

## 7 NOVEMBER 2023 PLANNING COMMITTEE

6a PLAN/2023/0645

WARD: Canalside

LOCATION: 3 - 12 High Street, Woking, Surrey, GU21 6BG

PROPOSAL: Partial demolition of 3-5 High Street, demolition and reinstatement of facade of 6-7 High Street, demolition of 8-12 High Street and redevelopment of the site to create a shared living building (sui-generis use) which ranges in height from two and three storeys (plus basement), to eight and nine storeys (plus basement), to fourteen to seventeen storeys (plus basement), including commercial floorspace [Use Class E], plant, refuse, bicycle store and associated highway works, including alterations to rear service access (Environmental Statement submitted).

APPLICANT: Halcyon Development Partners

OFFICER: Benjamin Bailey

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### **REASON FOR REFERRAL TO COMMITTEE**

This is an application for planning permission, where the recommendation is for approval, for the provision of buildings where the floor space to be created by the development is 1,000 square metres or more. As such, the application falls outside of the Development Manager - Scheme of Delegation.

### **PLANNING STATUS**

- Urban Area
- Woking Town Centre
- Woking Town Centre Conservation Area
- Locally Listed Buildings (No.3 High Street & Nos.4-5 High Street, both Buildings of Architectural Significance)
- Primary Shopping Area
- Secondary Shopping Frontage
- Site Allocations DPD (2021) Policy UA4
- Adjacent to Locally Listed Buildings (Nos.1-2 High Street, Building of Architectural Significance)
- Thames Basin Heaths Special Protection Area (TBH SPA) Zone B (400m-5km)

### **RECOMMENDATION**

That the Planning Committee resolves to **Grant** planning permission subject to:

1. The prior completion of a Section 106 Legal Agreement to secure the requirements as set out at the conclusion of this report;
2. Completion of an Appropriate Assessment, supported by Natural England; and
3. Planning conditions set out at the end of this report.

The Planning Committee is also requested to authorise the Development Manager (or their authorised deputies) to take all necessary action(s) in connection with points 1-3 above.

## **SITE DESCRIPTION**

The existing buildings on the site range in height between 2 and 3 storeys. The buildings to the High Street frontage date from the mid-19th to early 20th century and vary in quality, with some good examples of commercial architecture (i.e., Nos.3-7 High Street) while others are of a more limited quality and have been subject to a greater degree of unfortunate alteration, particularly at ground floor level, where there are a range of low quality shopfronts and signage. The fabric behind many of the facades along Chapel Street and High Street have been subject to substantial alterations since the buildings were first constructed, with many of their rear elevations completely obscured from visibility or removed and redeveloped. The quality of the rear extensions are, on the whole, of low architectural quality through their ad-hoc nature and utilitarian character, including within the site.

Building materials are largely traditional masonry, including good quality red brick above ground floor level, painted render, and yellow brown stock bricks for elements to the rear. The roofscape is complex, reflecting the iterative pattern of development, comprising traditional pitched and hipped and later flat roofs. Shopfronts to the High Street tend to be constructed of more modern materials.

## **RELEVANT PLANNING HISTORY**

The site has an extensive planning history, including for replacement shopfronts, changes of use, for the display of advertisements (under the Advertisement Regulations) and for minor alterations such as flues etc., which have occurred over the years. The most significant, and relevant, planning history is shown below:

### **Nos.8-12 High Street:**

- PLAN/2011/1113 - Extension of time application PLAN/2008/0943 for the demolition of existing three and two storey buildings and construction of a new nine storey building with three basements consisting of the following:- 80 bed hotel with ancillary dining room, bar, function room penthouse apartment and basement car parking (13 spaces); roof top restaurant and bar; 3No. ground floor retail units.  
Granted subject to conditions (26.04.2012)
- PLAN/2008/0944 - Demolition of existing three and two storey buildings and construction of a new nine storey building with three basements consisting of the following :- 80 bed hotel with ancillary dining room, bar, function room penthouse apartment and basement car parking (13 spaces); Roof top restaurant and bar; 3 No. ground floor retail units.  
Granted subject to conditions (02.12.2008)
- PLAN/2008/0943 - Demolition of existing three and two storey buildings and construction of a new nine storey building with three basements consisting of the following :- 80 bed hotel with ancillary dining room, bar, function room penthouse apartment and basement car parking (13 spaces); Roof top restaurant and bar; 3 No. ground floor retail units.  
Granted subject to conditions (02.12.2008)

### **Nos.8-10 High Street:**

- PLAN/2012/0456 - Change of Use of existing building from A1 to sui generis, a mix of community uses, to include installation of new fire escape stair, fire escape doors, roof top garden at first floor level and new shopfront.

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Granted subject to conditions (25.07.2012)

- PLAN/2007/0691 - Conservation Area Consent for the demolition of existing three storey building.

Granted subject to conditions (18.03.2008)

- PLAN/2002/0091 - Change of use of ground floor to Class A3 (food and drinks). Erection of extensions and two additional storeys including 18 self-contained flats. (amended scheme).

Granted subject to conditions (22.05.2002)

### No.14 Chapel Street:

- PLAN/2019/1081 - Change of use from C4 (small HMO), 1 bed flat and taxi office to Sui Generis (large HMO for 11 persons).

Granted subject to conditions (27.03.2020)

### **SUMMARY OF PROPOSED DEVELOPMENT**

The proposed development will comprise a single building, albeit with three distinct elements which are distinguished by varying heights. The High Street frontage would be retained and/or reinstated at 2-3 storey height (3 storeys close to the corner with Chapel Street), set in front of a 'shoulder' block of between 8-9 storeys and with a taller building element which would vary in height between 14, 15, 16 and 17 storeys (maximum height 17 storeys, +92.740m AOD, excl. roof plant) located close to the corner of High Street and Chapel Street. The proposed development would see the retention and restoration of key facades along High Street and continue the High Street frontage scale at pedestrian level. External materials will include buff brick, red and brown brick tones and recessed metal panels.

Tree and flower planters will be added along High Street to add visual interest and improve the public realm. Biodiverse green roofs are integrated with blue roof systems on the second, third and fourteenth floors.

Pedestrian access would be achieved from both Chapel Street and High Street directly onto pedestrian footways. The existing service access from Chapel Street will be retained and upgraded / resurfaced as part of the proposed development and will continue to provide access to the commercial and retail properties to the north-east on Church Path and to the service yard to the rear of Morris House (which fronts Commercial Way). It will also provide an access route for refuse collection from the Co-living and Class E unit bin stores.

The inherently sustainable location of the site centrally within Woking Town Centre and adjacent to Woking railway station, has enabled a largely car-free development to be designed. Instead, the proposed development is designed to encourage cycling, walking and use of public transport. As such, the Chapel Street vehicular access would provide access to x2 accessible parking spaces (with a further x1 accessible parking space provided on High Street), with the proposed development otherwise being car-free. One car club space would be located on High Street and one of the existing two loading bays located on High Street would be retained. x98 cycle parking spaces will be provided internally at ground floor level (x82 of which will be for resident owned cycle parking, with the remaining x16 spaces occupied by a variety of bicycles including foldable and electric that residents would be able to use for free through a cycle loan scheme), x4 external cycle parking spaces would be provided for public use. Cyclists will access the site via Chapel Street.

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Refuse and recycling collection would take place from the Chapel Street vehicular access, and this access would continue to provide access for servicing vehicles associated with the existing commercial and retail units to the north-east.

### Co-Living Accommodation

The proposed development will provide x329 units of co-living accommodation, comprising x297 'standard' rooms (with a typical floorspace of 18 sq.m GIA) and x32 accessible / adaptable rooms (with a typical floorspace of 27-32 sq.m GIA). Each co-living room consists of a bedroom with an en-suite bathroom, a small kitchen / sitting area and integrated storage space. The co-living use is residential in nature but is *sui-generis* in planning terms (that is, it does not fall within a defined Use Class). Co-living units will be provided on all floors from Level 1-17 (incl.).

Co-living spaces are not self-contained housing, and therefore communal facilities are included in the proposed development. The first floor will provide a gym and wellness studio, laundry room, co-working space, private dining area, and cinema room. The eighth floor will provide what the applicant describes as a "MasterChef" communal kitchen (with x20 cooking stations) and a residents' lounge provided on the sixteenth floor. A variety of external amenity spaces are provided in the form of roof terraces and include: the eighth floor 'Kitchen Garden', which provides an outdoor kitchen facility and opportunities for outdoor dining and growing food; the fifteenth floor terrace providing a quiet space for residents with areas for reading, working and exercise; the sixteenth floor terrace (connected to the residents' lounge).

'Back of House' and management space associated with the co-living use include the reception area and lobby which fronts onto Chapel Street and provides a welcome point and security line for residents and provides post boxes, soft seating and a reception desk which is proposed to be manned 24/7. 'Back of House' spaces, located at the rear of the ground floor area, include bin stores, cycle storage, plant space and storage space for the Class E (Commercial, Business and Service) floorspace.

### Class E (Commercial, Business and Service) Floorspace

Ground floor level space fronting High Street, and turning the corner onto Chapel Street, is designed to be suitable for uses within Use Class E (Commercial, Business and Service) of the Town and Country Planning Use Classes Order 1987 (as amended), this space amounts to around 520 sq.m GIA. Uses within Use Class E includes shops, cafes, provision of professional services to the visiting public, indoor recreation, day-care nursery, medical services and offices.

The Class E floorspace has been designed and laid out so as to be suitable to (re)accommodate The Lighthouse, a charitable hub hosting a wide range of projects to support, encourage and empower local people. Key elements of The Lighthouse provision include:

- a community run café ('The Cosy Café') located on the corner of High Street and Chapel Street to maximise the active frontage and also connected internally to the Co-living reception area;
- spaces fronting the High Street which include a soft-play space, clothing studio and foodbank accommodation.

The main entrance of the Class E floorspace/The Lighthouse would be located in the rebuilt facades of Nos.6-7 High Street.

The table on the following page provides a schedule of the proposed land uses and floorspace:

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Land Use	GIA Floorspace (sq.m)
Residential	10,603
Class E (Commercial, Business and Service)	520
Internal Residential Amenity Space	854
External Residential Amenity Space	418
'Back of House' and Management Space, including reception lobby	860
<b>Total</b>	<b>12,837 (excl. external amenity space)</b>

### **Environmental Impact Assessment (EIA)**

Owing to the scale and nature of the proposed development, falling within category 10(b) of Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), as an 'urban development project' of more than x150 residential units (although not specifically residential units, the proposed co-living accommodation is considered to have similar characteristics, and thus similar impacts on the environment, as residential units) the applicant voluntarily commissioned an Environmental Impact Assessment (EIA). Before determining the planning application, the Local Planning Authority must consider the environmental information contained in the Environmental Statement (ES), as well as representations from consultees about the environmental effects of the development.

The ES assesses the likely environmental impacts from the proposed development including from demolition and construction and from operation. The ES identifies the existing (baseline) environmental conditions, and the likely environmental impacts (including magnitude, duration, and significance) and also identifies measures to mitigate any adverse impacts. A summary of potential positive and negative residual effects remaining after mitigation measures is also given.

The ES itself does not necessarily consider compliance with planning policies and so planning permission does not have to be granted or refused based on its findings, but these are material considerations.

The ES contains analysis of impacts for the following topics:

- Socio-Economics;
- Daylight, Sunlight, Overshadowing and Solar Glare;
- Wind; and
- Heritage, Townscape & Visual Impact Assessment.

### **CONSULTATIONS**

Active Travel England:	Deferral - Active Travel England is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response. Areas of Concern; insufficient cycle parking, access to the proposed cycle store, no mention of any proposed improvements to nearby cycle routes such as improved surfacing, width or lighting, or improved links to those cycle routes. The Travel Plan lacks ambition. <i>(Officer Note: The applicant has provided a response to these comments. Active Travel</i>
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	<i>England were re-consulted, following the response provided by the applicant. Any further comments received from Active Travel England will be updated via an addendum to this report).</i>
Affinity Water:	No comments received.
County Archaeologist (Surrey County Council):	Satisfied that if the development is permitted, it should be with no further requirement for archaeological mitigation, and I have no archaeological concerns.
County Highway Authority (Surrey County Council):	The proposed development has been considered by the County Highway Authority who having assessed the application on safety, capacity and policy grounds, recommends the following conditions be imposed in any permission granted. (recommended conditions 08, 09, 10, 11, 12, 13 and 14 refer).
Contaminated Land Officer (WBC):	No objection subject to recommended conditions 35, 36, 37 and 38.
Elmbridge Borough Council:	No objection.
Environment Agency:	No comments received.
Environmental Health (WBC):	There is no objection to submit in relation to the above application on EH [Environmental Health] grounds. The Planning noise assessment by Waterman, July 2023, concludes that appropriate internal and external noise levels can be achieved with the recommended design and glazing specifications. If you are minded to approve, please can conditions and informatives be added to cover the following; Noise, Fume Extraction, Management Plan to be submitted for use of the communal spaces including use of the external areas and communal kitchen, Acoustic Details, Plant and Equipment Details, Air Source Heat Pumps & Construction Hours. (Recommended conditions 07, 15, 16, 17, 18, 19, 20, 21 and 41 refer, the S106 Legal Agreement also refers).
Fairoaks Airport:	No safeguarding objections to the proposed development.
Farnborough Airport:	No objection.
Guildford Borough Council:	Holding objection until; (i) Landscape and townscape impact on long range strategic views (ii) impact on the Setting of Listed Buildings and (iii) Surrey Hills Area of Outstanding Natural Beauty are addressed.
Heathrow Airport Ltd:	No comments received.
Health and Safety Executive (HSE):	Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.
Historic England:	Historic England provides advice when our engagement can add most value. In this case we

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	<p>are not offering advice. This should not be interpreted as comment on the merits of the application. We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <a href="https://historicengland.org.uk/advice/find/">https://historicengland.org.uk/advice/find/</a></p>
Joint Waste Solutions:	<p>Our waste collection contractor, Amey has confirmed that a 26T refuse collection vehicle would be able to access the bin store, located to the rear of the development, and accessible via Chapel Street.</p> <p>It is understood that a 24-hour concierge service will be available to support safe and efficient collections. Due to the central location of the development, it's likely that collections would be made early on the scheduled collection day and bins will be made available from the bin store that's nearest to the access road. This will be achieved with the support of an on-site facilities team, who will rotate bins for the development, ultimately ensuring that full bins are brought to the most accessible bin store in time for collections by Amey.</p> <p>It was agreed that securing the bin store with a key or coded lock would be beneficial to avoid unauthorised access/trespassing and to avoid misuse of the bins/store. The possibility of Amey being provided with a code or key to enable direct access was discussed positively and it was agreed that finer details such as this could be achieved through condition of a final waste management plan before completion.</p> <p>Other factors, such a number of bins, bin store size and vehicle clearance were discussed and not believed to be problematic, as they comply with the developer's guidance provided to the design team previously.</p> <p>No other concerns were raised, and it's believed that Amey would be able to service the household waste collection service that's proposed. (recommended condition 22 refers).</p>
Natural England:	<p>As long as the applicant is complying with the requirements of Woking's Avoidance and Mitigation Strategy for the Thames Basin Heaths SPA (through a legal agreement securing contributions to Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM)), Natural England has no objection to this application. Natural England has not assessed this application for impacts on protected species.</p>
NATS Safeguarding:	<p>The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly,</p>

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	<p>NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.</p> <p>However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.</p>
Network Rail:	<p>Holding objection - As a public funded company, Network Rail has responsibilities to spend public funds efficiently which consequently means we do not have the funds available to mitigate the impact of third-party development on railway stations. Following a review of the application, Network Rail object to this planning application as this development will have significant impact on our infrastructure. Network Rail request that the development provides a contribution to mitigate the additional usage, ensuring that the station can continue to operate effectively and provide a good standard for rail passengers. As a result, Network Rail request a meeting with the council to identify the most appropriate way of mitigating the impact at the station.</p> <p>In addition, due to the close proximity of the proposed works to Network Rail's land and the operational railway, Network Rail requests that, where applicable, the applicant / developer follows the attached Asset Protection informatives which are issued to all proposals within close proximity to the railway.</p>
Planning Casework Unit:	<p>We have no comment to make on the related Environmental Statement.</p>
Surrey Police Designing Out Crime Officer:	<p>There is insufficient information contained in the application for me to fully assess security of the development. We wish to reduce the opportunity for crime and the fear of crime and anti-social behaviour and see safer, sustainable communities created. This is also shown in the Design and Access Statement, indicating they have used the principles of Secured by Design. The only way these principles can be confirmed is via the Secured By Design award process for both residential and commercial. Requests a planning condition be attached to attain Secured by Design Certification.</p> <p>(Recommended informative 22 refers).</p>



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Lead Local Flood Authority (LLFA) (Surrey County Council):	<p>We are satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed, subject to our advice below.</p> <p>Our advice would be that, should planning permission be granted, suitably worded conditions are applied to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development. (recommended conditions 30 and 31 refer).</p>
RPS (Jo Evans, Director - Built Heritage Advisor to the Council):	<p>The Heritage Statement is considered to provide a robust assessment and conclusions regarding the contribution the site makes to each heritage asset. The summary of the contribution made by the buildings on the High Street to the Conservation Area is considered sound and reasonable.</p> <p>The conclusions at paragraph 5.19 of the Heritage Impact Assessment are considered to be a reasonable summary of the positive aspects of the proposal within the Conservation Area.</p> <p>The creation of new shop-fronts of traditional design is recognised as contributing to the significance of the conservation area and will help re-establish the High Street as a traditional High Street frontage which in turn will enhance the historic character of the town centre.</p>
Runnymede Borough Council:	No objection to the proposed development subject to the development complying with the relevant policies and any representation made taken fully into account.
South Western Trains Ltd:	No comments received.
Surrey Fire & Rescue Service:	No comments received.
Surrey Heath Borough Council:	After careful consideration, Surrey Heath Borough Council raises no objection to the development. I nevertheless trust that the proposals will be considered in the context of your local planning policies and that any representations received from nearby occupiers, including those from Surrey Heath Borough Council, will be fully taken into account.
Surrey Wildlife Trust Ecology Planning Advice Service:	Ensure that adequate contributions to Suitable Alternative Natural Greenspace provision and Strategic Access Management and Monitoring payment are secured (Thames Basin Heaths), Secure the biodiversity net gain, Secure submission of a Landscape and Ecological Management Plan (LEMP), Precautions should be taken during demolition/partial demolition to ensure that the possible presence of roosting bats is considered, Ensure no net increase in external lighting, Demolition and any vegetation clearance should take place outside of breeding bird season or following nesting bird checks, Care should be

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	<p>taken during construction to ensure the protection of terrestrial mammals, Suggested biodiversity enhancement features should be included in the final design.</p> <p>(Recommended conditions 23, 24, 25, 26, 27, 28 and 29 refer, the S106 Legal Agreement also refers).</p>
ThamesWey Energy Ltd:	<p>Object - ThamesWey does not believe the applicant can robustly determine whether a connection is viable without entering into a discussion with the network operator regarding network operating parameters, connection costs and charges. Over almost twenty years of such discussions with other developers, the evidence shows there is usually opportunity to find commercial arrangements which suit both parties. No such discussions have taken place between the applicant and its representatives and ThamesWey and therefore it is premature and without substance to conclude a network connection is unviable.</p> <p>Without any discussion with ThamesWey regarding the current or forecast carbon factors for the network, fixed and variable costs for heat and power, or the proposed terms of a supply agreement, the applicant cannot demonstrate a connection is unviable and its grounds for choosing an ASHP/VRF based energy system are unsubstantiated. As submitted, ThamesWey strongly believes the application's energy strategy fails to meet the requirements of the Core Strategy, CS22 and the Council's draft Climate Change SPD.</p>
Thames Water Development Planning:	<p>Request foul water drainage condition, surface water condition, piling method statement condition, compliance with Building Regulations Part H, Paragraph 2.26, measures undertaken to minimise groundwater discharges into the public sewer, petrol / oil interceptors.</p> <p>(Recommended conditions 32 and 33 refer. Recommended informatives 11, 12, 13, 14, 15, 16, 17 and 18 refer).</p>

### **REPRESENTATIONS**

**x5** letters in **objection** have been received, raising the following points:

- Object to a building which is above the current height. The towers and hotel have already reduced the amount of sunlight into my property (No.37 Oriental Road), as well as altering the landscape and providing ability to overlook my property. Further tall buildings would further reduce the light available to my family, especially during the winter when the sun is lower, and we need the sunlight for our health.
- Oriental Road is already overlooked from the residential towers, with this building being closer to Oriental Road we will be overlooked further.

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- At the very least, the height should be capped to 3 storeys, and certainly not 8-17 storeys, I wonder whether the Council has listened to the dismay of residents since the towers were built.
- The current building housing the NatWest Bank is one of the few traditional features that give any character and history to Woking Town Centre and should therefore be preserved.  
*(Officer Note: For the avoidance of any doubt the NatWest Bank building is adjacent to the site, it is not within the site)*
- The area is also becoming more pedestrian friendly, but this proposal threatens to counter that due to the increased vehicular traffic it will generate from deliveries to services to commercial need creating congestion, noise and adding to safety risk for pedestrians and cyclists.
- Question whether the commercial space is needed, given the empty property in Woking.
- Object to the strain that it will put on already stretched essential services, such as waste, water, health and medical, social services, already full trains at peak hours and lack of parking given the extra residential and commercial footprint it will create.
- The density of housing in this area is already high.
- The volume of traffic in central Woking is already too high during most hours of the day and the addition of a new block will add more traffic onto the roads, which are already over capacity.
- The development will increase noise levels during the night time.
- I live in a flat in Centrium (Station Approach) opposite and the new block will result in a loss of light and loss of privacy.
- This proposed development is overly dense in height for the area it is located in, a conservation zone, extending to a height of 17 storeys.
- The negative impact on the historic High Street and nearby Commercial Way will intensify the problems caused by local developments (including East Marches which I live in), through overshadowing, the wind tunnel effect and construction pressure on local wildlife and public realm access.
- The student living-style of the studio apartments is out of character with the Masterplan, local plan and local housing needs and this scheme is therefore poorly designed.
- Whilst appreciating that Woking is caught between a rock and a hard place on developing in town or out of town, this is another high rise out of keeping with the town centre where too much damage has already occurred. It would be difficult to object to a 4-5 storey building but this is another one over dense and too high.
- The effect on neighbouring business due to traffic disruption, noise levels and dust will be devastating.
- Planning Committee please demonstrate your powers by either throwing this back to the developers or rejecting.
- I have been assured that the Planning Department was working much more coherently with the Planning Committee and also to the plan, this does not appear to indicate that this cohesion is working yet.
- The proposed height is significantly out of context.
- I own a flat that will be directly impacted for loss of light in the creation of this sardine can. Whilst the planners may accept a neighbours loss in quality, I will look to arrange a group action to protect my Rights to Light.  
*(Officer Note: The originating address given on this letter of representation is Headmasters, No.28 Commercial Way, which contains no residential accommodation. As such, it is unclear what the address is of the flat which is referred to).*

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x9 letters in **support** have been received, raising the following points:

- Good use of a town centre site. Having more people living in the centre is a positive for supporting the local economy.
- Important that the Council ensures that the architecture, particularly the ground level treatment, is not dumbed down through reserved matters post acceptance. The Planning Committee should work proactively to ensure planning conditions are put in place accordingly.  
*(Officer Note: For the avoidance of any doubt this is a full planning application and therefore there are no 'reserved matters' in this instance. In dealing with post decision matters (i.e., the approval of details pursuant to planning conditions for example) Planning Officers always seek to ensure that the quality of approved development is not materially diminished including as a result of changes being made to the permitted scheme, in line with paragraph 135 of the NPPF)*
- This is a well-developed proposal that will bring good benefit to the town centre and provide much needed accommodation of a good standard.
- As a young adult from Woking, I enthusiastically support this project primarily because it will provide high-quality housing that mirrors the kind of accommodation that my generation actually wants.
- My peers (20s-30s-year-olds) and I aren't looking for the kind of housing past generations traditionally would have at our age. We don't want to fall victim to the cruel renting crisis going on in London and neither do we want to be out in the middle of nowhere with no people our age or facilities that cater to us. We still making up for lost social time during the COVID years.
- We enjoy the fantastic town life that Woking uniquely provides - we love visiting local coffee shops; family-run restaurants; Boz's fruit and veg market stalls; the ATG theatre, and local parks. Additionally, the town is so well connected compared to neighbouring towns that it makes Woking all that more attractive. We would flock to this kind of innovative co-housing development.
- The proposed development would benefit the wider Woking community, it not only addresses local housing needs but will relieve pressure on the housing market.
- Believe that this project would be key in continuing urban revitalisation in the town.
- Supporting this project is an investment in our community's future. It will aid in creating a more renter-inclusive Woking for all residents and continue to serve future generations with the flexible living it offers.
- Will help Woking town and its residents.
- It is vital that this part of Woking is developed. As you exit the railway station, all you see is boarded shops and shutters, this is not what potential investors or companies who may wish to relocate to.
- The application looks positive for Woking, it's lower than a lot of other buildings we have seen built.
- The communal spaces and the homes look high quality and should attract people in to live in Woking's town centre and keep more of our young people here rather than moving away or to London.
- This area of Woking is in urgent need of regeneration, it is important that we encourage businesses and investment into Woking.
- It is equally important that there is high quality housing available.
- It's great that The Lighthouse will stay and that the developers are willing to work to ensure that the community gains from development.
- The building looks like it matches the heritage and character of the area.
- Having a good shop frontage along the ground floor with the Cosy Café will hopefully make that corner of the town a bit more bustling.

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- I have been in The Broadway, operating as Galaxy, since the 1980's and its vital that the High Street is regenerated.
- The Lighthouse will benefit from a new and modern space, they've been vital to the community in their support and outreach work and keeping them in central Woking, close to the train station and bus route, is key to make sure that their services are accessible to all.
- We support the delivery of new housing as it helps growth and business, being in close proximity to traders in the town centre, Woking certainly needs a boost.

### **RELEVANT PLANNING POLICIES**

#### National Planning Policy Framework (NPPF) (2023)

Section 2 - Achieving sustainable development

Section 4 - Decision-making

Section 5 - Delivering a sufficient supply of homes

Section 6 - Building a strong, competitive economy

Section 7 - Ensuring the vitality of town centres

Section 8 - Promoting healthy and safe communities

Section 9 - Promoting sustainable transport

Section 11 - Making effective use of land

Section 12 - Achieving well-designed places

Section 14 - Meeting the challenge of climate change, flooding and coastal change

Section 15 - Conserving and enhancing the natural environment

Section 16 - Conserving and enhancing the historic environment

#### South East Plan 2009 (Saved policy)

NRM6 - Thames Basin Heaths Special Protection Areas

#### Woking Core Strategy (2012)

CS1 - A spatial strategy for Woking Borough

CS2 - Woking Town Centre

CS7 - Biodiversity and nature conservation

CS8 - Thames Basin Heaths Special Protection Areas

CS9 - Flooding and water management

CS10 - Housing provision and distribution

CS11 - Housing mix

CS12 - Affordable housing

CS16 - Infrastructure delivery

CS17 - Open space, green infrastructure, sport and recreation

CS18 - Transport and accessibility

CS20 - Heritage and conservation

CS21 - Design

CS22 - Sustainable construction

CS24 - Woking's landscape and townscape

CS25 - Presumption in favour of sustainable development

#### Development Management Policies Development Plan Document (DM Policies DPD) (2016)

DM1 - Green infrastructure opportunities

DM2 - Trees and landscaping

DM6 - Air and water quality

DM7 - Noise and light pollution

DM8 - Land contamination and hazards

DM16 - Servicing development

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DM17 - Public realm  
DM19 - Shopfronts  
DM20 - Heritage assets and their settings

Site Allocations Development Plan Document (SA DPD) (2021)  
UA4 - 1-12 High Street and 26-34 Commercial Way, Woking, GU21 6EN

Supplementary Planning Documents (SPD's)  
Design (2015)  
Parking Standards (2018)  
Outlook, Amenity, Privacy and Daylight (2022)  
Climate Change (2013)  
Affordable Housing Delivery (2023)

Supplementary Planning Guidance (SPG)  
Heritage of Woking (2000)

Other Material Considerations  
Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)  
The Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended)  
The Conservation of Habitats and Species Regulations 2017 (as amended)  
The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)  
Planning Practice Guidance (PPG) (online resource)  
National Design Guide: Planning practice guidance for beautiful, enduring and successful places (January 2021)  
Updated Thames Basin Heaths Avoidance Strategy (February 2022)  
Circular 06/2005: Biodiversity and Geological Conservation - Statutory obligations and their impact within the planning system  
The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 - 2nd Edition, December 2017, Historic England  
Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2, July 2015, Historic England  
Woking Character Study (2010)  
Woking Borough Council Strategic Flood Risk Assessment (SFRA) (November 2015)  
Community Infrastructure Levy (CIL) Charging Schedule (2015)  
Recycling and waste provision - guidance for property developers, Joint Waste Solutions

### **PLANNING ISSUES**

1. The main planning issues for consideration in this case are:
  - Spatial strategy and principle of development;
  - Amenities of future occupiers;
  - Affordable housing;
  - The effect on the character and appearance of the area, including on the Woking Town Centre Conservation Area and nearby heritage assets;
  - Archaeology (below-ground heritage);
  - Transport, highways and parking;
  - Impacts on neighbouring residential amenities;
  - Thames Basin Heaths Special Protection Area (TBH SPA);
  - Wind microclimate;
  - Solar glare;

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- Air quality;
- Contamination;
- Flooding and water management;
- Noise and vibration;
- Ecology and biodiversity;
- Energy and water;
- Fire safety;
- Aviation;
- Local finance considerations; and
- Conclusion and planning balance.

### **Spatial strategy and principle of development**

2. The National Planning Policy Framework (NPPF) (2023) emphasises three elements to sustainable development; economic, social and environmental and sets out (at paragraph 10) a presumption in favour of sustainable development (although the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making). Paragraph 11 of the NPPF sets out that for decision-taking applying the presumption in favour of sustainable development means *“approving development proposals that accord with an up-to-date development plan without delay”*.
3. The site is located centrally within Woking Town Centre, as this is defined by the Council's Proposals Map. Woking is a town that is experiencing significant growth and regeneration, in large part due to the constraints that affect large parts of the Borough, including Green Belt and areas covered by environmental restrictions, including the Thames Basin Heaths Special Protection Area (TBH SPA).
4. The Woking Core Strategy (2012) makes provision for the delivery of 4,964 net additional dwellings, as well as of 93,900 sq.m of additional retail floorspace, up to 2027 (i.e., the end of the present Development Plan period). Policy CS1 of the Woking Core Strategy (2012) recognises the constraints to development by stating that *“Most of the new development will be directed to previously developed land in the town, district and local centres, which offers the best access to a range of services and facilities. The scale of development that will be encouraged in these centres will reflect their respective functions and nature”*. Table 2 of the Woking Core Strategy (2012) sets out a Hierarchy of Centres within the Borough, with Woking Town Centre identified at the top of this hierarchy, as the Borough's principal centre, and therefore the primary focus for sustainable growth due, amongst other things, to its role as a key transport interchange and being an important location for shopping, offices, entertainment, cultural and community activities, with a primary role within the regional economy.
5. Policy CS1 of the Woking Core Strategy (2012) further states that:

*“Woking Town Centre will be the primary focus of sustainable growth to maintain its status as an economic hub with a flourishing, diverse and innovative economy and a transport hub which provides transport services, links and communication linking people to jobs, services and facilities. The town centre is designated as a centre to undergo significant change and the provision of a range of shops, cultural facilities, jobs and housing to meet locally identified needs and the needs of modern businesses will be encouraged. Main town centre uses as defined in the NPPF, will be acceptable in principle, subject to the requirements of the policies of the Core Strategy.*

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*In the town centre, well designed, high density development that could include tall buildings and which enhances its image will be encouraged, but without compromising on its character and appearance and that of nearby areas.* (emphases added)

6. Policy CS2 of the Woking Core Strategy (2012) sets out that around 2,180 dwellings are to be provided within Woking Town Centre up to 2027 and that:

*"The Council will support the development of the town centre as the primary centre for economic development in the Borough and as a primary economic centre in the South East. The Town Centre is the preferred location for town centre uses and high density residential development. New development proposals should deliver high quality, well designed public spaces and buildings, which make efficient use of land, contribute to the functionality of the centre and add to its attractiveness and competitiveness."* (emphasis added)

7. Policy CS2 sets out that:

*"The proposals will be achieved through:*

- mixed-use high density redevelopment of existing sites*
- refurbishment of outmoded sites*
- intensification of existing sites*
- change of use of existing employment uses where this will not undermine the delivery of the proposed development set out in the policy and the other objectives of the Core Strategy*
- safeguarding of existing office floorspace where there is evidence to justify that."*

8. The site is located within the Primary Shopping Area and within a Secondary Shopping Frontage. Policy CS2 of the Woking Core Strategy (2012) also states that:

*"The primary shopping area comprises primary and secondary frontages and will be the main focus, particularly at ground floor level, for A1 retail uses...The Council will consider favourably change of use proposals to other A Class uses within secondary frontages if it can be determined they would not have significant harmful effects on the frontage, crime and disorder and the vitality and viability of the town centre".*

9. Policy CS10 of the Woking Core Strategy (2012) states that *"The Council will make provision for at least 4,964 net additional dwellings in the Borough between 2010 and 2027"*, identifying that around 1,980 dwellings will be provided within Woking Town Centre at densities in excess of 200dph.

10. Policy CS11 of the Woking Core Strategy (2012) states that *"All residential proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs as evidenced in the latest Strategic Housing Market Assessment in order to create sustainable and balanced communities. The appropriate percentage of different housing types and sizes for each site will depend upon the established character and density of the neighbourhood and the viability of the scheme. The Council will not permit the loss of family homes on sites capable of accommodating a mix of residential units unless there are overriding policy considerations justifying this loss."*

11. Policy UA4 of the recently adopted Site Allocations Development Plan Document (2021) (the SA DPD) includes the site (as part of the 'urban block' which is bounded by High Street, Church Path, Chapel Street and Commercial Way). Policy UA4 states that *"This*



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0.58ha site is allocated for a mix of uses to comprise residential including affordable housing, office and retail” and identifies an anticipated site yield of 149 net additional dwellings together with 1,600 sq.m net (2,000 sq.m gross) of office space and retail floor space. The reasoned justification and supporting text (at paragraph 8.27) indicate that the 149 net additional dwellings is a minimum, through the words “at least”.

12. Section 7 of the NPPF (2023) relates to ‘Ensuring the vitality of town centres’ and states (at paragraph 86) that planning decisions “*should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth*” by “a) allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters...c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones...[and] f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites”.
13. Since the Woking Core Strategy (2012) was adopted (including Policy CS2) in 2012 Government has issued amendments to the Town and Country Planning (Use Classes) Order 1987, with substantive changes coming into force on 1 September 2020. The changes that Government introduced are intended to give businesses greater freedom so that they can adjust more quickly, and with more planning certainty, to changing demands and circumstances. A single Use Class E (Commercial, Business & Service) now comprises use, or part use, for all or any of the following purposes:
  - a) *for the display or retail sale of goods, other than hot food, principally to visiting members of the public [formerly Class A1],*
  - b) *for the sale of food and drink principally to visiting members of the public where consumption of that food and drink is mostly undertaken on the premises [formerly Class A3],*
  - c) *for the provision of the following kinds of services principally to visiting members of the public [all formerly within Class A2] comprising: (i) financial services, (ii) professional services (other than health or medical services), or (iii) any other services which it is appropriate to provide in a commercial, business or service locality,*
  - d) *for indoor sport, recreation or fitness, not involving motorised vehicles or firearms, principally to visiting members of the public [formerly within Class D2(e)],*
  - e) *for the provision of medical or health services, principally to visiting members of the public, except the use of premises attached to the residence of the consultant or practitioner [formerly Class D1(a)],*
  - f) *for a crèche, day nursery or day centre, not including a residential use, principally to visiting members of the public [formerly Class D1(b)],*
  - g) *for-*
    - (i) *an office to carry out any operational or administrative functions [formerly Class B1(a)],*
    - (ii) *the research and development of products or processes [formerly Class B1 (b)], or*
    - (iii) *any industrial process [formerly Class B1(c)],*  
*being a use [in all three cases, as in the former Class B1] which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.*
14. As explained in Paragraph 009a of the PPG, the Commercial, Business and Service Use Class (Class E) includes a broad and diverse range of uses which principally serve the needs of visiting members of the public and or are suitable for a town centre area. The

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class incorporates the whole of the previous Shops (A1) Use Class (although not, according to the PPG, those that now fall within the scope of the F.2 Local community Use Class), Financial and professional services (A2), Restaurant and cafés (A3) and Business (B1 including offices) Use Classes, and uses such as nurseries, health centres and gyms (previously in classes D1 Non-residential institutions, and D2 Assembly and leisure) *“and it seeks to provide for new uses which may emerge and are suitable for a town centre area”*.

15. The site presently accommodates around 908 sq.m of ground floor level Class E (Commercial, Business & Service) floorspace, with a further approximate 393 sq.m at basement level. There is office floorspace (also Class E, Commercial, Business & Service) at mezzanine, first and second floor levels (around 345 sq.m) and further Class E (Commercial, Business & Service) floorspace at first and second floor levels (around 449 sq.m). There is an existing large House of Multiple Occupation (HMO) at No.14 Chapel Street (ref: PLAN/2019/1081), which falls within the site, which occupies around 265 sq.m floorspace. As such, in overall terms, the site presently provides around 2,095 sq.m of Commercial, Business & Service floorspace and around 265 sq.m of residential floorspace (the residential floorspace being within *sui generis* use).
16. It is clear that the part of the High Street within which the site is located has rather suffered from a lack of investment and, as a result, has become somewhat run-down in appearance with little footfall and areas of inactive or vacant frontage.
17. The proposed development would provide an active frontage along High Street and ‘turning the corner’ into Chapel Street. This ground floor Commercial, Business & Service (Class E) floorspace would measure around 440 sq.m (plus a further 61 sq.m ‘Back of House’ area, thus a total area of around 501 sq.m). Whilst there would be a reduction in Commercial, Business & Service (Class E) floorspace across the site as a whole, and indeed at ground floor level, it is material that No.7 High Street is presently in poor condition, and No.3 High Street is presently vacant. It is also material that the proposed development would provide a notable amount of modern, high quality Class E floorspace which would be prominent on High Street and Chapel Street. The provision of modern, high quality Class E floorspace would enhance the commercial attractiveness of this part of High Street, notwithstanding that there would be a reduction in Class E floorspace as a result of the proposed development.
18. Clearly, the proposed development would also contain a significant residential component (329 co-living rooms supported by communal spaces), which would generate substantial footfall to and from the site across each day of the week, in addition to the proposed Class E floorspace at ground level. Whilst the principle of the residential land use will be considered subsequently it must be noted that the applicant states (Operational Management Plan, under ‘Staffing’ sub-heading) that *“Co-Living buildings tend to have more intensive employment levels to cater for the community level experience that we want to instil along with our wide-ranging series of events”* and that *“we are working off the basis that there will be circa 12+ full time jobs on site allocated to the operation of the building. There will also be several contractors who will be employed by third party services agreements”*. It must also be noted that the Operational Management Plan sets out that the co-living element of the building will have 24 hour management on-site, including a *“night concierge and security team”*. As such, the management of the co-living element of the building will also provide employment opportunities and thus will generate commercial activity within Woking Town Centre. This would go some way towards offsetting, in commercial activity terms, the reduction in Class E floorspace which would take place.

**Residential development**

Co-Living

19. The residential development which is proposed in this instance takes the form of 'Co-Living', this is a relatively recent, bespoke residential product which provides large-scale, purpose-built shared living accommodation. Whilst this type of residential accommodation is most prevalent in London and other cities it is expanding into towns.
20. Although clearly not forming part of the Development Plan in Woking Borough Policy H16 (Large-scale purpose built shared living) of the London Plan 2021 sets out helpful guidance on the quality of and requirements within large-scale purpose built shared living, stating that (Large-scale purpose-built shared living developments are *sui generis*):

*"A Large-scale purpose-built shared living development must meet the following criteria:*

- 1) it is of good quality and design*
- 2) it contributes towards mixed and inclusive neighbourhoods*
- 3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency*
- 4) it is under single management*
- 5) its units are all for rent with minimum tenancy lengths of no less than three months*
- 6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:*
  - a) convenient access to a communal kitchen*
  - b) outside communal amenity space (roof terrace and/or garden)*
  - c) internal communal amenity space (dining rooms, lounges)*
  - d) laundry and drying facilities*
  - e) a concierge*
  - f) bedding and linen changing and/or room cleaning services.*
- 7) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes*
- 8) a management plan is provided with the application"*

21. Paragraph 92 of the NPFF states that planning decisions should aim to achieve healthy, inclusive, and safe places which, inter alia, *"promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages."*
22. The applicant's Planning Statement (at Appendix 5) contains a co-living needs assessment which identifies, inter alia, that in Woking *"There are over 2,500 renters who are classified as Single and 4,570 who live in a Homeshare. These renters are likely living in HMOs or second-hand rental accommodation. The location, flexibility and all-inclusive rents of the proposed Co-living scheme would be appealing to those renters",* that *"Over a third of households, 37% or more than 15,300, are classified as one person: no children, and so would be an ideal market for the studio led single occupancy proposed scheme".* The co-living needs assessment also states that *"Accommodation specially designed to meet the needs of Woking's population of single renters are in short supply. One bed flats can be an expensive option for a single renter when factoring in bills and additional household spend. Co-living represents a more affordable option."*

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23. Co-living residential accommodation can make a significant contribution to the creation of mixed-use developments which encourage and facilitate social interaction. The communal amenity spaces (indoor and outdoor) within the proposed development will provide a range of opportunities for social interaction between residents, which is a key component of the co-living ethos. The potential provision of (Class E) space for The Lighthouse within the proposed development provides further opportunities for social interaction and the proximity of a range of leisure, retail and commercial floorspace will encourage this interaction to extend beyond the building into Woking Town Centre.

### Residential more generally

24. In respect of the residential accommodation proposed paragraph 60 of the NPPF (2023) states that *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay"*. Paragraph 120 relates to the effective use of land and states that planning decisions should encourage multiple benefits from urban land through mixed use schemes and *"c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs"*.
25. The application site is located centrally within Woking Town Centre, and thus is within the most sustainable location within the Borough (on the basis of the Hierarchy of Centres), it is a very short walk from Woking railway station. The proposed development would provide x329 co-living homes. The proposed residential use is an acceptable land use at the site, given its location within Woking Town Centre, and is lent policy support by Policies CS1 and CS2 of the Woking Core Strategy (2012) and Policy UA4 of the Site Allocations DPD (2021).
26. As defined by the Government's Housing Delivery Test (HDT) Measurement Rule Book (2018), bedrooms in communal accommodation count towards a local authority's overall net home delivery target. The contribution is calculated by dividing the number of communal bedrooms by the average number of adults in households in England. The Rule Book used 2011 Census Data which supported a value of 1.8 for this metric.
27. There is currently no uniform approach to calculating equivalent residential density for co-living accommodation. This is because co-living accommodation is based on the sharing of high-quality spaces and facilities and therefore it is not appropriate to consider it on a like for like basis compared to traditional (Use Class C3) residential accommodation. If the HDT Measurement Rule Book (2018) is applied, then for every 1.8 Co-living units this would represent a density of 1 traditional residential (Class C3) unit.
28. However, the applicant considers it most appropriate to consider the local Woking population because the HDT Rule Book (2018) metric excludes children and if a traditional (Use Class C3) residential scheme were to be pursued then it is likely some children would reside in the proposed building. From the same Census dataset (i.e., 2011), the average household size in Woking is 2.49 people. The two approaches are compared for a Co-living building on the site of 329 units (on the following page):

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Residential conversion ratio	Equivalent number of traditional (Class C3) residential units
1.8 (HDT)	183
2.49 (Applicants)	132

29. Applying the HDT Rule Book (2018) metric the co-living element of the proposed development would achieve, and indeed exceed, the minimum net housing delivery requirement of Policy UA4 of the Site Allocations DPD (149 net additional dwellings). Applying the latter metric, the equivalent number of traditional residential units would fall below the minimum net requirement of Policy UA4, albeit not significantly so and that requirement encompasses the whole UA4 allocation, which is larger than the application site. The notional shortfall could be made good by a small-scale development elsewhere within the Policy UA4 area.
30. As such, it is clear that the proposed development would make an important contribution to new homes in the Borough and would assist in achieving the Council's overarching aim to deliver 1,980 new dwellings within Woking Town Centre by 2027, in line with Policy CS10 of the Woking Core Strategy (2012). Policy CS11 of the Woking Core Strategy (2012 recognises that that lower proportions of family accommodation will be acceptable in locations in the Town Centres that are suitable for higher density developments, the justification text to Policy CS11 (paragraph 5.73) states that "*Lower proportions of family accommodation (2+ bedroom units which may be houses or flats) will be acceptable in locations in the Borough such as the town and district centres that are suitable for higher density developments*" (emphasis added). This emphasis was recognised by an Inspector (at paragraphs 15 and 16 of the appeal decision) in allowing an appeal (at Land at No.7 York Road) against the refusal of planning permission for the construction of a building to provide x47 dwellings (WBC ref: PLAN/2015/0299, Appeal Ref: APP/A3655/W/16/3148379).
31. The proposed residential accommodation comprises co-living homes, a form of Large Scale Purpose Built Shared Living. Considerations of housing mix do not therefore strictly apply within the proposed development, which is providing a specific type of accommodation aimed at a particular target demographic and providing a form of accommodation which is not currently available in Woking Borough. The applicant has nonetheless submitted a Housing Need Assessment (see Appendix 3 of Planning Statement), as previously referenced, which demonstrates that the residential accommodation to be provided will meet a clear local need. Given the provisions of Policy CS11 of the Woking Core Strategy (2012), together with the Woking Town Centre location of the site, the housing mix is nonetheless considered to be acceptable.
32. The proposed development would result in the loss of some existing residential accommodation at No.14 Chapel Street, which is within the site. This residential accommodation takes the form of a large House of Multiple Occupation (HMO) (ref: PLAN/2019/1081), for up to x11 persons. This existing large HMO accommodation is *sui generis* (i.e., does not fall within Use Class C3) and its loss would be offset by the *sui generis* residential accommodation provided within the proposed development. As such, there would be no loss of residential accommodation.

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### **Employment and economic activity**

33. One of the core objectives of achieving sustainable development, as the NPPF, is an economic objective – to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
34. Redevelopment of the site, which is previously developed land with Woking Town Centre, and forms part of Policy UA4 of the Site Allocations DPD (2021), with a mixed-use scheme of 329 co-living units and Commercial, Business & Service (Class E) floorspace, provides a major opportunity to enhance economic activity and employment for both the construction and operational phases of the development.
35. The Environmental Statement (ES) submitted with the application sets out that, accounting for both direct and indirect/induced effects, a total of x110 net additional full-time equivalent (FTE) positions could be generated each year across the wider impact area during the demolition and construction period, inclusive of x45 jobs in the local impact area. Once operational the ES sets out that the net additional employment in Woking resulting from the proposed development is estimated to be x5 FTE jobs, a positive impact for economic activity and employment within the Borough. Additionally, the new housing would accommodate an estimated x329 residents, who would spend money within the Borough, and particularly within Woking Town Centre, this would be a major positive impact for economic activity.

### **Conclusion on Spatial Strategy and Principle of development**

36. Overall, the development is a major opportunity for regeneration of previously developed land, and part of a site allocated for development by Policy UA4 of the Site Allocations DPD (2021), in the built-up urban area within Woking Town Centre, the principal centre of the Borough. The proposed co-living accommodation would provide a significant quantum of new housing for the Borough, also having significant economic benefits during both construction and operation, and would provide a range of opportunities for social interaction between residents, which is a key component of the co-living ethos.
37. In respect of the Class E (Commercial, Business & Service) floorspace the proposed development would provide an active frontage along High Street and 'turning the corner' into Chapel Street, the provision of modern, high quality Class E floorspace would enhance the commercial attractiveness of this part of High Street and the potential provision of space for The Lighthouse within this Class E floorspace would provide further opportunities for social interaction.

### **Amenities of future occupiers**

38. Policy UA4 of the Site Allocations DPD (2021) requires development of the site to, inter alia, *"Provide a high standard of amenity for future users, including any necessary mitigation in respect of the noise of adjacent roads, and ensure that appropriate levels of sunlight and daylight are available for internal environments."*
39. Paragraph 130 of the NPPF states that planning decisions should ensure that developments, inter alia, *"create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users"*.

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### Space standards and amenity spaces

40. There are currently no minimum space standards for co-living developments, including within Policy H16 of the London Plan 2021 (albeit this policy clearly doesn't form part of the Development Plan for Woking Borough in any case). However, that policy does state that private rooms should be appropriately sized to be comfortable and functional and may include facilities such as en-suite bathrooms and limited cooking facilities. The London Plan also identifies that communal amenity space is important in securing the quality of the overall accommodation is acceptable.
41. Although the Technical housing standards - nationally described space standard (March 2015) (NDSS) do not apply in this instance, it is useful to note that the minimum space standard, within the NDSS, for a single occupancy bedroom is 7.5 sq.m. The 'standard' private co-living rooms within the proposed development would generally be 18 sq.m (incl. the kitchenette & en-suite spaces), with some isolated examples at 17 sq.m, which are considered sufficient and is in line with several granted (& some constructed) examples of such co-living accommodation (particularly within London). Some of the private 'accessible' co-living rooms would be up to 32 sq.m in size albeit importantly these would remain below the 37 sq.m 'threshold' beyond which the units would be capable of potentially being occupied as self-contained homes. Whilst it is noted that all of the private co-living rooms would be single aspect, this would not result in a poor standard of accommodation due to the limited depth of the rooms and that none of the rooms would face due north.
42. In terms of amenity space SPD Outlook, Amenity, Privacy and Daylight (2022) does not form part of the Development Plan, although it provides guidance on how Policy CS21 of the Woking Core Strategy (2012) could be applied. SPD Outlook, Amenity, Privacy and Daylight (2022) does not contain specific provisions relating to co-living development although does state (at paragraph 3.12) that:

*"Non-family accommodation will be taken to mean studio and one bedroom flats and any other forms of dwellings of less than 61sqm. internal floorspace together with specified forms of accommodation such as older persons accommodation and specialist care units."*
43. Given that no private co-living unit would exceed 32 sq.m internal floorspace they would clearly constitute non-family accommodation, including for the purposes of SPD Outlook, Amenity, Privacy and Daylight (2022).
44. It is noted that SPD Outlook, Amenity, Privacy and Daylight (2022) states (at paragraph 3.13) that *"Whilst generally dwellings specifically designed not to be used for family accommodation do not require any specific area to be set aside for each as private amenity space, applicants will be encouraged to do so where it is feasible"* it must be borne in mind that no private co-living unit would constitute a 'dwelling', hence the residential component of the proposed development would be *Sui generis* rather than falling within Use Class C3.
45. Nonetheless co-living occupiers of the proposed development would benefit from access to a range of both indoor and outdoor communal amenity areas, including (on the following page):

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### Indoor

Floor level	Room use/purpose	Room size (GIA)
First	Gym	118
	Wellness studio	57
	Library/Co-working	133
	Private dining	42
	Cinema room	63
	Laundry room	39
Eighth	Communal Kitchen & Dining Room	185
Sixteenth	Lounge	85
<b>Total</b>		<b>722</b>

### Outdoor

Floor level	Roof terrace use/purpose	Roof terrace size (GIA)
Eighth	Outdoor kitchen & dining, Flexible space/games area, Food garden, Outdoor lounge	228
Fifteenth	Roof terrace	75
Sixteenth	Roof terrace	85
<b>Total</b>		<b>388</b>

46. The number and variety of these spaces is considered to provide a high standard of amenity for future residents.

### Outlook and Privacy

47. SPD Outlook, Amenity, Privacy and Daylight (2022) states (at paragraph 2.5) that *“Outlook from a principal window will generally become adversely affected when the height of any vertical facing structure exceeds the separation distance from the window. When a structure is placed too close to a window so that it completely dominates the outlook it will have an overbearing impact”*. The SPD also states (at paragraph 4.1) that:

*“New developments should be designed to protect the privacy of both new and existing dwellings”* and states (at para 4.11) that *“For three storey of taller accommodation (including dwellings with second floor dormer windows), a separation distance of approximately 30m will be adequate to prevent overlooking of dwellings of a similar or lesser height”*. Appendix 1 of the SPD sets out recommended minimum separation distances for achieving privacy (as below) stating that *“Standards of amenity may be relaxed for housing in Woking Town Centre...”*.

Number of storeys	Measured Dimension	Distance (metres)
Three and over	Front to front elevation	15
	Rear to rear elevation	30
	Front or rear to boundary/flank	15
	Side to boundary	2



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48. New residential accommodation (including the indoor communal spaces with a requirement for outlook such as the gym, wellness studio, library/co-working and private dining room) would be located at first floor level at the lowest. Between first and seventh floor levels (incl.) residential accommodation would face principally towards the front (across High Street and over the railway) to the rear (across the 'yard' areas and properties fronting Commercial Way, to the north-west) and across Chapel Street (to the south-west). There would be some more limited examples of private co-living rooms which would face 'into the site' to the side (i.e., to the north-east).
49. Where facing towards the front (i.e., across High Street) the proposed drawings demonstrate that at first floor level around 11.5m separation would be retained between the closest facing windows and the wall/building along the opposite side of High Street, this would achieve a good level of outlook taking into account the relative heights. At its closest around 66.0m separation would be retained between the High Street elevation and the Eastgate residential building on the south side of the railway, which is the closest building (other than the railway station, railway infrastructure) in this direction. In excess of 90.0m separation would be retained to the Telephone Exchange building, on the south side of the railway. These retained levels of separation would ensure that good levels of outlook are achieved to residential accommodation facing across High Street, as well as sufficient privacy for future occupiers.
50. Where facing across Chapel Street around 8.0m separation would be retained between the closest facing windows and the buildings opposite (No.13 High Street and Nos.3-4 Chapel Street). Whilst these would be quite close relationships, they would not be unduly close within this Woking Town Centre context, with No.13 High Street and Nos.3-4 Chapel Street being within non-residential uses. The submitted drawings also demonstrate that the relationship between the existing and proposed buildings would be such that the first floor level accommodation within the proposed building would, due to comparative heights, achieve a sufficient level of outlook, particularly in this Woking Town Centre context. At third floor level and above the residential accommodation within the proposed building would sit above the roof heights of opposing buildings such that very good levels of outlook would be achieved in this direction (i.e., to the south-west).
51. Where facing to the rear (across the 'yard' areas and properties fronting Commercial Way, to the north-west) residential windows at first, second and third floor levels (incl.) would have a close relationship with the facing elevation of Provincial House (No.26 Commercial Way, the Cote building). Around 6.0m separation would be retained between these two facing elevations. However, whilst there would be windows within this closest elevation of the proposed development these windows would serve a secondary function to x2 private co-living rooms on each floor (i.e., at first, second and third floors incl.), the primary aspect to which would be either across Chapel Street (discussed previously) or 'into the site' to the side (i.e., to the north-east). As such, the presence of Provincial House, and the close resulting relationship between these elements of the two buildings, would not harm the amenities of future occupiers due to the secondary function of the windows involved. At fourth floor level and above the windows within this closest facing elevation would be situated above the roof of Provincial House thus would benefit from good levels of outlook. Where windows would face 'into the site' (i.e., to the north-east) they would remain around 33.0m away from the opposing site boundary and thus would benefit from acceptable levels of outlook given the combination of this distance and the generally low heights of buildings opposite in this direction (i.e., those fronting Church Path, which are closest).
52. Where facing to the rear (across the 'yard' areas and properties fronting Commercial Way, to the north-west) residential windows would remain around 17.0m away from the

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rear elevations of buildings which front Commercial Way (i.e., Nos.28, 30-32 & 34). Given that the heights of these Commercial Way buildings are around 12.0m the retained level of separation would ensure acceptable levels of outlook and privacy to future residential occupiers, levels of outlook would of course improve as one moves upwards through the proposed building.

53. The proposed communal roof terraces (at eighth, fifteenth and sixteenth floors) would all be accessed either directly through the lift/stair core, or through communal indoor areas, such that they have been designed in such a way that would ensure no harmful loss of privacy or overlooking would arise to private co-living rooms.
54. Overall at the lowest residential levels (i.e., first, second and third incl.) sufficient levels of outlook and privacy would be achieved to future residential occupiers, given the Woking Town Centre location of the site. At fourth floor level and above good levels of outlook and privacy would be achieved to future residential occupiers.

### Daylight

55. Paragraph 125c) of the NPPF states that *“when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”*
56. The BRE Site layout planning for daylight and sunlight: A guide to good practice (Third edition, 2022) (hereafter referred to as the BRE Guide) recognises the importance of receiving adequate daylight within new residential accommodation; it states that *“Daylight provision in new rooms may be checked using either of the methods in BS EN 17037 Daylight in Buildings: direct prediction of illuminance levels using hourly climate data, or the use of the daylight factor (D). Both are measures of the overall amount of daylight in a space. The daylight factor (D) addresses daylight provision as a ratio of unobstructed external illuminance under overcast sky conditions.”* (paragraph 2.1.8). It is clear that the previous method of determining Average Daylight Factor (ADF) is no longer applicable and the new methodology can follow either the ‘Illuminance method’ (which involves using climatic data for the location of the site to calculate the illuminance from daylight at each point on an assessment grid on the reference plane at an at least hourly interval for a typical year) or the ‘Daylight factor method’ (which is the illuminance at a point on the reference plane in a space, divided by the illuminance on an unobstructed horizontal surface outdoors. The CIE standard overcast sky is used, and the ratio is usually expressed as a percentage).
57. The BRE Guide itself recognises that its advice is not mandatory, its aim being to help rather than constrain the designer. Although it gives numerical guidelines, it advises that these should be interpreted flexibly since natural lighting is only one of many factors in site design layout.
58. The UK National Annex gives illuminance recommendations of 100 Lux in bedrooms, 150 Lux in living rooms and 200 Lux in kitchens. These are median illuminances to be achieved over 50% of the assessment grid for at least half of the daylight hours. The private co-living rooms within the proposed development include a kitchenette and small table. While these rooms could technically be considered multi-use (i.e., Living/Kitchen/Dining, or LKD), future residents would have the benefit of the communal indoor (and outdoor) amenity areas which generally have access to good levels of daylight (where applicable). As such, the applicant considers that a target of 100 Lux is appropriate for the private co-living rooms and sets out that this approach is consistent

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with a number of similar schemes that have recently received planning permission, including Sandringham Mews in Ealing and William Road in Camden.

59. The applicant has also undertaken an assessment of some of the indoor communal amenity areas within the proposed development which have a reasonable expectation of daylight, including the library/co-working space, the private dining area and the 'MasterChef' communal kitchen area. For both the library/co-working space and the private dining area the applicant has used a target median illuminance of 150 Lux and for the communal kitchen area a target of 200 Lux has been used.
60. The applicants internal daylight assessment report concerns the first to eighth floors (incl.). The ground floor will contain no residential rooms (Class E or 'back of house' areas) and all of the rooms above eighth floor level will meet the BRE Guide suggested value (of 100 Lux) for bedrooms. The following paragraphs will focus on those rooms where the daylight assessment shows Lux values below the suggested levels being achieved.
61. At first floor level (i.e., the lowest residential floor, where achieving daylight levels would generally be the most challenging) the daylight assessment report shows that the library/co-working room (facing High Street) will achieve a median illuminance level of 115 Lux. Whilst this is below the suggested value of 150 Lux it is very difficult to achieve daylight penetration to the rear of this room due to its depth (around 10.5m), it is this room depth which reduces the overall median Lux value although clearly it is beneficial to future occupiers to provide as large a room as possible. The assessment demonstrates that good levels of daylight will be achieved towards the front of the room, with around one third of the room achieving 150 Lux or more and around half the room achieving 100 Lux or more. Overall therefore the daylighting of this communal room is considered acceptable particularly given that in this type of room there would generally be some reliance on electric lighting (as in an office for example).
62. In respect of the private co-living rooms at first floor level the daylight assessment shows that 18 of 21 rooms (86%) would achieve the suggested value of 100 Lux (or greater). Where 100 Lux would not be achieved 2 of the 3 rooms would fall only slightly short, at 92.6 Lux (room R6/801) and 93.3 Lux (room R16/801) respectively. Whilst room R14/801 would achieve only 50.2 Lux this would be a larger, accessible room (27 sq.m) and thus the larger room size would go some way to compensating for the lower daylight levels.
63. At second floor level 30 of 34 private co-living rooms (88%) would achieve the suggested value of 100 Lux (or greater). Where 100 Lux would not be achieved 1 of the 4 rooms would fall only very slightly short, at 96.9 Lux (room R13/802). The other 3 rooms would achieve 69.2 Lux (room R10/802), 75.2 Lux (room R12/802) and 63.8 Lux (room R25/802). The 2 (of these 3) rooms with the lowest daylight levels would be larger, accessible rooms (rooms R10/802 and R25/802) where the larger room sizes (27-28 sq.m) would go some way to compensating for the lower daylight levels.
64. At third floor level 30 of 32 private co-living rooms (94%) would achieve the suggested value of 100 Lux (or greater), with 1 room falling slightly short at 89.5 Lux (room R10/803) and a further room falling more significantly short at 65.0 Lux (room R23/803). Again, however these 2 rooms would both be larger, accessible rooms where the larger room sizes (27-28 sq.m) would go some way to compensating for the lower daylight levels.
65. At fourth and fifth floor levels 31 of 32 private co-living rooms (97%) on each floor would achieve the suggested value of 100 Lux (or greater). At fourth floor level 1 room (room R23/804) would achieve 72.3 Lux and at fifth floor level 1 room (room R23/805) would

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achieve 74.3 Lux. Again, however these 2 rooms would both be larger, accessible rooms where the larger room sizes (27 sq.m) would go some way to compensating for the lower daylight levels.

66. At sixth and seventh floor levels 31 of 32 private co-living rooms (97%) on each floor would achieve the suggested value of 100 Lux (or greater). At sixth floor level 1 room (room R23/806) would achieve 82.8 Lux and at seventh floor level 1 room (room R23/807) would achieve 87.6 Lux. Again, however these 2 rooms would both be larger, accessible rooms where the larger room sizes (27 sq.m) would go some way to compensating for the lower daylight levels. At eighth floor level 12 of 13 private co-living rooms (92%) would achieve the suggested value of 100 Lux (or greater), of the 1 room (room R13/808) that would fall short of 100 Lux it would do so only very slightly, achieving 97.7 Lux and again this would be a larger, accessible room (27 sq.m).
67. Overall, of the 231 rooms assessed, 216 (94%) meet the suggested median Lux levels for their room use. The daylight report states that if all of the proposed floors were included within the analysis (which concerns only first to eighth floors) then the overall compliance rate would increase to 95%. Daylight levels to private co-living rooms would, with some exceptions which have been set out, exceed the 100 Lux suggested value. Whilst some examples would fall below this value these would not be significant in number (14 rooms) and would generally occur within larger, accessible rooms where the larger room sizes would go some way to compensating for the lower daylight levels. It is also material that where private co-living rooms would exceed 100 Lux the daylight assessment demonstrates that they would generally do so quite substantially, particularly at second floor level and above, thus indicating that good levels of daylight would be achieved to the private co-living rooms overall. The communal library/co-working space (at first floor) would achieve acceptable levels of daylight (having regard to the room depth and purpose) and the daylight assessment demonstrates that the private dining area (at first floor) and the 'MasterChef' communal kitchen area (at eighth floor) would achieve very good levels of daylight. As such, the proposed development would achieve good (and in the case of 14 private co-living rooms, sufficient) levels of daylight for future occupants, particularly given the urban, Woking Town Centre context in which the proposed development would be located.
68. Overall, the proposed development would provide a high standard of amenity for future occupiers, particularly given the urban, and highly sustainable (in locational terms), Woking Town Centre context in which the proposed development would be located.

### **Affordable housing**

69. Policy UA4 of the Site Allocations DPD (2021) requires development of the site to, inter alia, *"Contribute towards affordable housing provision in accordance with Policy CS12: Affordable Housing of the Core Strategy."*
70. Policy CS12 of the Woking Core Strategy (2012) states that *"All new residential development on previously developed (brownfield) land will be expected to contribute towards the provision of affordable housing in accordance with the following criteria...On sites providing 15 or more dwellings, or on sites of over 0.5ha (irrespective of the number of dwellings proposed), the Council will require 40% of dwellings to be affordable"* and that *"The proportion of affordable housing to be provided by a particular site will take into account the following factors.*
- The need to provide an appropriate tenure mix that meets the needs of local residents, as evidenced by the latest SHMA, and that is considered affordable based on local income levels.*

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- *The requirement for significant provision of new affordable family homes.*
- *Constraints on the development of the site imposed by other planning objectives.*
- *The need to achieve a successful housing development in terms of the location and mix of affordable homes.*
- *The costs relating to the development; in particular the financial viability of developing the site (using an approved viability model)."*

71. The reasoned justification text to Policy CS12 states (at paragraph 5.88) that *"In exceptional circumstances, where the provision of affordable housing in accordance with this policy is not economically viable, the Council will expect the submission of financial appraisal information alongside the planning application. Applicants will be expected to pay for an independent review of the information submitted. If the Council is satisfied that affordable housing cannot be provided in accordance with this policy, it will seek to negotiate alternative provision. Further details on this matter will be set out in the Affordable Housing Delivery SPD."* This accords with NPPF and the PPG, which indicates that it is up to the applicant to provide the necessary justification. Paragraph 58 of the NPPF states that:

*"Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force."*

72. The Affordable Housing Delivery SPD (2023) reiterates this principle and gives more detail of how viability assessments should be undertaken.

73. However, Policy CS12 of the Woking Core Strategy (2012) is not reflective of the specific circumstances of co-living, which is a form of Build to Rent (BtR) development. Currently, there are no similar purpose built co-living schemes in Woking Borough.

74. At Annex 2 (Glossary) the NPPF states, under the definition of 'a) Affordable housing for rent' that *"...For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent)."*

75. The PPG states, under the heading 'What provision of affordable housing is a build to rent development expected to provide?' states:

*"The National Planning Policy Framework states that affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. Affordable private rent and private market rent units within a development should be managed collectively by a single build to rent landlord."*

*20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. If local authorities wish to set a different proportion, they should justify this using the evidence emerging from their local housing need assessment and set the policy out in their local plan. Similarly, the guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark."*

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*National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents. The discount should be calculated when a discounted home is rented out, or when the tenancy is renewed. The rent on the discounted homes should increase on the same basis as rent increases for longer-term (market) tenancies within the development.”*

(Paragraph: 002 Reference ID: 60-002-20180913, Revision Date: 13 09 2018)

76. Under the heading ‘How should affordable private rent be calculated?’ the PPG states that:

*“Affordable private rent should be set at a level that is at least 20% less than the private market rent (inclusive of service charges) for the same or equivalent property. Build to rent developers should assess the market rent using the definition of the International Valuations Standard Committee as adopted by the Royal Institute of Chartered Surveyors.”*

(Paragraph: 003 Reference ID: 60-003-20180913, Revision Date: 13 09 2018)

77. The PPG also states that *“It is expected that developers will usually meet their affordable housing requirement by providing affordable private rent homes”* (Paragraph: 004 Reference ID: 60-004-20180913, Revision Date: 13 09 2018).

78. SPD Affordable Housing Delivery (2023) is more up-to-date than Policy CS12 of the Woking Core Strategy (2012) and states (at 3.6. *Affordable housing provision on Build to Rent schemes*) that:

*“National Planning Practice Guidance (PPG) states that all Affordable Housing provision on Build to Rent schemes should, by default, take the form of Affordable Private Rent and be managed collectively with private market rent units by the Build to Rent landlord.*

*The PPG is detailed and applicants for Build to Rent development should refer to it in the preparation of their proposals.*

*The PPG states that ‘20% is generally a suitable benchmark for the level of affordable private rent homes to be provided...in any build to rent scheme’. Local authorities are permitted to adjust this, if justified, by inclusion in a local plan policy. As such, and if this guidance is still in place at the time, this may be considered as part of the next CS12 review.*

*In the meantime, the Council will encourage Build to Rent applications to provide a higher proportion of affordable housing, whilst treating 20% as the minimum requirement on such schemes. Any proposal to deliver less than 20% on site on a Build to Rent scheme will need to be justified in the same way as proposals to diverge from the proportions contained in CS12 for standard housing sites. This includes any proposals to provide financial contributions to off-site affordable housing in lieu of Affordable Private Rented dwellings on-site.”*

79. The applicant has submitted a Viability Appraisal and Report (undertaken by CBRE on behalf of Halcyon Development Partners) with the application. This report has been considered by independent consultants (Kempton Carr Croft, KCC) on behalf of the Council. Kempton Carr Croft have concluded that it is not viable for an affordable housing contribution to be provided by the proposed development.

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80. Whilst the independent consultants appointed by the Council concur that the proposed development scheme cannot viably afford to make an affordable housing contribution, the applicant is aware of the sensitivity surrounding affordable housing delivery in Woking. As such, the applicant has proposed, on a without prejudice basis, that 10% of all units [33 no. units] will be provided at a discounted rate of 80% of the market unit rent and that this will be provided at the applicant's own commercial risk and represents the applicant's social aspiration to maximise the public benefits generated via a grant of planning permission and delivery of the proposed development.

81. The applicant further states that:

*"As evidenced within the supporting application material, co-living provides a form of housing which is more accessible and affordable to local people compared to other new rented and ownership products in Woking. The inclusion of on-site discounted co-living units will ensure that the scheme is even more affordable to a wider pool of people.*

*The discounted affordable co-living units will be delivered integrally as part of the overall development. They will be designated on a plan for the initial purposes of the Section 106 Agreement albeit following launch and in operation there will be an opportunity for the location of designated units to change dependent on take up. Importantly, the overall quantum of discounted units in operation in the building will remain the same at all times.*

*The discounted co-living units will be fitted out as per the market units and occupiers will have access to all the same amenities, services and programme of events. The rental level will include the same all-inclusive billing arrangement.*

*JRL Group and Halcyon Development Partners are committed to realising the development of this important site and bringing forward the proposed regeneration benefits. The inclusion of affordable discounted units will strongly reinforce the principles of promoting mixed and balanced communities through development."*

82. It is acknowledged that Members may consider, that on its face, such a proposition is difficult to understand given the financial viability position, however this type of development is a long-term investment project that does not necessarily expect to make immediate returns. In the circumstances it is reasonable to surmise that the applicant is willing to take a long-term view in order to achieve a positive outcome in the short-term.

83. Should planning permission be granted, that 10% of all units [33 no. units] will be provided at a discounted rate of 80% of the market unit rent will be secured in the Section 106 Legal Agreement. On the preceding basis the proposed development complies with Policy CS12 of the Woking Core Strategy (2012), Policy UA4 of the Site Allocations DPD (2021), SPD Affordable Housing Delivery (2023) and the NPPF and PPG in respect of affordable housing.

### **The effect on the character and appearance of the area, including on the Woking Town Centre Conservation Area and nearby heritage assets**

#### **Policy approach to tall buildings in Woking Town Centre**

84. Woking is a town that is experiencing significant growth and regeneration. This is in large part due to the constraints that affect large parts of the Borough, including Green Belt and areas covered by environmental restrictions, including the Thames Basin Heaths Special

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Protection Area (TBH SPA) within a 400 metre 'exclusion zone' drawn around the edge of which net residential development is precluded by Policy CS8 of the Woking Core Strategy (2012).

85. Policy CS1 of the Woking Core Strategy (2012) recognises the constraints to development by directing most new development to *"previously developed land in the town, district and local centres, which offers the best access to a range of services and facilities"*. Table 2 of the Woking Core Strategy (2012) sets out a Hierarchy of Centres within the Borough, with Woking Town Centre identified at the top of this hierarchy and therefore the primary focus for sustainable growth due, amongst other things, to its transport links and accessibility to shops and services.
86. To date the major redevelopment and/or regeneration projects have mainly taken place in the western part of Woking Town Centre. These include Victoria Place, which comprises large scale buildings including towers rising up to 34 storeys. Planning permission was granted on appeal for buildings rising up to 37 storeys at Nos.20-32 Goldsworth Road (WBC Ref: PLAN/2020/0568, Appeal Ref: APP/A3655/W/21/3276474) (often referred to as 'EcoWorld'). That development will extend the cluster of tall buildings in a westerly direction. More recently planning permission was granted on appeal at Crown Place (WBC Ref: PLAN/2019/1141, Appeal Ref: APP/A3655/W/20/3259819), for a development which includes towers rising up to 22, 25 and 28 storeys within the eastern part of Woking Town Centre.
87. Policy CS1 of the Woking Core Strategy (2012) encourages high-density and well-designed development within Woking Town Centre stating that *"The town centre is designated as a centre to undergo significant change...[and that] In the town centre, well designed, high density development that could include tall buildings and which enhances its image will be encouraged, but without compromising on its character and appearance and that of nearby areas"*. Policy CS2 of the Woking Core Strategy (2012) supports Woking Town Centre as the preferred location for high quality, high density residential development, stating that *"The Town Centre is the preferred location for town centre uses and high density residential development. New development proposals should deliver high quality, well designed public spaces and buildings, which make efficient use of land, contribute to the functionality of the centre and add to its attractiveness and competitiveness."*
88. As the Inspector stated within the recent Crown Place appeal decision (at paragraph 11) *"What comprises a tall building is not specified in the development plan, although the Woking Design Supplementary Planning Document (2015) (the Design SPD) indicates that, bearing in mind prevailing heights in the town centre, a tall building would generally be regarded as above 6 storeys. There is no locational differentiation as to where such buildings should go, either in the CS or the Design SPD."*
89. Policy UA4 of the recently adopted Site Allocations Development Plan Document (2021) (the SA DPD) includes the site (as part of the 'urban block' which is bounded by High Street, Church Path, Chapel Street and Commercial Way). Policy UA4 advocates a mixed-use scheme to *"Be of a height informed by the local and wider town centre context, taking into account local and long-distance views of the site, and the necessity to avoid adverse environmental effects in terms of microclimate, wind, overshadowing and glare"*. Furthermore, it seeks new development to *"Be of a high design quality and visually attractive as a result of good architecture, with development footprints, scales and densities that maximise the efficient use of the site whilst reflecting the development grain of the surroundings, in a way that is sympathetic to the prevailing local character – taking into account the immediate context and not compromising the future development of*



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*allocated sites in the surrounding area.” The anticipated site yield set out by Policy UA4 is 149 net additional dwellings together with 1,600 sq.m net (2,000 sq.m gross) of office space and retail floor space. The reasoned justification and supporting text (at paragraph 8.27) indicate that the 149 net additional dwellings is a minimum, through the words “at least” and stating that “This indicative residential capacity of the site has been subject to scrutiny as part of the Core Strategy Examination and considered to be reasonable. It is anticipated that development would start by 2025/26 and complete shortly after the end of the plan period” [i.e., 2027].*

90. Policy UA4 also requires proposals for new development to “*Preserve heritage assets and pay regard to their settings in accordance with Policies CS20: Heritage and conservation, CS21: Design, CS24: Woking’s landscape and townscape, and DM20: Heritage assets and their settings*” although the reasoned justification and supporting text states (at para 8.25) that “*Heritage assets include, but are not limited to: the town centre Conservation Area, within which the site falls*” and that (at paragraph 8.26) “*The site acts as a gateway to this section of the town centre and there would be scope to provide a higher density development.*”
91. Whilst not all of Policy UA4 falls within the Woking Town Centre Conservation Area (WTCCA) the Conservation Area extends along this part of High Street (to the south-west beyond its junction with Chapel Street) and ‘returns’ northwards along Church Path. As such, it is highly material that of the 0.58 hectares covered by Policy UA4 approximately 0.32 hectares falls within the WTCCA (around 55%), with the remainder of the land either immediately adjacent to, or at least proximate to, the boundary of the WTCCA (the Policy UA4 boundary is never more than around 40 metres away from the WTCCA boundary). As such, it is clear that any proposed development which sought to deliver the anticipated site yield set out by Policy UA4 would either directly affect the WTCCA (as this proposal would do) or would have an indirect effect on the immediate setting of the WTCCA, and that these effects, whether direct or indirect, would be of a high magnitude.
92. In terms of the anticipated residential site yield of Policy UA4 it is useful to compare this to that for Policy UA6, which relates to the adjacent ‘urban block’ (to the south-west) which is bound by Chapel Street, High Street, Victoria Square and Commercial Way. Policy UA6 relates to a 0.45 hectare site, the anticipated site yield for which is at least 50 net additional dwellings, at least 400 sq.m net additional office floor space (2,000 sq.m gross) and retail floor space. That Policy UA4 has an anticipated site yield which is 99 dwellings higher than that of adjoining Policy UA6 indicates that a higher density form of development was/is anticipated on the Policy UA4 land.
93. Due to the nature of the issues, there is considerable overlap between heritage and townscape/design. This report is therefore structured with townscape character and appearance first, and then an assessment in respect of heritage, and then design of the proposed development. This is considered the most logical format in light of the significant overlap between the topics.

### Townscape character and appearance

94. The site is located within the southern extent of ‘Character Area 10. Woking Town Centre’ and is sited close to the boundary of ‘Character Area 11. Woking Town Centre South and Mount Hermon’, as defined by the Woking Character Study (2010). The remaining townscape character areas are around 500 metres away from the site boundary and thus do not have the potential to be significantly affected by the proposed development, due to distance and intervening built form. The Woking Town Centre Character Area comprises the commercial and retail centre of the Borough and much of the area consists of ‘Town

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Centre Redevelopment', albeit the site is located within an area identified as 'Late Victorian/Edwardian' in which the Woking Character Study (2010) states (at paragraph 5.113) *"Outside the retail centre some of the original Late Victorian/Edwardian properties have been retained whilst other areas have undergone ongoing redevelopment. The retained properties are generally red brick with lots of detailing built into the brickwork, such as contrasting coloured arches, or added through decorative woodwork. Some feature properties on corners or in focal locations also have towers built into their corners that extend above the eaves of the building"*.

95. More recent development of tall buildings with the townscape character area have delivered a step-change in scale, height and massing, including the introduction of buildings of a contemporary character, including the recent cluster of high density residential-led mixed use tall buildings as part of the Victoria Place development. More recently, west of Victoria Way, the Goldsworth Road area (EcoWorld) has also emerged as a focus for regeneration with planning permission granted on appeal for tall buildings, as well as at Crown Place within the eastern part of the town centre. Overall, the age, condition, scale, and materiality of buildings in the Woking Town Centre Character Area is mixed and there has been a step change in scale, height and character of buildings within Woking Town Centre, including a number of tall buildings.
96. The proposed development would directly affect the Woking Town Centre Character Area, including through the construction of a tall new building. The taller elements of the proposed development will have the largest impact on the overall character of the Woking Town Centre Character Area, with more localised effects associated with the lower building elements and alterations to the retained/rebuilt buildings along High Street. The taller building element will be consistent with the varied character of the townscape character area, which includes a number of tall buildings that are delivering significant change and confirming the function and importance of Woking Town Centre. The proposed approach to height and massing creates a transition in height and scale between the taller building groups (i.e., completed Victoria Place and extant EcoWorld) and the more traditional scaled townscape in the townscape character area and would serve to signal the location of Woking railway station. The proposed heights would serve to transition between those of Export House and Albion House (outside the railway station, north side).
97. The proposed development would indirectly affect the Woking Town Centre South and Mount Hermon Character Area, which comprises the area to the south of the railway as well as the Mount Hermon area. The existing townscape in this area is varied, with ongoing change, which results in limited visual coherence. Within the centre of the Woking Town Centre South and Mount Hermon Character Area, around Woking railway station, tall buildings create a sense of enclosure (i.e., Centrium, Eastgate etc.), with the site being located beyond (i.e., north of) the railway and the proposed development being experienced in the context of existing taller buildings within this part of the Woking Town Centre South and Mount Hermon Character Area. There is an awareness from streets in the townscape character area (i.e., from the south of the railway) of existing larger scale buildings to the north of the railway in Woking Town Centre, which influences the experience of this part of the townscape character area.
98. The taller elements of the proposed development would be visible from within the suburban residential streets and some open spaces in the Woking Town Centre South and Mount Hermon Character Area. The architectural character and larger scale of the proposed development would be consistent with the contrasting legibility between the different character areas associated with the residential townscape in the Woking Town Centre South and Mount Hermon Character Area and the Woking Town Centre Character

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Area. From more distant parts of the townscape character area, it will be possible to appreciate the composition of the taller elements and the visual relationship between those elements that creates a 'family' of related buildings, articulated by changes in materiality, detailing and the proposed roofscape. In closer parts of the townscape character area it will be possible to appreciate more of the finer scale of detail and texture of the proposed materiality.

99. Guildford Borough Council (GBC) have submitted a holding objection stating that GBC have adopted a Guildford Town Centre Views Study SPD which identifies views or vantage points that have helped to promote a better understanding of Guildford, how it has developed and its relationship with the countryside beyond. The applicant has submitted a response to the holding objection of GBC stating that whilst the proposed development may be visible from some viewpoints beyond 1km (i.e., 0.6 miles) from the site, it would appear as a very small element in the background of the view and would be experienced as part of the overall perception of the existing and emerging Woking Town Centre. Moreover, whilst the tallest element of the proposed development (17 storeys) may be visible in longer distance views from Guildford Borough, it would not be a prominent element in the context of the existing, tall(er) buildings in Woking Town Centre and would be experienced as part of the overall perception of the existing Woking Town Centre, such that it would not significantly alter the character or quality of such views.

### Built heritage legislation, policy and guidance

100. In respect of statutory listed buildings Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that *"In considering whether to grant planning permission or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."*
101. In respect of Conservation Areas Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that *"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."*
102. The setting of a conservation area is not enshrined in legislation and does not, therefore, attract the weight of statutory protection. It has been confirmed that Parliament's intention in enacting section 66(1) of the 1990 Act was that decision makers should give *"considerable importance and weight"* to the desirability of preserving the setting of listed buildings, where *"preserve"* means to *"to do no harm"*. This duty must be borne in mind when considering any harm that may accrue and the balancing of such harm against public benefits as required by the NPPF. It has also been confirmed that this weight can also be applied to the statutory tests in respect of conservation areas. The Secretary of State has confirmed that 'considerable importance and weight' is not synonymous with 'overriding importance and weight'. Importantly, the meaning of preservation in this context, as informed by case law, is taken to be the avoidance of harm.
103. Chapter 16 of the NPPF (Conserving and enhancing the historic environment) sets out the Government's policies regarding planning and the historic environment. Paragraph 194 states that *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of*

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*the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.”*

104. Paragraph 195 states that *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”*
105. Paragraph 197 states that *“In determining applications, local planning authorities should take account of:*
  - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
  - c) the desirability of new development making a positive contribution to local character and distinctiveness.”*
106. Paragraph 199 states that *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”*. Annex 2 (Glossary) of the NPPF defines *“Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance”*.
107. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification and paragraph 201 states that *“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
  - a) the nature of the heritage asset prevents all reasonable uses of the site; and*
  - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
  - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
  - d) the harm or loss is outweighed by the benefit of bringing the site back into use.”*
108. Paragraph 202 states that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*
109. Policy CS20 of the Woking Core Strategy (2012) states that:

*“New development must respect and enhance the character and appearance of the area in which it is proposed whilst making the best use of the land available. New development should also make a positive contribution to the character,*

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*distinctiveness and significance of the historic environment, including heritage assets at risk through neglect, decay or other threats.*

*The heritage assets of the Borough will be protected and enhanced in accordance with relevant legislation and national guidance as set out in the National Planning Policy Framework. The definition of what comprises the heritage assets of the Borough is included in the Glossary and also where relevant identified on the Proposals Map. There will be a presumption against any development that will be harmful to a listed building.”*

110. It should be noted, that in the Crown Place appeal decision (Appeal Ref: APP/A3655/W/20/3259819, Decision date: 3 November 2022), the Inspector stated (at paragraph 28) that *“Policy CS20 in the CS includes a presumption against any development that is harmful to a listed building and requires it to make a positive contribution to the character, distinctiveness and significance of the historic environment. Reference is made to the Framework in the policy, but it seems to me that it is not altogether consistent because there is an absence of reference to any balance against public benefits. In the circumstances, the proposed development would not be compliant with policy CS20.”*

111. Policy DM20 of the Development Management Policies DPD (2016) states:

*“A proposal affecting the character, appearance and/or setting of heritage assets will be required to show:*

- (i) that the works or development preserve and/or enhance the heritage asset and/or its setting in terms of quality of design and layout (scale, form, bulk, height, character, street pattern and features), materials (colour and texture) and historic street pattern of the area;*
- (ii) how relevant features and elements that contribute to the heritage asset’s significance and character will be conserved and/or reinstated if they have been lost. This includes chimneys, windows and doors, boundary treatments, original roof coverings, as well as internal features such as fireplaces, plaster cornices, doors, architraves, panelling and any walls in Listed Buildings;*
- (iii) where appropriate, that external elements such as street furniture, lighting and paving are sympathetically designed (further guidance is provided within the Design SPD);*
- (iv) that it would not have an adverse impact on views of or from the heritage asset or of the open spaces, trees or street scene which contributes positively to any asset and its setting; and*
- (v) that the use of the heritage asset is compatible with the conservation of its significance (i.e. uses that are not compatible with or damaging to the significance of the asset should be avoided). In appropriate cases the relaxation of policies controlling change of use may be considered to secure the retention of the building.*

*The Council will not permit the demolition of heritage assets except in exceptional circumstances. Where partial or total demolition of a heritage asset is permitted in exceptional circumstances, a high standard of design will be required in any replacement building. Where possible, special elements of the building should be salvaged and re-used in the development scheme. The applicant will also be required to:*

- (i) instigate a programme of recording of the lost asset; and*
- (ii) ensure the publication of that record in an appropriate form.”*

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112. Policy UA4 of the Site Allocations DPD (2021) states that development of the site will be required, inter alia, to *“Preserve heritage assets and pay regard to their settings in accordance with Policies CS20: Heritage and conservation, CS21: Design, CS24: Woking’s landscape and townscape, and DM20: Heritage assets and their settings”*.
113. The following assessment takes into account the five stage approach to decision taking set out in The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 - 2nd Edition, December 2017.
114. Due to the direct and significant built heritage implications in this case the Council has appointed an independent built heritage consultant (Jo Evans, a Director at RPS). Jo Evans has attended several pre-application meetings (alongside Planning Officers) and has had input into the design development of the scheme.
115. Other than the front part of Nos.3-5 High Street, which is to be retained and refurbished as part of the proposed development, all other buildings within the site are to be demolished. However, the façade of Nos.6-7 High Street will be sympathetically re-built in facsimile of the original building.
116. The proposed building will provide x329 units of co-living accommodation arranged over a maximum of 17 storeys (plus a below ground basement level). The High Street frontage will be retained/reinstated at 2-3 storey height, set in front of a ‘shoulder’ block and with a taller building element (maximum height 17 storeys) on the north-west part of the site. On the High Street frontage (and returning along part of Chapel Street) at ground (street) level the new building will provide Class E (Commercial, Business & Service) floorspace, which has been designed to accommodate the requirements of The Lighthouse, a community hub, which currently occupies space within some of the existing buildings on the site.
117. The proposed development includes works within the public realm on High Street, including reconfiguration of existing servicing and parking bays and the introduction of street trees (in planters) and landscaping. The existing vehicular access to the rear of the site, accessed from Chapel Street, will be upgraded and provide access for refuse collection, as well as access to two accessible parking bays and a cycle store for the co-living use.
118. The design of the proposed development has been developed in response to iterative testing and design development to avoid or reduce potential harm to the significance of the relevant built heritage assets. In summary:
  - In built heritage terms, the principle of concentrating the greatest height in the western part of the site and stepping down in height to more sensitive boundaries, reduces its potential impacts on the significance of the WTCCA, including views, which contribute to its heritage significance.
  - Early stage testing was carried out to appraise the relative impacts of development of various heights and disposition within the site in key views, to establish the potential scope of harm to the overall heritage significance of the relevant built heritage assets, in parallel with appraisal of the potential impacts on overshadowing, residential amenity within the proposed development and neighbouring amenity impacts on neighbouring buildings.
  - The distribution of height and buildings presented in the proposed development was considered to strike the best balance in addressing potential visual impacts

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on the overall heritage significance of the most sensitive heritage assets (i.e., the Woking Town Centre Conservation Area in which the site is located).

- The architectural treatment and material palette for the proposed development has been developed to reflect and complement local townscape character, informed by the widespread use of brick in the WTCCA, with changes in tone/colour assisting in articulating the different components of the proposed development in local heritage views, with variations in brick details; depth to window reveals; and patterns of projection & recession adding richness and a secondary scale of detailing to the elevations.
- Careful consideration has been given to the retention strategy, informed by a full assessment of the contribution made by existing buildings within the site to the significance of the WTCCA and the nearby heritage assets (as elements of setting). The approach has focussed on retaining the most intact and/or strongly contributing elements of the site and to provide the optimal balance between retention and delivery of a high quality and commercially viable scheme.
- New buildings to the High Street frontage have been carefully considered to respond to the prevailing positive characteristics of the WTCCA, including urban grain; height; materiality; richness of detailing; storey heights; consistent datums in facades; roof forms; and shopfronts to engage with the street, which will continue and reinvent the character of this part of the High Street.

### Effect on built heritage assets

119. Woking grew following the establishment of the Basingstoke Canal (completed in 1794). The railway station (then known as Woking Common Station) was built in 1838 and from its establishment became the central focus of development within the town. It was renamed Woking Station in the 1840s when Woking's surroundings predominantly consisted of open fields amongst a canal with towpath and locks. Having bought 5,000 acres of this common land in the early 1850s, the London Necropolis and National Mausoleum Company (LNNMC) used only 400 acres to develop Brookwood Cemetery. The rest of the land was sold in 1859. The 1871 OS Map shows a mix of residential and commercial development was built near the railway station forming the High Street, including some within the site, and the earliest phase of development in this area. Commercial Way and Chertsey Road had existed as routes before land that would make up Woking's town centre was sold.
120. Woking's population increased exponentially through the late-19th century with new residential properties and shops filling out empty plots and streets either side of Chertsey Road. Development was generally denser to the north, sandwiched between the railway and canal. Larger suburban developments with generous interspacing featured to the south beyond Oriental Road. Varied arrangements of residential properties and communal buildings are visible to the north of the site, across Commercial Road and Church Street on the 1896 OS Map, including a new church and Masonic Hall, showcasing Woking's emerging popularity as a commuter town with good transport links to London which would continue into the 20th century.
121. By the early 1900s, Broadway, Chertsey Road and the High Street were established as the main business and shopping streets. Much of the fabric of these Late-Victorian and Edwardian developments remains today. The railway station was rebuilt between 1936 and 1937 and, aside from this, little change is evident around the site in 1930s OS Maps, as Woking's central and commercial districts were already fully formed.
122. The 1968 OS map shows a large number of 19th century properties to the north of the site had been cleared around Commercial Road and either replaced with car parks or

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larger modern commercial units. The Wolsey Place Shopping Centre, built in the early 1970s, gradually moved the commercial focus away from the High Street and Chertsey Road further north, causing some properties to become rundown and neglected in this area. This was further impacted by the introduction of the Peacocks Shopping Centre in the 1980s. Removal of late-19th century properties as a result of new commercial development allowed new spaces to be opened up for public squares. The town square was rearranged and renamed Jubilee Square in 2012. This redevelopment has continued to the west of the railway station with emerging tall buildings and large-scale residential towers, including Victoria Place.

### Woking Town Centre Conservation Area (WTCCA)

123. The site is within the Woking Town Centre Conservation Area (WTCCA), which comprises the Victorian core of the Town Centre to the north of the railway station. The WTCCA is historically important as it largely comprises the original commercial developments of Woking Town Centre which were developed in association with the railway station following the land sale of 1859 by the London Necropolis and National Mausoleum Company (LNNMC). Although Commercial Way and Chertsey Road existed as routes prior to the land sale of 1859, all the street patterns and building plots within the area have remained largely unchanged from the Town Plan prepared for the LNNMC, specifically for the land disposal. In 1900 the High Street, Broadway and Chertsey Road were the principal shopping and business streets in the Town Centre and the majority of the original buildings remain.
124. The character of the WTCCA is mainly that of late Victorian and Edwardian purpose-built shopping parades, mostly of three storey construction, interspersed with individually designed period buildings. The architectural quality of buildings varies considerably and although none of the buildings are statutory listed many have interesting features and attractive architectural ornamentation such as decorative terracotta panels at the first floor level and are locally listed. The limited historical period during which most of the buildings in the WTCCA were constructed is such that, taken together, buildings within each street have a group value, which gives the area a special character.
125. As SPG Heritage of Woking (2000) states *“With the development of the Wolsey Place Shopping Centre in the early 1970’s and its more recent refurbishment, together with the pedestrianisation of Commercial Way, the focus of the shopping centre has gradually moved away from the High Street, Chertsey Road area and gravitated toward more recent shopping developments in Woking”* including The Peacocks Shopping Centre. The SPG also states that *“although many properties may have been spared by being less subjected to commercial pressure for redevelopment, a number of properties have become jaded in appearance through neglect, even though most of their fabric is still intact. Additionally, many of the shopfronts on the Victorian and Edwardian buildings have been altered or replaced by unsympathetic designs in inappropriate materials and there have been a limited number of modern infill redevelopments...which have detracted from the coherent character of the area and contributed to the resulting decline in the quality of the visual environment”*. There are no statutory listed buildings in the WTCCA although there are a number of locally listed buildings.
126. The significance of the WTCCA is mainly derived from its historic value and, to a lesser extent, its architectural value in terms of individual buildings as well as building groups. In terms of the setting of the WTCCA in the Crown Place appeal decision the Inspector stated (at paragraph 19) that *“The area beyond the boundaries [of the WTCCA] seems to me to contribute relatively little to significance. This is because there is not much of the*



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*Victorian townscape remaining and redevelopment has taken place that has been generally unsympathetic in terms of its grain and massing”.*

127. In respect of the Woking Town Centre Conservation Area (WTCCA) this was designated in 1991, it has since been subject to change and it is evident that the assessment of the character and appearance of the WTCCA that was carried out in 1991 (or earlier) focused on the principal elevations of built form along key thoroughfares of the area with limited reference to the elements, which are detrimental to its significance and make a poor contribution to its overall character and appearance, or areas which hold less architectural and historic interest.
128. The Heritage Statement submitted with the application also advances that the (subject) western portion of the WTCCA contributes to the character and appearance of the WTCCA to a much lower degree (than the eastern portion), that the historic development of this western portion along Chapel Street means that the buildings are a much later addition, having been built between 1916 and 1934, and that the external appearance of the buildings within this western portion has also been modified to meet the requirements of the internal uses with increased window areas and architectural detailing, which is not characteristic of the core of the WTCCA. The Heritage Statement sets out that many of the facades along Chapel Street and High Street have been subject to substantial alterations since the buildings were first constructed, with many of their rear elevations completely obscured from visibility, or removed and redeveloped, and that the architectural quality of the rear extensions are, on the whole, low as a result of their utilitarian and altered character, including those within the site.
129. The Heritage Statement also identifies that buildings along the western edge of Church Path, dating to the early 20th century, retain their principal elevations, with some small-scale single storey rear extensions although that many of the shop fronts have been modernised in the late-20th century. The Heritage Statement identifies that the eastern part of the WTCCA holds most of the architectural and historic interest, despite alterations to both principal and rear facades, and that the fine grain and vertical rhythm of Victorian/Edwardian plots is mostly legible with the upper storeys of buildings expressing ornate detailing typical of its era, although ground floor elevations have modern retail frontages, which has had a detrimental impact on the overall significance of the WTCCA.
130. The Heritage Statement sets out that the setting of the WTCCA has a strongly contrasting townscape character, which has continued to evolve since the WTCCA was first designated in 1991, and that this was principally facilitated by the construction of the Wolsey Place shopping centre in the late-20th century, which extended to the north of the original Town Centre, diverting activity away from the High Street, and that this effect has been reinforced by the more recent refurbishment and the pedestrianisation of Commercial Way and surrounding streets.
131. As such, the Heritage Statement identifies that the immediate setting of the WTCCA, therefore, comprises taller buildings, including Albion House (rising up to 8 storeys) to the north; Hollywood House to the north-east; Woking railway station and railway lines to the south; and late-20th, early-21st century urban development. The surrounding varied townscape context includes several tall buildings, such as the Centrium and New Central towers to the south of the railway and, most notably, the Victoria Place development to the west of the WTCCA, which includes towers of up to 34 storeys. In addition, the EcoWorld scheme on Goldsworth Road was allowed at appeal for the construction of mixed-used buildings rising between 9 and 37 storeys. A 2019 application for a 28-storey development at Crown Place was also allowed at appeal in November 2022. As such, this

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part of the townscape setting of the WTCCA is experiencing transformational change in character and scale.

132. Overall, the Heritage Statement concludes that the contribution this setting makes to the significance of the WTCCA varies, the railway station contributes positively as the historic catalyst for the most significant phase of development within the WTCCA although the wider townscape context does not contribute to the significance of the WTCCA as it is a contrasting character, scale, and architectural quality and is unrelated to the building stock, spaces, and historic development of the WTCCA.
133. The below relates to the existing buildings within the site:

### No.3 High Street

134. No.3 High Street is locally listed and identified as having architectural significance in SPG Heritage of Woking (2000). In 1871, No.3 formed part of a post office, an important piece of historic infrastructure, located to make effective use of proximity to the railway. OS maps show that a rear extension had been built by 1896, which was subsequently demolished before a new extension was constructed by 1978, likely to be the single storey extension that exists today. It is possible that the two storey elements to the centre of the plot are of late-Victorian construction. The first floor front elevation of the building is an attractive example of late 19<sup>th</sup> century commercial architecture, constructed of rich red/orange brick, with enriched brick detailing and fine Dutch gable. A 1960s photograph shows the decorative scheme of the front upper storeys as it is now, though the ground floor shopfront had been replaced with a modern design by this time. The applicants submissions assess that No.3 makes an overall positive contribution to the WTCCA with the upper storeys of the front elevation making a positive contribution, the front ground floor elevation a negative contribution and the rear elevation a negative contribution.

### Nos.4-5 High Street

135. Nos.4-5 High Street is locally listed and identified as having architectural significance in SPG Heritage of Woking (2000). This plot is thought to have contained two semi-detached residential buildings set within gardens in 1871, likely to have accommodated retail use at ground floor level. The 1896 OS map shows that an outbuilding was later added to the rear. These houses appear to have been heavily remodelled in 1915, illustrating the development of Woking's commercial town centre. A 1921 aerial photograph shows that the front of the building as it exists today, though with a square plan form behind this elevation. The upper storeys of the front elevation are a balanced and attractive composition, a good example of Edwardian commercial architecture, with a secondary scale of detail provided by a pair of stone canted bay windows and enriched brick detailing. The roofscape is articulated by a pair of gabled dormers and chimneys. By 1934, Nos. 4-5 was the location of a bank, now expanded over the whole of the former garden plots. In the latter part of the 20<sup>th</sup> century, rounded finials have been removed from the tops of the gable windows and a modern rear single storey block attached to the rear of the property. The poor quality shopfront does not relate to the building above and detracts from the significance of the WTCCA. The applicants submissions assess that Nos.4-5 makes an overall positive contribution to the WTCCA with the upper storeys of the front elevation making a positive contribution, the front ground floor elevation a negative contribution and the rear elevation a negative contribution.

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### *Impact on No.3 High Street, and Nos.4-5 High Street*

136. The proposed development would secure the retention of those elements of the site (i.e., the front elevations and rebuilt roofscapes of Nos.3 and Nos.4-5 High Street), which make the strongest contribution to the character and appearance of the WTCCA. These elements also form part of the traditional townscape setting of nearby locally listed Nos.1-2, and Nos.13-14, High Street (those being non-designated heritage assets), thereby maintaining the positively contributing elements of a traditional cohesive streetscape to the High Street.
137. The proposed development also allows for the reinstatement of missing historic features to the front elevations of Nos.3, and Nos.4-5 High Street, the removal of existing poor quality additions, the reversal of harmful modifications and the creation of new shopfronts of traditional design with metal awnings. These measures would strengthen the contribution of these retained and rebuilt elements to the significance of the WTCCA, enhancing their contribution to its vitality as an economic centre as well as enhancing the aesthetic value of the facades of the non-designated heritage assets.
138. The retained elements (alongside the considered introduction of new buildings) ensures the retention of a significant part of the late 19th and early 20th century commercial townscape that contributes to the significance of the WTCCA.

### Nos.6-7 High Street

139. Nos.6-7 High Street is likely to have originally formed two semi-detached residential buildings set in garden plots, with retail uses at ground floor. A small extension was built to the back of these properties in 1896. By 1915, Nos. 6-7 was the location of a bank, with buildings that covered the entirety of former garden plots. Extensive development to the rear was introduced in the late 20th century. The shopfronts also date to late 20th century and detract from the significance of the WTCCA. The building's principal contribution to the significance of the WTCCA derives from its historic value in illustrating the rapid urban development of Woking following the arrival of the railway. The applicants submissions assess that Nos.6-7 makes an overall minor positive contribution to the WTCCA with the principal elevation making a minor positive contribution and the rear elevation a negative contribution.

### *Impact on Nos.6-7 High Street*

140. A structural survey provides justification for the demolition of Nos.6-7 High Street, and the careful rebuilding of the front façade, stating that, whilst retention of the building is technically feasible, the works of repair and alteration necessary for the retention of this façade and its effective integration into the proposed development are likely to be so extensive as to effectively amount to retention of the first floor level and above (only), being works which are disproportionate to the building's limited contribution to the overall heritage significance of the WTCCA and will impact on the integrity of the retained fabric. As such, in overall terms, there is an opportunity to deliver a better overall aesthetic result via a careful rebuilding of the façade in facsimile, maintaining the overall cohesive group value and legibility of the positively contributing elements of the traditional 19th and 20th century streetscape in this part of the WTCCA and is to be weighed in the balance against any minor harm arising from the loss of the existing fabric and its authenticity.
141. The proposed demolition and careful rebuilding of Nos.6-7 High Street will remove late-19th century buildings, which, notwithstanding later detracting alterations, make a targeted positive contribution to the overall heritage significance of the WTCCA.

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Notwithstanding the proposed rebuilding, which will maintain the overall consistency in the aesthetic value of the complementary group value with Nos.1-5, and Nos.13-14 High Street, those proposed works will adversely impact on the authenticity of the WTCCA. The demolition of these buildings within the site will cause 'less than substantial' harm to the heritage significance of the WTCCA. Having regard to their targeted contribution to the significance of the WTCCA and localised impacts, such harm would be towards the lower end of the 'less than substantial' harm spectrum.

### No.8 High Street

142. By the 1870s, around 30 years after the arrival of the railway, No.8 High Street formed the east side of a residential/retail terrace of four properties, positioned on the corner between the High Street and Chapel Road. By 1915, a rear extension forming a courtyard with No.7 was built. Historic photographs dating to 1955 and 1960 show elaborate decoration on the front facade, with a central window with curved pediment above the recessed shop front, with two, single pane sash windows either side. By 1966, development to the rear of the building extended further into the former garden plot. The historic building frontage has been largely replaced, the rounded pediment has been removed and windows replaced with modern frames, glass and metal sliding doors. As existing, given the degree of alteration, the applicants submissions assess that No.8 is of no particular architectural value, such that its historic origins as part of the late 19th century development of the town centre are no longer strongly legible and it compares poorly with other, better quality and surviving examples in the WTCCA. Planning permission was granted for the demolition of No.8 in 2008 (ref: PLAN/2008/0944), albeit that permission pre-dates the NPPF.

### Nos.9-10 High Street

143. Nos.9-10 High Street formed the centre of a residential/retail terrace of four properties by the 1870s, featuring rear projections into garden plots behind. These were removed by 1896. A 1921 aerial photograph infers this was originally a single storey building with a flat roof. The 1934 OS map shows the entire plots now filled with building development. A 1955 photograph depicts the front facade's decorative 3-storey composition as it is now, though with tall chimneys either side. Nos.9-10 is an example of a 20th century commercial building, with the large first floor window likely being associated with the display of goods, but is not part of the more significant phase of the development of the WTCCA. The shopfront has been heavily remodelled, now comprising a poor quality late-20th century example that does not relate to the building above and erodes the legibility of individual building plots. Planning permission was granted for the demolition of Nos.9-10 in 2008 (ref: PLAN/2008/0944), albeit that permission pre-dates the NPPF.

### No.12 High Street

144. No.12 High Street formed the west end of a terrace, as shown on the 1871 OS map. By 1915, two outbuildings were located to the rear of the plot, one of these comprising a long structure running adjacent to No.7. Photographs dating to the 1950s show shopfronts on the building's south and west sides. By 1978, the entire plot had been developed. Today, the building largely consists of a mix of early 1900s and 1970s fabric, such that its origins as part of the 19th expansion of Woking Town Centre have been eroded as its original form is not strongly legible (i.e., its roof profile appears to have changed from gable to hipped in the late 20th century). Planning permission was granted for the demolition of No.12 in 2008 (ref: PLAN/2008/0944), albeit that permission pre-dates the NPPF.

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### *Impact on Nos.8-12 High Street (incl.)*

145. Planning permission has previously been granted for significant change within this part of the site (i.e., Nos.8-12 High Street). In 2008, planning permission was granted for the demolition of the terrace and for the construction of a 9-storey building. An extension of time application was later granted in 2012. The descriptions of development are included below:
- Ref. PLAN/2008/0944 - Demolition of existing three and two storey buildings and construction of a new nine storey building with three basements consisting of the following :- 80 bed hotel with ancillary dining room, bar, function room penthouse apartment and basement car parking (13 spaces); Roof top restaurant and bar; 3 No. ground floor retail units. Granted, 5th December 2008.
  - Ref. PLAN/2011/1113 - Extension of time application PLAN/2008/0943 for the demolition of existing three and two storey buildings and construction of a new nine storey building with three basements consisting of the following:- 80 bed hotel with ancillary dining room, bar, function room penthouse apartment and basement car parking (13 spaces); roof top restaurant and bar; 3No. ground floor retail units. Granted, 26th April 2012.
146. The reasons set out in the approval notice for the 2008 planning permission states the following *“The existing buildings do not contribute to the character and appearance of the Conservation Area and in part detract from its character. The proposed replacement building will result in the enhancement of the Town Centre Conservation Area both in terms of its built form and the vitality and viability of the surrounding area”*. The Heritage Statement assessment concludes that Nos.8-12 High Street make either a neutral, or negative, contribution to the character and appearance of the WTCCA and, in that context, their proposed demolition will, subject to the quality of any replacement buildings, preserve the overall heritage significance of the WTCCA.

### *Impact on Rear Elements of Nos.3-12 High Street*

147. The Heritage Statement sets out that the proposed demolition of the non-contributing elements within the rear of the site (i.e., behind street frontages to High Street and Chapel Street), as neutral or negative elements of the WTCCA, will have no impact on its heritage significance or that of the locally listed buildings, nor the ability to understand or appreciate that heritage significance. The Heritage Statement identifies that the cohesive group value with Nos.1-5, and Nos.13-14, High Street will be maintained through the careful rebuilding and will, therefore, in overall terms, sustain their local heritage significance.

### *Overall impact on Woking Town Centre Conservation Area*

148. The Heritage Statement sets out that in overall terms, the existing site makes a varied contribution to the significance of the WTCCA and that whilst there are elements that positively contribute to its character and appearance, largely the surviving elements of the 19th and early 20th century buildings, the site, in overall terms, has been subject to extensive intervention during the latter part of the 20th century, with this being most evident at ground floor level where the historic shop fronts have been replaced with poor quality modern examples, including signage, that does not relate to the building at first floor and above and, in some instances, have eroded the legibility of historic urban grain. Those alterations have an adverse impact on the significance of the WTCCA, and the appreciation of that significance from within the public realm.

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149. The Heritage Statement also identifies that there is a strong contrast between the contribution made to the character and appearance of the WTCCA between the principal and rear elevations of the existing buildings on the site. This is because the existing buildings have been subject to extensive alterations to their north (rear) elevations and, in all scenarios, have been extended into their former garden plots. As such, the legibility of the historic footprint of the Victorian/Edwardian buildings has, therefore, been eroded in this part of the site, with some buildings having been remodelled in their entirety. The roofscape is also of varying quality, as a result, with only fragments of the original Victorian roof form surviving, flat asphalt roofs are a common and non-contributing feature within the WTCCA.
150. The Heritage Statement sets out that this ad-hoc development has eroded an understanding and appreciation of the significant phases of this part of the development of the WTCCA and prevailing mixed residential and commercial character and that this is reinforced by the substantial amount of plant and paraphernalia, which is visible at all levels, presenting a cluttered and unattractive appearance experienced when travelling along Chapel Street and to the rear of the buildings aligning High Street and Commercial Way. In overall terms, the Heritage Statement concludes that these elements to the rear of the site do not contribute positively to the significance of the WTCCA and are, in some cases, detrimental to its character and appearance.
151. The Heritage Statement identifies that the positively contributing elements, predominantly the upper storeys of the 19th and early 20th century buildings and urban grain, enable the history of the WTCCA, and patterns of important phases of development, to be understood and better appreciated as part of its character and appearance and therefore that those buildings, individually and cumulatively, provide a legible legacy of Woking's importance as a Victorian town centre, contributing to the legibility of the traditional urban grain of the WTCCA and the rhythm of building plots in the local townscape character. The surviving elements that contribute most positively to the significance of the WTCCA are focussed on the corner building of No.1 High Street; the upper storeys of Nos.3-5 High Street; and, to a lesser degree, Nos.6-7 High Street (which make a minor positive contribution).
152. In terms of the impact of the proposed development on the WTCCA, within which the site lies, the Heritage Statement identifies that the taller components will clearly have the greatest and most significant visual impact on the significance (character and appearance) of the WTCCA (and the locally listed buildings contained therein), focussed on the principal tower element (up to 17 storeys) and, to a lesser extent, the lower 'shoulder' buildings within the depth of the site.
153. The Design and Access Statement (DAS) identifies the architectural rationale for the arrangement of these taller buildings and the relationship with the retained and new elements to the High Street and Chapel Street frontages. The Planning Statement identifies the plan-led support for densification of this allocated site, with expectations of significant change in this part of the WTCCA and its immediate setting, as have been previously discussed. The taller elements of the proposed development are an integral part of the positive placemaking delivered by the proposed development, which would signal the major regeneration of this allocated Woking Town Centre site.
154. The Heritage Statement identifies that the WTCCA is defined by the cohesiveness of its 19th and 20th century commercial townscape and does not have individual landmarks defined by 'singularity', height etc and therefore, in those terms, the proposed development will not have any visual impacts on important landmark buildings within the

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WTCCA. Notwithstanding this, clearly the taller components of the proposed development, notably the principal tower building (up to 17 storeys), will contrast with the prevailing character, scale, and height of buildings within this part of the WTCCA, albeit there are existing tall buildings in the immediate context and the site is located at something of a 'transitional' point between the designated WTCCA and wider townscape. The Heritage Statement identifies that the visual contrast in height, scale, character and form of the taller building components mean that they will appear as new elements that can distract from an appreciation of the character and appearance of this part of the WTCCA - largely as a commercial townscape of traditional mid-19th and early 20th century character - and that this will cause 'less than substantial' harm to the heritage significance of the WTCCA, with that harm being towards the lower end of the spectrum of 'less than substantial' harm.

155. The Heritage Statement sets out that the visual impacts of the taller components of the proposed development on the significance of the WTCCA have been reduced, where possible, via the massing strategy of setting them within the depth of the site and the articulation of the building form, which is arranged and experienced as a series of related masonry buildings/elements, which provides modulation in the overall form and silhouette of the building and which responds to the more granular character of the WTCCA, reflecting its iterative development. That approach to massing provides spatial and visual separation and 'breathing space' to the retained buildings addressing High Street and Chapel Street and in views towards the site from the east (i.e., towards No.1 High Street) where the impressive elevation that expresses the commercial function of No.1 would remain clearly understood.
156. The nature of enclosure and street pattern means that from within the WTCCA there would be generally targeted areas of visibility, generally of isolated elements of the taller building components, restricting potential visual impacts to closer distance views and where streets are aligned towards the site.
157. In the approach to the WTCCA from the east and west, the tallest component of the proposed development would be experienced as a new element when entering the WTCCA. The tallest, tower, element will be of a contrasting scale and character from the existing buildings that they will replace within the depth of the plot. However, the tallest component of the building will be experienced in the context of significantly taller buildings within the wider Woking Town Centre context and will be understood as part of the transitional location of this part of the WTCCA (which is reflected in the inclusion of the site within the Policy UA4 allocation of the Site Allocations DPD (2021) for development). The taller elements would step down towards the site's eastern and southern edges to manage the transition to the prevailing WTCCA context, maintaining the consistency of the High Street frontage, and address Woking railway station as an important transport node. Conversely, the taller elements, particularly the tower element (up to 17 storeys), would 'step up' towards the new and emerging context of Victoria Place, existing Export House and the extant EcoWorld development along Goldsworth Road.
158. The proposed extensive use of brick would respond to the prevailing character of the WTCCA, with the lower components utilising red, orange and brown tones to align with the traditional building stock that they relate most strongly to in visual terms, with the tallest, tower, element utilising a buff brick that will help to mark it as a new addition to the traditional townscape context, taking inspiration from other recent developments, such as Victoria Place. The proposed approach to external materiality also supports the proposed massing strategy by articulating the different elements of the proposed development as part of a 'family of buildings' that share similar characteristics, but which are articulated and detailed differently, thereby avoiding coalescence and thus reducing visual impacts.

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The taller elements also integrate a secondary scale of detail (through the use of brick detailing) that would add richness, shadow and depth (via articulation and recession) to the façades, in a manner that draws upon the generally high-quality detailing of the traditional building stock within the WTCCA.

159. The pitched roofscapes of the 'shoulder' component would take reference from the varied roofscape within the WTCCA more widely, mediating between the taller, tower component and the retained Nos.3-5 High Street. Perforated metal panels showing floral designs, inspired by detailing in the retained façades of the locally listed building, would draw the ground floor levels of the proposed and retained buildings together.
160. Where new buildings are proposed to replace demolished structures, these have been carefully considered and respond to the prevailing materiality of the WTCCA; the 2-3 storey scale of the traditional buildings addressing High Street and Chapel Street; prevailing building lines and grain; and commercial uses with shopfronts at ground floor level. These replacement buildings will be new additions consistent with the iterative and informal townscape character of this part of the WTCCA. The proposed approach to retention and careful introduction of new buildings to the public site frontages will recreate this part of the High Street, both in terms of appearance/aesthetic value but also by creating an attractive, and re-activated area, which would draw people to use it as part of an important point of entry/exit to the 'central' part of the Town Centre from Woking railway station.
161. The proposed mix of town centre/commercial uses will support and enhance vitality and vibrancy of the WTCCA and are consistent with its use and character. The proposed development would provide for more active uses above ground floor of the retained and proposed buildings addressing the High Street and Chapel Street, allowing for ongoing maintenance of the properties; supporting the vibrancy and vitality of the town centre; and improved passive surveillance/engagement with the street. It is proposed to provide improved space for The Lighthouse that will secure the retention of the contribution made by the more intangible qualities of that occupier to the character of the WTCCA (and wider public benefit). In that context, the proposed development will enhance the vitality of the WTCCA, which would be a heritage benefit.
162. Overall, in respect of the Woking Town Centre Conservation Area (WTCCA), the taller building components, particularly the principal tower element, will be a significant new visual element that will be experienced from some parts of the WTCCA, particularly where roads are aligned towards it. The proposed development will be most visible, and experienced to its greatest extent, where streets are aligned towards the site and in closer proximity, from where the contrasting scale of the proposed development will be experienced, alongside the retained and refurbished existing buildings to the High Street and new infill buildings.
163. Both the proposed demolition of Nos.6-7 High Street and the contrast in the prevailing character, scale, and height of the proposed development relative to the rest of the WTCCA will cause a degree of 'less than substantial' harm (at the lower end of the spectrum) to the overall significance of the WTCCA. The Council's Built Heritage Advisor concurs with this assessment of the degree of harm which will arise.
164. The applicant's Design and Access Statement (DAS) considers alternative options for the delivery of the strategic, plan-led aspirations for site allocation UA4, as a whole, to determine if there is another way of bringing forward the site, whilst optimising public benefit and minimising perceived heritage harm. This 'testing' included identifying an alternative location for a taller building element, which will be necessary to deliver the



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quantum of development required by site allocation UA4 (which anticipates delivery of development by 2027). No alternative proposals for development have been the subject of a planning application since the draft Site Allocations DPD was first conceived in 2015, and there is no known developer intention to prepare a proposal for any other part of the Policy UA4 site, as defined within the Site Allocations DPD (2021). The exercise undertaken within the applicant's DAS is therefore wholly hypothetical, albeit is nonetheless useful.

165. The exercise identifies that future development of any substantial nature/scale on the eastern portion of site allocation UA4 would be problematic due to the importance of Church Path to the Woking Town Centre Conservation Area (WTCCA). Church Path contributes significantly to the WTCCA due to the small scale of the buildings, the presence of locally listed buildings on each end, the small plot sizes, and the narrowness and pedestrian focused character of the thoroughfare itself to Commercial Way. The compact and intimate townscape is indicative of the historic development of, Woking within this part of the Town Centre. If the quantum of development set out by site allocation UA4 was to be spread across the site allocation, the role of Church Path in the WTCCA would be compromised, or lost entirely, and this would result in considerable harm to the significance of the WTCCA, this harm would be more than 'less than substantial'.
166. As such, the applicant's hypothetical massing study therefore concentrated on the parcel of land fronting Commercial Way (i.e., to the rear of Nos.3-12 High Street) as an alternative location for redevelopment and provision of a building of some height. This exercise shows that potentially providing a building large enough to provide x149 dwellings on the corner of Commercial Way and Chapel Street would give rise to a number of problematic issues. The close proximity of Middle Walk dwellings (approximately 13.0m away) (above Wolsey Place) places a constraint on the development potential of the Commercial Way and Chapel Street corner. A development of height in this corner would cause harmful overlooking issues to these existing dwellings and would impact daylight and sunlight levels received by these dwellings much more significantly than the proposed development.
167. Also, Commercial Way is considered a more sensitive location for the potential location of height due to its impact on the character of this primary, pedestrianised shopping street. A taller building element would appear unduly dominant and would cause significant overshadowing and enclosure of Commercial Way. The applicant also advances that another consideration for this element of the UA4 allocation relates to the various land ownerships in place, and long leases of occupiers, which means that it is highly unlikely that a comprehensive proposal for redevelopment could come forward on these plots, and certainly not within the timescale anticipated by the Site Allocations DPD (2021) (i.e., by 2027).
168. The applicant advances that the massing of the proposed development, away from Middle Walk dwellings (above Wolsey Place) mitigates the impacts on these existing dwellings, with the proposed development also fronting High Street, marking Woking railway station, and taking advantage of its natural urban position at the start of a pedestrianised area. It is also a material consideration that many of the Commercial, Business and Service (Class E) units within the site are vacant and the site has been assembled to facilitate its comprehensive redevelopment, whilst re-providing floor space within the proposed development for key occupiers still on site, such as The Lighthouse.
169. The proposed development will also provide heritage benefits, including reinstatement of missing historic features to the front elevations of No.3 High Street, and Nos.4-5 High

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Street, the removal of existing poor quality additions, the reversal of harmful modifications and the creation of new shopfronts, all of which will enhance the appearance and vitality of the WTCCA.

170. Notwithstanding the heritage benefits which would arise the proposed development would cause, in overall terms, a low level of 'less than substantial' harm (i.e., below the middle of the spectrum of 'less than substantial' harm) to the significance of the Woking Town Centre Conservation Area (WTCCA) due to the demolition of existing buildings within the site and the visual impacts of the taller elements of the proposed development. Nonetheless, paragraph 199 of the NPPF makes clear that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The exercise under paragraph 202 of the NPPF (i.e., weighing 'less than substantial harm' against the public benefits of a proposal) is therefore not an even balance and it has been undertaken in this assessment accordingly. The proposed development would also harm the local heritage significance of Nos.3-5 High Street (located within the site) and Nos.1-2, and Nos.13-14, High Street (located immediately adjacent to and proximate to the site), these impacts engage paragraph 203 of the NPPF (in relation to non-designated heritage assets). The heritage harm, and heritage benefits, are to be weighed in the overall planning balance (at the conclusion of this report).

### Statutory listed buildings

#### Woking Signal Box

171. Woking Signal Box is statutory listed at grade II and located around 30 metres south of the site, at the west end of platforms 2 and 3 of Woking railway station. It is a 2-storey 1930s electro-mechanical signal box constructed of brick, with a flat roof, canopy and single storey wings. It stands as a good example of its type within the Southern Region and is a good example of the work of James Robb Scott, who was responsible for designing many such buildings. It marks a transitional phase in railway signalling, from mechanical processing to full electrical power and is significant as a piece of 1930s railway infrastructure, showcasing Woking's continued development as a commuter town with vital rail connections to London.
172. The signal box is principally appreciated within the context and setting of Woking railway station, the railway tracks, platforms and associated buildings, which make the strongest positive contribution to its significance as elements of setting, having functional, historic and aesthetic relationships with the listed building. The significance and shared group value of those structures is best appreciated when using the railway station and in the approach via train. Woking Town Centre is readily visible, together with the signal box, to the north and south beyond the confines of the railway station. Modern residential blocks to the south, and the mixed character formal layout of commercial streets to the north, make neutral contributions as elements of setting.
173. Buildings/walls on the north boundary of the railway, opposite the site, obscure views of the signal box from street level (including where east of Chapel Street). Partial views of the listed building are likely achievable from south-facing upper storey windows however, they are not important (nor public) views that help to better understand the significance of the listed building.

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### *Impact on Woking Signal Box*

174. Impacts on Woking Signal Box will be only indirect, via change in part of its townscape setting. The architectural/aesthetic value, historic interest and association with James Robert Scott, as well as the experience of the listed building within the context of Woking railway station, would all remain unaffected by the proposal. In these respects the significance of the listed building would remain unaltered.
175. The tallest element of the proposed development would be visible as a new building in the wider urban context of the signal box, which is already varied and characterised by the existing contrasting relationships in terms of scale, height, massing and materiality between the signal box and the surrounding residential developments. The new visual relationships would be most readily appreciated in the kinetic approach to the railway station from the north and south, while waiting on platforms or otherwise moving through the railway station, where the listed building's siting in the middle of the tracks relative to the site would ensure that the important historic, functional and aesthetic relationships with the railway tracks, station and related infrastructure remain clearly legible and understood. Overall, the proposal would not cause any harm to the significance of Woking Signal Box.

### Christ Church

176. Christ Church is statutory listed at Grade II and located around 100 metres north-east of the site. It was built in the latter part of the 19th century and as the town rapidly expanded, its location within the residential area made it central to the congregation that it served. It is an impressive building and is a good example of elaborate Victorian Gothic architecture which was popular in civic and ecclesiastical buildings at the time. It is constructed mainly of red brick and detailing includes tall narrow arched windows, decorative banding, buttresses and turrets and two elegant copper spires. It has group value with the Woking War Memorial (also statutory listed at Grade II) located in the centre of Jubilee Square, the church and war memorial are intervisible and have shared messages regarding commemoration and as a focal point for civic and religious functions.
177. Christ Church is a local landmark, situated at the south-east corner of Jubilee Square, where it meets Church Street East. Its external architectural interest is best appreciated from the centre of Jubilee Square, where there are uninterrupted views of its whole composition. Intervening built form restricts views from the north, east and south however, the tall spires can be seen in longer distance views throughout Woking Town Centre. The scale of the church is such that it would have been a prominent feature within the original residential environment around it. However, the surroundings of the church have changed considerably, and it now stands at one side of a public square (Jubilee Square) amidst the modern shopping centre (Wolsey Place Shopping Centre, dates from the 1970's and was refaced in 2012). The significance of Christ Church is derived not only from its fabric and architecture but also from its historical and communal associations. It provides a solid and permanent presence within a built environment that has continually evolved around it, especially latterly. The setting in which Christ Church is appreciated and experienced is now quite different in terms of grain, scale and uses. It is a modern commercial context, including buildings with a far greater height and scale than the church itself. Christ Church is separated from the WTCCA (to the south) where historic street forms are better retained, the asset's closer setting possessing only a few isolated remnants of 19th and early-20th century built form. Overall, development forming the asset's setting makes a neutral contribution to its significance.

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178. None of the existing buildings within the site can be viewed in conjunction with Christ Church at street level due to intervening early and late-20th century built form. In overall terms, the site makes a neutral contribution to the significance of Christ Church as part of its wider setting.

### *Impact on Christ Church*

179. Impacts on Christ Church will be only indirect, via change in part of its townscape setting. The fabric, architecture and historical and communal associations of the church would not be impacted by the proposed development and therefore these elements of its significance would be retained, as would the group value with the Woking War Memorial.
180. It is only the tallest element of the proposed development (up to 17 storeys) that has the potential to affect the setting of Christ Church, due to the nature of intervening built form, which will preclude other components of the proposed development from the wider townscape context. Even where other components of the proposed development would be visible in conjunction with the church (for example in elevated views), the effects of separation distances and intervening buildings would ensure that there would be no material impacts on an appreciation of its landmark qualities or heritage significance.
181. The proposed development would form a new addition to the varied townscape context within which Christ Church sits that would remain consistent with the existing contrasting relationships with the mid-20th century (and onwards) context. The tallest element (up to 17 storeys) will be visible as a new building in the wider urban context of Christ Church, faced with brickwork with articulated facades giving an appreciation of the composition of related elements contributing to a layered facade with projection and recession.
182. It is in looking south from Jubilee Square where the new visual relationships between Christ Church and the proposed development would be most evident. The proposed development will form a new visual element, in that it would be evident in some southerly views from Jubilee Square, although would be offset from Christ Church, as well as set beyond the intervening built form of existing retail development enclosing Jubilee Square and experienced in the townscape context of the existing taller buildings at Victoria Place and Export House, with existing views looking westwards interrupted by the towers of Victoria Place. The overall height, siting, disposition and tonality of the proposed brickwork of the proposed development means that it would not diminish the focal prominence of Christ Church in views from Jubilee Square and the reciprocal relationships with the Woking War Memorial. Moreover, the above effect would be confined to a relatively small part of the setting. Overall, the proposal would not cause any harm to the significance of Christ Church.

### *Woking War Memorial*

183. The Woking War Memorial is statutory listed at Grade II and located around 135 metres north of the site. It forms the centrepiece of Jubilee Square and is an important commemorative sculpture remembering the lives lost in the conflicts of the 20th century. It is of architectural and historic interest, and has communal value, featuring a bronze statue of winged Victory, who stands on a globe and pedestal which is in turn set atop a sandstone column and plinth, which stands on a two-stepped base. It has inscribed dedications to those who were lost in both the First and Second World Wars. Having been relocated from Victoria Garden to Jubilee Square in 1975, the memorial is experienced within the context of a busy, urban centre which is continually undergoing change. The memorial has group value with Christ Church, though there is no historical or functional

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relationship between the two structures, the proximity of the church reinforces the public, commemorative function of the memorial.

184. As set out above the war memorial is not in its original location and its setting has altered significantly since it has been in Jubilee Square. Nonetheless, its prominent, central position in this open, civic space amplifies the aesthetic interest of the memorial, by reinforcing an appreciation of its special architectural and historic interest as a piece of public art and as a local landmark and focal point of remembrance. More widely, the war memorial is located within Woking Town Centre, which is a varied urban townscape, characterised by a broad mix of buildings and structures of different ages, styles, forms and uses. This wider setting does not contribute positively to an understanding or appreciation of the memorial's special interest. The memorial can only be experienced by pedestrians from within Jubilee Square (together with more limited views from Church Street East, Market Walk and Mercia Walk, on approach to Jubilee Square). There are no existing views between the site and the memorial, the site makes no contribution to significance as an element of its setting.

### *Impact on Woking War Memorial*

185. Impacts on Woking War Memorial will be only indirect, via change in part of its townscape setting. It is in looking south from Jubilee Square where the new visual relationships between the war memorial and the proposed development would be most evident. The proposed development will form a new visual element in that it would be evident in some southerly views from Jubilee Square although would be offset from the memorial, as well as set beyond the intervening built form of existing retail development enclosing Jubilee Square and experienced in the townscape context of the existing taller buildings at Victoria Place and Export House, with existing views looking westwards interrupted by the towers of Victoria Place. The overall height, siting, disposition and tonality of the brickwork of the proposed development means that it would not diminish the focal prominence of the war memorial in views from Jubilee Square and the reciprocal relationships with Christ Church. Moreover, the above effect would be confined to a relatively small part of the setting. Overall, the proposal would not cause any harm to the significance of Woking War Memorial.

### Conclusion on Statutory listed buildings

186. For the reasoning previously set out the proposed development would preserve the special interest and settings of the relevant statutory listed buildings, avoiding any harm to the significance of these proximate designated heritage assets (by reason of indirect effect, development within setting).

### Locally listed buildings / Non-designated heritage assets (outside of the site)

#### Nos.1-2 and Nos.13-14 High Street

187. No.1 High Street (presently occupied by NatWest bank) is identified as having architectural significance in SPG Heritage of Woking (2000), it was purpose-built as a bank in 1908, standing as good example of this high street building typology in the Edwardian era, and key to the town centre as an emerging shopping district at this time. The building is a grand and imposing example of Edwardian 'Wrenaissance', positioned on the prominent corner plot between Church Path and the High Street. The Heritage Statement sets out that there is a visual contrast between yellow stock brick and red brick engaged giant composite pilasters, that entablature and window surrounds articulate key architectural elements, creating an elegant design that communicates the messages of

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solidity and responsibility of a banking institution and that the building's layout and original features evidence its function as a high street bank, and it has group value with No.2 High Street. Establishments like this demonstrate Woking's growth into an affluent middle-class commuter town by the 1910s as a key development on the High Street.

188. No. 2 High Street is identified as having architectural significance in SPG Heritage of Woking (2000), it is a two bay three-storey early-20th century building of red brick construction. The Heritage Statement sets out that original windows and flanking stone pilasters at the first and second floors create a restrained classically influenced composition, with large shop windows at first and second floor (perhaps related to showrooms) providing evidence of its original commercial function and changing trends in retail design and consumer expectations. The ground storey shopfront and rear elevations are less significant, having been extensively altered. No.2 High Street is a remnant of historic character of this area, which in turn reflects Woking's wider development as a commercial centre by the early-20th century.
189. No.13 High Street is an historic commercial premises of a slightly later date - between 1916 and 1934 - consisting of two-storeys with a single bay elevation facing the High Street, a canted bay at the corner of the High Street and Chapel Street and 3 bay elevation facing Chapel Street. The building also has a shorter, two-bay, part-two/part-single storey rear range. The Heritage Statement sets out that the building has been much altered from the mid-20th century onwards, with the originally exposed brickwork rendered over and the historic shopfront removed albeit, notwithstanding the adverse impacts of those changes, the modest scale of the building, its character and form, and the surviving sash windows at the first floor, continue to provide a sense that the building was historically part of a traditional parade of shops along this street. In this context, No.13 High Street has targeted, local architectural and historic interest in illustrating the rapid historic development of Woking following the arrival of the railway.
190. No.14 High Street is a historic commercial premises (1916-1934), located to the west of No.13 High Street. The only part visible along the High Street is a single bay elevation, of two-storeys with a pitched roof. As with No.13 High Street, behind this elevation there are two rear buildings of varying heights that face onto the small service lane. The Heritage Statement sets out that No.14 High Street has limited, local architectural interest derived principally from the character of its upper floor to the High Street, which retains the historic exposed brick and bay window (which echoes that on No.13 High Street) and roof form, with these features contributing to a sense of its historic character as part of an early 20th century parade of shops along the High Street. The Heritage Statement identifies that the shopfront has been substantially altered since the mid-20th century and does not contribute to the building's architectural interest, although the engaged pilasters and corbel/console brackets to either side of the modern shopfront remain and contribute to an understanding of the historic commercial use of the property.
191. The Heritage Statement identifies that Nos.1-2, and Nos.13-14, High Street are experienced in a mixed and diverse townscape context, that Woking railway station is located immediately to the south and modern development of varying scales and heights is located to the north and east. The railway contributes positively to the setting of these locally listed buildings as the historic catalyst for their development albeit the wider, modern townscape context to the north and east does not contribute to their significance as it is of a contrasting character, scale, and architectural quality and is unrelated to the historic development or architectural character of these locally listed buildings.
192. The Heritage Statement identifies that Nos.3-5 High Street (locally listed buildings located within the site) contribute positively to the traditional townscape setting of Nos.1-2, and

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Nos.13-14, High Street, with this contribution being focussed on the upper storeys of the front elevations only, as these areas demonstrate that the buildings are broadly contemporaneous and have a similar quality of architectural design and broadly shared characters. The rear elevations and ground floor shopfronts undermine these two elements and detract as elements of setting.

193. The Heritage Statement identifies that other buildings within the site make a more varied contribution to the significance of Nos.1-2, and Nos.13-14, High Street's overall heritage significance as elements of setting. This is because other buildings within the site are not locally listed and have generally been subject to a greater degree of alteration such that the legibility of their historic character has been largely lost. The upper storeys of Nos.6-7, Nos.9-10 and No.12 High Street retain, to a limited degree, a historic appearance and thus make a negligible positive contribution to Nos.1-2, and Nos.13-14, High Street as elements of setting.

### Heritage Assets in Guildford Borough

194. Guildford Borough Council (GBC) have submitted a holding objection, requesting that the impact on the following heritage assets, within Guildford Borough, be assessed:

- Cathedral Church of the Holy Spirit (Guildford Cathedral) (Grade II\*);
- Clandon House (Grade I);
- Clandon Park (Grade II);
- Hatchlands (Grade I); and
- Hatchlands Park (Grade II).

195. The applicant has submitted a response to the comments of GBC, which identifies, in summary, the following:

196. Cathedral Church of the Holy Spirit (Guildford Cathedral) (Grade II\*) - The proposed development will be a recessive element experienced at distance (c. 8.9km) and in the context of the existing tall(er) buildings in Woking Town Centre. Accordingly, the proposed development will sustain the heritage significance of Guildford Cathedral.

197. Clandon House (Grade I) and Clandon Park (Grade II) - Due to the height of the proposed development; the significant separation distances (c. 7km to the northern boundary of Clandon Park) and occluding effects of interposing landscaping it would not be a prominent or distracting element in these views and the shared historic and architectural interest of the listed building and registered park and garden would continue to be readily appreciated, with no material effect on the heritage values that comprise their particular significance. The proposed development will sustain the heritage significance of Clandon House (Grade I Listed Building) and Clandon Park (Grade II Registered Park and Garden).

198. Hatchlands (Grade I) and Hatchlands Park (Grade II) – Where longer range views from the house and park are possible, the existing cluster of tall buildings in Woking Town Centre may be visible. The proposed development would be a minor addition in these views but would not be a prominent or distracting element due to its height relative to the taller buildings already present within Woking Town Centre and its proposed character & materiality. Due to those factors and the occluding effects of separation distances (c. 8.2km to the northern boundary of Hatchlands Park) and interposing landscape elements, the shared historic and architectural interest of the park and the house, and related contribution made by their shared settings, would remain strongly legible and readily understood, with no material effect on the heritage values that comprise their particular

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significance. In that context, the proposed development will sustain the heritage significance of Hatchlands (Grade I Listed Building) and Hatchlands Park (Grade II Registered Park and Garden).

### Conclusion on built heritage

199. The NPPF sets out, at paragraph 200, that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. It has been identified that the proposed development would result in a low level of 'less than substantial' harm (i.e., below the middle of the 'less than substantial harm' spectrum) to the significance of the Woking Town Centre Conservation Area (WTCCA). Nonetheless, paragraph 199 of the NPPF makes clear that when considering the impact of a proposal on the significance of a designated heritage asset (which includes a Conservation Area) great weight should be given to the asset's conservation. Therefore this 'less than substantial' harm must nonetheless be afforded considerable weight and importance.
200. The proposed development has identified measures to minimise and/or mitigate the heritage harm where possible. Paragraph 202 of the NPPF, regarding 'less than substantial harm' is, therefore, engaged, it states that under these circumstances, any such harm should be weighed against the "*public benefits*" of the proposals, including where appropriate securing the optimum viable use of the asset(s). Having regard to paragraph 199 of the NPPF the exercise under paragraph 202 of the NPPF is not an even balance and it has been undertaken in this assessment accordingly.
201. Paragraph 203 of the NPPF is also engaged, which requires the effect of an application on the significance of a non-designated heritage asset to be considered in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement is required, having regard to the scale of any harm or loss and the significance of the heritage asset. The proposed development would cause a low level of harm to the local heritage significance of Nos.3-5 High Street (located within the site) and Nos.1-2, and Nos.13-14, High Street (located immediately adjacent to and proximate to the site).
202. The PPG states that "*Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.*" (Paragraph: 020 Reference ID: 18a-020-20190723, Revision date: 23 07 2019). The public and heritage benefits will be considered in the overall planning balance, at the conclusion of this report.
203. Insofar as the proposed development would preserve the significance of a range of built heritage assets, it is consistent with the objectives of Policy CS20 of the Woking Core Strategy (2012), Policy UA4 of the Site Allocations DPD (2021) and Policy DM20 of the Development Management Policies (DPD) (2016). Where the proposed development would cause harm to the significance of the Woking Town Centre Conservation Area, there would be conflict with these policies. That Development Plan policy context is generally aligned with NPPF policy and allows for harm to the significance of heritage assets to be weighed against the public benefits of a proposed development in the overall planning balance.



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### Design

204. The NPPF states that *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”* (paragraph 126).
205. The NPPF also states (at paragraph 130) that *“Planning policies and decisions should ensure that developments:*
- a) 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;*
  - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
  - c) 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);*
  - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
  - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
  - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*
206. The NPPF states that *“Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels”* (paragraph 133).
207. Policy CS21 of the Woking Core Strategy (2012) requires proposals for new development to, inter alia, *“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. Tall Buildings could be supported in Woking Town Centre, if well designed and can be justified within the context”*.
208. Paragraph 5.248 of the Development Management Policies DPD (2016) states that *“Landscape character is a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another. Townscape character is the appearance and character of buildings and all other features of an urban area taken together to create a distinct visual impression.”*

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209. Policy CS24 of the Woking Core Strategy (2012) states that:

*“All development proposals will provide a positive benefit in terms of landscape and townscape character, and local distinctiveness and will have regard to landscape character areas.*

*To protect local landscape and townscape character, development will be expected to:*

- conserve, and where possible enhance existing character, especially key landscapes such as heathlands, escarpments and the canal/river network and settlement characteristics; maintain locally valued features, and enhance or restore deteriorating features*
- respect the setting of, and relationship between, settlements and individual buildings in the landscape*
- conserve, and where possible, enhance townscape character, including structure and land form, landscape features, views and landmarks, and appropriate building styles and materials*
- support land management practices that have no adverse impact on characteristic landscape patterns and local biodiversity.*
- Protect and encourage the planting of new trees where it is relevant to do so.”*

210. Policy DM19 of the DM Policies DPD (2016) relates to shopfronts and states:

*“Proposals for new and replacement shopfronts will be permitted where they pay regard to the guidance set out in the Woking Design SPD on Shopfronts in terms of character, proportion, materiality, lighting and security; and:*

- (i) they do not adversely affect pedestrian or highway safety;*
- (ii) they would preserve or enhance heritage assets having regard to design and materials of the building and adjoining shops, including any traditional or original features that should be retained;*
- (iii) they are designed to allow equal access for all users; and*
- (iv) they do not detrimentally affect the amenity of neighbouring occupiers.*

*In Conservation Areas and on heritage assets, where traditional shopfronts are important, new shopfronts should be of a traditional format and reflect the character of the building and/or the area.”*

211. SPD Design (2015) provides design guidance and good practice to improve the quality of design in new development across the Borough. The SPD provides (at paragraph 4.4) the criteria against which proposals for tall buildings will be considered include, but are not necessarily limited to:

- “Be of exceptional design quality and subject to a formalised design review process during the evolution of the scheme;*
- Not adversely affect the site's surrounds in terms of micro-climate, wind, overshadowing, glare, aviation navigation and telecommunications interference;*
- Contribute positively to the setting of identified heritage assets that might be affected by the proposal;*
- Take account of key views both across the site and long views towards the building itself. Design proposals will need to take into account the need for the building to be designed so it is seen in the round; and*

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- *Pay particular attention to the environment created at ground floor. Proposals must be appropriate to the streets and spaces they address and should exploit opportunities for improvement of existing and creation of new public spaces."*

212. The preceding criteria will inform the (wider) analysis undertaken within this report. The applicant's Design and Access Statement (DAS) provides information about the evolution of the design and the factors taken into consideration when preparing the proposed development, including that the design development process explored a series of massing options to establish a preferred approach.

213. The DAS sets out that the retention/restoration and reinstatement of key façades and the continuation of the High Street frontage scale (2-3 storeys) at pedestrian level has driven the design development from the outset. It also sets out that the proposed design has drawn inspiration from the buildings within the Woking Town Centre Conservation Area, as well as the tight knit grain and rhythm of the street frontages, and that the ground floor frontages, along High Street and wrapping around the corner of Chapel Street, will provide new and active frontages to a currently run down, forgotten part of Woking Town Centre.

214. The DAS sets out that the proposed massing has been set out based on the following principles:

- The High Street elevation has been retained at two to three storeys to allow the streetscape to be read clearly within the Woking Town Centre Conservation Area;
- The eastern section of the building has been set down as a shoulder height to the scheme, which matches the height of Albion House next to the station;
- The shoulder has been pushed further back from the existing High Street shopfronts, giving relief to the pedestrian experience at ground level;
- The taller (tower) element has been designed along Chapel Street as the least sensitive part of the site; this allows the building to step up towards the larger developments of Victoria Place, Export House and the recently approved EcoWorld development on Goldsworth Road; and
- The taller element has been broken down using a change in materials and steps in the massing to provide good proportions and a sculpted form from key views.

215. The DAS also sets out that the proposed building has been broken down into three distinct forms; the shoulder, the taller (tower) building and the street frontage and that these all have their own identity but still read as a unified building through:

- Repeating window types and proportions;
- Overlapping material palette inspired by the retained existing buildings and surrounding Woking Town Centre Conservation Area; and
- Activation of 'end walls' through repeating grid, designing with no back of the building.

216. The DAS also sets out that variation is provided through:

- Different street contexts informing different building scales and details;
- Variation in elevational emphasis and roof forms for the tall element compared to the shoulder element;
- Individualised frontage at ground and first floor; and
- Alternative brick type within the taller element to break up the form and respond to emerging context in townscape views.

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217. The external material palette predominately consists of brick with roofs, parapets and windows in dark grey metal (or slate in the case of the Nos.3-7 High Street roofs) to create a contrast. The DAS sets out that the various brick tones are based on creating distinct but harmonious identities between the different parts of the building and that the red and brown tones chosen are present in several areas of the Woking Town Centre Conservation Area, whereas the buff brick is intended to complement the more recent additions to Woking Town Centre, such as the Victoria Place development.
218. The south-west part of the site is marked by the tallest element of the building (up to 17 storeys), which the DAS sets out will aid with wayfinding to Woking railway station and the 'central core' of Woking Town Centre. The DAS sets out that the key design drivers have been:
- Creating a clear top, middle and base of the building, defined through consistent base details that wrap around the entire building;
  - The façade is arranged to achieve regular brick pier widths that ground each element;
  - The top residential levels of the central piece are grouped as a three through a stacked in and-out brick detail to define and celebrate the crown of the building;
  - The top level of each of the 'wings' also has this detail to complete the top of the building;
  - The parapets of each element are defined by rotating the brick, adding interest to the top of the building;
  - All windows in the middle section of the tall element have been paired on alternate floors with an inset stack brick detail; these pairings express the building's verticality;
  - The base is defined by smaller banding details between brick piers that wrap around the whole new element of the building and breaks up the large band where the transfer slab sits; and
  - Windows of the main elevations have either both or one side set in by half a brick around them. Within the central element, this occurs on both sides, within the 'wings' whereas this is either side of the window.
219. The tower element has been 'broken down' into three 'sections', formed of a buff brick central section (17 storeys) and flanking red brick components to the north and south, which step down to 14 and 16 storeys respectively. This change in brick tone visually breaks down the proportions of the tower element into several, more slender, elements, also breaking down the overall form. In stepped heights (i.e., at 14 and 16 storeys), the lower elements of the tower provide an interesting silhouette to the tower element overall. Recesses within the façade would accentuate the proportions and ensure a visually crisp transition between the buff and red brick tones.
220. The 'shoulder' element (9 and 8 storeys) is set back (from High Street) to enable the retained and reinstated façades of the High Street (2-3 storeys) to be read clearly and is 'divided' into three elements (with shared proportions), providing consistent brick gables to High Street, and providing a more varied and articulated roof-line than the counterpoint of the flat roof profile of the tower element. The 'division' into three is further emphasised with the recessed drain pipe between roof pitches and that the windows on each floor are grouped by the shared herringbone brick detail in-between them. The gabled forms take inspiration from those within The Broadway buildings to the east. The "Masterchef" communal kitchen is set behind the most westerly brick gable, and would have a standing seam metal roof, which is considered to be architecturally successful. The pitched roof forms of the 'shoulder' element also provide an appropriate transition between the tower

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element and the much smaller buildings along Church Path to the east and serve to step down to Albion House.

221. The proposed metal framed windows would achieve a clean and crisp finish to the building and the tall, narrow proportions of the window openings are considered to work well within the wider architectural composition. The design includes a deep brick reveal between the façade and the windows; the reveal depths are detailed in the application drawings and would ensure that the window reveals are sufficiently deep so as to achieve good modelling within the facades, as well as surface contrast within the scale of the facades proposed.
222. At lower levels along High Street (close to the corner with Chapel Street) the proposed development seeks to retain the grain and rhythm of the street frontage whilst including a more contemporary approach. The existing façades of Nos.3-5 High Street are to be retained and those of Nos.6-7 High Street rebuilt to emulate the architectural details and patterns of the surrounding area, such as arched openings and bay windows. This would achieve a familiar character at ground floor level and 'embed' the proposed building into High Street. Metal detailing, including awnings and perforated panels, would signify the main entrance points and create a shop front feel, activating the building at ground floor level with the roof of the existing façades being rebuilt so as to ensure that each building is read individually.
223. The new element on the High Street has drawn inspiration from the existing 'The Lighthouse' building as well as the fine grain of the Woking Town Centre Conservation Area. The bays have been split down into smaller sections by creating a step in the brickwork piers. The parapet has also been stepped in height to accentuate this detail, similar to the existing roofscapes. The proposed metal awnings are used to assist with the solar shading and wind microclimate mitigation; these awnings also tie in with the historic images of High Street.
224. The main entrance of the Class E ground floorspace (proposed to accommodate The Lighthouse) is located in the rebuilt façades of Nos.6-7 High Street, the entrance is inset to provide relief from the street and to emphasise for legibility and wayfinding. All of the shopfronts of existing façades are proposed to be rebuilt, taking inspiration from traditional Victorian shop fronts, giving a point of difference between the new and the existing elements of the High Street frontage. However, consistent design features such as the perforated metal pattern and material palette, would allow the base of the building to be tied together.
225. A new 'joining' piece on High Street, between the new elements of the streetscape and the existing retained and/or reinstated elements, would create a transition between the two and allow them both to be appreciated on their own merits, albeit unifying the two through similar details with references to the Woking Town Centre Conservation Area and a shared material palette.
226. The co-living residential entrance has been located on Chapel Street with this entrance having a large opening, providing clear way finding. The entrance area has a similar language to the openings above, but with the addition of a recess to give relief off the street and an arched motif on the doors to signify the opening. The perforated metal panel, showing a floral detail, is inspired by the retained locally listed façade details and wraps around all openings on the ground floor, tying together and unifying these areas. Along Chapel Street the elevational treatments are architecturally strong.

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227. The ground floor level awnings have been simplified during design development and along Chapel Street an awning would only be provided over the co-living residential entrance. The awnings would be metal, ensuring their longevity and robustness.

### Conclusion on Design

228. Overall, the proposed development is considered to have been designed to the highest standard with specific attention given to the edges of the building at ground level and with a well resolved elevational form overall, offering visual interest and with a clear hierarchy to the facades, being proposed. It is clear that each building element has been considered as both a singular element and a part of the whole. The ground floor edges are appropriate to the streets and spaces they would address. The building has been designed with its inherent visibility from all sides having been carefully considered, façade materials would have depth and definition, a richness in treatment and would achieve a high-quality appearance, also having been informed by long-term maintenance considerations (i.e., the predominant use of masonry/brick). The proposed development would play an important role in creating an attractive town centre environment and would support the aspiration for a vibrant town centre with strongly defined, active streets.

### Archaeology (below-ground heritage)

229. Section 16 of the NPPF places the conservation of archaeological interest as a material planning consideration. Paragraph 194 of the NPPF states that “*Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation*”. Policy CS20 of the Woking Core Strategy (2012) states that “*On all development sites over 0.4 hectares an archaeological evaluation and investigation will be necessary if, in the opinion of the County Archaeologist, an archaeological assessment demonstrates that the site has archaeological potential.*”
230. Whilst the site is not within an Area of High Archaeological Potential (AHAP), and does not exceed 0.4 hectares, it falls within the Woking Town Centre Conservation Area. A desk-based study (informed by a site walkover survey) therefore assesses the impact of the development on archaeological remains, concluding that, on the basis of available evidence, there is an overall negligible potential for significant archaeological features of all periods (i.e., Roman, Early Medieval (Saxon), Medieval, Post-Medieval), other than the Prehistoric period, which has been assigned a low potential on the basis of a findspot within 500m, and that earlier settlement, burials or other appropriate non-agricultural features may be considered to be of medium significance, while poorly preserved agricultural features may be considered to be of negligible-low significance, but none are anticipated given the limited potential and previous land use as heath or waste.
231. The assessment identifies that subsequent phases of building and demolition on thin heathland soils mean that any such archaeological remains are unlikely to survive in a coherent or legible form, particularly given that there appears to be some evidence for cellaring and ground reduction on the site, that some make-up of ground is also evident but the date of this is uncertain and earlier damage to underlying deposits that may have previously occurred is not well-defined. The assessment identifies that there is some uncertain potential for Post-medieval features relating to an earlier late-19th century phase of terraced housing, and various phases of late 19th and 20th century outbuildings, but that any such remains would be of negligible significance. The assessment therefore concludes that the overall unmitigated archaeological impact of the proposed

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development is predicted to be negligible and therefore no further archaeological investigation or mitigation works are recommended.

232. The Surrey County Council (SCC) Archaeological Officer comments that *"The applicant has submitted an archaeological assessment in support of this application, which identifies that the site has been subject to past development impacts which will have reduced the significance of any archaeological remains that may have survived at the site. The site does not lie within a county "Area of High Archaeological Potential" (AHAP) and the supporting assessment also notes that the site is not over 0.4ha in scale, which is the adopted threshold under the Woking BC local plan for development proposals to need to consider impacts on potential archaeology. Given these facts, I am satisfied that if the development is permitted, it should be with no further requirement for archaeological mitigation, and I have no archaeological concerns regarding these proposals."*
233. In conclusion, the impact on archaeology is acceptable and there are no further requirements in relation to archaeological mitigation. The proposal complies with Policy CS20 of the Woking Core Strategy (2012) and the provisions of the National Planning Policy Framework (NPPF) in respect of archaeology (below-ground heritage).

### **Transport, highways and parking**

234. Policy CS18 of the Woking Core Strategy (2012) states that *"The Council is committed to developing a well-integrated community connected by a sustainable transport system which connects people to jobs, services and community facilities, and minimises impacts on biodiversity and that this will be achieved by taking the following steps [inter alia] (emphasis added):*
- *"Locating most new development in the main urban areas, served by a range of sustainable transport modes, such as public transport, walking and cycling to minimise the need to travel and distance travelled."*
  - *Ensuring development proposals provide appropriate infrastructure measures to mitigate the adverse effects of development traffic and other environmental and safety impacts (direct or cumulative). Transport Assessments will be required for development proposals, where relevant, to fully assess the impacts of development and identify appropriate mitigation measures. Developer contributions will be secured to implement transport mitigation schemes.*
  - *Requiring development proposals that generate significant traffic or have significant impact on the Strategic Road Network to be accompanied by a travel plan, clearly setting out how the travel needs of occupiers and visitors will be managed in a sustainable manner.*
  - *Implementing maximum car parking standards for all types of non-residential development, including consideration of zero parking in Woking Town Centre, providing it does not create new or exacerbate existing on-street car parking problems. Minimum standards will be set for residential development. However, in applying these standards, the Council will seek to ensure that this will not undermine the overall sustainability objectives of the Core Strategy, including the effects on highway safety. If necessary, the Council will consider managing the demand and supply of parking in order to control congestion and encourage use of sustainable transport."*

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235. The reasoned justification text to Policy CS18 states (at paragraph 5.165) that:

*“The main urban centres offer a wide range of retail, employment and community services. It is in these areas where public transport interchanges and walking and cycling networks are readily available. By concentrating development in the main urban centres, the amount and length of journeys can be minimised, particularly by private car, as the needs of the population can be met by the services and facilities around them, and use of sustainable transport modes can be maximised. This will lead to a reduction in energy consumption, efficient use of public transport, lower transport carbon emissions and an overall improvement in the well being of the population due to the health benefits of walking and cycling and increased social inclusion.”*

236. Policy DM16 of the Development Management Policies DPD (2016) states that:

*“The Council will require servicing facilities to be well designed, built to accommodate the demands of new development and sensitively integrated into the development and the surrounding townscape and streetscape. In particular, servicing activities should not give rise to traffic congestion, conflict with pedestrians, or other road users, or be detrimental to residential amenity”.*

237. The Site Allocations DPD (October 2021) supports the delivery of the Woking Core Strategy (2012), and allocates land for housing, employment and infrastructure uses as illustrated on the Council's Proposals Map. Policy UA4 incorporates the proposed site and allocates it *“for a mix of uses to comprise residential including affordable housing, office and retail”*. The relevant key requirements of Policy UA4 are:

- “i. Make a contribution to enhance a multi-modal transport interchange facility in the vicinity of the north of Woking Railway Station (see allocation site UA7).*
- iv. Include appropriate provision for car, cycle parking and servicing within the site, taking into account the Parking Standards SPD; the site's accessible location and the need to avoid adverse highway safety effects.*
- v. Be supported by a Transport Assessment to assess the likely impacts of the development, and to inform appropriate mitigation. This should take account of proposed developments in the vicinity of the site.*
- vi. Be supported by a Travel Plan to minimise car use of prospective occupants of the development.*
- vii. Incorporate effective access arrangements that are safe and suitable for all users.”*

238. Section 9 of the NPPF (Promoting sustainable transport) states, at paragraph 104, that:

*“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*



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- e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

239. Paragraph 105 states that *“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”* (emphasis added).

240. At paragraph 107 the NPPF states that:

*“If setting local parking standards for residential and non-residential development, policies should take into account:*

- a) *the accessibility of the development;*
- b) *the type, mix and use of development;*
- c) *the availability of and opportunities for public transport;*
- d) *local car ownership levels; and*
- e) *the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”*

241. Paragraph 110 states that *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- a) *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) *safe and suitable access to the site can be achieved for all users;*
- c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

242. Paragraph 111 of the NPPF states that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

243. Within the preceding context the NPPF states that all applications for developments should (paragraph 112):

- a) *“give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*

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- d) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

244. The application has been submitted with a Transport Assessment (TA), Travel Plan (TP) and Delivery & Servicing Plan (DSP).
245. The site is located quite centrally within Woking Town Centre and is bound to the south by High Street, east by additional commercial and retail units, north by a parking and servicing area associated with the units further to the north and east, and to the west by Chapel Street.

### Walking and Cycling

246. Pedestrian access to the site is very good, with wide and well surfaced pavements located within the vicinity. Furthermore, the west of the site is bound by Chapel Street which has a shared surface environment that connects to Commercial Way (a pedestrian environment). Restricted access for vehicles along Chapel Street reduces the number of vehicle movements along this stretch, creating a more pedestrian friendly environment, and to the east there is a large area of public realm outside Woking railway station that extends along Church Path towards Commercial Way. There is street lighting throughout the surrounding roads along with dropped kerbs and tactile paving at pedestrian crossing points.
247. Two short Public Rights of Way (PROW's) are located close to the site; Footpath 112 travels from Woking railway station, along Church Path, towards Commercial Way, and Footpath 60 is used to cross beneath the railway lines, including to travel to leisure facilities, such as Woking Leisure Centre (c. 1.3km, 17 minute walk) and Woking NHS walk in centre/ Woking Community Hospital (c. 600m, 9 minute walk), which are both located to the south of the railway.
248. Cycling is also very well supported from the site. Along The Broadway and High Street an on-carriageway contraflow cycle lane is present between Victoria Way (A320) to the west and Duke Street to the east. Chapel Street is a signed advisory route which can be utilised by cyclists to travel between High Street and National Cycle Network (NCN) Route 223, which travels along Commercial Way, providing a mixture of on-road and traffic-free cycling throughout Woking, and which leads into NCN Route 221, an approximately 14km long canal path with an east-west alignment that offers traffic free cycling. NCN Route 223 itself also continues for an extended distance, connecting Woking to Chertsey (located c. 9km to the north-east) from where further cycle travel can be completed using NCN Route 4 (which travels north east through Walton-on-Thames and into central London). To the south, NCN Route 223 connects Woking to Guildford (c. 9km).
249. The TA forecasts that a total of 39 and 38 two-way movements by walking (i.e., on foot) are forecast to be associated with the co-living units in the AM (8:00-09:00) and PM (17:00-18:00) peak periods respectively, and 262 movements across the day. This additional level of demand/use would be comfortably absorbed given the high quality of pavements etc. in the area.

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### Public Transport

#### Bus

250. The closest bus stops to the site are Woking railway station (Stops 1-6) which are located c. 120m-150m to the east of the site and which have a shelter, seating, timetables and a dedicated bus stop layby. There are a wide range of bus services operating from the Woking railway station bus stops that provide frequent services to a number of destinations, including Guildford, Camberley, Knaphill, Brooklands and Weybridge.
251. The TA forecasts that the proposed development is expected to increase bus demands by 5 passengers in both the AM (08:00-09:00) and PM (17:00-18:00) peak hours. The TA then distributes these bus trips on services that run in the vicinity of the site, which includes routes from the Woking railway station stops (to the north-west of the proposed site), showing that the proposed development is anticipated to lead to an increase of up to 1 passenger per five bus services, which is considered a negligible impact.

Time Period	Services per hour	Additional Passengers (two-way)	Impact (passengers per service)
AM Peak (08:00-09:00)	32	5	0.2
PM Peak (17:00-18:00)	30	5	0.2

#### Rail

252. The closest railway station to the site is Woking Railway Station, with the (High Street side) entrance of the station located approximately 100m to the east of the site access. Woking Railway Station has c. 570 car parking spaces and c. 456 sheltered bike storage spaces including some located within a recent cycle hub which has 24-hour access, full CCTV coverage and maintenance tools. Cycle hire is also available from a Brompton Bicycles bike hire dock on the southern side of the railway lines. The TA provides an overview of the services, and frequency of services, available at Woking Railway Station (within Table 2.2, which is replicated below):

Route	Approximate Frequency (one-way)		
	Weekday	Saturday	Sunday
Guildford – Woking – London Waterloo	13 per hour	13 per hour	8 per hour
Portsmouth – Woking – London Waterloo	1 per hour	1 per hour	1 per hour
Woking – Virginia Water – London Waterloo	2 per hour	2 per hour	1 per hour
Basingstoke – Woking – London Waterloo	3 per hour	3 per hour	1 per hour
Alton – Aldershot – Woking – London Waterloo	2 per hour	2 per hour	1 per hour
Exeter – Woking – London Waterloo	1 per hour	1 per hour	1 per hour
Bournemouth – Woking – London Waterloo	3 per hour	3 per hour	3 per hour
Weymouth – Woking – London Waterloo	2 per hour	2 per hour	1 per hour

253. The TA forecasts that for the most commonly used mode of transport (rail) the proposed development is expected to increase rail demand by 67 and 65 passengers during the AM

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(08:00-09:00) and PM (17:00-18:00) peak periods respectively (with an increase of 452 movements across the day). The TA distributes the AM and PM peak hour rail trips on services that operate from Woking railway station, showing that the proposed development is anticipated to lead to an increase of up to 1.5 passengers per rail service, considered a negligible impact.

Time Period	Services per hour	Additional Passengers (two-way)	Impact (passengers per service)
AM Peak (08:00-09:00)	45	67	1.5
PM Peak (17:00-18:00)	44	65	1.5

254. Network Rail state that as a public funded company, they have responsibilities to spend public funds efficiently which consequently means that Network Rail do not have the funds available to mitigate the impact of third-party development on railway stations. Network Rail object to this planning application as they state that this development will have significant impact on their infrastructure. Network Rail have requested that the proposed development provides a contribution to mitigate the additional usage, ensuring that the station can continue to operate effectively and provide a good standard for rail passengers, although Network Rail have put forward no specific financial contribution nor identified what works any such financial contribution would be put towards.

255. In response the applicant has stated that the site forms part of an allocated site within Woking Town Centre (Policy UA4 of the Site Allocations DPD (2021)) which is identified for redevelopment in the period to 2027, that the quantum of residential development proposed to be delivered is compatible with the quantum anticipated in the Site Allocations DPD (2021). Whilst the applicant acknowledges that Policy UA4 of the Site Allocations DPD (2021) includes a requirement to *“Make a contribution to enhance a multi-modal transport interchange facility in the vicinity of the north of Woking Railway Station (see allocation site UA7)”* the applicant advances that enhancements to the multi-modal transport facility on the north side of the station have already been delivered through the Woking Integrated Transport Project (WITP) and that these works include:

- *“Creation of the new pedestrian public plaza outside railway station and Albion House;*
- *Relocation of the taxi rank to The Broadway;*
- *Rebuilding and resurfacing The Broadway, including bus bays, with granite block paving;*
- *Reconfiguring the High Street to a one-way bus lane, with widened pedestrian footpath and incorporation of a contra-flow cycle lane; and*
- *Extension of the High Street to create a new junction with Victoria Way with provision of further bus stops and shelters with real-time passenger information.”*

256. The applicant further states that:

*“Network Rail’s own information on the passenger usage of Woking Station confirms that, in line with the pattern observed at many stations, there has been a very significant drop in the level of passenger usage of Woking Station between April 2019 and March 2022. The pattern of usage indicates a very significant decline in passenger numbers (based on passengers entering and leaving the station) between*

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*2019/20 and 2021/2022. The decline in usage is around 46 percent. The absolute numbers are as follows:*

*Passengers entering and leaving the station in 2019 / 2020: 7,312,236*

*Passengers entering and leaving the station in 2020 / 2021: 1,517,284*

*Passengers entering and leaving the station in 2021 / 2022: 4,070,300*

*The figures indicate a substantial decline attributable to the Covid 19 lockdown, followed by an increase in 2021 / 2022 which is reflective of a return to work post-Covid but with altered working patterns with many potential customers now working remotely for a proportion of the week.*

*Based on the above figures, it is clear that there is currently significant capacity for the station to accommodate further passenger demand, and that this situation is likely to persist for the foreseeable future. Network Rail should be welcoming of a development which will provide new customers."*

257. Paragraph 57 of the NPPF states that "Planning obligations must only be sought where they meet all of the following tests:

- a) necessary to make the development acceptable in planning terms;*
- b) directly related to the development; and*
- c) fairly and reasonably related in scale and kind to the development"*

258. Given the preceding, and most particularly that the site forms part of Policy UA4 within the adopted Site Allocations DPD (2021), it is not considered to meet all of the tests for planning obligations, as set out within paragraph 57 of the NPPF, to require the applicant to make a financial contribution to mitigate additional use of Woking railway station arising from the proposed development.

### Car Clubs

259. Car clubs provide easy and convenient access to cars and vans on a short-term rental basis, therefore allowing people to use a car when they require one, without having to use or own a private vehicle. They have grown significantly in popularity over recent years and have the potential to reduce private car ownership and use.

260. There are x5 car club spaces within Woking Town Centre, operated by Enterprise Car Club, which is one of the largest car club networks currently operating in the UK. The two closest car club spaces are located adjacent to one another along Goldsworth Road a c. 300m (3 minute) walk to the west of the site. One additional space is located a c. 400m (5 minute) walk to the north-west of the site in the Shoppers Car Parks, with the remaining two spaces located adjacent to one another a c. 650m (8 minute) walk south-west of the site, in Quadrant Court.

261. As part of the proposal, the applicant is proposing to facilitate the provision of x1 car club space along High Street. The provision of x1 new car club space, directly adjacent to the site, would contribute towards providing an attractive alternative to private car use and is considered an appropriate response to parking provision in a highly sustainable central Woking Town Centre location.

### Highway Network

262. High Street is a one-way single carriageway road for westbound vehicles, it has street lighting and parking restrictions along its entirety. Two loading bays are also included in

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the road layout, along the northern side of the carriageway. A segregated contraflow cycle lane is present along the full length of High Street between Woking railway station to the east and the A320 to the west. To the east the cycle lane continues along The Broadway. Along High Street there is a vehicle restriction in place between 07:00-21:00 hrs that only allows cycles, local buses and authorised vehicles to travel west from Woking railway station to Victoria Way (A320). These restrictions are controlled by Surrey County Council (SCC) using Automatic Number Plate Recognition (ANPR) cameras (SCC operate with an online request system which can be utilised by local businesses to request access to High Street during the restricted hours).

263. With regard to the impact of the site on the local highway network, due to the (very largely) car free nature of the proposed development the TA forecasts that the impact of the site on the local highway network would be minimal, with only 6 passengers in vehicles/vans in both the AM (08:00-09:00) and PM (17:00-18:00) peak hours and 42 across the day.
264. Overall, the site is very well situated to make the most of modes of both public and active transport measures.

### Access

265. It is proposed that the site will benefit from a single vehicular access point along Chapel Street, an existing access point comprising a priority junction. The existing access route is used by delivery and service vehicles accessing the rear of shops and commercial units on Church Path and by vehicles accessing the rear parking and the service yard to the rear of Morris House on Commercial Way.
266. The existing access point will be upgraded to provide access to x2 Accessible parking bays that are proposed to be located within the undercroft car park. Refuse collection for the proposed site would also be undertaken from this Chapel Street access point, which would continue to provide access for servicing vehicles associated with the existing commercial and retail units to the north-east. As is the case in the existing scenario, this vehicular route would be ramped, with a gradient of 1 in 26 to the west of the x2 parking bays, and a gradient of 1 in 10 to the east. The parking area would be level.
267. Chapel Street has automated rising bollards in place at the junction with High Street and a barrier to the north of the site on the approach to Commercial Way. As such there is restricted access to Chapel Street, ensuring that the number of traffic movements is low with low vehicle speeds, mainly comprising servicing vehicles associated with the units located in the immediate vicinity. Accordingly, the location of this vehicular access point is considered suitable because vehicles accessing and egressing the site are unlikely to experience passing traffic.
268. Pedestrian access would be achieved from both Chapel Street and High Street via three pedestrian access points that will connect directly to the pedestrian footways adjacent to the site (to the co-living residential reception lobby, and x2 to the Class E space). Cyclists will access the site via the Chapel Street access, allowing access to the cycle store which will be accessible at the top of the ramp, which is at most 1 in 10 grade, which is shallow and therefore considered suitable for cyclists.

### Housing Infrastructure Fund (HIF)

269. The Council has been requiring residential development within Woking Town Centre to make a £2,000 per unit financial contribution towards the Housing Infrastructure Fund

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(HIF) Recovery Strategy. However, at its meeting on 5th October 2023, the Council's Executive resolved to terminate the HIF project. As such, it would clearly not meet all of the tests for planning obligations, as set out within paragraph 57 of the NPPF, to require the applicant to make a financial contribution towards the HIF Recovery Strategy.

### Parking Standards

#### Car Parking – Residential

270. SPD Parking Standards (2018) does not form part of the Development Plan for the Borough although its purpose is to act as guidance on how Policy CS18 of the Woking Core Strategy (2012), concerning transport and accessibility, could be applied. The SPD specifies no parking standards specifically for co-living, as a specialised form of residential accommodation, and sets out the following minimum on-site residential parking standards:

Number of bedrooms	Flat, apartment or maisonette	House or bungalow
1	0.5 space	1 space

271. Relevant parking standards suggest that a total of x165 on-site residential parking spaces would need to be provided (i.e., 0.5 space x 329 units). However, Table 3 of SPD Parking Standards (2018) is clear about the circumstances where development falling below the minimum parking standards could be appropriate, namely within Woking Town Centre, as is the case here. Furthermore both Policy CS18 and SPD Parking Standards (2018) acknowledge that the application of the parking standards should be balanced against the overall sustainability objectives of the Woking Core Strategy (2012).
272. Given the very high level of accessibility of the site, not only in terms of the range of travel modes which would be available to future residential occupiers to travel to and from the local area, but also in terms of the range of local amenities which can be easily accessed primarily on foot given the central Woking Town Centre location, it is proposed that the site will be car free, with the exception of x3 accessible parking spaces and x1 car club space.
273. Furthermore, the residential component of the proposed development in this instance is for co-living units, which typically attract residents who do not own a private car. The applicant cites other fully operational co-living developments as evidencing this assertion, stating that the Old Oak site (open since 2016 with x546 rooms) and Canary Wharf (open since 2019 with x705 rooms) are both car free yet have an average occupancy of 97%, illustrating that they are highly attractive even as car free developments.
274. Whilst both of the stated developments are located within London (and within PTAL 4 areas), and therefore benefit from very good access to public transport modes the site in this instance is also very well located with regards to public transport, with a range of bus and rail services accessible from Woking railway station and associated bus stops. As such, the proposed (almost) car free approach is considered suitable for the proposed development due to its co-living nature and the highly accessible Woking Town Centre location.
275. Two of the Accessible parking spaces proposed will be located within the undercroft car park to the rear of the site, with the third space located to the south of the site along High Street. The car club space is also proposed to be located along High Street.

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276. The car club bay and blue badge bay along High Street will have Electric Vehicle (EV) charging provision in line with SPD Climate Change (2013) which outlines that all new developments which include parking facilities should be designed to provide opportunities for charging electric and plug-in hybrid vehicles.
277. In respect of electric vehicle (EV) charging points SPD Climate Change (2013) confirms (at Section 6.1) that *“Flats and housing with communal facilities of 20 or more parking spaces to be determined on a site by site basis but the minimum to be provided will be at least %% Active Charging Points [and] 15% Passive Charging Points (both percent of total parking spaces)”*. Because less than x20 car parking spaces are proposed at the site there are no specific EV parking standards relevant to the site.

### Car Parking – Non-residential

278. With regard to the proposed Commercial, Business and Service (Class E) floorspace at ground floor level, as stated within paragraph 4.3 of SPD Parking Standards (2018), *“maximum parking standards will be implemented for all types of non-residential parking standards, including consideration of zero parking in Woking Town Centre”*. Under ‘Part A Use Classes’ the SPD also states that *“Woking Town Centre is a highly sustainable and accessible location with huge pressure on the demand for land. To ensure the efficient use of land in this area zero parking has been applied, in line with Core Strategy Policy CS18: Transport and accessibility”*. It must be noted that what were previously uses falling within A Use Classes now fall within Use Class E (other than former Classes A4 & A5). As such, the provision of zero car parking to serve the proposed Commercial, Business and Service (Class E) floorspace at ground floor level is entirely consistent with the Development Plan and SPD Parking Standards (2018).

### Cycle Parking – Residential

279. The provision of good quality cycle parking supports cycling as a means of transport and is therefore critical to increasing the use of cycles. Section 4.6 of Parking Standards SPD (2018) sets out minimum cycle provision as being *“2 spaces per dwelling”* for *“C3 Dwelling houses (family houses, up to 6 residents living as a single household, including households where care is provided)”*. The applicant considers that these standards cannot be considered to be applicable to the co-living nature of the proposed development, which involves single occupancy rooms with shared communal spaces.
280. The applicant therefore proposes that x98 cycle parking spaces will be located within the ground floor level cycle store, x82 of these spaces will be for resident owned cycle parking, with the remaining x16 spaces managed by the on-site management team. These x16 managed spaces would be occupied by a variety of bicycles, including foldable and electric, that residents would be able to use for free through a cycle loan scheme and will be maintained for use at all times.
281. The applicant states that the proposed level of residential cycle parking has been based upon existing co-living sites operated by Halcyon Development Partners (the applicant) and that an independent survey was undertaken in July 2022 at one site located along Palmerston Road in Harrow (planning reference: P/2555/18) which has x222 co-living units (of which x179 units were occupied when the survey was undertaken) and x222 cycle parking spaces. The applicant asserts that across the day surveyed a maximum usage of x6 cycles was recorded, equating to 3% of the total cycle parking capacity.
282. The applicant states that at a second site: Sunday Mills, Earlsfield, which has x315 co-living rooms (and x315 cycle parking spaces) a maximum usage of circa 10% was



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recorded, also stating that Sunday Mills is located along a popular cycle path away from a major transport node, therefore making it suitably located for cycle travel. As such, the applicant considers that the usage of cycle parking spaces at the Sunday Mills site would be expected to be high when compared to sites located close to public transport nodes, such as the proposed site at High Street.

283. The applicant therefore considers that the x98 residential cycle parking spaces proposed represents a provision that is sufficient to be more than able to accommodate the forecast level of cycle parking demand at the site. Furthermore, the applicant considers that the proposed cycle parking provision can be considered suitable because the site is located within Woking Town Centre and due to the range of amenities available in the town centre itself, as well as the fact that the site is also located within walking distance of a range of public transport services including those at Woking railway station.
284. Whilst both Active Travel England and Surrey County Council Highways (initially in respect of Surrey CC) have raised concern in respect of the quantum of cycle parking to be provided it must also be borne in mind that potentially increasing the cycle parking provision would reduce the quantum, and usability, of Commercial, Business & Service (Class E) floorspace to be provided at ground floor level. There is a requirement for residential and non-residential bin storage to take place at ground floor level (due to the size, weight etc. of bins), for some plant to be accommodated at this level and for the co-living lobby to be provided. Whilst it would be preferable for increased cycle parking provision to be provided such increased provision would reduce active ground floor space, which would have adverse impacts in other respects. As such, Officers consider, on balance, that sufficient justification has been provided by the applicant for the level of cycle parking provision proposed albeit that this justification is specific to the co-living nature of the development proposed in this instance (which does not fall within Use Class C3).
285. Officers do however consider that monitoring surveys should be undertaken every 12 months from the date of first occupation of the co-living element of the proposed development for a period of 3 years. The purpose of this is to confirm cycle parking usage against supply, if a threshold of 80% of occupancy of cycle parking is reached a scheme for additional cycle loan scheme spaces must be submitted to and approved by the Council within 6 months, the approved scheme thereafter being implemented within 6 months and then being permanently retained and maintained. Recommended condition 11 refers in respect of cycle parking.

### Cycle Parking – Non-residential

286. With regard to the proposed Commercial, Business and Service (Class E) floorspace at ground floor level, x4 cycle parking spaces (in the form of x2 Sheffield stands) will be provided along High Street in close proximity to the building entrance. In addition, x10 public cycle parking spaces are also available 65m to the east of the site outside Woking railway station, with an additional x20 spaces located 20m further east.

### Servicing

287. It is proposed that all servicing, with the exception of refuse collection, will be undertaken from the on-street loading bay along High Street, thus ensuring that the existing servicing arrangements for The Lighthouse are unchanged. Servicing from this bay would generally involve the delivery of goods to the site and swept path analysis has confirmed that both a 7.5 tonne truck and Mercedes Sprinter van can access and egress the on-street servicing bay in forward gear.

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288. Refuse collection will be undertaken from within the undercroft area located to the rear of the site, accessible from Chapel Street. Refuse vehicles would service the site by travelling along Chapel Street in forward gear before undertaking a reversing manoeuvre into the undercroft area to the rear of the site. Once the vehicle is off the street refuse collection would take place. Swept path analysis of an 11.2m refuse truck has been undertaken confirming that this manoeuvre can be completed from Chapel Street, which operates as a shared surface environment.
289. Access to the existing service yard to the north-east of the site would be unchanged from the existing scenario, and as such would be achieved via the proposed undercroft area to the rear of the site. Swept path analysis of a 7.5t box van and Mercedes Sprinter van have been undertaken illustrating how both vehicles could complete this manoeuvre.
290. There are vehicle restrictions along High Street which restrict vehicle movement to buses, bicycles and authorised vehicles. These restrictions are controlled by Surrey County Council (SCC) using Automatic Number Plate Recognition (ANPR) cameras. SCC operate with an online request system which can be utilised by local businesses to request access to High Street during the restricted hours. Accordingly, it is proposed that servicing vehicles that regularly service the site will be authorised to travel along High Street.
291. The TA forecasts that the proposed development would attract x26 servicing vehicles per day. It should be noted that the co-living units within the proposed site will be furnished and, as such, co-living residents will not arrive at the site with personal furniture and are therefore more likely to arrive using public transport modes. Furthermore, no furniture deliveries will be required at the site (once completed), which will help to ensure that the frequency of deliveries using larger vehicles is minimised. Therefore, there will be less stress on the loading bay located along High Street. The TA sets out that the greatest number of servicing movements are forecast to occur between 10:00-11:00 hrs, and between 13:00-14:00 hrs, with eight two-way movements forecast during these hours. During the AM (08:00-09:00) and PM (17:00-18:00) peak hours three and two two-way servicing movements are forecast. The TA forecasts that the Commercial, Business & Service (Class E) floorspace at ground floor level would generate six two-way servicing trips across per day. As such, the TA forecasts that the whole site would generate x58 two-way servicing vehicle movements per day which would be undertaken by approximately x29 servicing vehicles.
292. The TA concludes that this level of servicing demand can be accommodated by the servicing bay located along High Street and that, between 07:00-19:00 hrs, this would equate to on average between two and three servicing vehicles arriving at the site and using the loading bay every hour. This equates to one vehicle every 20 to 30 minutes, meaning vehicles would have ample time to access, unload goods and then egress the site before another vehicle arrives at the site.
293. A Delivery and Servicing Plan (DSP) has been submitted and provides further detail as to how delivery and servicing movements will be managed at the proposed site. A final Service and Deliveries Management Plan (SDMP) will be secured via recommended condition 13.
294. Overall, the TA concludes that the proposed development would not have an adverse impact on the local transport network and would support the use of active travel and public transport. The County Highway Authority (Surrey County Council) raise no objection on highway safety, capacity and policy grounds.

**Impacts on neighbouring residential amenities**

295. Policy CS21 of the Woking Core Strategy (2012) states that “*Proposals for new development should...Achieve a satisfactory relationship to adjoining properties, avoiding significant harmful impact in terms of loss of privacy, daylight or sunlight, or an overbearing effect due to bulk, proximity or outlook*”. More detailed guidance is provided within SPDs Outlook, Amenity, Privacy and Daylight (2022) and Design (2015).

**Overbearing and privacy**

296. The potential loss of enjoyment of a view is not a ground on which planning permission can potentially be refused although the impact of a development on outlook is a material planning consideration and stems on whether the development would give rise to an undue sense of enclosure or overbearing effect to neighbouring/nearby residential properties. There are no established guidelines for what is acceptable or unacceptable in this regard, with any assessment subjective as opposed to empirical, with key factors in this assessment being the existing local context and the existing and proposed arrangement of buildings and uses. However, paragraph 2.5 of SPD Outlook, Amenity, Privacy and Daylight (2022) states that “*Outlook from a principal window will generally become adversely affected when the height of any vertical facing structure exceeds the separation distance from the window. When a structure is placed too close to a window so that it completely dominates the outlook it will have an overbearing impact*”. It must also be noted that Policy CS21 of the Woking Core Strategy (2012) refers to “*significant harmful impact*”, this is the threshold which must be reached to form any potentially robust, and defensible, reason for refusal on neighbouring amenity grounds.
297. SPD Outlook, Amenity, Privacy and Daylight (2022) states (at paragraph 4.1) that “*New developments should be designed to protect the privacy of both new and existing dwellings*” and states (at paragraph 4.11) that “*For three storey or taller accommodation (including dwellings with second floor dormer windows), a separation distance of approximately 30m will be adequate to prevent overlooking of dwellings of a similar or lesser height*”. Appendix 1 of the SPD sets out recommended minimum separation distances for achieving privacy (as below) stating that “*Standards of amenity may be relaxed for housing in Woking Town Centre...*”.

Number of storeys	Measured Dimension	Distance (metres)
Three and over	Front to front elevation	15
	Rear to rear elevation	30
	Front or rear to boundary/flank	15
	Side to boundary	2

298. New residential accommodation within the proposed development (including the indoor communal spaces) would be located at first floor level at the lowest. Between first and seventh floor levels (incl.) residential accommodation would face principally towards the front (across High Street and over the railway) to the rear (across the ‘yard’ areas and properties fronting Commercial Way, to the north-west) and across Chapel Street (to the south-west). There would be some more limited examples of private co-living rooms which would face ‘into the site’ to the side (i.e., to the north-east).
299. The closest nearby residential properties which need to be considered are:
- No.14 High Street;
  - No.22 Commercial Way (ref: PLAN/2021/0790);

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- Middle Walk flats (above Wolsey Place) (these are referred to within the ES as Nos.29-51 Commercial Way (ref: PLAN/2019/0752);
- Albion House; and
- Eastgate, Station Approach (south side of railway).

### No.14 High Street

300. No.14 High Street is located on the opposite, western, side of Chapel Street (beyond intervening No.13 High Street, which is non-residential) and contains residential accommodation at ground and first floor levels. It has ground and first floor side-facing (north-east) windows and windows facing towards the rear (i.e., towards buildings fronting Commercial Way).
301. The existing level of outlook from the side-facing windows of No.14, in particular those at ground floor level, is likely to be heavily compromised (in the existing situation) by the massing of the 'return' of the No.13 High Street building (i.e., where this 'returns' along Chapel Street). All of the relevant windows of No.14 High Street look out into a 'yard' area with the side-facing windows facing towards a two storey elevation of No.13 High Street at a distance of around 4.0m and the rear facing windows facing towards the (three storey) side elevation of Nos.3-4 Chapel Street (which contains windows at all levels) at a distance of around 12.0m. As such, the rear facing windows are likely to have a greater level of outlook than the side-facing windows.
302. The proposed development would face across Chapel Street at around 8.0m separation to the buildings opposite (No.13 High Street and Nos.3-4 Chapel Street) and at around 18.0m separation to the side-facing windows within No.14 High Street. In this central Woking Town Centre context this 18.0m retained separation distance is considered sufficient to avoid a significant harmful loss of privacy to the side-facing windows within No.14 High Street. Whilst the presence of the 17 storey component of the tower would result in an overbearing effect (due to bulk, proximity and likely loss of outlook) to the side-facing windows of No.14 High Street given that the existing level of outlook from these windows is likely to be heavily constrained (as set out previously), and that the existing form of No.13 High Street would continue to intervene, it is not considered that the resulting overbearing effect to these windows would reach the threshold of 'significant' harmful impact, as set out within Policy CS21 of the Woking Core Strategy (2012).
303. It is also a material consideration that No.14 High Street is located within an urban block which is allocated, by Policy UA6 of the Site Allocations DPD (2021), for "*mixed use development to comprise of residential including affordable housing, retail and offices*" (i.e., for at least x50 net additional dwellings, at least 400 sq.m net additional office floor space (2,000 sq.m gross) and retail floor space). As such, there is a strong possibility that No.14 High Street would be demolished or reconfigured as part of any development which may come forwards in the future to achieve the aims of Policy UA4 of the Site Allocations DPD (2021).

### No.22 Commercial Way

304. No.22 Commercial Way fronts Commercial Way and is located on the opposite side of Chapel Street (to the west). It benefits from extant prior approval for office-to-residential change of use at first and second floor levels (ref: PLAN/2021/0790), this change of use has yet to take place (although it is noted that applications have been submitted to the Council for Habitats Regulations approval and approval of details pursuant to a prior approval noise condition).

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305. The north-western extent (i.e., site boundary) of the proposed development would be offset from the south-eastern extent (i.e., site boundary) of No.22 Commercial Way. As such, there would be an oblique relationship between the proposed development and No.22 Commercial Way. The oblique nature of this relationship, combined with a separation distance of around 22.0m between the two site boundaries, would preclude any significant harmful loss of privacy, and would also preclude any significant harmful overbearing effect (due to bulk, proximity or loss of outlook), particularly given the central Woking Town Centre location.

### Middle Walk flats (above Wolsey Place)

306. Middle Walk flats are located between the second and fourth floors incl. (above Wolsey Place). Flats at second floor level are the closest to the site, with those at third and fourth floor levels stepping back from the site, due to the 'ziggurat' form.
307. The proposed development would remain at least 41.0m away from the (lowest) second floor level balconies/flats at Middle Walk, with the balconies/flats at second and third floor levels being slightly further distant from the proposed development than this. The closest element of the proposed development would be the 14 storey 'step' of the tower component, which would have a height (above ground level) of around 48.0m. Given that the floor level of the (lowest) second floor Middle Walk flats are around 8.8m above ground level the perceived building height of the closest 14 storey tower component would be reduced by around 8.8m, thus would be perceived as around 39.2m.
308. That the retained level of separation (at least 41.0m) exceeds the approximate 39.2m height (above ground level) of the closest (14 storey) part of the proposed development would preclude any significant harmful loss of privacy and would also preclude any significant harmful overbearing effect (due to bulk, proximity or loss of outlook), to Middle Walk balconies/flats, particularly given the central Woking Town Centre location, and the location of Middle Walk flats above ground and first floor level commercial units/uses.
309. Whilst the tower component would rise to a maximum height of 17 storeys (around 60.0m above ground level) this element would be located at least 47.0m away from the (lowest) second floor level balconies/flats at Middle Walk. Again, given that the floor level of the (lowest) second floor Middle Walk flats are around 8.8m above ground level the perceived building height of the tallest 17 storey tower component would be reduced by around 8.8m, thus would be perceived as around 51.2m. Given that at least 47.0m separation would be retained, with more being retained at third and fourth floor levels, the tallest tower component would not cause significant harmful loss of privacy and would also not cause significant harmful overbearing effect (due to bulk, proximity or loss of outlook), to Middle Walk balconies/flats, particularly given the central Woking Town Centre location, and the location of Middle Walk flats above ground and first floor level commercial units/uses.
310. The 'linking' 15 storey element (around 51.5m above ground level) would be located at least 47.0m away from the (lowest) second floor level balconies/flats at Middle Walk. Given the elevated nature of the lowest Middle Walk flats (at second floor level) combined with the fact that the retained separation distance would exceed the respective building height, the 15 storey element would not cause significant harmful loss of privacy and would also not cause significant harmful overbearing effect (due to bulk, proximity or loss of outlook), to Middle Walk balconies/flats, particularly given the central Woking Town Centre location.

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311. Similarly, the 'shoulder' element (9 and 8 storeys) (maximum height of around 35.0m above ground level) would be located at least 51.0m away from the (lowest) second floor level balconies/flats at Middle Walk. Again, given the elevated nature of the lowest Middle Walk flats (at second floor level) combined with the fact that the retained separation distance would notably exceed the respective building height, the 'shoulder' element would not cause significant harmful loss of privacy and would also not cause significant harmful overbearing effect (due to bulk, proximity or loss of outlook), to Middle Walk balconies/flats, particularly given the central Woking Town Centre location.

### Albion House

312. Albion House is located to the east, on the opposite (eastern) side of Church Path. It contains dwellings at first floor level and above, albeit these dwellings are restricted to its northern extent (i.e., along the northern section of Church Path and along Commercial Way).
313. Although the proposed development would be notably offset from the location of the dwellings within Albion House where it would face 'into the site' (i.e., towards Albion House, beyond intervening non-residential Church Path buildings, to the north-east) the proposed development would remain around 58.0m away from the facing elevation of Albion House, this retained separation distance being commensurate with the maximum height of the proposed building above ground level (around 60.0m, where at 17 storeys). Whilst the 'shoulder' element (9 and 8 storeys) of the proposed development would be positioned closer to Albion House this element would nonetheless remain around 25.0m away from the facing elevation of Albion House, this retained separation distance being commensurate with the height of the 'shoulder' element.
314. The preceding considerations would preclude any significant harmful loss of privacy and would also preclude any significant harmful overbearing effect (due to bulk, proximity or loss of outlook), to dwellings within Albion House, particularly given the central Woking Town Centre location.

### Eastgate

315. Eastgate is the closest residential building on the opposite, southern side of the railway. Whilst the proposed development would largely be offset from Eastgate at its closest around 66.0m separation would be retained between the proposed development and the Eastgate residential building, this being the closest (residential) building in this direction. That this retained level of separation exceeds the approximate 60.0m height (above ground level) of the tallest (17 storey) part of the proposed development would preclude any significant harmful loss of privacy and would also preclude any significant harmful overbearing effect (due to bulk, proximity or loss of outlook), to dwellings within Eastgate, particularly given the central Woking Town Centre location. Residential buildings located further to the south of Eastgate would clearly be further distant away from the proposed development and thus no significant harmful loss of privacy or overbearing impacts would arise to any such buildings/dwellings, given the conclusion reached in respect of Eastgate.

### No.37 Oriental Road

316. A letter of objection has been received from No.37 Oriental Road, which objects on the basis of loss of sunlight and overlooking/loss of privacy to No.37. The boundary of the rear garden of No.37 Oriental Road is around 220.0m away from the site boundary (the house of No.37 is slightly further away), the site is to the north-west of No.37. Given this

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very significant level of separation, combined with the height of the proposed development (c. 60.0m at its tallest) and the location of the proposed development to the north-west, No.37 Oriental Road would sustain no material loss of daylight and sunlight, nor would it sustain any material overlooking/loss of privacy, and would certainly not sustain any significant harmful loss of daylight and sunlight, nor significant harmful loss of privacy.

### Daylight

317. Policy CS21 of the Woking Core strategy (2012) states that proposals for new development should “*Achieve a satisfactory relationship to adjoining properties avoiding significant harmful impact in terms of loss of [inter alia] daylight or sunlight.*” SPD Outlook, Amenity, Privacy and Daylight (2022) states, in respect of daylight and sunlight, (at paragraph 5.1) that “*The BRE makes a number of recommendations in its report ‘Site Layout Planning for Daylight and Sunlight: A guide to good practice (2011)’.*”
318. The BRE Site layout planning for daylight and sunlight: A guide to good practice (Third edition, 2022) has since superseded the second edition (2011), which is referred to within SPD Outlook, Amenity, Privacy and Daylight (2022). Hence the more recent third edition (2022) will be referred to, hereafter as the BRE Guide.
319. The impact of the proposed development upon nearby existing (and extant) residential properties has been assessed by the applicant within the Environmental Statement (ES), in compliance with the methodology outlined within the BRE Site layout planning for daylight and sunlight: A guide to good practice (Third edition, 2022), a recognised industry tool for assessing these effects.
320. Where the BRE guidelines are exceeded then daylighting and/or sunlighting may be adversely affected. The BRE Guide provides numerical guidelines although emphasizes that the advice given is not mandatory and the BRE Guide should not be seen as an instrument of planning policy; the (numerical guidelines) are to be interpreted flexibly since natural lighting is only one of many factors in site layout and design. The BRE Guide also sets out that in special circumstances the developer or Local Planning Authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.
321. It is also a material consideration that Paragraph 125c) of the NPPF states that “*local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).*”
322. The BRE Guide states (at paragraph 2.2.2) that the guidelines “*are intended for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens, and bedrooms. Windows to bathrooms, toilets, storerooms, circulation areas, and garages need not be analysed.*” Vertical Sky Component (VSC) and No Sky Line Contour (NSL) are the primary tests used to assess the impact of new development upon the daylighting of existing buildings.

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323. Commercial properties are generally not treated as having a reasonable expectation of daylight or sunlight because they are usually designed to rely on electric lighting to provide sufficient light by which to work rather than natural daylight or sunlight.
324. The ES assesses the impact of the proposed development on the daylighting of the following surrounding residential addresses:
- No.14 High Street (partial);
  - No.22 Commercial Way (ref: PLAN/2021/0790);
  - Middle Walk flats (above Wolsey Place) (these are referred to within the ES as Nos.29-51 Commercial Way (ref: PLAN/2019/0752);
  - Albion House; and
  - Eastgate, Station Approach (south side of railway).

### *Vertical Sky Component (VSC)*

325. Vertical Sky Component (VSC) quantifies the amount of skylight falling on a vertical wall or window, measured on the outer pane of the window. According to the BRE Guide if the VSC, with the new development in place, is greater than 27% then enough daylight should still be reaching the window of the existing building. If the VSC, with the new development in place, is both less than 27% and less than 0.8 times (i.e., a greater than 20% reduction in existing VSC is sustained as a result of the new development) of its former (pre-development) value, occupants of the existing building will notice the reduction in the amount of skylight; for the purposes of this report changes below this threshold will be identified as a 'negligible' effect. It should be noted that 'noticeable', as per the BRE Guide, is a different test than that set out within Policy CS21 of the Woking Core Strategy (2012), which refers to 'significant' harm. As such, a 'noticeable' loss of daylight does not automatically equate to a finding of 'significant harm' contrary to Policy CS21.
326. If there would be a significant loss of light to the main window but the room served also has one or more smaller windows, an overall VSC may be derived by weighting each VSC element in accordance with the proportion of the total glazing area represented by its window. Where there will be a 'noticeable' change, the results have been summarised dependant on how far beyond the suggested targets the reductions are from existing levels. For VSC, the ranges of reduction are:
- 20% reduction or less (Typically >0.80 times former value) (Negligible) (i.e., BRE Guide compliant)
  - 20-29.9% reduction (0.70-0.79 times former value) (Low);
  - 30-39.9% reduction (0.60-0.69 times former value) (Medium); and
  - 40%+ reduction (<0.60 times former value) (High).



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327. The following table summarises the Vertical Sky Component (VSC) results against the BRE Guide:

Surrounding Properties	Total Number of Windows	Total that meet the BRE Guidelines (i.e., 20% reduction or less)	Below BRE Guidelines			
			20-29.9% reduction - Low	30-39.9% reduction - Medium	40%+ reduction - High	Total BRE Fails
No.14 High Street	6	1	0	0	5	5
No.22 Commercial Way	13	8	5	0	0	5
Middle Walk flats (above Wolsey Place)	65	30	31	4	0	35
Albion House	11	11	0	0	0	0
Eastgate	12	11	1	0	0	1
<b>Total</b>	<b>107</b>	<b>61</b>	<b>37</b>	<b>4</b>	<b>5</b>	<b>46</b>

328. The VSC results confirm that a total of 61 of the 107 (57%) of the habitable room windows tested meet the BRE Guidelines. As such, these 61 windows would experience a 'Negligible' loss of skylight such that occupiers are unlikely to notice the reduction in the amount of skylight. 37 of the remaining windows would experience a low reduction (i.e., between 20-29.9% reduction), 4 of the remaining windows would experience a medium reduction (i.e., between 30%-39.9%) and 5 windows would experience a high reduction (i.e., 40%+).

### *No Sky Line Contour (NSL)*

329. The BRE Guide sets out (at paragraph 2.2.10) that *"Where room layouts are known (for example if they are available on the local authority's planning portal), the impact on the daylighting distribution in the existing building should be found by plotting the no sky line in each of the main rooms. For houses this would include living rooms, dining rooms, and kitchens; bedrooms should also be analysed although they are less important."*
330. The no sky line divides points on the working plane (in housing assumed to be horizontal and 0.85m high) which can and cannot see the sky. The BRE Guide states (at paragraph 2.2.11) that *"If, following construction of a new development, the no sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.80 times its former value [i.e., a greater than 20% reduction] this will be noticeable to the occupants, and more of the room will appear poorly lit."* For the purposes of this report changes below this threshold will be identified as a 'negligible' effect. Again, it should be noted that 'noticeable', as per the BRE Guide, is a different test than that set out within Policy CS21 of the Woking Core Strategy (2012), which refers to 'significant' harm. As such, a 'noticeable' reduction in daylighting distribution does not automatically equate to a finding of 'significant harm' contrary to Policy CS21.
331. Where there will be a 'noticeable' change, the results have been summarised dependant on how far beyond the suggested targets the reductions are from existing levels. For VSC, the ranges of reduction are:

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- 20% reduction or less (Typically >0.80 times former value) (Negligible) (i.e., BRE Guide compliant)
- 20-29.9% reduction (0.70-0.79 times former value) (Low);
- 30-39.9% reduction (0.60-0.69 times former value) (Medium); and
- 40%+ reduction (<0.60 times former value) (High).

332. The BRE Guide also states (at paragraph 2.2.12) that “*The guidelines above need to be applied sensibly and flexibly...If an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky line may be unavoidable.*”

333. The following table summarises the No Sky Line Contour (NSL) results against the BRE Guide:

Surrounding Properties	Total Number of Rooms	Total that meet the BRE Guidelines (i.e., 20% reduction or less)	Below BRE Guidelines			
			20-29.9% reduction - Low	30-39.9% reduction - Medium	40%+ reduction - High	Total BRE Fails
No.14 High Street	4	1	1	0	2	3
No.22 Commercial Way	8	8	0	0	0	0
Middle Walk flats (above Wolsey Place)	50	41	6	2	1	9
Albion House	9	9	0	0	0	0
Eastgate	10	10	0	0	0	0
<b>Total</b>	<b>81</b>	<b>69</b>	<b>7</b>	<b>2</b>	<b>3</b>	<b>12</b>

334. The NSL results confirm that a total of 69 of the 81 (85%) of the habitable rooms tested meet the BRE Guidelines. As such, these 69 rooms would experience a ‘Negligible’ loss of daylight distribution such that this is unlikely to be noticeable to occupiers. 7 of the remaining rooms would experience a low reduction (i.e., between 20-29.9%), 2 rooms would experience a medium reduction (i.e., between 30-39.9%) and 3 rooms would experience a high level of reduction (i.e., 40%+).

335. More detailed consideration of daylight effects will now be given to properties, other than Albion House, which would only experience VSC and NSL alterations fully compliant with the BRE Guide.

### No.14 High Street

336. No.14 High Street is located on the opposite, western, side of Chapel Street (beyond intervening No.13 High Street, which is non-residential) and contains residential accommodation at ground and first floor levels. It has ground and first floor side-facing (north-east) windows and windows facing towards the rear (i.e., towards buildings fronting Commercial Way).

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337. In respect of VSC reductions 1 window (window W1/1341) would satisfy the BRE Guide (i.e., the reduction in VSC to this window would be 10.57%, being notably less than the 20% 'noticeable' effect as per the BRE Guide) such that the loss of skylight to this window is unlikely to be noticeable. This same window (serving room R1/1341) would also satisfy the BRE Guide for NSL (i.e., an 8.4% reduction, being notably less than the 20% 'noticeable' effect as per the BRE Guide) such that the loss of daylight distribution within this room is unlikely to be noticeable.
338. The remaining 5 windows of No.14 High Street, which all face to the side, towards the site (albeit beyond intervening No.13 High Street) would all experience high levels of VSC reduction, ranging between a reduction of 48.66% (window W3/340) and of 69.62% (window W1/341). In respect of the NSL test 1 room (room R2/340) would experience a medium reduction (of 27.4%), with the remaining 2 rooms experiencing a high level of reduction, of 48.3% (room R3/341) and of 52.1% (room R1/341).
339. However, these high levels of reduction in daylight are isolated to one building, and to three rooms within it. It is also a material consideration that No.14 High Street is located within an urban block which is allocated, by Policy UA6 of the Site Allocations DPD (2021), for "*mixed use development to comprise of residential including affordable housing, retail and offices*" (i.e., for at least 50 net additional dwellings, at least 400 sq.m net additional office floor space (2,000 sq.m gross) and retail floor space). As such, there is a strong possibility that No.14 High Street would be demolished or reconfigured as part of any development which may come forwards in the future to achieve the aims of Policy UA4 of the Site Allocations DPD (2021).

### No.22 Commercial Way

340. In respect of the VSC reductions at No.22 Commercial Way 3 of the 5 windows (where falling below the BRE Guide) would be only just beyond the 20% reduction which would be noticeable (as per the BRE Guide). These would be reductions of 20.74% (room R2/71), 22.07% (room R3/71) and 20.51% (room R1/72). The 2 more significant VSC reductions would still both fall below a 29% reduction, these being 25.70% (room R2/72) and 28.76% (room R3/72). Moreover, whilst No.22 Commercial Way benefits from extant prior approval for office-to-residential change of use at first and second floor levels (ref: PLAN/2021/0790) this change of use has yet to take place (although it is noted that applications have been submitted to the Council for Habitats Regulations approval and approval of details pursuant to a prior approval noise condition). The NSL assessment shows that the changes in daylight distribution within habitable rooms of No.22 Commercial Way would all remain BRE Guide compliant and thus result in a 'Negligible' effect. Overall, given the VSC reductions which would take place (where these would exceed the BRE Guide) combined with the BRE Guide compliant NSL assessment and the status of this residential change of use in having yet to take place, it is considered that no significant harmful loss of daylight would arise to No.22 Commercial Way contrary to Policy CS21 of the Woking Core Strategy (2012), particularly taking into account the Woking Town Centre location.

### Middle Walk flats (above Wolsey Place)

341. Middle Walk flats are located between the second and fourth floors incl. (above Wolsey Place). The ES sets out that this building contains numerous, large external projecting balconies along the southern façade and that these balconies materially limit the access of skylight to the windows below. The ES also sets out that the effect of the balconies on this building is further compounded by the walls which project either side of the windows,

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creating a 'blinkering' effect and making them particularly sensitive to changes in massing opposite.

342. In respect of Middle Walk flats 30 windows (out of 65) would satisfy the BRE Guide recommendations in terms of the VSC assessment and thus would experience a 'Negligible' loss of skylight. 31 of the remaining 35 windows, that do not meet the BRE Guide recommendations, would experience a relative change of between 20-30% which is considered 'Low', 4 windows would experience relative changes of between 30-40% which is considered 'Medium', these 4 most affected windows are located on the second floor beneath deep overhangs and the most significant reduction would be 33.55% (room R13/262).
343. 41 (out of 50) habitable rooms would satisfy the BRE Guide recommendations in terms of the NSL assessment and thus would experience a 'Negligible' loss of daylighting distribution, which is unlikely to be noticeable to occupiers. 6 rooms would experience a relative change of between 20-30% which is considered 'Low', 2 rooms would experience a relative change of between 30-40% which is considered 'Medium' and 1 room would experience a relative change of greater than 40% (of 43.7%) which is considered 'High'. Again, all of these most affected rooms are located on the second floor. However, all 9 rooms that would experience a relative change beyond BRE Guide will retain a view of the sky to 56% of the room area or more. Additionally 5 of these most impacted rooms are bedrooms, which are considered by the BRE Guide to be 'less important' for NSL.
344. It must also be noted that the BRE Guide states (at paragraph 2.2.13) that *"Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight, for both the existing and proposed situations, without the balcony in place. For example, if the proposed VSC with the balcony was under 0.80 times the existing value with the balcony, but the same ratio for the values without the balcony was well over 0.8, this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of light"*. The BRE Guide also states (at paragraph 2.2.14) that *"A larger relative reduction in VSC may also be unavoidable if the existing window has projecting wings on one or both sides of it or is recessed into the building so that it is obstructed on both sides as well as above."*
345. As such, the ES contains an additional VSC assessment which has been undertaken, in respect of Middle Walk flats, to demonstrate the limiting effect of the existing balconies on the daylighting levels of this building. This 'without balconies' assessment demonstrates that 58 of the 65 Middle Walk flats windows (89%) assessed would satisfy the BRE Guide for VSC (i.e., they would sustain a less than 20% reduction in VSC). 4 of the 7 windows which would not be BRE Guide compliant would sustain VSC reductions which are so marginally beyond the 20% 'noticeable' level (i.e., 20.06%, 20.44%, 20.38% & 20.27%) that, in the real world, these reductions would be very unlikely to be 'noticeable' to occupiers and certainly would not meet the threshold of 'significant harmful' impact contrary to Policy CS21. The remaining 3 windows would experience a VSC reduction of 24.46% (room R15/262) at the highest, and of 22.02% (room R15/263) and 21.89% (room R8/264) such that a significant harmful loss of daylight would not be sustained to these windows. Moreover, these windows are located adjacent to large projecting meaning they are even more sensitive to changes in massing opposite because a large section of the sky is blocked by the projecting wing, as well as by the balcony. As such, the effects of the proposed development upon the VSC of windows of Middle Walk flats are 'low' when

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considering the limiting effect of the balconies on this building, and as demonstrated by the 'without balconies' assessment within the ES.

### Eastgate

346. Eastgate is the closest residential building on the opposite, south side of the railway. The VSC reduction at Eastgate (where falling below the BRE Guide) would be restricted to 1 window, with the other 11 assessed windows (at the lowest facing floor level) complying with the BRE Guide for VSC, thus resulting in 'Negligible' effect. However, the affected window (room R3/322) would sustain a VSC reduction of 20.92%, which is so marginally beyond the 20% 'noticeable' level that, in the real world, this reduction would be very unlikely to be 'noticeable' to occupiers and certainly would not meet the threshold of 'significant harmful' impact contrary to Policy CS21. The NSL assessment at Eastgate shows all 10 assessed rooms (at the lowest facing floor level) to be BRE Guide compliant, such that the effect on the daylighting distribution of these rooms would be 'Negligible'.

### Sunlight (to windows)

347. Unlike daylight, which is non-directional and assumes that light from the sky is uniform, the availability of sunlight is dependent on the orientation of the window, or area of ground, being assessed relative to the position of due south. The BRE Guide states that obstruction to sunlight may become an issue if some part of a new development is situated within 90° of due south of a main window wall of an existing building.
348. The BRE Guide states (at paragraph 3.2.3) that *"To assess loss of sunlight to an existing building, it is suggested that all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90° of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun. Normally loss of sunlight need not be analysed to kitchens and bedrooms, except for bedrooms that also comprise a living space". The BRE Guide continues (at paragraph 3.2.4) stating that "To calculate the loss of sunlight over the year, a different metric, the annual probable sunlight hours (APSH), is used. Here 'probable sunlight hours' means the total number of hours in the year that the sun is expected to shine on unobstructed ground, allowing for average levels of cloudiness for the location in question (based on sunshine probability data). The sunlight reaching a window is quantified as a percentage of this unobstructed annual total"* and (at paragraph 3.2.5) that *"If the main living room to a dwelling has a main window facing within 90° of due north, but a secondary window facing within 90° of due south, sunlight to the secondary window should be checked."*
349. The BRE Guide states (at paragraph 3.2.6) that *"If a room can receive more than one quarter of annual probable sunlight hours (APSH), including at least 5% of APSH in the winter months between 21 September and 21 March, then it should still receive enough sunlight. Also, if the overall annual loss of APSH is 4% or less, the loss of sunlight is small."*
350. The BRE Guide goes on to state that if these guidelines are not met, and a window receives less than 0.80 times its former value of total APSH or winter APSH, and if that window has a reduction in total APSH of more than 4% *"then the occupants of the existing building will notice the loss of sunlight"*.
351. Where there will be a 'noticeable' change, the results have been summarised dependant on how far beyond the suggested targets the reductions are from existing levels. For APSH, the ranges of reduction are:

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- 20% reduction or less (Typically >0.80 times former value) (Negligible) (i.e., BRE Guide compliant)
- 20-29.9% reduction (0.70-0.79 times former value) (Low);
- 30-39.9% reduction (0.60-0.69 times former value) (Medium); and
- 40%+ reduction (<0.60 times former value) (High).

352. The following table summarises the Winter and Annual APSH results against the BRE Guide:

### Winter

Surrounding Properties	Total Number of Rooms	Total that meet the BRE Guidelines (i.e., 20% reduction or less)	Below BRE Guidelines			Total BRE Fails
			20-29.9% reduction - Low	30-39.9% reduction - Medium	40%+ reduction - High	
No.22 Commercial Way	4	4	0	0	0	0
Middle Walk flats (above Wolsey Place)	20	19	0	0	1	1
Albion House	9	9	0	0	0	0
<b>Total</b>	<b>33</b>	<b>32</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>

### Annual

Surrounding Properties	Total Number of Rooms	Total that meet the BRE Guidelines (i.e., 20% reduction or less)	Below BRE Guidelines			Total BRE Fails
			20-29.9% reduction - Low	30-39.9% reduction - Medium	40%+ reduction - High	
No.22 Commercial Way	4	4	0	0	0	0
Middle Walk flats (above Wolsey Place)	20	19	1	0	0	1
Albion House	9	9	0	0	0	0
<b>Total</b>	<b>33</b>	<b>32</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>

353. The APSH results confirm that a total of 32 of the 33 (95%) relevant main living rooms/studios/assumed rooms tested meet the BRE Guide so would experience a 'Negligible' effect, which would be unlikely to be noticeable to occupiers. For winter APSH, just 1 room would fall short of the BRE Guide, experiencing a 'High' reduction. For total APSH, all of the rooms will retain an annual APSH of 25% or above.

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354. More detailed consideration of sunlight effects will now be given to Middle Walk flats, this is because both No.22 Commercial Way and Albion House would experience sunlight alterations which are fully compliant with the BRE Guide. All Middle Walk flats southerly orientated main habitable rooms have been assessed for sunlight, 19 (out of 20) rooms would satisfy the BRE Guide recommendations for both winter and total APSH and therefore the sunlight effects to these rooms would be 'Negligible' and unlikely to be noticeable to occupiers. All rooms would meet the BRE Guide for Annual APSH and therefore, the effects in annual APSH would be 'Negligible'. The 1 room that would fall short of the BRE Guide for winter APSH would experience a relative reduction of over 40% which is considered 'High'. This room will however retain a winter APSH of 2%, demonstrating that some winter APSH will be retained. This room would also retain an annual APSH of 31% which is far above the 25% suggested within the BRE Guide.

### Sun on the ground

355. The BRE Guide states (at paragraph 3.3.1) that *"Good site layout planning for daylight and sunlight should not limit itself to providing good natural lighting inside buildings. Sunlight in the spaces between and around buildings has an important impact on the overall appearance and ambience of a development"* and (at paragraph 3.3.7) that *"it is recommended that at least half of the amenity areas listed above [i.e., gardens, parks and playing fields, sitting out areas etc.] should receive at least two hours of sunlight on 21 March"*. The BRE Guide continues (at paragraph 3.3.14), stating that *"If a space is used all year round, the equinox (21 March) is the best date for which to prepare shadow plots as it gives an average level of shadowing. Lengths of shadows at the autumn equinox (21 September) will be the same as those for 21 March, so a separate set of plots for September is not required"*. The BRE Guide states (at paragraph 3.3.17) that *"It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area that can receive two hours of sun on 21 March is less than 0.80 times its former value, then the loss of sunlight is likely to be noticeable."*
356. The ES sets out that there are no public or private amenity areas within the vicinity of the site which are deemed relevant for technical sun on the ground analysis, the closest public amenity space is Jubilee Square which is around 130 metres away and therefore will be unaffected by the proposed development (in respect of sun on the ground). However, Commercial Way is a pedestrianised street to the north of the site, which has a reasonable expectation for sunlight and has therefore been considered for sun on ground within the ES. The 21 March results within the ES show that the pedestrianised section of Commercial Way to the north of the site would experience a relative reduction in sun on the ground of 21%, with the area that receives 2 hours of direct sunlight on 21 March reducing from 48% to 38%. However, the affected area of Commercial Way constitutes a small area of the pedestrianised area which doesn't include any seats or planting and therefore the reduction in sun on the ground in this area is considered to be 'Low' in significance and not to amount to significant harmful impact contrary to Policy CS21 of the Woking Core Strategy (2012).

### Conclusion on neighbouring residential amenities

357. In conclusion, whilst the presence of the 17 storey component of the tower would result in an overbearing effect (due to bulk, proximity and likely loss of outlook) to the side-facing windows of No.14 High Street given that the existing level of outlook from these windows is likely to be heavily constrained, and that existing form of No.13 High Street would continue to intervene, it is not considered that the resulting overbearing effect to these

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windows of No.14 High Street would reach the threshold of 'significant' harmful impact, so as to conflict with Policy CS21 of the Woking Core Strategy (2012).

358. Whilst No.14 High Street would sustain high levels of reduction in daylight, as a result of the proposed development, these high levels of daylight reductions would be isolated to one building, and to three rooms within it. It is also a material consideration that No.14 High Street is located within an urban block which is allocated, by Policy UA6 of the Site Allocations DPD (2021), for "*mixed use development to comprise of residential including affordable housing, retail and offices*" (i.e., for at least 50 net additional dwellings, at least 400 sq.m net additional office floor space (2,000 sq.m gross) and retail floor space). As such, there is a strong possibility that No.14 High Street would be demolished or reconfigured as part of any development which may come forwards in the future to achieve the aims of Policy UA4 of the Site Allocations DPD (2021).
359. The proposed development would avoid significant harmful neighbouring amenity impacts to all other relevant properties, including to the extant residential development at No.22 Commercial Way, to Middle Walk flats (above Wolsey Place), to dwellings within Albion House and to flats within Eastgate, Station Approach. In respect of the neighbouring amenity impacts to these properties the proposed development complies with Policy CS21 of the Woking Core Strategy (2012), SPDs Outlook, Amenity, Privacy and Daylight (2022) and Design (2015) and the National Planning Policy Framework (NPPF).

### **Thames Basin Heaths Special Protection Area (TBH SPA)**

360. The Thames Basin Heaths Special Protection Area (TBH SPA) is an internationally important site of nature conservation and has been given the highest degree of protection under The Conservation of Habitats and Species Regulations 2017 (as amended), technical changes to which have been made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 following EU exit. As such EU exit has no bearing on the protection afforded to the TBH SPA.
361. The Thames Basin Heaths Special Protection Area (TBH SPA) was designated on 9 March 2005 under the EU Directive to specifically protect nightjars, woodlarks and Dartford warblers all three are ground nesting birds or at low level and are easily disturbed by human activity, in particular, recreational activity such as dog walking. Also, predation by domestic cats and fly tipping into the heathland are potential threats. The three pronged approach that is used to avoid any significant effect of new residential development on the TBH SPA includes:
- The provision and maintenance of Suitable Alternative Natural Green Space (SANG) to attract people away from the TBH SPA;
  - Strategic Access Management and Monitoring (SAMM) to monitor and manage the impact of people using the TBH SPA; and
  - Habitat management of the TBH SPA to improve the habitats of the protected birds (this measure relates to longer term management of the TBH SPA and is the duty of the landowner).
362. The South East Plan (2009) was partially revoked in 2013. However, Policy NRM6 (Thames Basin Heaths Special Protection Areas) remains in place as a saved policy and sets out the principle of the protection of the Thames Basin Heaths SPA in the South East.
363. Policy UA4 of the Site Allocations DPD (2021) requires development of the site to, inter alia, "*Contribute towards Strategic Access Management and Monitoring to mitigate the*



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*impacts of residential development of the site on the Thames Basin Heaths Special Protection Area."*

364. Policy CS8 of the Woking Core Strategy (2012) states that any proposal with potential significant impacts (alone or in combination with other relevant developments) on the Thames Basin Heaths Special Protection Area (TBH SPA) will be subject to Habitats Regulations Assessment to determine the need for Appropriate Assessment. Following recent European Court of Justice rulings, a full and precise analysis of the measures capable of avoiding or reducing any significant effects on European sites must be carried out at an 'Appropriate Assessment' stage rather than taken into consideration at screening stage, for the purposes the Habitats Directive (as interpreted into English law by The Conservation of Habitats and Species Regulations 2017 (the "Habitat Regulations 2017")).
365. Policy CS8 of the Woking Core Strategy (2012) states that *"New residential development beyond 400m threshold but within 5 kilometres of the SPA boundary (in a straight line) will be required to make an appropriate contribution towards the provision of Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM)."*
366. Policy CS17 of the Woking Core Strategy (2012) states that *"New residential units within five km of an SPA will be required to provide or contribute to the provision and improvement of Strategic Alternative Natural Greenspace (SANG) which is a component of Green Infrastructure and also its Strategic Access Management and Monitoring (SAMM). This land will be used to mitigate the impact and effect of residential development on the SPA, by providing informal recreation land of appropriate quality across Woking Borough".*
367. As set out within the Updated Thames Basin Heath Avoidance Strategy (2022) (at paragraph 1.16) *"The SANG and landowner payment elements of the SPA tariff are encompassed within the Community Infrastructure Levy (CIL), however the SAMM element of the SPA tariff is collected outside of CIL. The relevant proportions of the CIL contribution is ring fenced for the provision and maintenance of SANGs."*
368. As previously set out Policy UA4 of the recently adopted Site Allocations Development Plan Document (2021) includes the site (as part of the 'urban block' which is bounded by High Street, Church Path, Chapel Street and Commercial Way). Policy UA4 states that *"This 0.58ha site is allocated for a mix of uses to comprise residential including affordable housing, office and retail"* and identifies an anticipated site yield of 149 net additional dwellings together with 1,600 sq.m net (2,000 sq.m gross) of office space and retail floor space.
369. The Updated Thames Basin Heath Avoidance Strategy (2022) states (at paragraph 1.16) that *"The adopted Site Allocations DPD has been subject to Appropriate Assessment in accordance with Article 6(3) of the Habitats Directive. The HRA report concluded, in consultation with Natural England, that no likely significant effects would occur on the Thames Basin Heaths SPA or other European sites under consideration as a result of the policies (proposal sites) in the DPD, as appropriate measures have been incorporated into the Development Plan to avoid or mitigate adverse effects. The HRA considered recreational pressure, proximity effects (urbanisation), effects on hydrology/hydrogeology, invasive species introductions, reduction in air quality and trans-boundary/cumulative effects in reaching this conclusion. As clarified earlier, all relevant proposals will be subject to an Appropriate Assessment to determine the specific effects and the appropriate measures of mitigation."*

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370. The Updated Thames Basin Heath Avoidance Strategy (2022) continues (at paragraph 1.20) that *“It is important to note that the Avoidance Strategy does not address all possible effects of development on the SPA but only those resulting from recreational visits arising from residential development (including unconventional residential). Therefore any development not directly connected with or necessary for the conservation management of the SPA, which could have other (non-recreational) likely significant effects upon the SPA would still require an Appropriate Assessment. This will be determined on a case by case basis.”* As such, an Appropriate Assessment will be undertaken for the proposed development.
371. The Updated Thames Basin Heath Avoidance Strategy (2022) states (at paragraph 2.14) that *“In the majority of cases applicants have made/will make a contribution towards Council operating SANGs rather than providing their own”* and (at paragraph 2.15) that *“Prior to April 2015, the Council applied a tariff for SANG and SAMM for any scheme which resulted in a net additional dwelling. The council has introduced CIL as the primary mechanism for securing developers contributions. Given that SANGs are deemed as a form of infrastructure contributions are now secured as part of CIL”*. The Avoidance Strategy sets out that 39.5% of CIL income will be ring-fenced for the provision and maintenance of SANG.
372. The Council’s CIL Charging Schedule (2014) states (at paragraph 3.19 / Table 3) that:
- “For the purposes of the Charging Schedule ‘residential’ means:*
- Use as a dwellinghouse (whether or not a main residence) by:*
- a. A single person or by people to be regarded as forming a single household;*
  - b. Not more than six residents living together as a single household where care is provided for residents; or*
  - c. Not more than six residents living together as a single household where no care is provided to residents (other than use within Class C4)*
- Use of a dwelling house by 3 – 6 residents as a ‘house in multiple occupation’”*
373. The preceding definitions reflect those for Use Class C3 (Dwellinghouses) and Use Class C4 (Houses in multiple occupation) within The Town and Country Planning (Use Classes Order) 1987 (as amended). In this particular instance the co-living component of the proposed development is *sui generis* and thus does not fall within the preceding definition of ‘residential’, as set out within the Council’s CIL Charging Schedule (2014). The co-living component of the proposed development is therefore not liable for Community Infrastructure Levy (CIL).
374. However, because the co-living component of the proposed development would nonetheless provide residential accommodation, and would accommodate up to x329 residents, the Council is of the view that contributions towards both SANG and SAMM are required. As such, a notional CIL liability has been calculated for the co-living accommodation which indicates that, in the event it had been CIL liable, 39.5% of the CIL liability (being that which would have been ring-fenced for the provision and maintenance of SANG) would amount to **£392,053.00**. The applicant has agreed for this financial contribution towards SANG to be secured via the Section 106 Legal Agreement.
375. As is usual practice, the SAMM element of the SPA tariff is required to be addressed outside of CIL, and to be secured via the Section 106 Legal Agreement. Table 6 of the Updated Thames Basin Heath Avoidance Strategy (2022) shows that the SAMM

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contribution per Studio / 1 bedroom dwelling (since index linked from £552 to £662 on the 1 April 2023 - 31 March 2024 tariff) is based on an average occupancy rate of 1.4 persons per dwelling. Given that each private co-living room in this instance would be occupied by x1 person the applicant considers that a reduced ratio should be applied to convert the £662 contribution to reflect that of a single person occupancy (i.e., reduced to £472.86 per person / room). Given the specifics of the proposed development in this case (in which the 'standard' private co-living rooms would generally be 18 sq.m and the private 'accessible' co-living rooms up to 32 sq.m in size (both incl. the kitchenette & ensuite spaces)) it is considered appropriate that the Studio / 1 bedroom contribution be reduced to account for single occupancy of these co-living rooms. In this respect the applicant has agreed to make a SAMM contribution of **£155,570.94**. This would also need to be secured through the Section 106 Legal Agreement.

376. Natural England have commented that as long as the applicant is complying with the requirements of Woking's Avoidance and Mitigation Strategy for the Thames Basin Heaths SPA (through a legal agreement securing contributions to Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM)), Natural England has no objection to the application. For the avoidance of any doubt for the preceding reasons the proposed development is considered to comply with the Council's Updated Thames Basin Heath Avoidance Strategy (2022).
377. Overall, subject to securing the provision of both the SANG and SAMM contributions (both via the Section 106 Legal Agreement), and subject to the completion of an Appropriate Assessment (supported by Natural England), the Local Planning Authority would be able to determine that the proposed development would not affect the integrity of the Thames Basin Heaths Special Protection Area (TBH SPA) either alone, or in combination with other plans and projects, in relation to urbanisation and recreational pressure effects. On that basis (reflected in the recommendation) the proposed development would therefore accord with Policies CS8 and CS17 of the Woking Core Strategy (2012), the Updated Thames Basin Heaths Avoidance Strategy (February 2022), Saved Policy NRM6 of the South East Plan 2009 and the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended).

### **Wind microclimate**

378. The tall buildings strategy within SPD Design (2015) requires proposals for tall buildings to not adversely affect the site's surrounds in terms of, inter alia, wind. The Environmental Statement (ES) contains a pedestrian level wind microclimate assessment, the objective of which is to determine the ground and elevated level (i.e., proposed roof-top terrace level) wind environment within and around the proposed development. Based on the wind climate statistics, the prevailing winds at the site blow from the south westerly sector. Wind speeds are generally highest during winter, when the most frequent strong winds blow from the south-west and west-south-west. Wind speeds are generally lower during summer. North-easterly winds are common during spring but, although potentially cold, these winds are generally light. South-easterly winds are generally light, rarely occurring and usually do not cause adverse impacts on pedestrian level conditions.
379. The ES sets out that Computational Fluid Dynamics (CFD) modelling was used to assess the pedestrian level wind environment and that this modelling covered a full-scale extent of 500m from the centre of the site (i.e., well beyond the extent of potential significant effects arising from the proposed development).
380. The ES sets out that the assessment considered the following scenarios:
- Configuration 1: Existing Site (baseline) with existing surrounds;

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- Configuration 2: Proposed Development with existing surrounds; and
- Configuration 3: Proposed Development with existing and future (cumulative) surrounds.

381. For Configuration 3, recently completed developments, or developments currently under construction with significant above-ground construction progressed, were included within the baseline, in their completed form. This included the following schemes:
- Victoria Square / Place (ref. PLAN/2017/0006 & PLAN/2018/0444); and
  - Shoppers Car Park Red (ref. PLAN/2018/1114).
382. The committed future developments considered within the cumulative effects assessment comprised the following surrounding schemes:
- Goldsworth Road / EcoWorld (ref. PLAN/2020/0568);
  - Crown Place (ref. PLAN/2019/1141); and
  - 46 Chertsey Road (ref. PLAN/2017/0802).
383. The Lawson criteria seek to define the reaction of an average pedestrian to the wind, setting out four pedestrian activities to reflect the fact that less active pursuits require more benign wind conditions. The categories for pedestrian comfort are:

Comfort Rating	Threshold Mean-hourly Wind Speed Exceeded < 5% of the Time	Qualifying Comments
Long-term Sitting (C4)	4 m/s	Light breezes desired for outdoor restaurants and seating areas where one can read a paper or comfortably sit for long periods for example to eat or drink.
Standing or short-term Sitting (C3)	6 m/s	Gentle breezes acceptable for building entrances, pick-up/drop-off points, bus stops and window shopping.
Walking or Strolling (C2)	8 m/s	General areas of walking and sightseeing.
Business Walking (C1)	10 m/s	Local areas around tall buildings where people are not likely to linger.

384. The ES sets out that the assessment took full account of seasonal variations in wind conditions and pedestrian activities. Thus, conditions for recreational activities focused on summer but also considered spring and autumn. Recreational activities did not consider winter comfort ratings as it is anticipated that users would not demand suitable conditions 95% of the time in winter but would instead be satisfied to use the amenity spaces on occasions when conditions, including rainfall and temperature, allow. Conditions for pedestrian thoroughfare, access or waiting (for example at bus stops) considered all seasons, with winter being predominantly the critical season due to generally higher wind speeds in the winter months. The activities considered, and their relation to the comfort criteria detailed above, are shown in the table on the following page in order of decreasing sensitivity to wind speeds. Conditions considered suitable for the more sensitive activities would also be suitable for the subsequent, less sensitive uses (on the following page):

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Suitability		Target Lawson comfort and safety criteria for specified seasons
Outdoor seating	For long periods of sitting, such as for an outdoor café or picnic area.	'Long-term sitting' (C4) in at least summer.
Entrances, waiting areas	For pedestrian ingress / egress at entrances, or short periods of sitting or standing such as at a bus stop, taxi rank, meeting point, window shopping, etc.	'Standing or short-term sitting' (C3) in all seasons.
General leisure (excluding seating areas)	For leisure uses excluding long periods of outdoor sitting, such as active leisure, general park spaces, children's play area, etc.	'Standing or short-term sitting' (C3) from spring to autumn.
Thoroughfare	For pedestrian access to, and passage through, the site and surrounding area.	'Business walking' / 'Walking or strolling' (C1/C2) in all seasons - 'Walking or strolling' (C2) desired but 'Business walking' (C1) may be acceptable in some areas.
Unsuitable	Unsuitable for all activities.	Exceeds comfort criterion for 'Business walking' (C1) or safety criteria (S1/S2).

385. The ES sets out that landscaping proposals (within the proposed development) included within the CFD modelling simulations included:

- Multi-stem deciduous trees, of around 3.5m to 4.5m height, and smaller deciduous trees / shrubs, of around 1.0m to 2.0m height, at the north-east end of the Level 16 terrace and across both the Level 15 and the Level 08 terraces;
- Pleached trees forming a green screen of around 50% solidity and around 1.9m height along the south-west side of the outdoor lounge in the east corner of the Level 08 terrace;
- Evergreen hedging within planters, up to a combined height of around 1.2m to 1.3m, around the perimeter of each terrace; and
- Pergolas above parts of the Level 16 and Level 08 terraces of the proposed development.

386. The ES sets out that further designed-in (or embedded) mitigation measures have been incorporated at both ground and roof terrace levels, including:

- A 50% porous fence on the north side of the vehicular underpass;
- 3 trees at ground level, along the south-east side of the proposed development;
- 1.5m high, 75% solid, balustrades around the perimeter of each roof terrace;
- An additional pergola above the outdoor lounge in the east corner of the Level 08 terrace, with the pleached trees / green screen extended up to the pergola height (approximately 2.5m height); and
- Additional multi-stem deciduous trees along the Level 16 terrace.

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387. The ES sets out that, with the preceding mitigation measures in place, pedestrian level wind conditions in and around the site, and proposed roof-top terrace level wind conditions, are expected to rate as safe for all users.
388. The ES sets out that, in terms of pedestrian comfort, with respect to wind force, wind conditions within the vehicular underpass at the west corner of the proposed development have potential to be suitable, ideally, only for fast walking (normally associated with business activities) during winter. However, conditions are expected to exceed the Lawson criterion only marginally for leisurely strolling and, although covered, the area is expected to be used mainly for vehicular access. Wind conditions within this area are therefore expected to be at least tolerable for pedestrian passage. Wind conditions on thoroughfares within the site are expected to be suitable for at least leisurely strolling and would be considered suitable for pedestrian access to, and passage past, the site. Wind conditions at the proposed building entrances are expected to be suitable for pedestrian ingress / egress.
389. The ES sets out that the proposed spill-out seating area by the side of High Street, on the south-east side of the proposed development, has potential to receive the outer edge of the prevailing south-westerly wind channelling around the south corner of the building and may be marginally windy for long periods of outdoor sitting in summer. However, conditions are expected to be tolerable for roadside spill-out seating.
390. The ES sets out that the designed-in mitigation features (i.e., balustrades around the perimeters of the roof terraces, landscaping etc.) are expected to result in wind conditions which are expected to be generally suitable for recreational activities including long periods of outdoor sitting, such as for picnics or dining for example, during at least summer. Whilst the more exposed corner areas may remain suitable for only short periods of sitting or standing, such as for viewing, this mix of conditions would generally be considered acceptable target conditions for elevated, communal, amenity spaces such as these.
391. The ES sets out that, following construction of the proposed development, wind conditions on thoroughfares surrounding the site are expected to remain suitable for at least leisurely strolling. The area in front of the south corner of the Cote Brasserie (at the junction of Chapel Street and Commercial Way) is potentially susceptible to (partially dispersed) downdraughts from the proposed development channelling around the corner. The ES sets out that these winds may then combine with the residues of dispersed downdraughts from the Victoria Place development to create a second area of accelerated winds on Commercial Way, in front of the Robert Dyas store. However, the resulting conditions are expected to remain suitable for leisurely strolling during winter and are not expected to impact on the building entrances or retail frontages. Entrances to the surrounding buildings, including retail outlets, are expected to retain suitable wind conditions for pedestrian ingress / egress and retail frontages are also expected to remain suitable for window shopping.
392. Bus stops on High Street are expected to retain suitable conditions for awaiting a bus and Woking railway station's platforms are expected to retain suitable conditions for awaiting a train. Cote Brasserie's outdoor seating terrace (on Chapel Street) is sheltered by solid balustrades around the perimeter of the seating terrace. The ES sets out that wind conditions here, and around the corner (on Commercial Way) are expected to remain suitable for long periods of outdoor sitting, such as for café outdoor seating, during at least summer.

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393. Overall, the communal roof-top terraces would be more exposed but would benefit from substantial (designed-in) balustrading and landscaping, purposely developed to help enhance wind conditions. The ES sets out that resulting wind conditions are expected to rate as safe for all users and are expected to be generally comfortable for existing and proposed activities, with just a few localised areas potentially being marginally windy, but tolerable, for proposed activities. As such, the wind microclimate effects of the proposed development are therefore considered to be acceptable.

### **Solar glare**

394. The tall buildings strategy within SPD Design (2015) requires proposals for tall buildings to not adversely affect the site's surrounds in terms of, inter alia, glare. The Environmental Statement (ES) contains assessment of solar glare.
395. The BRE Guide states (at paragraph 5.8.1) that *“Glare or dazzle can occur when sunlight is reflected from a glazed façade or area of metal cladding. There are two types of reflected glare problem that can occur. Discomfort glare causes visual discomfort without necessarily affecting the ability to see. Disability glare happens when a bright source of light (such as the reflected sun) impairs the vision of other objects. The bright light is scattered in the eye, making it harder to see everything else. Outdoors, disability glare is easily the more serious problem, as it can affect motorists’ and train drivers’ ability to drive safely.”*
396. The BRE continues (at paragraph 5.8.2) stating that *“The problem can occur either when there are large areas of reflective glass or cladding on the façade, or when there are areas of glass or cladding that slope back so that high altitude sunlight can be reflected along the ground. Thus solar dazzle is only a long-term problem for some heavily glazed (or mirror clad) buildings. Photovoltaic panels generally tend to cause less dazzle because they are designed to absorb light.”*
397. The BRE Guide outlines a brief methodology for evaluation of the scale of a solar glare issue, stating (at paragraph 5.8.3) that *“If it is likely that a building may cause solar dazzle the exact scale of the problem should be evaluated. This is done by identifying key locations such as road junctions and railway signals, and working out the number of hours of the year that sunlight can be reflected to these points.”*
398. Solar glare assessments simulate the path of the sun for the entire year around a proposed development in order to establish the locations, times, duration and direction of solar reflections and identify where these may affect sensitive locations, with a particular focus on road users or railways. The ES identifies that the sensitive receptors include the train tracks to the south and potential glare locations identified close to railway signals. It is important to note that direct solar glare is a naturally occurring phenomenon and that at certain times, usually around sunrise or sunset, there can be certain locations where the rising or setting sun would be directly in the desired line of sight. The ES sets out that this is something that all train drivers would have experienced at some time and that, furthermore, in an urban area where large buildings adjacent to the railway lines are common, there would be times when windows, or other specular surfaces, produce solar reflections. As such, it is important to bear in mind that solar reflections from windows are part of the normal pattern of sunlight in urban areas.
399. The ES identifies that the solar glare screening exercise generates a sequence of images of the proposed development, taken at 15-minute intervals on the 21st of each month for half the year, with the other half being symmetric (i.e., for potential reflections on July 21st, refer to images for May 21st; for August 21st refer to April 21st etc). These images

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visually depict solar reflections as patches of coloured reflected yellow light on the buildings and terrain surrounding the site. The screening exercise is used to identify sensitive locations surrounding the site once the proposed development has been fully built out at which time the glare reflection or reflections appear more intense. It is important to note that the screening exercise assumes a worst case of the windows acting as a perfect mirror for the purposes of showing the annual pattern of reflections; and assumes a clear sky throughout the year. It therefore overstates any potential glare.

400. The ES sets out that the solar glare screening exercise shows that there would potentially be instances of solar reflections to the south-west of the site along the train tracks and near the identified signals for a small period of time in February and October and that these instances could potentially affect train drivers heading east into Woking railway station. In order to consider the above areas in more detail, three locations have been selected and assessed for glare calendars. These viewpoints are:

- Viewpoint 1 – 50m from the closest signal to the station
- Viewpoint 2 – 100m from the closest signal to the station
- Viewpoint 3 – 50m from the second signal

401. Whether any solar glare is actually caused on any occasion is dependent upon the time of day and the weather at the time that the instance occurs. There are no quantitative criteria within the BRE Guide regarding acceptable levels of solar glare. There is, however, research which suggests that the significance of a glare occurrence is largely dependent upon its angle from the line of sight, the strength of the glare and the relevance of this with respect to the human field of vision. The ES sets out the following criteria for impact magnitude:

Impact Magnitude	Descriptor
High	Glare angles smaller than 3° & a Veiling Luminance of over 500 cd m <sup>-2</sup>
Medium	Glare angles between 3° and 10° for long period of time & a Veiling Luminance of over 500 cd m <sup>-2</sup>
Low	Glare angles between 10° and 30° for long periods of time or between 3° and 10° for a short period of time
No Impact	Glare angles greater than 30°, as reflections beyond this angle are normally not intense enough to cause glare, or between 10° and 30° for short periods of time.

402. Glare angle refers to the angle between a reflection and the receptors' line of sight. Glare angles greater than 30° are normally of little significance unless the glare source is of unusual intensity (i.e., very reflective glass or tilted rooflights that could reflect intense sunlight from high solar altitudes).

403. Viewpoint 1 - Considers the train drivers view, 50m away from the closest signal, heading east along the tracks into Woking railway station. It therefore considers whether the train drivers view of the closest signal would be affected. There will be some solar reflections for a small amount of time of the day on certain dates in February and mid-October/early November. There will be some very fleeting instances that occur between 10° and 30° intermittently between 4:20pm and 4:45pm in February and between 3:50pm and 4:15pm in October. The Veiling Luminance Calendar graph shows figures of between 0 and 300 cd/m<sup>-2</sup>, significantly less the 500 cd/m<sup>-2</sup> threshold above which disability glare is a possibility.



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404. Visualisations of the views have been prepared within the ES for sample times of 4:39pm on 15th February and 5:04pm on 27th October, which have been identified from the Calendar Graphs as instances where the reflection angle is less than 10°. These times were chosen to represent the likely worst-case instances of solar glare. In both views the reflection of the sun is just inside of the 10° circle to the left of the signal structure. It is worth noting however that the actual signals/lights appear to be located in the middle/right hand side of the signal structure. Again, it is important to note that these views are based on optimal conditions with a clear sky whereas in reality the number of instances of solar glare identified would be less frequent than that established in the technical analysis within the ES.
405. As such, the ES concludes that the overall effect on Viewpoint 1 is considered Minor to Moderate Adverse for a very small window twice a year, particularly given the train driver would either be decelerating or going at a low speed while approaching Woking railway station, giving ample time to assess the situation.
406. Viewpoint 2 - Viewpoint 2 considers the train drivers view, 100m away from the closest signal, heading east along the tracks into Woking railway station. It therefore considers whether the train drivers view of the closest signal would be affected. The Calendar Graph shows that there will be some solar reflections for a small amount of time of the day on certain dates in February and October. There will be some very fleeting instances that occur of less than 10° and less than 30° intermittently from between 4:20pm and 4:45pm in February and between 3:50pm and 4:15pm in October. The veiling luminance calendar graph shows figures of significantly less the 500 cd/m<sup>-2</sup> threshold, above which disability glare is a possibility.
407. Visualisations of the views have been prepared within the ES for sample times of 4:57pm on 21st February and 4:57pm on 21st October, which have been identified from the Calendar Graphs as instances where the reflection angle is less than 10°. These times were chosen to represent the likely worst-case instances of solar glare. It can be seen from both views that the reflection of the sun is just inside of the 10° circle to the upper left of the signal structure. It is worth noting however that the actual signals/lights appear to be located in the middle/right hand side of the signal structure.
408. As such, the ES concludes that the overall effect on Viewpoint 1 is considered no more than Minor to Moderate Adverse for a very small window twice a year, particularly given the train driver would either be decelerating or going at a low speed while approaching Woking railway station, giving ample time to assess the situation.
409. Viewpoint 3 - Viewpoint 3 considers the train drivers view heading east along the tracks, 50m away from the second identified signal. It therefore considers whether the train drivers view of the identified signal would be affected. The Calendar Graph shows that there will be some solar reflections for a small amount of time of the day on certain dates in February and October. There will be some very fleeting instances that occur, of less than 10°, intermittently (for less than 20 minutes) between 4:20pm and 4:40pm in February and between 3:50pm and 4:10pm in October. The veiling luminance calendar graph shows figures of between 0 and c.400 cd/m<sup>-2</sup> in February and in October/early November figures range between 0 and 500 cd/m<sup>-2</sup>. There will, for a few minutes on the 8th-10th November, between 4:00pm and 4:05pm, be the potential for disability glare in optimum conditions.
410. Visualisations of the views have been prepared within the ES for sample times of 4:32pm on 6th February and 4:00pm on 7th November, which have been identified from the Calendar Graphs as instances where the reflection angle is less than 10°. These times

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were chosen to represent the likely worst-case instances of solar glare. It can be seen from both views that the reflection of the sun is inside of the 10° circle.

411. As such, the ES concludes that the overall effect on Viewpoint 3 is considered no more than Moderate Adverse. The train driver would either be decelerating or going at a low speed while approaching Woking railway station and given the distance from the station will have ample time to assess the situation.
412. Network Rail have provided no comments in respect of solar glare to train signals, South Western Railway have been consulted on the application although have submitted no comments. Overall, the solar glare assessment has identified some instances of potential disability glare during optimum conditions along the railway line, with several fleeting instances at key viewpoints as train drivers approach signalling on the approach into Woking railway station. The ES considers these effects to be no greater than moderate adverse, however do generally arise in the winter months when the sun is lower in the sky, but the solar glare assessment also assumes a worst-case scenario of clear skies for optimum sunlight availability. As such, whilst there would be some instances of potential solar glare, the majority of instances will arise as train drivers are approaching Woking railway station at slower speeds, allowing for greater response times in the event of any perceived disability glare in the line of vision. As such, the solar glare implications are considered acceptable.

### Air quality

413. Paragraph 186 of the NPPF sets out that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas and that opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Paragraph 186 of the NPPF also sets out that planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
414. Policy UA4 of the Site Allocations DPD (2021) requires development of the site to, inter alia, *“Be supported by a detailed Air Quality Assessment to determine potential impact of development”*. Policy CS21 of the Woking Core Strategy (2012) requires new development to be designed to, inter alia *“avoid significant harm to the environment and general amenity resulting from noise, dust, vibrations, light or other releases”*.
415. Policy DM5 of the DM Policies DPD (2016) states that *“When assessed individually or cumulatively, development proposals should ensure that there will be no unacceptable impacts on [inter alia] air quality.”* Policy DM6 of the DM Policies DPD (2016) states that *“Development that has the potential, either individually or cumulatively, for significant emissions to the detriment of air quality, particularly in designated Air Quality Management Areas or in areas at risk of becoming an Air Quality Management Area, should include an appropriate scheme of mitigation which may take the form of on-site measures or, where appropriate, a financial contribution to off-site measures. An Air Quality Assessment will be required for schemes that meet the thresholds set out in paragraph 4.15”*. This threshold is, inter alia, development in excess of 100 dwellings or 10,000 sq.m other floorspace (or equivalent combination) anywhere in the Borough.
416. The application has been submitted with an Air Quality Assessment (dated July 2023) which identifies that the Council has an Air Quality Management Area (AQMA) declared

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for exceedances of the annual mean NO<sub>2</sub> (Nitrogen Dioxide) Air Quality Strategy (AQS) objective and that this AQMA is located approximately 600 metres south-west of the site and incorporates a small section of Guildford Road (to the south of Constitution Hill junction and to the north of the Junction with Ashdown Close).

417. The main likely effects on local air quality during construction relates to nuisance dust. Activities associated with the demolition and construction of the development will give rise to a risk of dust impacts at existing sensitive receptors during demolition, earthworks and construction, as well as from trackout of dust and dirt by vehicles onto the public highway. The assessment of effects from dust during demolition and construction has been undertaken in accordance with Institute of Air Quality Management, 2014, 'Guidance on the Assessment of dust from demolition and construction'; the dust emission magnitude is considered to be small for demolition and earthworks, large for construction, and medium for trackout. Mitigation measures are predicted to ensure that residual effects from construction works would be 'not significant'; this is a standard approach, is considered appropriate and can be secured through condition (recommended condition 07 refers).
418. In respect of the operational phase of the development, the Environmental Protection UK & Institute of Air Quality Management (2017), 'Land-Use Planning & Development Control: Planning for Air Quality' (EPUK/IAQM) guidance sets out criteria for when an air quality assessment is required to accompany a planning application. The guidance states that an air quality assessment is required if there is a change of:
- more than 100 Light Duty Vehicles (LDV's) flows in Annual Average Daily Traffic (AADT) within or adjacent to an AQMA or more than 500 AADT elsewhere; or
  - more than 25 Heavy Duty Vehicles (HDV) flows AADT within or adjacent to an AQMA or more than 100 AADT elsewhere; or
  - combustion plant where the single or combined NO<sub>x</sub> emission rate exceeds 5 mg/sec.
419. The Transport Assessment (TA) submitted with the application confirms that the vehicle flows generated by the development (once operational) would not result in a change of more than 100 LDVs or 25 HDVs AADT on local roads with relevant receptors and would therefore be below the EPUK/IAQM guidance criteria for when an air quality assessment is required. Additionally, the proposed development would not include any centralised combustion plant. As such, based on the low trip generation and the absence of any centralised combustion plant, on the basis of the EPUK/IAQM guidance, the development is not expected (once operational) to give rise to adverse air quality impacts.
420. In terms of the air quality of future occupiers/users the Victoria Way 4 (VW4) roadside diffusion tube is the closest diffusion tube to the site, located approximately 0.2km to the south-west (on the junction of Victoria Way and the High Street) and thus is considered a conservative representation of annual mean NO<sub>2</sub> concentrations future occupiers/users of the development would be exposed to. The monitored annual mean NO<sub>2</sub> concentrations at the VW4 diffusion tube are significantly below the annual mean NO<sub>2</sub> AQS objective of 40µg/m<sup>3</sup> in all years. The Air Quality Assessment sets out that the Defra background maps were considered representative of PM<sub>10</sub> and PM<sub>2.5</sub> (Particulate Matter, 10 microns and 2.5 microns) concentrations at the site and the 2019 concentrations were below the respective AQS objectives for both pollutants. As such, the air quality experienced by future occupiers/users would be acceptable.
421. Overall, subject to recommended conditions, there will be no significant impacts to existing or proposed sensitive receptors during the construction or operational phases of

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the proposed development. The proposal therefore complies with Policy CS21 of the Woking Core Strategy (2012), Policies DM5 and DM6 of the Development Management Policies DPD (2016), and the National Planning Policy Framework (NPPF), in respect of air quality.

### **Contamination**

422. Paragraph 174 of the NPPF states that *“planning...decisions should contribute to and enhance the natural and local environment by [inter alia] remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”*. Paragraph 183 of the NPPF states that *“planning...decisions should ensure that: a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination...after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and...adequate site investigation information, prepared by a competent person, is available to inform these assessments.”* Paragraph 184 of the NPPF states that *“Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.”*
423. Policy UA4 of the Site Allocations DPD (2021) requires development of the site to, inter alia, *“Consider current or historical contaminative uses of the site, and make provision for appropriate investigation and any necessary remediation.”*
424. Policy DM8 of the Development Management Policies DPD (2016) states, inter alia, that *“Adequate site investigation information should be provided with development proposals, including the site’s history, potential contamination sources, pathways and receptors, and where appropriate, physical investigation, chemical testing, and a risk assessment to cover ground gas and groundwater.”*
425. The application has been submitted with a Phase 1 Desk Study report (dated July 2023) which determines that the proposed development is unlikely to generate any significant effects associated with land contamination, ground conditions and controlled waters. A number of sources of potential ground contamination have been identified for the site, although the report identifies that human health risks in the long term are considered generally low as much of the Made Ground will be removed and where it remains will be covered either by buildings or hardstanding. An intrusive site investigation is recommended to confirm the potential risks to receptors. It is likely that the implementation of remediation measures would be required to ensure that the proposed development is suitable for use.
426. The Council’s Contaminated Land Officer comments that potential ground contamination sources / issues have been raised and a site investigation is required (following demolition). These measures can be secured through recommended conditions 35, 36, 37 and 38, together with implementation of any required remediation measures. Subject to these recommended conditions the proposed development would comply with Policy DM8 of the DM Policies DPD (2016), and the National Planning Policy Framework (NPPF), in terms of contamination.

### **Flooding and water management**

427. Policy CS9 of the Woking Core Strategy (2012) states that *“The Council will determine planning applications in accordance with the guidance contained within the NPPF. The SFRA will inform the application of the Sequential and Exceptional Test set out in the NPPF”*. Policy CS9 also states that *“The Council expects development to be in Flood*

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*Zone 1 as defined in the SFRA...The Council will require all significant forms of development to incorporate sustainable drainage systems (SUDS) as part of any development proposals...To further reduce the risk from surface water flooding, all new development should work towards mimicking greenfield run-off situations”.*

428. Policy UA4 of the Site Allocations DPD (2021) requires development of the site to, inter alia, *“Be supported by a Detailed Surface Water Drainage Design that mitigates impacts on surface water flooding and incorporates sustainable drainage systems in accordance with Core Strategy Policy CS9: Flooding and water management and taking into account the Council’s guidance supporting the provision of a Surface Water Drainage Statement”.*
429. Paragraphs 159-169 (inclusive) of the NPPF relate to planning and flood risk, paragraph 169 states that *“Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate”.*
430. The application has been submitted with a flood risk assessment and drainage strategy (hereafter referred to for brevity as the FRA) which identifies that the site is located entirely within fluvial Flood Zone 1 (low risk), and significant distances away from fluvial Flood Zones 2 and 3 (medium and high risk). In accordance with Policy CS9 of the Woking Core Strategy (2012) and the NPPF all forms of development are suitable in Flood Zone 1. The Council’s Strategic Flood Risk Assessment (SFRA) (November 2015) identifies that no part of the site is at risk of surface water flooding, nor are the adjoining sections of High Street and Chapel Street at risk of surface water flooding. As such, there is no requirement for a flood risk sequential test to be undertaken in this instance.
431. In respect of other sources of potential flooding (i.e., sewer flooding, groundwater flooding and flooding from impounded water bodies) the FRA identifies that providing that non-return valves are provided to the basement drainage connections into the public sewer, the risk of flooding from the sewer to the proposed development is considered to be low, that the site is located in an area with limited potential for groundwater flooding to occur (albeit recommends that a specialist waterproofing contractor should be appointed in the next design stage to define the requirements for protecting the basement from groundwater flooding) and that the site is not at risk of flooding from reservoirs.
432. The FRA identifies that the existing site is laid totally to building footprints or hardstanding and that, based on the available information, it is assumed that the surface water run-off from the existing site discharges unattenuated to the public sewer.
433. In respect of the proposed surface water drainage strategy the FRA identifies that the sustainable drainage hierarchy has been considered and that considering the existing ground conditions and the limited open space within the site boundary, infiltration into the underlying geology has been deemed unviable as a method of surface water disposal. The FRA also identifies that there are no watercourses in the immediate vicinity of the site for disposal of surface water and therefore potential discharge to a water body has been discounted.
434. The FRA sets out that the Thames Water asset data show that there is a 225mm diameter surface water public sewer running underneath Chapel Street and that utility survey shows that the surface water drainage from the existing buildings within the site boundary may discharge into a 100mm diameter surface water drainage underneath the access road at the rear of the site which, in turn, discharges into the surface water public sewer running underneath Chapel Street. As such, it is proposed to reuse this existing connection to discharge all surface water runoff from the proposed development (subject to confirmation that its conditions are suitable for re-use, if the existing connection/s are

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not suitable for re-use, a new connection into the public sewer underneath Chapel Street will be provided).

435. The FRA identifies that surface water runoff will be stored within the proposed blue/green roof build-ups and discharged at a restricted rate using a flow control device and that the proposed drainage system has been modelled for various return period events up to and including the 1 in 100 year storm event plus 45% climate change allowance. The FRA demonstrates that, due to the proposed SuDS scheme, there will be a significant reduction in the existing surface water discharge rates from the site.
436. Thames Water state that they have been unable to determine the foul and surface water infrastructure needs of this application and therefore request conditions, in respect of foul and surface water drainage, be attached to any grant of planning permission (recommended conditions 32 and 33 refer). It should be noted that, since the publication of the new connections and development charging rules in April 2018, drainage authorities (including Thames Water) in England are obligated to provide a point of connection and undertake any mitigation or improvement works and network reinforcements, where necessary.
437. The proposed development will result in an increase in potable water demand. No consultation response has been received from the relevant potable water supplier (Affinity Water) and thus it is considered that there is no issue in this respect. In respect of foul and potable water it is also a material consideration, of full weight, that the proposed development is located on a site which is allocated for development within the Development Plan, including residential development, by Policy UA4 of the Site Allocations DPD (2021).
438. The statutory consultee (in respect of surface water drainage) of the Lead Local Flood Authority (LLFA) (Surrey County Council), has advised that, following a review of the Flood Risk Assessment and Drainage Strategy, and of the applicant response to the initial comments of the LLFA, the LLFA is satisfied that the proposed drainage scheme meets the requirements set out in Policy CS9 of the Woking Core Strategy (2012), the NPPF, its accompanying PPG and the Non-Statutory Technical Standards for sustainable drainage systems, and are content with the development proposed (in respect of surface water). The LLFA advise that, should planning permission be granted, suitably worded conditions should be applied to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development (recommended conditions 30 and 31). The Environment Agency (EA) have, thus far, submitted no comments on the application (although the site does not fall within, nor adjacent to, any fluvial flood zone).
439. Overall, subject to recommended conditions, the proposed development complies with Policy CS9 of the Woking Core Strategy (2012), the National Planning Policy Framework (NPPF), its accompanying PPG and the Non-Statutory Technical Standards for sustainable drainage systems, in respect of flooding and water management.

### **Noise and vibration**

440. Policy CS21 of the Woking Core Strategy (2012) states that proposals for new development should *"Be designed to avoid significant harm to the environment and general amenity, resulting from noise, dust, vibrations, light or other releases"*.
441. Policy UA4 of the Site Allocations DPD (2021) requires development of the site to, inter alia, *"Provide a high standard of amenity for future users, including any necessary*

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*mitigation in respect of the noise of adjacent roads, and ensure that appropriate levels of sunlight and daylight are available for internal environments.”*

442. Policy DM7 of the DM Policies DPD (2016) states that *“The Council will require noise generating forms of development or proposals that would affect noise-sensitive uses to be accompanied by a statement detailing potential noise generation levels and any mitigation measures proposed to ensure that all noise is reduced to an acceptable level”* and that *“Development will only be permitted where mitigation can be provided to an appropriate standard with an acceptable design, particularly in proximity to sensitive existing uses or sites”*. Policy DM7 sets out that *“In general, the following values will be sought for residential development:*
- Day time (7am – 11pm) 35 dB LAeq4 16 hours in all rooms and 50 dB in outdoor living areas.*
  - Night time (11pm – 7am) 30 dB LAeq 8 hours and LAmx5 less than 45 dB in bedrooms.”*
443. The reasoned justification text to Policy DM7 states (at paragraph 4.19) that *“Noise-sensitive development generally includes housing, hospitals and schools. Such development should not generally be located next to existing sources of significant environmental noise (such as road, rail and air noise, and certain types of industrial development)...However, the spatial strategy for Woking Borough foresees most new development being directed to previously developed land in the town, district and local centres, where it is more likely that environmental noise exists. Depending on the level of environmental noise, the impact can in some cases be satisfactorily mitigated, allowing noise-sensitive development or noise generating development to proceed on the affected site. The design of mitigation measures should have regard to the need to provide a satisfactory environment for future occupiers and take account of other material planning considerations such as urban design and heritage settings.”*
444. Paragraph 174e) of the NPPF states that *“Planning...decisions should contribute to and enhance the natural and local environment by...preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of [inter alia] noise pollution”*. Paragraph 185 states that *“Planning...decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life”*.
445. The application has been submitted with a noise and vibration assessment report which identifies that the main noise consideration to the proposed residential development is rail noise and the noise level of tannoy announcements at Woking railway station and that second to this is road traffic noise, especially at ground level facing High Street and localised noise from the surrounding land uses. In respect of vibration the assessment report identifies that the main consideration is potential vibration caused by trains passing through Woking railway station.
446. With reference to noise levels in external amenity spaces BS 8233:2014 *Guidance on sound insulation and noise reduction for buildings* states that *“the acoustic environment of external amenity areas that are an intrinsic part of the overall design should always be assessed and noise levels should ideally not be above the range 50-55 dB LAeq,16h. These*

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*guideline values may not be achievable in all circumstances where development might be desirable. In such a situation, development should be designed to achieve the lowest practicable noise levels in these external amenity spaces but should not be prohibited*". In traditional amenity spaces, such as gardens and patios, it is desirable for noise levels to not exceed 50dB LAeq, with an upper guideline value of 55dB LAeq in noisier environments. In terms of noise external amenity areas are considered for use during day time (7am - 11pm), as per Policy DM7 of the DM Policies DPD (2016). It must also be recognised that recommended values are not achievable in all circumstances where development might be desirable, and that in higher noise areas, such as city centres or urban areas adjoining the strategic transport network, a compromise between elevated noise levels, and other factors, such as the convenience of living in these locations or making efficient use of land, might be warranted.

447. The assessment report sets out that a baseline environmental noise survey was undertaken between Wednesday 3rd August and Tuesday 9th August 2022 with the dominant noise source at the site being rail noise and noise associated with Woking railway station with a secondary contribution from road traffic noise. Delivery and plant noise to the north of the site was also noted to contribute to the noise climate.
448. The noise assessment sets out that measured noise levels at the site indicate the outdoor amenity areas (residential terraces) proposed at 8th floor, 15th floor, and 16th floor levels will experience daytime noise levels of an acceptable level when account is taken of inherent mitigation (solid parapets around the perimeter of the terraces at vertical heights of 725mm for the 8th floor terrace and 1150mm for the 15th and 16th floor terraces) and these roof terraces are therefore considered suitable from a noise perspective.
449. The noise assessment sets out that measured noise levels at the site indicate that glazing affording a minimum sound insulation performance of between 29 and 38 dB  $R_w+C_{tr}$  and ventilator requirements of circa 41-44 dB  $D_{n,ew}+C_{tr}$  is likely to be required for some bedrooms, with the more onerous sound insulation requirements at lower residential floor levels (i.e., 1st and 2nd floors) within the south elevation, in order to achieve desirable internal ambient noise levels. This requirement is mainly driven by the measured  $L_{Amax}$  values during the night-time period. Generally, the indicative glazing and ventilator performance requirements are less onerous for higher floor levels due to the lower predicted facade noise levels, due to height above ground level. Full indicative glazing requirements, and associated indicative required passive ventilator performance, are contained within the assessment report.
450. The assessment report identifies that the residential element of the proposed development would not adversely impact the surrounding land-uses in terms of noise and that noise from the non-residential elements of the development will be controlled through acoustic design measures secured through planning conditions (recommended conditions 17 and 19 refer) .
451. In respect of noise levels from fixed external plant and building services clearly the most onerous time is the night-time period when background noise levels are lower (due to reduced road traffic, human, industrial and commercial activities). The assessment report identifies that although details of fixed external plant are not presently available (due to that stage of design development having not been yet reached) appropriate noise levels from fixed external plant and building services should nonetheless be achievable through implementation of the following measures, where required:
- Procurement of non-tonal plant;
  - Enclosures, acoustic screens;
  - In-duct attenuators, splitters, acoustic louvres;



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- Isolation of plant from building (flexible connectors, isolation mounts [springs/neoprene]);
- Strategic location of plant away from sensitive receptors.

452. Furthermore, indicative noise criteria for fixed external plant have been recommended within the assessment report, based on measured background sound levels (LA90) and guidance of BS4142 to safeguard existing and future residential amenity. To allow for cumulative effect the recommended plant noise criteria is for the rating level to be 10dB below the representative background sound level.
453. In respect of potential vibration caused by trains passing through Woking railway station the assessment report identifies that the transmission of vibrational energy is complex and although the site is located at a horizontal distance of roughly 20 metres from the railhead, the railway line and the railway station are on raised ground with respect to the site, therefore the vibration energy will have to pass down through a large mass of material before travelling horizontally along and then up through the foundation of the proposed development.
454. The assessment report also identifies that tactile vibration was not detected at basement level or in any areas of The Lighthouse building during the baseline survey. In addition reference is made to a vibration assessment carried out in July 2017 by Hann Tucker Associates whereby the vibration dose values were measured at roughly 20 metres from the railhead at Nos.74-76 Maybury Road, Woking (in support of planning application ref: PLAN/2016/1192), the railway being the same as that which runs adjacent to the site and the distance between the railway and measurement location being equivalent to the distance between the railway and the proposed development at Nos.3-12 High Street. As such, vibration levels monitored within the assessment by Hann Tucker Associates (at Nos.74-76 Maybury Road) are considered to be representative of the vibration levels experienced at the site.
455. The Hann Tucker Associates assessment concludes that the highest vibration dose value experienced at the measurement location (at Nos.74-76 Maybury Road) from train passes was 0.06 m/s<sup>1.75</sup> during daytime and 0.03 m/s<sup>1.75</sup> during night-time and that such vibration levels, when considered in-line with the assessment procedure against BS6472:2008 (0.2 m/s<sup>1.75</sup> during daytime and 0.1 m/s<sup>1.75</sup> during night-time), demonstrate that the vibrational energy experienced by train passes are considerably below the probability of causing adverse comment. However, the assessment report recommends that pile-cap and concrete slab vibration monitoring is undertaken at the construction stage, to ensure that vibration transmission through the building foundations would not adversely affect future residents of the proposed development.
456. Noise and Vibration during demolition and construction can be mitigated, as far as is practicable, through a Construction Environmental management Plan, CEMP); recommended condition 07 refers. The Council's Environmental Health service raises no objection to the proposal subject to recommended conditions 16, 17, 18, 19, 20 and 21.
457. Overall, subject to recommended conditions, the proposed development would comply with Policy CS21 of the Woking Core Strategy (2012), Policy DM7 of the Development Management Policies DPD (2016), and the National Planning Policy Framework (NPPF) in respect of noise.

**Ecology and biodiversity**

458. Policy CS7 of the Woking Core Strategy (2012) states that *“The Council is committed to conserving and protecting existing biodiversity assets within the Borough. It will require development proposals to contribute to the enhancement of existing biodiversity and geodiversity features and also explore opportunities to create and manage new ones where it is appropriate.”* The National Planning Policy Framework (NPPF) states that *“planning...decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity”* (paragraph 174d).
459. Policy UA4 of the Site Allocations DPD (2021) requires development of the site to, inter alia, *“Retain any trees of demonstrable amenity value and provide appropriate landscaping, including proportionate on-site measures to support the creation, protection, enhancement and management of local biodiversity and green infrastructure.”*
460. Circular 06/05 - Biodiversity and Geological Conservation provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system and requires the impact of a development on protected species to be established before planning permission is granted. Paragraph 180 of the NPPF sets out the principles that local planning authorities should apply, in relation to biodiversity, when determining planning applications, including (at d)) that *“opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”*
461. In respect of ecology and biodiversity the application has been submitted with:
- Design and Access Statement, Assael Architecture, 12th July 2023;
  - Preliminary Ecological Appraisal, Greengage, June 2023;
  - BREEAM NC 2018 Ecology Report, Greengage, July 2023;
  - Biodiversity Net Gain Assessment, Greengage, June 2023;
  - The Biodiversity Metric 4.0 Calculation Tool;
  - Bat Survey Interim Letter Report, Greengage, 13th July 2023; and
  - Bat Survey Report, Greengage, July 2023.

462. The Preliminary Ecological Appraisal (PEA) identifies that the surrounding area is heavily urbanised, that the closest greenspace is a woodland area and Horsell Moor Recreation Ground approximately 350 metres to the north and there is no existing vegetation within the site boundary with the exception of two small buddleia and a single small sycamore sapling, these have extremely limited extent and a lack of potential to support protected or notable species. The PEA identifies that given the highly urbanised nature of the site, which is laid to buildings or hardstanding and is effectively ecologically isolated by roads and the surrounding built environs, its value to species typically assessed for as part of a PEA (i.e., badgers, otters, great crested newt, otter and water vole etc) has not been assessed in detail due to the presence of these species being so unlikely in this instance.

**Bats**

463. The PEA identifies that although all buildings on site were found to have a low level of bat roosting potential a number of features with low potential to support roosting bats were found on the site, these included lifted and missing tiles, cracked and missing brickwork and gaps behind fascia boards. For the preceding reasons the PEA identifies a

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requirement for a single emergence survey to establish the relative importance of the site for local bat populations and to identify the presence/likely absence of roosting bats.

464. A bat survey report has therefore also been submitted with the application, this identifies that a bat emergence survey was undertaken on 5th July 2023 in clear, still and dry weather conditions between 21:05 hrs and 22:50 hrs (i.e., beginning 15 minutes before sunset and concluding 1.5 hours after sunset). The bat survey report identifies that there was no evidence of bat roosting observed during the emergence survey and therefore that roosting bats can be confirmed as likely-absent from the site. As such, the bat survey report concludes that there is no requirement for mitigation with regards to roosting bats.
465. In respect of foraging and commuting bats the PEA identifies that the site is dominated by hardstanding and buildings, with extremely limited vegetation, which is unlikely to offer any value to foraging bats. However, the site is within the zone of influence of larger and more diverse habitats, such as the railway sidings to the south which are likely to provide the main source of foraging habitat for local bat populations. Therefore, the PEA concludes that the site has a negligible potential to support foraging bats, however there is a possibility that the habitats within the zone of influence have potential to support foraging behaviour. The (subsequent) bat survey report identifies that no commuting or foraging activity was detected during the emergence survey and therefore the site can be considered to be reasonably inconsequential for local bat populations.
466. Notwithstanding the above the PEA and bat survey report identify that the proposed development is likely to introduce higher levels of artificial light on site, which can disturb bats, and that to minimise this impact measures to limit additional light disturbance, so as to maintain the foraging value of habitats in the zone of influence of the site, should be implemented (recommended condition 26 refers)
467. Surrey Wildlife Trust (SWT) (the ecological advisor to the Council) comment that the submitted bat survey report appears appropriate in scope and methodology and has identified the likely absence of active bat roosts within the development site, SWT therefore advise that bats do not appear to present a constraint to the proposed development however bats are highly mobile and move roost sites frequently. As such, unidentified bat roosts may still be present and as such a precautionary approach to works should therefore be implemented (recommended condition 25 refers). SWT also comment that bat roosting opportunities are to be provided at the development site and, because bat species are sensitive to any increase in artificial lighting of their roosting and foraging places and commuting routes, the applicant should ensure that the proposed development will result in no net increase in external artificial lighting at the development site (recommended condition 26 refers).

### Nesting Birds

468. Nesting birds, eggs and their nests are protected from any intentional damage under the Wildlife and Countryside Act 1981 (as amended). The PEA identifies that natural vegetation on site is extremely limited and offers negligible potential for nesting birds. However, the buildings contain features such as gaps behind fascia boards and gaps in soffits which could be used by bird species such as tits for nesting and areas of flat roof which could be used for by pigeons for nesting. However, the PEA states that the location of the site in a highly urbanised area somewhat limits this potential. Therefore the PEA concludes that overall the site has low potential to support nesting birds.
469. Nonetheless, to ensure impacts upon nesting birds is fully avoided (in accordance with the above 1981 Act), the PEA identifies that development and clearance of the site should

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take place outside of the nesting bird season (March to August incl.) and that if this is not possible, an inspection of buildings within 48 hours prior to clearance should be undertaken by a suitably qualified ecologist to confirm the absence of any nesting birds. If an active nest is discovered, then an appropriate species dependant buffer system should be enacted, whereby all works should be prevented until the young have fledged and the nest becomes inactive. This can be secured via recommended condition 24.

470. The PEA identifies that nesting provision will be included for swallows through the addition of x3 artificial swallow boxes (or a triple swallow box) and that starlings and house sparrows will benefit (at the site level) from foraging opportunities brought about by the proposed new landscaping (recommended condition 27 refers). The PEA identifies that nesting provision for starlings and sparrows is not proposed due to a lack of suitable locations given that the outdoor landscaped areas are expected to experience a high level of use by residents, especially during the summer months, thus disturbing such nest boxes.
471. SWT comment that the applicant should take action to ensure that development activities such as demolition and vegetation clearance are timed to avoid the bird nesting season of early March to August inclusive and if this is not possible, and no large areas of dense vegetation are affected, the site could be inspected for active nests by an ecologist within 24 hours of any clearance works. If any active nests are found they should be left undisturbed with a buffer zone around them, until it can be confirmed by an ecologist that the nest is no longer in use. This is consistent with the submitted reports and can be secured via recommended condition 24.

### Invasive Species

472. The PEA identifies that it is important that the buddleia is removed sensitively from the site during the clearance works and destroyed in such a way that prevents its spread. Recommended informative 20 refers.

### Terrestrial Mammals

473. SWT comment that the applicant should ensure that construction activities on site have regard to the potential presence of terrestrial mammals to ensure that these species do not become trapped in trenches, culverts, or pipes and that all trenches left open overnight should include a means of escape for any animals that may fall in. Recommended informative 19 refers.

### Biodiversity Enhancements / Biodiversity Net Gain

474. The PEA identifies that in accordance with the NPPF, Policy CS7 of the Woking Core Strategy (2012) and The Environment Act 2021, development proposals should seek to provide measurable net gains in biodiversity, which should aspire to a minimum of 10% biodiversity net gain (BNG), which should be evidenced through a Biodiversity Impact Assessment (BIA) using the Natural England Biodiversity 4.0 metric or similar. A Biodiversity Net Gain Assessment has been completed for the site which identifies that the baseline biodiversity value of the site is calculated to be 0 biodiversity units and that, post-development, the biodiversity value of the site is calculated to be 1.38 biodiversity units. This is due to the inclusion within the proposed development of biodiverse green roof areas, ground based green wall, vegetated garden, introduced shrub, ground level planters and approximately x9 'urban trees'. As such, the report identifies that, in the absence of additional enhancement measures and habitat creation, the proposed development stands to result in a net gain of 1.38 biodiversity units associated with area-

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based habitats from pre-development levels, corresponding to a total net increase of 100% in ecological value.

475. SWT comment that if planning permission is granted a condition should be added to secure the biodiversity net gain that has been identified in the biodiversity net gain assessment (recommended condition 23 refers).
476. The site will be further enhanced for wildlife through the provision of a biodiverse landscape scheme which includes green roofs integrated with a blue roof system for water attenuation (around 180 sq.m of green roof to be of a deeper substrate depth and to include log piles, rope coils and rock and sand piles), raised planting with large planters which will include tree planting and the integration of x6 integrated or facade mounted bat boxes, x2 facade bound triple cavity swift nest boxes and x2 insect boxes/habitat panels. The PEA and Biodiversity Net Gain Assessment identify that a Landscape Ecological Management Plan (LEMP) should be produced and implemented for the site (recommended condition 28 refers).
477. SWT comment that the proposed development offers opportunities to restore or enhance biodiversity and such measures will assist the LPA in meeting their obligation and help offset any localised harm to biodiversity caused by the development process. The development should progress in line with the submitted Biodiversity Net Gain Assessment and the BREEAM NC 2018 Ecology Report and incorporate the following:
- Bird and bat boxes erected on or integral within the new building ;
  - Species listed on the Royal Horticultural Society's Plants for Pollinators Guide;
  - Living roofs;
  - Log piles, rope coils, and sand piles;
  - Green walls and climbing plants;
  - Native tree planting; and
  - Habitat panels, insect hotels, bee bricks and bee posts.
478. SWT also recommend that if planning permission is granted that the LPA requires the development to be implemented in accordance with an appropriately detailed Landscape and Ecological Management Plan (LEMP). The biodiversity enhancements and submission of a LEMP can be secured via recommended conditions 2, 27 and 27.
479. Overall, subject to recommended conditions, the approach to ecology and biodiversity is acceptable, with the proposed development avoiding adverse impact upon biodiversity and protected species and providing a net gain of 1.38 biodiversity units associated with area-based habitats from pre-development levels, corresponding to a total net increase of 100% in ecological value. As such, the proposed development complies with Policy CS7 of the Woking Core Strategy (2012), the National Planning Policy Framework (NPPF) and Circular 06/05 - Biodiversity and Geological Conservation in respect of ecology and biodiversity.

### **Energy and water**

480. Policy CS21 of the Woking Core Strategy (2012) requires proposals for new development to, inter alia, *"incorporate measures to minimise energy consumption, conserve water resources, use the principles of sustainable construction and provide for renewable energy generation in accordance with policy CS22 Sustainable Construction and CS23 Renewable and Low Carbon Energy Generation."*

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481. Policy UA4 of the Site Allocations DPD (2021) requires development of the site to, inter alia, *“Connect to an existing or proposed district heating network unless it can be demonstrated that a better alternative for reducing carbon emissions can be achieved, subject to considerations of technical feasibility and financial viability.”*
482. Policy UA4 of the Site Allocations DPD (2021) also requires development of the site to *“Incorporate relevant sustainable construction requirements at the time of planning application, including the achievement of BREEAM ‘Very Good’ standards for any non-residential buildings of 1,000 sqm or more, in accordance with Policy CS22: Sustainable construction and taking into account the Climate Change SPD.”*
483. The Council has adopted BREEAM (Building Research Establishment Environmental Assessment Method) standards in Policy CS22 of the Woking Core Strategy (2012) in order to deliver more sustainable non-residential development across the Borough:
- “New non-residential development of over 1,000 sq,m or more (gross) floorspace is required to comply with the BREEAM very good standards (or any future national equivalent).”*
484. To encourage renewable and low carbon energy generation in the Borough, Policy CS23 of the Woking Core Strategy (2012) sets out the following:
- “Applicants should take appropriate steps to mitigate any adverse impacts of proposed development through careful consideration of location, scale, design and other measures. All reasonable steps to minimise noise impacts should be taken”.*
- “Applicants should provide sound evidence of the availability of the resource which will be harnessed or the fuel to be used, including details of the adequacy of transport networks where applicable and detailed studies to assess potential impacts such as noise nuisance, flood risk, shadow flicker and interference with telecommunications”.*
485. Policy CS22 of the Woking Core Strategy (2012) also states that *“All new development should consider the integration of Combined Heat and Power (CHP) or other forms of low carbon district heating in the development. All new development in proximity of an existing or proposed CHP station or district heating network will be required to be connected to it unless it can be demonstrated that a better alternative for reducing carbon emissions from the development can be achieved. Details of the zones where connection will be required will be set out in an SPD and will be determined by factors such as the capacity of the existing CHP network, distance from it and physical constraints”.* Policy CS22 also states that *“The evidence base sets out the locations in the Borough which have significant potential for CHP or other forms of low carbon district heating networks. Subject to technical feasibility and financial viability, all development within these zones will be required to be designed and constructed to enable connection to the future network.”* SPD Climate Change (2013) provides more detailed guidance.
486. The application has been submitted with an Energy Statement (which has been revised to Issue P04 during the application process) which sets out that the “Energy Hierarchy” methodology provides a design framework that was used to develop the low carbon energy strategy for the proposed development and that the approach described by this methodology provides a stage process: Be Lean, Be Clean and Be Green to assess energy efficiency design measures:
- Be Lean - Aim: to reduce the buildings energy demand through “passive design measures”. This step of the energy hierarchy focussed on a “Fabric First Approach”.

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- Be Clean - Aim: to meet the reduced energy demand in the most efficient way possible using “active measures”.
- Be Green - Assess the technical feasibility of incorporating a low or zero carbon technology to further reduce the CO2 emissions “green measures”.

487. ‘Be Lean’ focuses on maximising passive design measures and developing energy efficiency measures to minimise building energy demand. The Energy Statement sets out that high levels of passive design measures will be incorporated to reduce energy consumption and associated CO2 emissions, including:

- Enhanced U-values for both opaque and transparent elements.
- Very good air tightness where feasible (approx. 3m3/h.m2).
- High light transmittance glazing in façade ( > 60% LT).
- Solar shading devices and solar control glazing within the façade, balancing passive solar control and controlling thermal comfort on the floors.
- Use of thermal mass if possible.
- Relaxing heating and cooling setpoints to 20°C ± 2°C and 26°C ± 2°C respectively.
- Mechanical Ventilation with Heat Recovery to reduce space heating energy demand.

488. Under the ‘Be Clean’ element the Energy Statement identifies that the preliminary assessment of local District Heating Networks (DHN) identified the ThamesWey Energy Centre at Poole Road as a potential connection option for the proposed development. However, it sets out that connection to this network was disregarded at this stage based on the following grounds (among others):

- The Poole Road Energy Centre currently relies on Gas-fired boilers and CHPs, which do not align with the proposed development's goals of achieving a fossil fuel-free and Net Zero Carbon future.
- The use of gas-fired boilers, CHP, and the proximity to the site could reduce carbon savings and possibly put at risk compliance with new Part L 2021 (with 2023 amendments) due to concerns about carbon targets, primary energy targets, and distribution losses.

489. The Energy Statement also sets out (at paragraph 3.3) that *“It is understood that the District Heating Network provider has plans for future development and decarbonization. To future-proof the Development, allocations are to be made to enable future connection to the network if it aligns with the objectives mentioned above and if the connection is technically, environmentally, and financially advantageous.”*

490. The Energy Statement also sets out (at paragraph 3.3) that *“A Part L V2 2021 compliance assessment was carried out to further investigate the impact connecting to a DHN would have in terms of the energy and CO2 emissions on the current proposals. The results for this assessment were compared against the performance of the proposed servicing solutions (dedicated Air Source Heat Pumps)”* and that *“This assessment assumed that the following: DHN to serve the domestic hot water (DHW) requirements of the building (At this stage default CO2 conversion (0.360 kgCO2/kWh) and Primary Energy (1.58 kWh/kWh) factors were used).”*

491. The table on the following page is replicated from the Energy Strategy (Table 4.1 - Result summary DHN Connection study, within that document) and presents a comparison of the buildings emissions rate and primary energy consumption obtained (on the following page):

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	Building Emissions Rate (BER)	Primary Energy
ASHP for DHW (Current proposal)	11.53 kgCO <sub>2</sub> /m <sup>2</sup>	124.85 kWh/m <sup>2</sup>
DHN for DHW (Potential connection to district heating scheme).	67.02 kgCO <sub>2</sub> /m <sup>2</sup>	319.57 kWh/m <sup>2</sup>
Potential impact	+55.49 kgCO <sub>2</sub> /m <sup>2</sup>	+194.72 kWh/m <sup>2</sup>

492. The Energy Statement sets out that *“The results show that the proposed solution achieves significantly lower Building Emission Rate and Primary Energy Consumption when compared to a DHN option”*. As such, it is considered that the applicant has demonstrated that a better alternative for reducing carbon emissions from the proposed development can be achieved in lieu of connecting to the local Combined Heat and Power (CHP) network. However, recommended condition 39 will allow this matter to be re-visited at a later design stage, should planning permission be granted.
493. The ‘Be Green’ section of the Energy Statement evaluates a range of options for on-site renewable energy generation (in order to achieve compliance with the planning and Building Regulations requirements). A low and zero carbon (LZC) technology options assessment has been undertaken within the Energy Statement to evaluate which renewable energy technologies would be feasible in terms of economic, environmental and practical consideration. Photovoltaics (Solar PV) is deemed feasible although at this stage this technology is not recommended for the proposed development due to the small area of un-shaded roof in the proposed development. Solar thermal, wind turbines, biomass boilers / CHP (on-site), fuel cells, and ground to air/water heat pumps (Electric) are all deemed not to be feasible.
494. The Energy Statement sets out that after assessing the feasibility of the different LZC technologies it is proposed to provide all domestic hot water (DHW) requirement through a central Air Source Heat Pump (ASHP) system providing low carbon heat. A high efficiency Hybrid Variable Refrigerant Flow (H-VRF) system is to be included to provide low carbon space heating and comfort cooling to the proposed development.
495. A BREEAM pre-assessment report has also been submitted with the application which identifies that the proposed development could provisionally achieve a maximum BREEAM New Construction rating of 84.83% (which would be just below the BREEAM ‘Outstanding’ threshold of 85%) although that a BREEAM rating of 73.59% is being targeted (this is just above the BREEAM ‘Excellent’ threshold of 70%). It should be noted that BREEAM ‘Very Good’ standard is awarded where the overall BREEAM score/rating is between 55% - 69%. Whilst the stated 73.59% targeted BREEAM score/rating is provisional, at this pre-construction phase, the evidence suggests that there is no reason that at least a (lower) BREEAM score/rating of 55% should not be achieved, which would result in a BREEAM ‘Very Good’ score/rating, in line with the requirement of Policy CS22 of the Woking Core Strategy (2012). Recommended condition 42 refers in respect of BREEAM and recommended condition 40 in respect of potable water use.
496. Overall the details within the Energy Strategy and BREEAM pre-assessment reports are considered to demonstrate compliance with the relevant requirements of Policies CS22 and CS23 of the Woking Core Strategy (2012) and SPD Climate Change (2013). Recommended conditions 39, 40, 41 and 42 can secure the requisite energy and water requirements.



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### **Fire safety**

497. Measures to ensure the consideration of fire safety matters as they relate to land use planning are (from 1 August 2021) incorporated at the planning stage for schemes involving a relevant high-rise residential building. Government made a commitment in 'A reformed building safety regulatory system: government response to the 'Building a Safer Future' consultation' to introduce planning gateway one. Planning gateway one has two key elements:
- to require the developer to submit a fire statement setting out fire safety considerations specific to the development with a relevant application for planning permission for development which involves one or more relevant buildings; and
  - to establish the Health and Safety Executive (HSE) as a statutory consultee for relevant planning applications.
498. A relevant building contains two or more dwellings (or educational accommodation) and meets the height condition of 18 metres or more in height, or 7 or more storeys. A local planning authority is required to consult the HSE before granting planning permission for a relevant building. It must be noted that the fire safety matters contained in a fire statement are relevant only to the extent they are relevant to land use planning and therefore the level of detail and focus of information is not meant to contain the breadth and depth of information on fire safety which will be submitted at building control stage (and local planning authorities are not responsible for any building regulation matters or for the enforcement of building control requirements).
499. The proposed development is for a relevant building and therefore the application has been submitted with an outline fire safety strategy report and a fire statement. The Health and Safety Executive (HSE), as the statutory consultee for developments that include a relevant building, comment that *"Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations"*.
500. Surrey Fire and Rescue Service (SFRS) have been consulted on the application albeit have not submitted any comments. However, SFRS are not a statutory consultee on fire safety matters (for planning application purposes) and thus have no obligation to submit any comments at this stage. The overriding consideration, for planning decision-making purposes, is that the HSE (the statutory consultee for developments that include a relevant building) is content with the fire safety design of the proposed development, to the extent that it affects land use planning considerations.

### **Aviation**

501. The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction (2002) identifies two officially safeguarded aerodromes within 20km of the site; London Heathrow, which has been consulted and has provided no comments, and Farnborough Airport, which has confirmed that they have no objection (albeit request early engagement on the use of cranes, recommended informative 24 refers). The National Air Traffic Services (NATS) have confirmed that they have no safeguarding objection to the proposed development. Fair Oaks Airport have also confirmed that they have assessed the application against safeguarding criteria and have no safeguarding objections to the proposed development. For the preceding reasoning it is concluded there are no adverse aviation implications to the proposed development.

**LOCAL FINANCE CONSIDERATIONS**

502. The Council's CIL Charging Schedule (2014) states (at paragraph 3.19 / Table 3) that:

*"For the purposes of the Charging Schedule 'residential' means:*

*Use as a dwellinghouse (whether or not a main residence) by:*

- (a) A single person or by people to be regarded as forming a single household;*
- (b) Not more than six residents living together as a single household where care is provided for residents; or*
- (c) Not more than six residents living together as a single household where no care is provided to residents (other than use within Class C4)*

*Use of a dwelling house by 3 – 6 residents as a 'house in multiple occupation'"*

503. The preceding definitions reflect those for Use Class C3 (Dwellinghouses) and Use Class C4 (Houses in multiple occupation) within The Town and Country Planning (Use Classes Order) 1987 (as amended). In this particular instance the co-living component of the proposed development is *sui generis* and thus does not fall within the preceding definition of 'residential', as set out within the Council's CIL Charging Schedule (2014). The co-living component of the proposed development is therefore not liable for Community Infrastructure Levy (CIL).
504. Whilst the proposed Commercial, Business & Service (Class E) floorspace (at ground floor level) would be CIL liable (because it would be capable of being used for retail, former Class A1, purposes) the CIL Regulations 2010 (as amended) enable the existing floorspace to be demolished to be taken into account (providing the building, or part of the building, has been occupied for its lawful use for 6 continuous months of the previous 36 months, excluding temporary permissions). Because the existing Class E floorspace is larger than that which would be provided within the proposed development the CIL liability for the proposed Class E floorspace would be Nil.

**CONCLUSION AND PLANNING BALANCE**

505. The planning application is Environmental Impact Assessment development. Officers have taken account of the environmental information in their consideration and conclusions.
506. Overall, the proposed development would result in a high quality mixed use (albeit residential-led) development on part of an allocated site which is located centrally within Woking Town Centre (the principal centre of the Borough), this being the preferred location for town centre uses and high density residential development. Woking Town Centre is the most sustainable centre of the Borough and one which the Development Plan identifies to undergo significant change.
507. The proposed development would provide for active ground floor uses and closely aligns with national and local planning policy which seek to make the best use of urban land in the most sustainable locations such as this (in this case within very close proximity to Woking railway station), thus promoting travel by active means and by public transport, helping to reduce the use of private cars and to create sustainable communities. The proposed development would deliver a high quality, well designed building, the result of an iterative design-led process, which has had particular regard to the relevant built heritage considerations and to the existing and emerging townscape of Woking Town Centre. The proposed development would contribute significantly to the prosperity and

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functionality of Woking Town Centre, adding to its attractiveness and competitiveness, with the resulting additional residential population in particular adding to the vitality, and social, community and economic vibrancy, of this principal centre of the Borough and important centre in the wider region.

508. It has been identified that No.14 High Street would sustain high levels of reduction in daylight, as a result of the proposed development. However, these high levels of daylight reductions would be isolated to one building, and to three rooms within it. All other neighbouring amenity impacts which would arise from the proposed development would comply with Development Plan policy, and other material considerations, in all other respects. It is also a material consideration that No.14 High Street is located within an urban block which is allocated, by Policy UA6 of the Site Allocations DPD (2021), for *“mixed use development to comprise of residential including affordable housing, retail and offices”* (i.e., for at least 50 net additional dwellings, at least 400 sq.m net additional office floor space (2,000 sq.m gross) and retail floor space). As such, there is a strong possibility that No.14 High Street would be demolished or reconfigured as part of any development which may come forwards in the future to achieve the aims of Policy UA4 of the Site Allocations DPD (2021).
509. The National Planning Policy Framework (NPPF) sets out, at paragraph 200, that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. It has been identified that the proposed development would result in a low level of ‘less than substantial’ harm (i.e., below the middle of the ‘less than substantial harm’ spectrum) to the significance of the Woking Town Centre Conservation Area. Nonetheless, paragraph 199 of the NPPF makes clear that when considering the impact of a proposal on the significance of a designated heritage asset (which includes a Conservation Area) great weight should be given to the asset’s conservation. Therefore this low level of ‘less than substantial’ harm must nonetheless be afforded considerable weight and importance.
510. The proposed development incorporates measures to minimise and/or mitigate the heritage harm where possible. Paragraph 202 of the NPPF, regarding ‘less than substantial harm’ is, therefore, engaged, it states that under these circumstances, any such harm should be weighed against the *“public benefits”* of the proposals, including where appropriate securing the optimum viable use of the asset(s). Having regard to paragraph 199 of the NPPF the exercise under paragraph 202 of the NPPF is not an even balance and it has been undertaken, to inform this recommendation, accordingly.
511. Paragraph 203 of the NPPF is also engaged, which requires the effect of an application on the significance of a non-designated heritage asset to be considered in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement is required, having regard to the scale of any harm or loss and the significance of the heritage asset. The proposed development would cause a low level of harm to the local heritage significance of Nos.3-5 High Street (located within the site) and locally listed Nos.1-2 High Street, and Nos.13-14 High Street (located immediately adjacent to and proximate to the site).
512. The PPG states that *“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset*

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*could be a public benefit.*" (Paragraph: 020 Reference ID: 18a-020-20190723, Revision date: 23 07 2019).

513. In this instance, the public (and heritage) benefits of the proposed development would be considerable and can be summarised as follows:

- Preservation and celebration of the historic presence and fine grain of the buildings through the retention of the front elevations of Nos.3-5 High Street and the rebuilding of Nos.6-7 High Street. The proposed development will reinstate appropriate ground level High Street frontages for these units in line with the traditional character of the Woking Town Centre Conservation Area. The preceding will create a 'new' High Street frontage which will create an architecturally rich and vibrant contribution to the local area. Through reflecting the existing grain and incorporating a high quality of detail, the proposals will retain the most strongly contributing elements to the significance of the Woking Town Centre Conservation Area within the site. The proposed development will take opportunities to better reveal that contribution through works of repair and reinstatement of lost features and reinstate a traditional high street character through high-quality shopfronts;
- Re-creation of the High Street, creating what an impartial observer would expect of a traditional High Street, not just in terms of the architectural approach but by creating an attractive, activated area which will draw people to use it;
- Improved physical and built environment at a key arrival point to Woking Town Centre, adjacent to Woking railway station. Regeneration of a rather neglected previously developed site, which is part of an area identified for redevelopment by adopted Development Plan policy, Policy UA4 of the Site Allocations DPD (2021);
- Provision of x329-units of co-living accommodation, a form of residential accommodation which is not currently provided for in Woking Town Centre (or indeed within Woking Borough) which the application demonstrates to be appropriate to meet local needs, and which will provide a greater range and choice of housing types for those seeking to live in Woking and the provision of which may well assist in releasing houses-in-multiple occupation (HMO) back into the general (family) housing stock. The quality of communal and amenity spaces provided within the proposed development would make it more attractive to potential occupiers when compared to more traditional flat/house share arrangements;
- Provision of 10% of co-living units [33 no. units] at a discounted rate of 80% of the market unit rent (i.e., constitutes affordable housing);
- Creation of a new residential community which will contribute to the wider social and economic vitality and well-being of Woking Town Centre. The increased residential population in this sustainable Woking Town Centre location will create linked benefits to shops, services and business in the wider Town Centre due to increased spending and footfall arising from new residents;
- Creation of new, purpose-designed Commercial, Business & Service (Class E) floorspace which could provide a new home for The Lighthouse, allowing them to continue their important work supporting the local community, from the site;

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- Creation of an almost car free development (car club and Accessible parking spaces only) supporting ambitions for active travel, fitness and well-being, within a highly sustainable Woking Town Centre location;
- Direct benefits in terms of job creation and investment from the construction and operational phases;
- Due to the proposed SuDS scheme, there will be a significant reduction in the existing surface water discharge rates from the site; and
- A net gain of 1.38 biodiversity units associated with area-based habitats from pre-development levels, corresponding to a total net increase of 100% in ecological value.

514. This is a case (as with most large-scale Major development) where there are competing national and local planning policy objectives that pull in different directions. Although there are some reservations about the impact of the proposed development on the Woking Town Centre Conservation Area, these reservations are relatively limited in extent and must be weighed against the very substantial (public and heritage) benefits which would flow from the proposed development, as well as taking into account that the site forms part of a wider area which is allocated for development by Policy UA4 of the Site Allocations DPD (2021), which forms part of the Development Plan. As such, it is concluded that the substantial benefits would outweigh the limited harms which have been identified. The proposed development would therefore accord with the Development Plan when taken as a whole and it is therefore recommended that planning permission should be granted (subject to the recommendation set out within this report).

### **SECTION 106 LEGAL AGREEMENT REQUIREMENTS**

- Co-living accommodation, including submission of, and operation in compliance with, a Co-living management plan, which must include (but not be limited to):
  - Length of tenancy agreements;
  - That each private co-living room must have only x1 tenant; and
  - Management of communal internal and external co-living amenity spaces.
- 10% of co-living units [33 no. units] to be provided at a discounted rate of 80% of the market unit rent.
- Highway / public realm works - requirement to enter into Section 278 agreement(s) with the County Highway Authority (Surrey County Council) to secure the carrying out of highway / public realm works, including:
  - alterations to the existing lay-bys on High Street; and
  - the introduction of street-trees within planters.
- Car Club - x1 parking space in the lay-by on High Street adjacent to the site will become a Car Club space.
- £392,053.00 Suitable Alternative Natural Greenspace (SANG) (Thames Basin Heaths SPA) financial contribution (including index linking based on RPI annual inflation).

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- £155,570.94 Strategic Access Management and Monitoring (SAMM) (Thames Basin Heaths SPA) financial contribution (including index linking based on RPI annual inflation).

### **BACKGROUND PAPERS**

Site & Press Notices  
Letters of representation  
Consultation responses

### **RECOMMENDATION**

That the Planning Committee resolves to **Grant** planning permission subject to:

1. The prior completion of a Section 106 Legal Agreement to secure the requirements as set out above;
2. Completion of an Appropriate Assessment, supported by Natural England; and
3. Planning conditions set out at the end of this report.

The Planning Committee is also requested to authorise the Development Manager (or their authorised deputies) to take all necessary action(s) in connection with points 1-3 above.

### **Conditions**

#### Time limit

01. The development for which permission is hereby granted must be commenced not later than the expiration of three years beginning with the date of this permission.

Reason: To accord with the provisions of Section 91(1) of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

#### Approved plans

02. The development hereby permitted must be carried out only in accordance with the approved plans listed in this notice, unless where required or allowed by other conditions attached to this planning permission, or by details subsequently approved by the Local Planning Authority pursuant to other conditions:

Drawing No. / Revision.	Drawing Title.	Date.
A3948-ASA-ZZ-ZZ-DR-A-0101 P20	Site Location Plan	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0110 P20	Proposed Alterations/Demolition Plan	29/06/23
<b><i>Proposed Plans</i></b>		
A3948-ASA-ZZ-B1-DR-A-0199 P20	Proposed Basement Plan	29/06/23
A3948-ASA-ZZ-00-DR-A-0200 P20	Proposed Ground Floor Plan	29/06/23
A3948-ASA-ZZ-01-DR-A-0201 P20	Proposed First Floor Plan	29/06/23
A3948-ASA-ZZ-02-DR-A-0202 P20	Proposed Second Floor Plan	29/06/23

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A3948-ASA-ZZ-ZZ-DR-A-0203 P20	Proposed Third-Seventh Floor Plans	29/06/23
A3948-ASA-ZZ-08-DR-A-0204 P20	Proposed Eighth Floor Plan	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0205 P20	Proposed Ninth to Thirteenth Floor Plans	29/06/23
A3948-ASA-ZZ-14-DR-A-0206 P20	Proposed Fourteenth Floor Plan	29/06/23
A3948-ASA-ZZ-15-DR-A-0207 P20	Proposed Fifteenth Floor Plan	29/06/23
A3948-ASA-ZZ-16-DR-A-0208 P20	Proposed Sixteenth Floor Plan	29/06/23
A3948-ASA-ZZ-RP-DR-A-0209 P20	Proposed Roof Plan	29/06/23
<b><i>Proposed Sections</i></b>		
A3948-ASA-ZZ-ZZ-DR-A-0300 P20	Section AA	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0301 P20	Section BB	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0302 P20	Section CC	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0303 P20	Section DD	29/06/23
<b><i>Proposed Elevations</i></b>		
A3948-ASA-ZZ-ZZ-DR-A-0400 P20	Proposed South-East Elevation	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0401 P20	Proposed South-West Elevation	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0402 P20	Proposed North-West Elevation	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0403 P20	Proposed North-East Elevation	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0404 P20	Proposed Site Wide Elevation	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0405 P20	Proposed Detailed Elevation Sheet 1/2	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0406 P20	Proposed Detailed Elevation Sheet 2/2	29/06/23
<b><i>Proposed Details</i></b>		
A3948-ASA-ZZ-ZZ-DR-A-0500 P20	Proposed Details - Bay Study 1	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0501 P20	Proposed Details - Bay Study 2	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0502 P20	Proposed Details - Bay Study 3	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0503 P20	Proposed Details - Bay Study 4	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0510 P20	Proposed Details - Window Detail Study 1	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0511 P20	Proposed Details - Window Detail Study 2	29/06/23
A3948-ASA-ZZ-ZZ-DR-A-0512 P20	Proposed Details - Window Detail Study 3	29/06/23

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<b><i>Landscape Plans</i></b>		
A3948-ASE-ZZ-02-DR-L-0100 P4	Landscape Proposals Second Floor Plan	29/06/23
A3948-ASE-ZZ-03-DR-L-0101 P4	Landscape Proposals Third Floor Plan	29/06/23
A3948-ASE-ZZ-08-DR-L-0102 P4	Landscape Proposals Eighth Floor Plan	29/06/23
A3948-ASE-ZZ-14-DR-L-0103 P4	Landscape Proposals Fourteenth Floor Plan	29/06/23
A3948-ASE-ZZ-15-DR-L-0104 P4	Landscape Proposals Fifteenth Floor Plan	29/06/23
A3948-ASE-ZZ-16-DR-L-0105 P4	Landscape Proposals Sixteenth Floor Plan	29/06/23
A3948-ASE-ZZ-RP-DR-L-0106 P4	Landscape Proposals Roof Plan	29/06/23

Reason: To ensure the development is carried out in accordance with the planning permission and to ensure that the development that is carried out is that which has been assessed.

### Levels

03. The development hereby permitted must be carried out only in accordance with the proposed finished floor levels and proposed finished ground levels as shown on the approved plans listed within condition 02 of this notice.

Reason: In the interests of visual amenity of the site and surrounding area, including the Woking Town Centre Conservation Area, in accordance with Policies CS20, CS21 and CS24 of the Woking Core Strategy (2012), Policy DM20 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

### External materials

04. ++ An external facing material must not be installed and/or applied to the development hereby permitted until samples and full particulars of that external facing material have been submitted to and approved in writing by the Local Planning Authority. Details submitted pursuant to this condition must include but not be restricted to:
- a) Mock-up panels of no less than 1 metre by 1 metre of each external cladding material. Details of external cladding, where relevant, must include all types of brick or other cladding material (i.e., render / stone, metal) to be used, details of bond, mortar and pointing for brick and details of joints, panel sizes and fixing method for other types of cladding. If an off-site manufactured cladding system is to be used, the full details of the system must be provided, and the sample panel must include at least one junction between pre-assembled panels of each cladding type;
  - b) Samples of fenestration;
  - c) Details and samples of roofing (including slate roofing);
  - d) Details of terraces and associated balustrades and soffits;



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- e) Details and samples of external rainwater goods, flues, grilles, louvres and vents; and
- f) Details of external plant, plant enclosures and safety balustrades; and
- g) 1:50 scale drawings of rooftop layout, showing plant, machinery and building services equipment required for the functioning of the building.

The details must accord with the type and quality of materials indicated within the application. The development must thereafter be carried out and permanently maintained in accordance with the approved details.

Reason: In the interests of visual amenity of the site and surrounding area, including the Woking Town Centre Conservation Area, in accordance with Policies CS20, CS21 and CS24 of the Woking Core Strategy (2012), Policy DM20 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

### Aerials/ pipework etc

05. Notwithstanding The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any equivalent Order(s) revoking and/or re-enacting and/or modifying that Order with or without modification(s)), no cables, wires, aerials, pipework (except for the rainwater goods as shown on the approved plans listed within condition 02 of this notice) meter boxes or flues must be fixed to any elevation of the building hereby permitted without the prior written consent of the Local Planning Authority. Any such works must be undertaken only in accordance with the approved details and thereafter permanently maintained for the lifetime of the building.

Reason: In the interests of visual amenity of the site and surrounding area, including the Woking Town Centre Conservation Area, in accordance with Policies CS20, CS21 and CS24 of the Woking Core Strategy (2012), Policy DM20 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

### Hard and soft landscape

06. ++ The overall concept, layout, extent and type of hard and soft landscaping for the development hereby permitted (including to all of the roof terraces) must generally accord with the approved plans listed within condition 02 of this notice (and must have regard to the approved surface water drainage scheme). Prior to the commencement of any superstructure works details of the hard and soft landscaping scheme must first be submitted to and approved in writing by the Local Planning Authority. The submitted details must include:
- a) full details of all proposed tree planting, including planting and maintenance specifications, including cross-section drawings, details of tree planter size and design, and confirmation of location, species and sizes;
  - b) soft planting, shrubs and herbaceous areas detailing species, sizes and numbers/densities;
  - c) specifications for operations associated with plant establishment and maintenance that are compliant with best practice;
  - d) enclosures including type, dimensions and treatments of any balustrades, walls, fences, screen walls, and railings;

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- e) hard landscaping, including samples and specifications of all ground and roof terrace surface materials, kerbs, edges, steps and any synthetic surfaces;
- f) any other landscaping features forming part of the scheme, including any associated outdoor structures;
- g) a landscape management plan for the public and private areas to include a maintenance schedule for all landscaped areas.

All landscaping must be completed/planted in accordance with the approved details prior to the first occupation of the development hereby permitted or in accordance with a programme otherwise first agreed in writing with the Local Planning Authority. All soft landscaping must have a written five year maintenance programme following planting. Any new tree(s) that die(s), are/is removed or become(s) severely damaged or diseased must be replaced and any new planting (other than trees) which dies, is removed, becomes severely damaged or diseased within five years of planting must be replaced. Unless further specific permission has been given by the Local Planning Authority, replacement planting must be in accordance with the approved details.

Reason: In the interests of visual amenity of the site and surrounding area, including the Woking Town Centre Conservation Area, in accordance with Policies CS20, CS21 and CS24 of the Woking Core Strategy (2012), Policies DM2 and DM20 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

### Construction Environmental Management Plan (CEMP)

07. ++ Development must not take place, including any works of demolition, until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP must accord with and give effect to the principles for such a plan proposed in the Environmental Statement (ES) submitted with the application. The CEMP must include the following matters:
- a. Contractors' access arrangements for vehicles, plant and personnel including the location of construction traffic routes to, from and within the site, details of their signing, monitoring and enforcement measures, along with location of parking for contractors and construction workers;
  - b. Delivery and collection times for demolition and construction;
  - c. Hours of working on the site;
  - d. Dust management - measures to control the emission of dust/dirt during demolition and construction including wheel washing and measures to control dust/dirt on the public highway by providing a Dust Management Plan;
  - e. Measures to control noise and vibration during demolition and construction and the use of best practical means to minimise noise and vibration disturbance from works;
  - f. Measures to prevent ground and water pollution from contaminants on site/a scheme to treat and remove suspended solids from surface water run-off during construction, including the use of settling tanks, oil interceptors and bunds;
  - g. Soil management measures;
  - h. Details of any temporary lighting to be used for demolition/construction purposes including confirmation from the project Ecologist that the temporary lighting would not be harmful to the ecology of the site and measures for monitoring of such lighting;

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- i. Site fencing/hoarding and security measures;
- j. The prohibition of burning of materials and refuse on site;
- k. Management of materials and waste;
- l. External safety and information signing and notices;
- m. Liaison, consultation and publicity arrangements including dedicated points of contact and contact details;
- n. Complaints procedures, including complaints response procedures;
- o. Access and protection arrangements around the site for pedestrians, cyclists and other road users including temporary routes;
- p. Procedures for interference with public highways, permanent and temporary realignment, diversions and road closures; and
- q. Construction management plan for surface water run-off during the construction period.

Development must be carried out only in accordance with the approved Construction Environmental Management Plan (CEMP).

Reason: To ensure the proposed development does not prejudice the amenities of occupiers of adjoining properties and in the interests of highway and pedestrian safety and to protect the environmental interests and the amenity of the area and to comply with Policies CS7, CS9 and CS21 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF). This condition is required to be addressed prior to commencement in order that the ability to discharge its requirement is not prejudiced by the carrying out of building works or other operations on the site.

### Highways / Transport

08. ++ No part of the development hereby permitted must be first occupied unless and until the proposed vehicular access to Chapel Street has been constructed and provided with a means within the private land of preventing private water from entering the highway, visibility zones in accordance with a scheme to first be submitted to and approved in writing by the Local Planning Authority. Thereafter the vehicular access must be permanently maintained for the lifetime of the development hereby permitted and the visibility zones must be kept permanently clear of any obstruction over 1.05m high.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Policy CS18 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF).

09. ++ The development hereby permitted must not be first occupied unless and until 2 disabled parking spaces, including passive EV charging facilities, have been laid out in accordance with a scheme to first be submitted to and approved in writing by the Local Planning Authority. Thereafter the 2 disabled parking spaces must be permanently maintained for the lifetime of the development hereby permitted unless replaced with a more advanced technology achieving the same objective.

Reason: In order that suitable provision for on-site car parking and for electric vehicle charging points is made in accordance with Policy CS18 of the Woking Core Strategy (2012), SPDs Parking Standards (2018) and Climate Change (2014) and the National Planning Policy Framework (NPPF).

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10. ++ The development hereby permitted must not be first occupied unless and until the proposed delivery bay, car club space, and disabled parking alterations to the existing parking restrictions on High Street and the associated Traffic Regulation Orders have been designed, and implemented at the applicant's expense, in accordance with a scheme to first be submitted to and approved in writing by the Local Planning Authority. Thereafter the delivery bay and car club space must be permanently maintained for the lifetime of the development hereby permitted.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users, and to encourage travel by means other than the private car, in accordance with Policy CS18 of the Woking Core Strategy (2012), SPD Parking Standards (2018) and the National Planning Policy Framework (NPPF).

11. ++ a) The development hereby permitted must not be first occupied unless and until the cycle parking has been constructed in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority. The approved scheme must be for a total minimum of x98 cycle parking spaces (x82 of which will be for resident owned cycle parking) with the remaining x16 cycle parking spaces occupied by a variety of bicycles, including foldable and electric, that residents would be able to use for free through a cycle loan scheme) internally within the development and for a further x4 cycle parking spaces within the external landscaping areas of the development. The submitted scheme must include:

- details on how the cycle spaces and access to cycle stores will be managed and enforced;
- details of the design and materials of cycle stands/storage;
- details of the number and type of cycles to be provided for residents to use for free through a cycle loan scheme and the details of operation of the cycle loan scheme; and
- details of CCTV and lighting for the cycle storage area and for the access/egress route to and from the cycle storage area from Chapel Street.

The cycle storage approved under this condition must be installed and made available for use prior to the first occupation of any residential (co-living) unit and must be permanently retained at all times for cycle storage only and must not be used for any other purpose(s).

b) Monitoring surveys must be undertaken every twelve (12) months from the date of first occupation of the residential (co-living) component of the development hereby permitted for a period of three (3) years to confirm cycle parking usage against supply, with the survey methodology to be agreed in writing by the Local Planning Authority prior to first occupation of the development. If the threshold of 80% occupancy of cycle parking is reached a scheme for additional cycle loan scheme spaces (including quantum, location, access) must be submitted to and approved in writing by the Local Planning Authority within six (6) months. The approved scheme must be implemented within six (6) months of the date of the scheme being approved and thereafter must be permanently retained and maintained for the lifetime of the development in accordance with the agreed scheme.

Reason: To encourage travel by means other than the private car in accordance with Policy CS18 of the Woking Core Strategy (2012), SPD Parking Standards (2018) and the National Planning Policy Framework (NPPF).

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12. ++ Development must not commence, including demolition, until a Construction Transport Management Plan (CTMP) has been submitted to and approved in writing by the Local Planning Authority. The CTMP must include details of:
- a. loading and unloading of plant and materials within the site and/or to/from the public highway;
  - b. storage of plant and materials within the site and/or on the public highway;
  - c. provision of any boundary hoarding on the public highway frontage(s) of the site;
  - d. the routing of heavy goods vehicles to/from the site;
  - e. measures to prevent the deposit of earth or other construction-related materials from the site onto the public highway;
  - f. turning of heavy goods vehicles; and
  - g. any proposed temporary occupation of the public highway, associated with the construction of the development together with proposals to temporarily divert public highway users during any such highway occupation.

Development must be carried out only in accordance with the approved Construction Transport Management Plan (CTMP).

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Policy CS18 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF). This condition is required to be addressed prior to commencement in order that the ability to discharge its requirement is not prejudiced by the carrying out of building works or other operations on the site.

13. ++ Prior to the first occupation of the development hereby permitted a Service and Deliveries Management Plan (SDMP), for the residential (co-living) and commercial, business & service (Class E) floorspace must be submitted to and approved in writing by the Local Planning Authority. The SDMP must include (but not be limited to) details of:
- a. details of the parcel drop facilities and its management;
  - b. maximum delivery and service vehicle sizes;
  - c. management of deliveries entering the High Street's bus and authorised access zone;
  - d. key staff to manage delivery and serving activity;
  - e. monitoring of delivery and servicing activity; and
  - f. refuse and/or recycling collection procedure.

Development must be carried out in accordance with the approved Service and Deliveries Management Plan (SDMP).

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Policy CS18 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF).

14. ++ The development hereby permitted must not be first occupied unless and until the following facilities have been provided in accordance with a scheme first to be submitted to and approved in writing by the Local Planning Authority for:

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- a. Travel Statement which includes an Information Pack to be provided to residents regarding the availability of and whereabouts of local public transport / walking / cycling / car sharing clubs / car clubs; and
- b. The provision of 1 car club space within the adjacent section of High Street.

Development must be carried out only in accordance with the approved Sustainable Travel Plan (STP).

Reason: To encourage travel by means other than the private car in accordance with Policy CS18 of the Woking Core Strategy (2012), SPD Parking Standards (2018) and the National Planning Policy Framework (NPPF).

### Air quality

15. The primary source(s) of energy for the residential (co-living) element of the development must be Air Source Heat Pumps (ASHPs) and/or a Hybrid Variable Refrigerant Flow (H-VRF) system unless otherwise first agreed in writing by the Local Planning Authority. If ASHP and/or H-VRF are not to provide the main source of energy for the residential (co-living) element of the development for any reason, additional future air quality modelling in respect of an alternative energy source must first be submitted to and approved in writing by the Local Planning Authority in order to ensure that there are no significant adverse air quality impacts. The development must thereafter be permanently maintained in accordance with any such approved details.

Reason: To ensure no adverse impact upon air quality in accordance with Policy DM6 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

### Noise

16. ++ a) The residential (co-living) component of the development hereby permitted must be constructed with the window/glazing, insulation, ventilation and other noise insulation measures strictly in accordance with the details specified within the Planning Noise Assessment (Document Reference: WIE18953-100-R-3.1.8\_Noise), Issue 01, dated June 30<sup>th</sup>, 2023, prepared by Waterman Group, including the proposed mitigation measures.

b) Prior to first occupation of the residential (co-living) units, a Post Completion Verification Report, including acoustic test results, acoustic data for the glazing system and ventilation system to a sample of the residential (co-living) units, and confirming that the relevant maximum noise standards have been complied with must be first submitted to and approved in writing by the Local Planning Authority. Should the report indicate that the relevant maximum noise standards have not been met, the Report must include a Mitigation Scheme detailing measures to remedy the shortfall.

The Post Verification Report and any Mitigation Scheme so approved must be implemented, in full, prior to first occupation of the residential (co-living) units and must be permanently retained as such thereafter for the lifetime of the development.

Reason: To safeguard the residential amenities of future residential occupiers in accordance with Policy CS21 of the Woking Core Strategy (2012), Policy DM7 of

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the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

17. ++ Prior to the commencement of above ground works, excluding demolition, a scheme for the insulation of the private co-living rooms against the transmission of airborne sound and impact sound between these rooms and all communal internal co-living amenity areas, and the Class E floorspace at ground floor level, must first be submitted to and approved in writing by the Local Planning Authority. The approved scheme must be implemented prior to first occupation of the development hereby permitted and thereafter be permanently retained and maintained in accordance with the approved details.

Reason: To safeguard the residential amenities of future residential occupiers in accordance with Policy CS21 of the Woking Core Strategy (2012), Policy DM7 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

18. ++ Prior to the installation of any internal and external plant equipment and trunking, including any heat pump equipment, equipment associated with air moving equipment, compressors, generators, building services plant, ventilation and filtration equipment and any commercial kitchen exhaust ducting/ventilation, full details (including acoustic specifications where relevant) of internal and external plant equipment and trunking, including any heat pump equipment, equipment associated with air moving equipment, compressors, generators, building services plant, ventilation and filtration equipment and any commercial kitchen exhaust ducting/ventilation, must first be submitted to and approved in writing by the Local Planning Authority. The development must thereafter be carried out only in accordance with the approved details and all flues, ducting and other equipment must be installed in accordance with the approved details prior to the use commencing and must thereafter be permanently maintained in accordance with the manufacturers' instructions for the lifetime of the development.

Reason: To safeguard the residential amenities of future residential occupiers in accordance with Policy CS21 of the Woking Core Strategy (2012), Policy DM7 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

19. Sound reproduction equipment which conveys messages, music or other sound by voice or otherwise which is audible outside the development hereby permitted must not be installed on the site without the prior written approval of the Local Planning Authority.

Reason: To safeguard the amenity of the surrounding area and the residential amenities of future occupiers in accordance with Policy CS21 of the Woking Core Strategy (2012), Policy DM7 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

20. ++ a) Prior to the commencement of superstructure works for the development hereby permitted details of:
- the design condition for overheating;
  - how overheating shall be addressed through glazing and ventilation design; and
  - that predicted levels do not lead to unacceptably high levels of noise when glazing and ventilation are operating to prevent overheating

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must be submitted to and approved in writing by the Local Planning Authority. The development must thereafter be permanently maintained in accordance with the approved details for the lifetime of the development.

Reason: To safeguard the residential amenities of future occupiers in accordance with Policy CS21 of the Woking Core Strategy (2012), Policy DM7 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

### External lighting / CCTV etc

21. ++ Before the development hereby permitted is first occupied or brought into use, the following details on or around the building must first be submitted to and approved in writing by the Local Planning Authority:
- any Closed-Circuit Television (CCTV);
  - any General external lighting;
  - any Security lighting; and
  - any Access control measures for residential entrances.

The details must include the location and specification of all lamps, light levels/spill, illumination, close circuit television cameras (including view paths) and support structures including type, materials and manufacturer's specifications. The details must include an assessment of the impact of any such lighting on the surrounding residential environment and the environment of Woking Town Centre. Development must be carried out in accordance with the approved details before the first occupation or use and must be retained and maintained in accordance with the manufacturer's instructions for the lifetime of the development.

Reason: To protect the general environment, the amenities of the area, the residential amenities of neighbouring and nearby existing and introduced properties and the habitat for bats and other nocturnal animals in accordance with Policies CS7 and CS21 of the Woking Core Strategy (2012), Policy DM7 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

### Refuse / recycling

22. ++ The waste and recycling bin storage areas shown on the approved plans listed within condition 02 of this notice must be provided prior to first occupation of the development and thereafter be made permanently available for the lifetime of the development.

Before the development is first occupied or brought into use, details of the refuse and recycling collection arrangements (including arrangements for bin store access for bin crews, and for bin collection more generally) and a strategy for its management must first be submitted to and approved in writing by the Local Planning Authority. The development must thereafter be carried out in accordance with the approved details and permanently retained thereafter for the lifetime of the development.

Reason: To ensure the provision of satisfactory facilities for the storage and recycling of waste and to protect the general amenity of the area in accordance with



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Policy CS21 of the Woking Core Strategy (2012), SPD Design (2015) and the National Planning Policy Framework (NPPF).

### Biodiversity / ecology

23. The development hereby permitted must be undertaken only in strict accordance with the measures to achieve the Biodiversity Net Gain (BNG) that have been identified within the Biodiversity Net Gain Assessment, dated June 2023, prepared by Greengage, and The Biodiversity Metric 4.0 Calculation Tool. The measures identified to achieve the Biodiversity Net Gain (BNG) include the provision of biodiverse green roof areas, ground based green wall, vegetated garden, introduced shrub, ground level planters and approximately x9 'urban trees' and must be provided in full prior to the first occupation of the development hereby permitted and thereafter be permanently retained and maintained for the lifetime of the development.

Reason: To contribute towards and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity in accordance with Policies CS21 and CS7 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF).

24. ++ All removal of shrubs, scrub or tall herbaceous vegetation must be undertaken between September and February inclusive. If this is not possible then a suitably qualified Ecologist must carry out any inspection of the areas concerned immediately prior to the clearance works (within 5 days) to ensure that no nesting or nestbuilding birds are present. If any nesting birds are present, then the vegetation around the nest must not be removed until an Ecologist confirms that the birds have finished nesting.

If no nesting birds are found, there is no need to report the survey findings to the Local Planning Authority before clearance of vegetation.

Once the site has been cleared, details of measures taken to ensure no nesting birds were harmed must be subsequently submitted to and approved in writing by the Local Planning Authority. This could include that the site has been cleared between the months of September and February; that a survey has been undertaken and no nests were found; or that nests were found, protection measures put in place around the nest(s), and a subsequent survey found that birds were no longer nesting.

Reason: To prevent birds being injured or killed during site works and to comply with Policy CS7 of the Woking Core Strategy (2012), Circular 06/05 Biodiversity and the National Planning Policy Framework (NPPF).

25. Demolition (and partial demolition) work must be undertaken in accordance with the following precautionary method of working unless an alternative precautionary method of working is first submitted to and approved in writing by the Local Planning Authority:
- Prior to any internal or external demolition works commencing on site, all demolition personnel must receive a toolbox talk from a licensed Ecologist regarding bats and their awarded level of protection and places of shelter. The toolbox talk must also include information on how to proceed if a bat is discovered during the course of works;

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- Following the toolbox talk and immediately before to the commencement of works, the bat licenced Ecologist must undertake an internal and external inspection of the buildings to confirm no Potential Roosting Features have formed since the survey date, as well as to confirm the absence of bats from the site;
- Demolition works must take reasonable avoidance measures such as removing roof tiles carefully, checking beneath for the presence of bats before being discarded. A licenced bat worker should carry out a watching brief when critical works are being carried out, such as when tiles and other key roofing components are removed from the roofs;
- Once the most likely areas for bats have been demolished / removed it may not be necessary for an Ecologist to be on site. If the Ecologist is not on site when a bat is found (or suspected to be found), then all work must stop and the bat licenced Ecologist be immediately contacted for further advice; and
- Should bats be discovered at any point during the demolition works all works must cease immediately and the bat licenced Ecologist contacted.

Reason: Whilst the Bat Survey Report has identified the likely absence of active bat roosts within the development site (such that bats do not appear to present a constraint to the proposed development) bats are highly mobile and move roost sites frequently. As such, unidentified bat roosts may still be present on the site and therefore a precautionary approach to works should be implemented to prevent bats being injured or killed during site works and to comply with Policy CS7 of the Woking Core Strategy (2012), Circular 06/05 Biodiversity and the National Planning Policy Framework (NPPF).

26. ++ External lighting must not be installed within the red line of the development hereby permitted (with the exception of any temporary demolition/construction required external lighting) until full details (to include a layout plan with beam orientation and a schedule of equipment in the design (luminaire type, mounting height, aiming angles and luminaire profiles)) and demonstrating compliance with both the recommendations of the BCT & ILP (2023) Guidance Note 08/23. Bats and artificial lighting at night (Bat Conservation Trust, London & Institution of Lighting Professionals, Rugby) (or any future equivalent(s)) and the recommendations of the Institute of Lighting Professionals Guidance Note GN01/21 for The Reduction of Obtrusive Light (2021) (or any future equivalent(s)) have been submitted to and approved in writing by the Local Planning Authority. The external lighting scheme must thereafter be installed and permanently maintained in accordance with the approved details for the lifetime of the development.

Reason: To protect the general environment, the amenities of the area, the residential amenities of neighbouring and nearby existing properties and the adjacent railway corridor habitat for bats and other nocturnal animals. Nocturnal animals, including bats, are sensitive to any increase in artificial lighting of their roosting and foraging places and commuting routes. To accord with Policies CS7 and CS21 of the Woking Core Strategy (2012), Circular 06/05 Biodiversity and Geological Conservation and the National Planning Policy Framework (NPPF).

27. ++ Superstructure works must not commence until full details of biodiversity enhancements have been submitted to and approved in writing by the Local Planning Authority. The biodiversity enhancements across the development must be in accordance with the relevant recommendations of the following reports:
- Preliminary Ecological Appraisal, prepared by Greengage, dated June 2023;

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- BREEAM NC 2018 Ecology Report, prepared by Greengage, dated July 2023;
- Biodiversity Net Gain Assessment, prepared by Greengage, dated June 2023;
- The Biodiversity Metric 4.0 Calculation Tool; and
- Bat Survey Report, prepared by Greengage, dated July 2023.

and must include (as a minimum) the following biodiversity enhancement measures:

- a) incorporation of areas of biodiverse green roof where possible;
- b) provision of log piles, rope coils, hibernacula and rock and sand piles, details of which must include number, locations and type of feature;
- c) provision of raised planting with large planters which will include tree planting;
- d) provision of at least x6 integrated or facade mounted bat boxes, details of which must include number, locations and type of boxes;
- e) provision of at least x2 facade bound triple cavity swift nest boxes, details of which must include number, locations and type of boxes; and
- f) provision of at least x2 habitat panels, insect hotels, bee bricks and bee posts, details of which must include number, locations and type of feature.

The approved biodiversity enhancement measures must be implemented in full prior to the first occupation of the development hereby permitted and must thereafter be permanently retained as such for the lifetime of the development.

Reason: To contribute towards and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity in accordance with Policies CS21 and CS7 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF).

28. ++ The development hereby permitted must not be commenced, other than demolition, until a Landscape and Ecological Management Plan (LEMP) has first been submitted to and approved in writing by the Local Planning Authority. The LEMP must be based on the proposed impact avoidance, mitigation and enhancement measures specified in the Preliminary Ecological Appraisal, prepared by Greengage, dated June 2023, and should include, but not be limited to, the following:

- a) Description and evaluation of features to be managed;
- b) Ecological trends and constraints on site that might influence management;
- c) Aims and objectives of management;
- d) Appropriate management options for achieving aims and objectives;
- e) Prescriptions for management actions, together with a plan of management compartments;
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a 30 year period);
- g) Details of the body or organisation responsible for implementation of the plan;
- h) Ongoing monitoring and remedial measures;
- i) Legal and funding mechanisms by which the long-term implementation of the plan will be secured by the applicant with the management body(ies) responsible for its delivery;
- j) Monitoring strategy, including details of how contingencies and/or remedial action will be identified, agreed, and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

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The LEMP as approved must be carried out concurrently with the development hereby permitted and thereafter be permanently maintained for the lifetime of the development.

Reason: In the interests of biodiversity and to protect the general amenity and character and appearance of the locality in accordance with Policies CS7, CS17, CS21 and CS24 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF).

### TBH SPA

29. ++ No residential (co-living) development within the development hereby permitted must commence pursuant to this planning permission until written confirmation has first been obtained from the Local Planning Authority that Suitable Alternative Natural Green Space (SANGS) has been secured for the residential (co-living) development and no co-living unit hereby permitted must be first occupied before written confirmation has been obtained from the Local Planning Authority that the works required to bring the land up to acceptable SANGS standard for the development have been completed.

Reason: To accord with The Conservation of Habitats and Species Regulations 2017 (as amended), saved policy NRM6 of the South East Plan (2009), Policies CS8 and CS17 of the Woking Core Strategy (2012), the Updated Thames Basin Heaths Avoidance Strategy (February 2022) and the National Planning Policy Framework (NPPF).

### Water management (SuDS) (LLFA)

30. ++ Prior to the commencement of the development hereby permitted, other than demolition, details of the design of a surface water drainage scheme must first be submitted to and approved in writing by the Local Planning Authority. The submitted surface water drainage scheme design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, National Planning Policy Framework (NPPF) and Ministerial Statement on SuDS. The required drainage details must include:
- a) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+45% allowance for climate change) storm events during all stages of the development. If infiltration is deemed unfeasible, associated discharge rates and storage volumes must be provided using a maximum discharge rate equivalent to the pre-development Greenfield run-off including multifunctional sustainable drainage systems;
  - b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). Confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times;

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- c) A plan showing exceedance flows (i.e., during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk;
- d) Details of drainage management responsibilities and maintenance regimes for the drainage system; and
- e) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the SuDS design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site in accordance with Policies CS9 and CS16 of the Woking Core Strategy (2012), the national Non-Statutory Technical Standards for SuDS, the National Planning Policy Framework (NPPF) and the Ministerial Statement on SuDS. This condition is required to be addressed prior to commencement (other than demolition) in order that the ability to discharge its requirement is not prejudiced by the carrying out of building works or other operations on the site.

31. ++ Prior to the first occupation of the development hereby permitted, a surface water drainage verification report, prepared out by a qualified drainage engineer, must be submitted to and approved by the Local Planning Authority. This verification report must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

Reason: To ensure the constructed design meets the national Non-Statutory Technical Standards for SuDS and does not increase flood risk on or off site in accordance with Policies CS9 and CS16 of the Woking Core Strategy (2012), the national Non-Statutory Technical Standards for SuDS, the National Planning Policy Framework (NPPF) and the Ministerial Statement on SuDS.

### Thames Water

32. ++ The development hereby permitted must not be first occupied until written confirmation has been submitted to and approved in writing by the Local Planning Authority that either:
- 1. Foul water capacity exists off site to serve the development hereby permitted;
  - 2. A development and infrastructure phasing plan has been agreed with the Local Planning Authority in consultation with Thames Water. Where a development and infrastructure phasing plan are agreed, no occupation must take place other than in accordance with the agreed development and infrastructure phasing plan; or
  - 3. All Foul water network upgrades required to accommodate the additional flows from the development hereby permitted have been completed.

Reason: Foul water network reinforcement works may be required to accommodate the development hereby permitted. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents in

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accordance with Policy CS16 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF).

33. ++ The development hereby permitted must not be first occupied until written confirmation has been submitted to and approved in writing by the Local Planning Authority that either:
1. Surface water capacity exists off site to serve the development hereby permitted;
  2. A development and infrastructure phasing plan has been agreed with the Local Planning Authority in consultation with Thames Water. Where a development and infrastructure phasing plan are agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan; or
  3. All Surface water network upgrades required to accommodate the additional flows from the development hereby permitted have been completed.

Reason: Surface water network reinforcement works may be required to accommodate the development hereby permitted. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents in accordance with Policy CS16 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF).

34. ++ Any piling must not take place pursuant to the development hereby permitted until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must thereafter be undertaken only in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure and piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. This condition is required by Policy CS16 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF).

### Land contamination

35. ++ Prior to the commencement of the development hereby permitted, other than demolition, a contaminated land site investigation and risk assessment, undertaken in accordance with the approved site investigation proposal (within the Phase 1 Desk Study Report A3948 High Street Woking), dated 12.07.2023, Revision: 01, prepared by Walsh), that determines the extent and nature of contamination on site and reported in accordance with the current best practice and guidance such as Land Contamination Risk Management (LCRM) and British Standard BS 10175, must be submitted to and approved in writing by the Local Planning Authority (including any additional requirements that the Local Planning Authority may specify). If applicable, ground gas risk assessments must be completed in line with CIRIA C665 guidance.

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Reason: To address any potential land contamination and make the land suitable for the development hereby permitted without resulting in risk to construction workers, future users of the land, occupiers of nearby land and the environment generally in accordance with Policy DM8 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF). This condition is required to be addressed prior to commencement (other than demolition) in order that the ability to discharge its requirement is not prejudiced by the carrying out of building works or other operations on the site.

36. ++ Prior to the commencement of the development hereby permitted, other than demolition, a detailed remediation method statement must be submitted to and approved in writing by the Local Planning Authority (including any additional requirements that the Local Planning Authority may specify). The remediation method statement must detail the extent and method(s) by which the site is to be remediated, to ensure that unacceptable risks are not posed to identified receptors at the site and must detail the information to be included in a validation report. The remediation method statement must also provide information on a suitable discovery strategy to be utilised on site should contamination manifest itself during site works that was not anticipated. The Local Planning Authority must be given a minimum of two weeks written prior notice of the commencement of the remediation works on site. The development must then be undertaken in accordance with the approved details.

Reason: To address any potential land contamination and make the land suitable for the development hereby permitted without resulting in risk to construction workers, future users of the land, occupiers of nearby land and the environment generally in accordance with Policy DM8 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF). This condition is required to be addressed prior to commencement (other than demolition) in order that the ability to discharge its requirement is not prejudiced by the carrying out of building works or other operations on the site.

37. ++ Prior to the first occupation of the development hereby permitted, a remediation validation report for the site must be submitted to and approved in writing by the Local Planning Authority. The report must detail evidence of the remediation, the effectiveness of the remediation carried out and the results of post remediation works, in accordance with the approved remediation method statement and any addenda thereto, so as to enable future interested parties, including regulators, to have a single record of the remediation undertaken at the site. Should specific ground gas mitigation measures be required to be incorporated into the development hereby permitted the testing and verification of such systems must have regard to current best practice and guidance for the design of protective measures for methane and carbon dioxide ground gases for new buildings.

Reason: To address any potential land contamination and make the land suitable for the development hereby permitted without resulting in risk to construction workers, future users of the land, occupiers of nearby land and the environment generally in accordance with Policy DM8 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

38. Contamination not previously identified by the site investigation, but subsequently found to be present at the site must be reported to the Local Planning Authority as soon as is practicable. If deemed necessary development must cease on site until an addendum to the remediation method statement, detailing how the unsuspected

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contamination is to be dealt with, has been submitted to and approved in writing to the Local Planning Authority (including any additional requirements that the Local Planning Authority may specify). The development must then be undertaken only in accordance with the approved details. Should no further contamination be identified then a brief comment to this effect must be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted.

Reason: To address any potential land contamination and make the land suitable for the development hereby permitted without resulting in risk to construction workers, future users of the land, occupiers of nearby land and the environment generally in accordance with Policy DM8 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

### Energy and water

39. ++ Superstructure works must not take place until a revised Energy Statement has been submitted to and approved in writing by the Local Planning Authority. The revised Energy Statement must detail further consideration/exploration (following further engagement between the developer and a CHP network operator) of the possibility for connection of the development hereby permitted to the local Combined Heat and Power (CHP) network. Thereafter the construction of the development must only be carried out in accordance with the approved details.

Reason: To ensure that the development achieves a high standard of sustainability and makes efficient use of resources in accordance with Policy CS22 of the Woking Core Strategy (2012), SPD Climate Change (2014) and the National Planning Policy Framework (NPPF).

40. ++ Superstructure works must not take place until a copy of the water efficiency calculator for new dwellings from Building Regulations Approved Document Part G has been submitted to and approved by the Local Planning Authority for each co-living unit type with a unique sanitary ware and water-consuming appliances specification. The document must demonstrate that each co-living unit will achieve water use of not more than 110 litres per person per day (including a 5 litre per person per day allowance for external water use) in line with the optional requirements of Approved Document G. The calculator tools must be accompanied by specification documents demonstrating the water consuming fittings and fixtures which have been specified within the co-living units in order to achieve the calculated water use.

Reason: To ensure that the development achieves a high standard of sustainability and makes efficient use of potable water resources in accordance with Policy CS22 of the Woking Core Strategy (2012), SPD Climate Change (2014) and the National Planning Policy Framework (NPPF).

41. ++ Superstructure works must not take place until full details of the Air Source Heat Pumps (ASHP), or any such alternative energy source as previously agreed in writing by the Local Planning Authority (including manufacturer's specifications, acoustic properties and location) to serve the building have been submitted to and approved in writing by the Local Planning Authority. Such approved details must be installed prior to the first occupation of the building and thereafter be permanently maintained and operated for the lifetime of the building unless otherwise first agreed in writing by the Local Planning Authority.



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Reason: To ensure that the development achieves a high standard of sustainability and makes efficient use of resources in accordance with Policy CS22 of the Woking Core Strategy (2012), SPD Climate Change (2014) and the National Planning Policy Framework (NPPF).

42. ++ The non-residential unit(s) (i.e., Class E unit(s)) of the development hereby permitted must achieve a minimum post construction BREEAM 2021 (version 6) (shell and core) rating of at least 'Very Good' (or such equivalent national measure of sustainable building which replaces that scheme). Within 3 months of the completion of the development a final Certificate confirming that the development has achieved a BREEAM rating of at least 'Very Good' (or such equivalent national measure of sustainable building which replaces that scheme) must be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the development achieves a high standard of sustainability and makes efficient use of resources in accordance with Policy CS22 of the Woking Core Strategy (2012), SPD Climate Change (2014) and the National Planning Policy Framework (NPPF).

### Communal facilities / amenity spaces

43. No co-living unit must be first occupied until all of the communal facilities / amenity space provision associated within the development hereby permitted are available for use in accordance with the approved plans listed within condition 02 of this notice. These communal facilities / amenity spaces include (on the approved plans listed within condition 02 of this notice) the indoor first floor areas labelled as 'Gym', 'Wellness studio', 'Laundry Room', 'Library/Co-working', 'Private dining', and 'Cinema room', the eighth floor area labelled as 'Communal Kitchen and Dining Room', the sixteenth floor area labelled as 'Lounge' and the roof terraces at eighth floor, fifteenth floor and sixteenth floor. Thereafter the communal facilities and roof terraces must be permanently maintained for the lifetime of the development hereby permitted and made available to co-living occupiers at all reasonable times.

Reason: To ensure a good standard of residential amenity in accordance with Policy CS21 of the Woking Core Strategy (2012), SPD Outlook, Amenity, Privacy and Daylight (2022) and the National Planning Policy Framework (NPPF).

44. Notwithstanding the provisions of Article 3 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any orders amending or re-enacting that Order, or superseding equivalent Order(s), with or without modification(s)), other than where identified as such on the approved plans listed within condition 02 of this notice the flat roof areas of the development hereby permitted must not be used as a roof terrace, sitting out area or similar amenity area.

Reason: In order to protect adjoining and nearby properties from overlooking and noise in accordance with Policy CS21 of the Woking Core Strategy (2012), Policy DM7 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

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### Telecoms equipment

45. Notwithstanding the provisions of Schedule 2 of The Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any orders amending or re-enacting that Order(s), or superseding equivalent Order, with or without modification(s)), the following development must not be undertaken without prior specific express planning permission in writing from the Local Planning Authority:

The installation of any structures or apparatus for purposes relating to telecommunications on any part the development hereby permitted, including any structures or development otherwise permitted under Part 16 “Communications”.

Reason: To ensure that any structures or apparatus for purposes relating to telecommunications on the development hereby permitted do not adversely affect the appearance of the area, including of the Woking Town Centre Conservation Area, in accordance with Policies CS20, CS21 and CS24 of the Woking Core Strategy (2012), Policy DM20 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

46. ++ Notwithstanding the provisions of Article 4 (1) and Part 25 of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any orders amending or re-enacting that Order(s), or superseding equivalent Order, with or without modification(s)), no satellite antennae shall be erected or installed on the development hereby permitted. The development hereby permitted must have a central dish or aerial system for receiving all broadcasts for the residential (co-living) units created; details of such a scheme must be first submitted to and approved in writing by the Local Planning Authority prior to first occupation of the development hereby permitted, and the approved scheme must be implemented and permanently retained thereafter.

Reason: To ensure that any satellite antennae on the development hereby permitted do not adversely affect the appearance of the area in accordance with Policies CS20, CS21 and CS24 of the Woking Core Strategy (2012), Policy DM20 of the Development Management Policies DPD (2016) and the National Planning Policy Framework (NPPF).

47. Before the residential (co-living) component of the development hereby permitted is first occupied or brought into use the unit labelled ‘Class E - High Street Uses’ at ground floor level on the approved plans listed within condition 02 of this notice must be constructed at least to ‘shell and core’ level on site in accordance with the approved plans. Notwithstanding the provisions of The Town and Country Planning (Use Classes) Order 1987 (as amended) or Article 3, Schedule 2 of The Town and Country Planning (General Permitted Development) Order 2015 (as amended) (or any order(s) revoking and re-enacting those Order(s) with or without modification(s)) the use of the unit labelled ‘Class E - High Street Uses’ at ground floor level on the approved plans listed within condition 02 of this notice must be restricted solely to uses falling within Use Class E (Commercial, Business & Service) of The Town and Country Planning (Use Classes) Order 1987 (as amended) and for no other purpose(s) without the prior written permission of the Local Planning Authority.

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Reason: To ensure that active ground floor use is provided in this Woking Town Centre location in accordance with Policy CS2 of the Woking Core Strategy (2012) and the National Planning Policy Framework (NPPF).

48. Thirteen (13) of the private co-living studios/rooms within the development hereby permitted must be designed and constructed to Part M4(2): Category 2 - 'Accessible and adaptable dwellings' of the Building Regulations 2010 (as amended) prior to first residential occupation of the development. Thereafter these thirteen (13) private co-living studio/rooms must be permanently retained as such for the lifetime of the development.

Reason: To ensure that the residential element of the development is constructed in an inclusive way to accommodate all members of the community, regardless of any disability, and to allow scope for changes to be made to meet the needs of the occupier, in accordance with Policy UA4 of the Site Allocations Development Plan Document (2016) and Policy CS21 of the Woking Core Strategy (2012).

### Informatives

01. The Council confirms that in assessing this planning application it has worked with the applicant in a positive and proactive way, in line with the requirements of the National Planning Policy Framework (NPPF).
02. The applicant's attention is specifically drawn to the planning conditions above marked ++. These condition(s) require the submission of details, information, drawings, etc. to the Local Planning Authority PRIOR TO THE RELEVANT TRIGGER POINT. Failure to observe these requirements will result in a contravention of the terms of the planning permission and the Local Planning Authority may serve Breach of Condition Notices (BCNs) to secure compliance. The applicant is advised that sufficient time needs to be allowed when submitting details in response to planning conditions, to allow the Local Planning Authority to consider the details and discharge the condition(s). A period of between five and eight weeks should be allowed for.
03. The applicant is advised that Council officers may undertake inspections without prior warning to check compliance with approved plans and to establish that all planning conditions are being complied with in full. Inspections may be undertaken both during and after construction.
04. The provisions of the Party Wall etc. Act 1996 may be applicable and relates to work on an existing wall shared with another property; building on the boundary with a neighbouring property; or excavating near a neighbouring building. An explanatory booklet, prepared by the Ministry of Housing, Communities and Local Government, and setting out your obligations, is available at the following address:  
<https://www.gov.uk/guidance/party-wall-etc-act-1996-guidance#explanatory-booklet>
05. All bridges, buildings or apparatus (with the exception of projecting signs) which project over or span the highway may be erected only with the formal approval of the Transportation Development Planning Team of Surrey County Council under Section 177 or 178 of the Highways Act 1980.
06. The permission hereby granted shall not be construed as authority to obstruct the public highway by the erection of scaffolding, hoarding or any other device or

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apparatus for which a licence must be sought from the Highway Authority Local Highways Service.

07. The permission hereby granted shall not be construed as authority to carry out any works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <http://www.surreycc.gov.uk/roads-andtransport/permits-and-licences/traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see [www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice](http://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice).
08. Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movement of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant / organisation responsible for the damage.
09. It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to: <http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html> for guidance and further information on charging modes and connector types.
10. The Contaminated Land Officer would like to draw the applicants/agents/consultants attention to the specifics of the contaminated land conditional wording such as 'prior to commencement', 'prior to occupation' and 'provide a minimum of two weeks' notice'. The submission of information not in accordance with the specifics of the planning conditional wording can lead to delays in approving details pursuant to conditions, potentially result in details pursuant to conditions being unable to be approved or even enforcement action should the required level of evidence/information be unable to be supplied. All relevant information should be formally submitted to the Local Planning Authority and not directly to the Contaminated Land Officer.
11. In respect of the Thames Water foul and surface water planning conditions the developer can request information to support the approval of details pursuant to these conditions by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning).
12. Thames Water recommend that the developer read the Thames Water guide 'working near our assets' to ensure the workings will be in line with the necessary processes the developer needs to follow if the developer is working above Thames Water pipes or other structures. Please see: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

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Should the developer require further information in this respect please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB.

13. As required by Building Regulations part H paragraph 2.36, Thames Water requests that the developer should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions.
14. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.
15. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should the developer require further information please refer to the Thames Water website: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>
16. Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.
17. Thames Water advise that there are public sewers crossing or close to the proposed development. Thames Water will need to check that the development doesn't limit repair or maintenance activities or inhibit the services Thames Water provide in any other way. The applicant is advised to read The Thames Water guide: <https://www.thameswater.co.uk/developers/larger-scaledevelopments/planning-your-development/working-near-our-pipes>
18. With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.
19. The applicant should ensure that demolition and construction activities on site have regard to the potential presence of terrestrial mammals to ensure that these species do not become trapped in trenches, culverts, or pipes. All trenches left open overnight should include a means of escape for any animals that may fall in.

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20. The applicant is advised that to prevent its spread any Rhododendron species present that is listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) should be eradicated using qualified and experienced contractors and disposed of in accordance with the Environmental Protection Act (Duty of Care) Regulations 1991. Further information on this species can be obtained from the GB Non-native Species Secretariat at [www.nonnativespecies.org](http://www.nonnativespecies.org). In order to comply with the relevant legislation, the applicant will need to ensure they do not cause any invasive non-native species to spread as a result of the works associated with the development.
21. The applicant is advised that, in accordance with the Town Improvement Clause Act 1987 Sections 64 & 65 and the Public Health Act 1925 Section 17, Woking Borough Council is the authority responsible for the numbering and naming of properties and new streets. You should make a formal application electronically to Woking Borough Council using the following link: [www.woking.gov.uk/planning-and-building-control/street-naming-and-numbering/about-street-naming-and-numbering](http://www.woking.gov.uk/planning-and-building-control/street-naming-and-numbering/about-street-naming-and-numbering) before addressing any property or installing or displaying any property name or number or street name in connection with any development the subject of this Planning Permission.
22. The Surrey Police Designing Out Crime Officer has advised that the proposed development should seek to attain Secured by Design certification to the standards of the following document.  
Residential  
[https://www.securedbydesign.com/images/HOMES\\_GUIDE\\_2023\\_web.pdf](https://www.securedbydesign.com/images/HOMES_GUIDE_2023_web.pdf)  
[https://www.securedbydesign.com/images/HOMES\\_APP\\_FORM\\_REG\\_CHECKLIST\\_2023\\_v2.pdf](https://www.securedbydesign.com/images/HOMES_APP_FORM_REG_CHECKLIST_2023_v2.pdf)  
Commercial  
[https://www.securedbydesign.com/images/COMMERCIAL\\_GUIDE\\_23.pdf](https://www.securedbydesign.com/images/COMMERCIAL_GUIDE_23.pdf)  
The applicant is therefore strongly encouraged to continue to liaise with the Surrey Surrey Police Designing Out Crime Officer in this regard.
23. Due to the close proximity of the proposed works to Network Rail's land and the operational railway, Network Rail requests that, where applicable, the applicant / developer follows the Asset Protection informatives which are issued to all proposals within close proximity to the railway. Should you wish to discuss any of the informatives, please contact the Network Rail Asset Protection team via [AssetProtectionWessex@NetworkRail.co.uk](mailto:AssetProtectionWessex@NetworkRail.co.uk).
24. The applicant should undertake early engagement on the planned use of cranes with Farnborough Airport (because a building mounted crane may have an impact on Farnborough Airport's Instrument Flight Procedures). The applicant should contact Farnborough Airport by emailing: [safeguarding@farnboroughairport.com](mailto:safeguarding@farnboroughairport.com)