no provision for residents' visitors. The

parking SPD suggests a minimum rate of 10% of the total number of car parking spaces provided for the development.

7.0 PROPOSED CONDITIONS IN THE EVENT THAT PERMISSION IS GRANTED

7.1 With respect to the draft planning conditions appended to the officer's report to committee SWAG would wish to see proposed conditions strengthened. In particular:

- a) Additional condition limiting use of the stadium bowl for sporting events open to the general public for up to twice weekly only.
- b) The proposed condition (09) stopping the use of the stadium for standalone musical performances be strengthened to not allow any musical performance other than during a normal sports event interval.
- c) The hours of use of the bars and hospitality suite ((condition 11) should be restricted to 23.00 hours only.
- d) Provision to be made for smokers using the hospitality suite and bars within the stadium demise.
- e) Plant noise limits outlined in condition 40 to be extended to new as well as existing dwellings.
- f) The stadium to not be first occupied until all the proposed parking spaces are brought into use.
- g) Staff associated with the Stadium or ancillary uses should not be on the premises more than 1 hour before or 1 hour after the hours when customers/members of the public are allowed to attend.

7.2 SWAG reserves the right to comment on or suggest further planning conditions.

8.0 LIST OF DOCUMENTS

8.1 SWAG may refer to the following documents:

- 1) National Planning Policy Framework 2019
- 2) Planning Practice Guidance
- 3) Woking Core Strategy
- 4) The annual monitoring report 2018-2019
- 5) Woking Parking SPD
- 6) The developing Woking Site Allocations Development Plan Document and other documents associated with the examination process.
- 7) 2015 Strategic House Strategic Housing Market Assessment
- 8) Woking Design SPD
- 9) Woking proposals map 2016

8.2 Other documents may be added to this list.