



Town and Country Planning Act 1990

The Town and Country Planning Appeals (Determination by Inspectors) (Inquiries Procedure) (England) Rules 2000, as amended

Woking Borough Council's Proof of Evidence Summary

Planning: Peter Rainier MRTPI

APPEAL BY: GolDev Woking Ltd

APPEAL SITE: Land south of Kingfield Road and east of Westfield Avenue, Westfield, Woking, GU22 9PF

APPEAL PROPOSAL: 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 (Environmental Statement submitted).

Pins Ref: APP/A3655/W/20/3265969

LPA Ref: PLAN/2019/1176

April 2021

Prepared by Peter Rainier MRTPI Principal Director of Planning DMH Stallard LLP

Acting as planning consultant for the Local Authority for the Appeal

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Authors Qualifications and Experience

1. I am Principal Director of Planning at DMH Stallard. I have more than 30 years planning experience in both the public and private sector. I have degrees in Geography and Town Planning. For over 16 years I worked for Mid Sussex District Council (latterly as a Development Control Team Leader) and subsequently for DMH Stallard for nearly 20 years. I provide advice on a wide range of site promotions, applications and appeals to both public and private sector clients. I have been a Chartered Member of the Royal Town Planning Institute for nearly 30 years. I am a Planning Advisory Service accredited consultant.
2. I was invited to provide planning evidence to this inquiry by Woking Borough Council in support of their refusal of planning permission. Prior to deciding whether to take the instruction, I visited the site and perused the planning application documentation. I have, prior to compiling this evidence visited the site and surroundings on two further occasions.
3. The evidence which I provide in this document has been prepared in accordance with the guidance of my professional institution, the Royal Town Planning Institute. Where opinions are expressed, these are my own professional and sincerely-held opinions.

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4. The impacts of the proposal are considerable and wide-ranging. The appeal proposal is one of significant scale. Consequently, the benefits are numerous, but the impact upon the locality is also very significant.
5. The proposed football stadium with ancillary and other facilities, and the new housing, would make a major positive contribution to the strategic objectives of the Development Plan, to promote the redevelopment of previously developed land, including for provision of additional market and affordable housing and employment opportunities. In assessing the proposal I have carefully considered the full range of benefits which the scheme would bring to the Borough and which weigh in favour of the envisaged development, along with the general aim of promoting brownfield/sustainable proposals as set out in national and local policy.
6. Section 4 of the NPPF (Paragraph 38) (CD4.7) states that Local Planning Authorities should approach decisions on proposed development in a positive and creative way and that decision-makers at every level should seek to approve applications for sustainable development where possible. Section 11 of the NPPF (Paragraph 117) (CD4.7) states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. This involves balancing the economic, social and environmental aspects of a proposal, particularly in large scale developments such as in this case.
7. Whilst the NPPF states in paragraph 127 (CD4.7), being “sympathetic to local character” is not to prevent or discourage “appropriate change” it is the extent

and acceptability of that change which is a key consideration. In this case, the scale of change in terms of built form, density and height are very significant.

8. The density of the residential element of the scheme is agreed to be 336 dph which illustrates that the scheme is of a very high density. As with the appeal scheme, high densities often result in tall buildings, affecting the townscape, the amenity of neighbouring residents and the general character of the area.
9. The NPPF (Paragraph 127) also states that planning policies and decisions should ensure that developments:
 - will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

It is, consequently, crucial in assessing the fundamental to the quality of the appeal scheme to pay proper regard to the surrounding development.
10. In my view, the policy framework offers no support for tall buildings outside of the town centre. Policy CS10 (CD4.1) is a borough-wide policy that provides minimum densities for development such that the minimum housing target for Woking can be achieved. This policy sets out an indicative density range for different parts of the plan area with Woking Town Centre being 200+ dwellings per hectare (dph) and other areas varying between 30 and 100 dph. The policy accepts that higher densities than those indicated may be possible but only where higher densities can be integrated into the existing urban form and the character of an area would not be compromised.
11. Paragraph 5.61 of the Core Strategy (CD4.1), which states that “Development proposals in the High Density Residential Areas, as defined on the Proposals

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Map, will be permitted at densities generally in excess of 70dph in order to make the most efficient use of land". The High Density Residential Area does not include the site but comes to within 60m of the site boundary, covering in Claremont Avenue and Davos Close (to the north-west).

12. Therefore, the CS sets out on the proposals maps areas where very high densities may be achievable (the town centre) and a second zone where high density residential development will be permitted. It is obviously noteworthy that the appeal site falls outside those areas.
13. Policy CS21 (CD4.1) requires proposals for new development to create buildings and places that are attractive with their own distinct identity; they should respect and make a positive contribution to the street scene and the character of the area in which they are situated, paying due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land, and should incorporate landscaping to enhance the setting of the development.
14. In the case of the appeal scheme, the surroundings, are sensitive to change given;
 - o The nearby open spaces to the north and south which create viewing opportunities.
 - o The surrounding development being predominantly low rise.
 - o The surrounding development being predominantly low density.
15. Emerging Site Allocations DPD Policy UA42 (CD4.4) provides in principle support for a new or enhanced stadium. However, the policy also envisages a much lower quantum of residential development.

16. Overall, therefore, it is considered that the appeal proposal fails to meet the aim of the NPPF and Development Plan policies for high quality development, sensitive to its surroundings. The scheme is, therefore contrary to established planning policy.
17. The proposal would be incongruous and visually jarring, particularly in relation and comparison to the other buildings in the area. The surrounding dwellings are predominantly bungalows and two storey houses (generally 6-9m high). The development rises to 11 floors (actually 12.5 with the plant above and the semi basement parking below) and up to 36.6m high (or 38.6m with plant). The density of the scheme is also at odds with the prevailing character at 336dph when compared to the surrounding residential development being less than 30 dph. The result would be a development with a density, height, scale and massing which would be totally out of keeping and therefore harmful to the surrounding character of the area.
18. In terms of housing mix, the SHMA (CD4.15) concludes, as shown in the table above that for market dwellings the need is for over 60% three/four bed units and almost 40% one/two bed dwellings. The proposal completely fails to meet the mix indicated by the SHMA (CD4.15) and consequently Policy CS11 of the CS (CD4.1).
19. In terms of Affordable Housing the proposed number of one and four bed units is close to matching the SHMA (CD4.15) mix. In terms of 2 bedroom dwellings the SHMA identifies the need at 24.4% - the scheme would deliver 52% (i.e. 243 dwellings). The SHMA (CD4.15) indicates that there is a need for 22.3% three bed units, with only 1% being provided.
20. High rise and high density developments often give rise to an abundance of small units as is the case here. But on a site which does not fall within the town

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centre, where most developments have resulted in one/two bedroom dwellings there is a need to take the opportunity for a more balanced development which meets the mix indicated within the SHMA (CD4.15). Furthermore, such a mix would be achievable and desired through emerging policy UA42 (CD4.4), as well as being likely to result in a built form more appropriate to the site surroundings.

21. The development would also give rise to a significantly harmful overbearing effect, loss of privacy and daylight to various dwellings. In this regard the development conflicts with Policy CS21 (CD4.1), SPDs Outlook, Amenity, Privacy and Daylight (2008) (CD4.12) and Design (2015) (CD4.13). The properties particularly impacted are; No.2 Westfield Grove, Penlan (Kingfield Green), The Cedars (Kingfield Green), Nut Cottage (Kingfield Green), Beech House (Sycamore Avenue), Hazel House (Sycamore Avenue) and Elm View (Kingfield Road). The harm which would be caused by the proposed development to the amenity of local occupiers are a manifestation of the excessive scale and density proposed via the appeal scheme.

22. Turning to parking, the Proposed Development will result in a significant increase in on-street parking in the vicinity of the site which is not being managed or mitigated by the Appellant and this will result in a significantly detrimental effect on local parking conditions. Therefore, the Proposed Development does not accord with the Woking Core Strategy (CD4.1), SPD Parking Standards (2018) (CD4.11) and the National Planning Policy Framework (CD4.7).

23. The impact of additional overspill parking, is that the amenities of local residents will be harmed. For the duration of matches and a period before and after the game vehicular activity will increase with resultant noise and disturbance. Furthermore, 100% of on-street parking spaces will be occupied within a one mile radius. There is a likelihood of occasions where supporters attending

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matches do not park safely/considerately. There is a high probability that there will be occasions when residents or visitors to local residents cannot park in the vicinity of their homes due to the lack of available spaces.

24. In conclusion, the adverse impacts of the appeal scheme would be considerable and permanent for the reasons indicated. Consequently, the adverse impacts of granting planning permission would,, significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework and Development Plan taken as a whole.
25. For the reasons stated above, the Inspector is therefore respectfully requested to dismiss this appeal.