

# Comments for Planning Application PLAN/2020/0568

## Application Summary

Application Number: PLAN/2020/0568

Address: Land To The North And South Of Goldsworth Road Woking Surrey GU21 6JT

Proposal: Demolition of all existing buildings and redevelopment of the site for a phased mixed-use scheme, comprising 929 residential units (Class C3), communal residential and operational spaces, commercial uses (Classes A1/A2/A3/A4/B1/D1/D2) at ground floor and homeless shelter (sui generis) within 5 blocks of varying heights of between 9 and 37 storeys (including rooftop amenity) to the north and south sides of the site together with soft and hard landscaping including public realm works, highway alterations to Goldsworth Road, car parking, cycle parking, bin storage, ancillary facilities and plant (Environmental Statement submitted) (amended plans and reports received 13.11.2020).

Case Officer: Brooke Bougnague

## Customer Details

Name: Dr Anthony Fraser

Address: Parkstone House, Ashwood Road, Woking, Surrey GU22 7JW

## Comment Details

Commenter Type: Resident (local res.- member of public)

Stance: Customer objects to the Planning Application

Comment Reasons:

- High-over density of development
- Impact of development
- Out of Character

Comment: Having reviewed the Planning Officer's report to the Committee I have a number of additional comments:

Height

To quote

"39. The proposed 37 storey tower (T3) would be 116.5m, the same height as the 35 storey tower in the 2016 resolution to grant scheme. The height of the proposed buildings has been chosen to reflect the 2016 resolution to grant scheme and complete the western cluster of tall buildings with Victoria Square (currently under construction) and The Gateway (Woking Borough Council and Coplan have signed an agreement to develop the site, a planning application has not been submitted to date)."

However:

1. 'Tall' has never been defined in objective terms despite repeated requests from the local community and recent statements from Councillor Azad acknowledging these concerns.
2. The Planning Officer refers to the 2016 resolution to grant as justification. However, this development is to all intents and purposes different (otherwise it could have been submitted as a

variation to the earlier planning permission) and we are in a different environment where the local community is becoming much more aware of the impact of these developments.

3. Similarly, the officer refers to Victoria Square and an unapproved application (The Gateway) as further justification for the height. Victoria Square is intended as a landmark development for the town not as a height benchmark for other buildings.

Fairoaks airport also raises significant safety concerns about the height of the building. In rejecting their concerns, reference is made to:

"271. There is a 2016 resolution to grant scheme including a tall building of 147.825m AOD. This is the same height as tallest building in the current proposed development. It is noted that no comments were received from Fairoaks Airport on this application."

Again, I believe this is irrelevant and repeating it in the context of rejecting Fairoaks current concerns is unfair inference i.e., "you didn't object before so why you are objecting now?". The Planning Officer goes on to state:

"273. ....If the CAA were to have any real concerns about the impacts of the scheme then it would respond accordingly, and the Local Planning Authority would be able to react accordingly. Conversely, if the CAA were not to provide unequivocal support to the objection of Fairoaks Airport, it would be evident that the objection was not valid, and that planning permission could be granted without leading to any adverse impact on aircraft operations at Fairoaks Airport."

However, the response from the CAA does not support and appears to contradict this statement: "The CAA will not have comments to make on development projects unless CAA property is involved, but we will offer guidance pertaining to aviation safety and direct developers or LPAs to the relevant regulations on request."

I can see no evidence that the Planning Officer has put Fairoaks specific concerns to the CAA.

#### Density

The density of the Goldsworth Road development is 807dph. CS10 refers to densities in the town centre of "in excess of 200dph (pro rata where part of a mixed use scheme)". While the core policy says "in excess" the proposed density is over 4x the indicative level (even higher given this is a mixed use scheme).

Densities over 350dph are considered to be hyper-density and bring with them a number of issues - [https://www.pollardthomasedwards.co.uk/download/SUPERDENSITY\\_2015\\_download.pdf](https://www.pollardthomasedwards.co.uk/download/SUPERDENSITY_2015_download.pdf).

There is a generalised reverse justification in the report based on 'reducing the need to develop greenbelt'.

#### Affordable housing

The development only provides 5% affordable housing versus a requirement of 40% under CS12. The justification for this is the Financial Viability Assessment (FVA) which purports to show that the development is not viable above 5% level of affordable housing. I note that the Planning Officer draws comfort from the 'peer review' of the analysis and the proposed later stage profitability review (has the latter ever generated any later payments or other contributions from developers?)

Despite this, I feel there are significant unanswered questions:

1. Why has the financing cost changed from ~£15 million in the original FVA submitted on June 29 to ~£25 million in the latest version (addendum) submitted on November 13 when the overall cost

of the building and therefore the financing requirement has decreased given the reduced size of the development. This is illogical and the single biggest factor in the reduction of profitability of the scheme used to justify the reduced affordable housing, yet I cannot see where either the Planning Officer or peer reviewer has challenged it.

2. I see that the financial analysis shows revenue to the developer of £6,071,815 from the Homeless Shelter ('York Road') - pretty much a market rate. The developer has made considerable PR around the provision of the facility, so who is paying this £6 million to the developer, e.g., York Road Charity, Woking BC or other and when?