

COUNCIL – 18 OCTOBER 2018

REVIEW OF WOKING CORE STRATEGY – SUPPLEMENTARY REPORT

Executive Summary

Item 10 on the agenda for Council meeting tonight deals with the review of the Woking Core Strategy. The Council has received representations from Guildford, Waverley and Runnymede Borough Councils regarding this item. The representations are attached at Appendix 1. In summary, they raise the following concerns:

- The Council failed to consult its neighbouring authorities prior to deciding on the review;
- The review should make clear that based on the revised 2016 household projections, Woking will no longer have an unmet need to be met by neighbouring authorities;
- There needs to be a proper review of the Council's evidence base, including a Green Belt boundary review to inform the review of the Core Strategy;
- The review should take the opportunity for Woking to identify more land, including further land in the Green Belt to meet its full objectively assessed housing need.
- Green Belt sites in Pyrford and Mayford which have ability to deliver much needed housing are being recommended to be retained in the Green Belt whilst Guildford and Waverley are being required to meet Woking's unmet need.

Members are advised to note that paragraph 33 of the National Planning Policy Framework (NPPF) require Councils to review their Local Plans to assess whether they need updating at least every five years. The review should be completed no later than five years from the adoption date of the plan. The Woking Core Strategy is over 5 years and the review is therefore overdue. Without the review, the Core Strategy is considered out of date, and in that case the presumption in favour of sustainable development applies. An out of date Local Plan could also have significant implications for calculating the Council's five year housing land supply. For example, without an up to date Local Plan, instead of calculating the housing land supply using the Council's annual housing requirement, the local housing need figure will have to be used. There are therefore serious consequences for delaying decisions on this matter, and Members are advised not to delay their decision as a result of the attached representations.

Regarding the representations themselves, they raise nothing new or significant enough to justifying delaying a decision on the matter.

As highlighted in the Officers' report, there is no prescribed guidance on the format of the review either in the NPPF or in planning legislation. There is also no good practice elsewhere by other local authorities to drawn from. The available national guidance only requires the Council to review the Local Plan and publish their reasons if they felt that no modification is necessary. If the Council were to decide that a modification is necessary, then the timing for doing so will be reflected in the Local Development Scheme for that to be done through the formal plan making process, involving the necessary consultation that it entails. Whilst the concerns of Guildford and Runnymede Borough Councils regarding the failure of the Council to consult them are acknowledged, there is no requirement for the Council to do so given that the Council is not proposing to modify the plan.

The National Planning Practice Guidance (NPPG) sets out what could be considered when undertaking the review of the local plan. Officers have comprehensively considered them in undertaken the review. The review also deal with the evidence base used to inform the decisions on the matter and are satisfied that the evidence base is robust to withstand scrutiny. In particular, no further Green Belt land could be released for development without significantly undermining its purposes and integrity. Paragraph 3.5.22 of the Green Belt boundary review report makes this

conclusion very clear. Members have since reviewed this evidence and found even less of the limited recommended land to be developable.

Paragraph 60 of the NPPF requires local housing need assessment to be conducted using the standard method in national planning guidance. The national planning guidance expects the latest household projection to be used in calculating the need. In accordance with the above, it is estimated that the local housing need will be 266 dwellings per year. By committing to continue with the 292 annual housing requirement, there would be no unmet need arising from Woking as raised by Runnymede Borough Council.

The review sets out the implications of the various objectively assessed housing needs on the unmet need arising from Woking. It is clear from the analysis that by using the 2016 household projections to calculate the need, there will be no unmet need arising from Woking. Officers have already previously acknowledged and in responding to Councillors questions going to Council tonight that whilst their estimate of the housing need using the 2016 household projections is 266 dwellings per year, there are other calculations that estimate the figure to be 263 dwellings per year. The difference is marginal to give any cause for concern and it is due to how figures have been rounded during the calculation.

Based on the above, Officers will recommend that the representations raise nothing new or significant enough to justify delaying deciding on this matter.

Recommendations

The Council is requested to:

RESOLVE That

- (i) the representations received from Guildford, Runnymede and Waverley Borough Councils are noted, and that they raise nothing new or significant enough to justifying delaying a decision on the review of the Woking Core Strategy.

The Council has the authority to determine the recommendation(s) set out above.

Background Papers: National Planning Policy Statement (NPPF)
Woking Core Strategy
Town and Country Planning (Local Planning) (England) (Amendment) regulations 2017

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1.0 Implications

Financial

- 1.1 No additional financial implications.

Human Resource/Training and Development

- 1.2 No additional human resource, training and development implications.

Community Safety

- 1.3 There are no community safety implications.

Risk Management

- 1.4 It is a statutory requirement for local plans to be reviewed every five years. Given that the Woking Core Strategy is nearly six years old, it will need to be reviewed to comply with Government Regulations.

Sustainability

- 1.5 There are no specific sustainability impacts associated with reviewing the Core Strategy. A Sustainability Appraisal was carried out to inform the preparation of the Core Strategy. It concluded that overall, the Core Strategy would contribute towards the sustainable development of the Borough.

Equalities

- 1.6 There are no specific equality impacts associated with the review of the Woking Core Strategy.

Safeguarding

- 1.7 There are no safeguarding implications for reviewing the Core Strategy.

2.0 Conclusions

The representations are noted, however, they raise nothing new or significant enough to justifying delaying a decision on the review of the Core Strategy.

REPORT ENDS



Mr Ernest Amoako
Planning Policy Manager
Woking Borough Council
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Via email only
17 October 2018

Re: Review of Woking Core Strategy (WBC18-025)

Dear Mr Amoako,

We understand that a review of Woking's Core Strategy is being presented at the Council meeting on Thursday 18th October 2018 for approval. Guildford Borough Council (GBC) was given no forewarning of the review and have not been consulted on it. Indeed, GBC first became aware of the review on 15th October 2018.

The failure to engage constructively, actively and on an ongoing basis with GBC in relation to the review is plainly contrary to both the spirit and legal requirements of the Duty to Co-operate, see in particular Planning and Compulsory Purchase Act 2004, s.33A(1), (2) and (3)(a), (d)&(e).

GBC would wish to respond substantively to a number of issues within the review, particularly those with cross-boundary implications. However given the limited time-frame it is unable to do so in an informed manner.

However, one point of immediate concern in the review must be raised at this stage. The review considers the issues of local housing need for Woking, as well as the unmet need in the Housing Market Area. It rightly identifies that the objectively assessed need (OAN) for Woking in the 2009 SHMA was 594dpa, and that the 2015 SHMA reduced the OAN to 517dpa. In light of the revised NPPF, it then calculates the OAN (now referred to in the revised NPPF as 'local housing need') for Woking, using the standard method and based on the 2014-household projections, as 409dpa. Following the recent release of the 2016-household projections, application of the standard method reduces the local housing need still further to 266dpa (by GBC's calculations it is 263dpa, but this is a minor difference). Subject to the 3dpa difference in the latest housing need, GBC's provisional view is this part of the review accurately summarises the position.

However, the review then states that "[b]y using the standard method, the unmet need is likely to be 117 dwellings per year". GBC understand that this figure is arrived at by subtracting the housing requirement figure in the Core Strategy (292dpa) from the local

housing figure produced by applying the standard method and 2014-household projections (409dpa). This is plainly flawed. If – as GBC agree is broadly correct – Woking's local housing need is 266dpa based on the application of the standard method and the 2016-household projections, this means that there is no unmet need (the housing requirement of 292dpa being greater than the local housing need of 266dpa). It is illogical to, on the one hand, base the local housing need figure on the latest household-projections, but not then to update the amount of unmet need in light of that figure.

Both the failure to comply with the Duty to Cooperate and the defective logic in concluding that there remains an unmet need of 117 dwellings per year render the review legally flawed.

GBC trust that you will take these concerns seriously. In particular, we request that approval of the review be deferred in order that it can be reconsidered by Officers and that engagement with GBC (as well as other relevant bodies) required by the Duty to Co-operate has been undertaken.

We understand that Runnymede Borough Council are intending to raise concerns of their own relating to the review.

Yours Sincerely,



Tracey Coleman

Director of Planning and Regeneration

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Guildford Borough Council

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17th October 2018

Mr Ernest Amoako
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By email only to: Ernest.Amoako@woking.gov.uk

Dear Ernest

Woking Local Plan Review

The Council has recently reviewed the agenda items for the 18th October 2018 Woking Council meeting and notes that item 10 is concerned with the review of the Woking Core Strategy. Whilst Runnymede Borough Council welcomes this review, it is disappointed that the recommendation is that there is no need to modify any policies in the Core Strategy despite the officer report acknowledging that there are unmet needs within the Guildford, Waverley and Woking Housing Market Area.

All of Woking's neighbouring local authorities face similar constraints to Woking Borough, including significant Green Belt constraints, ecological constraints and flooding constraints. Runnymede, the Royal Borough of Windsor and Maidenhead, Guildford and Waverley are all good examples of Local Authorities who have worked positively to ensure that they are setting out proposals and policies in their Local Plans to meet their objectively assessed housing needs in full. Having reviewed the 18th October Council report on the Woking Core Strategy review, the Council is not satisfied that Woking Borough Council has taken the opportunity to thoroughly review the adequacy of its evidence base to ensure that it is able to demonstrate that it has turned every stone with the aim of meeting its identified housing needs in full. Runnymede Borough Council is of the opinion that Woking Borough Council has the opportunity to carry out a far more thorough review, including the production of additional evidence to help ensure that the housing needs of the Guildford, Waverley and Woking HMA are met in full. Whilst the covering report to Council notes that, 'Woking is working in partnership with neighbouring authorities to address the unmet needs in the HMA', it is unclear whether there are any further realistic avenues to explore with HMA partners, and what they may be, given that Waverley has already committed to meeting 50% of Woking's unmet needs and given that it appears that Guildford will be asked to meet 20% of Woking's unmet needs. Furthermore, Guildford's response to their Inspector's Matters and Issues indicates that they are unwilling to do any more to meet unmet needs from Woking and that they are of the opinion that the review of the Woking Core Strategy presents the opportunity for Woking to meet its Objectively Assessed Housing Need in full.

If unmet needs are predicted to persist across the Guildford, Waverley and Woking HMA, it is suggested that the current review of the Woking Core Strategy needs to more thoroughly look at gaps in the Council's evidence base. Runnymede Borough Council has particular concerns about the adequacy of the Council's Green Belt evidence. In particular, whilst it is noted that in 2014, Woking Borough Council published a Green Belt Boundary Review, it appears that the brief given to the consultants at this time was constrained, with the report noting that the consultants were only ever asked to identify: 1-Suitable, deliverable and sustainable sites to deliver 550 new homes by 2027; and 2-A further 40ha of land to assist in delivering the housing requirement between 2027 and 2040 (approx. 1200 new homes). Had the

Appendix 2

Green Belt Review had an unconstrained brief it is questioned whether further suitable sites may have been identified.

Furthermore, it is noted that a number of the parcels considered in Woking's 2014 Green Belt Boundary Review were of a significant scale. Since Woking produced its review in 2014, numerous other Local Authorities in the sub region have also reviewed their Green Belt. A number of these authorities (for example Runnymede, South Bucks and Spelthorne) have carried out second stages of their Green Belt Review work to provide a more detailed and thorough assessment of smaller parcels of Green Belt land in their areas. Runnymede felt that this was particularly necessary given that through consultations on its Local Plan, it was noted that a number of representations expressed concerns that the Green Belt parcels assessed in Runnymede's 2014 Green Belt Review were too large in size in some cases. It was argued that if smaller parcels had been considered, different conclusions would have been drawn in terms of how a site performed against the Green Belt purposes. These comments were taken into consideration, and as a result, the Council's consultants Arup recommended to the Council that additional, more spatially focused work could be undertaken. It was suggested that a more finely grained review could be carried out, to better understand the performance of smaller parcels against Green Belt purposes, and their context in relation to the Green Belt as a whole. The output of this second piece of work was that further pieces of land were identified that the Council could release from the Green Belt to meet its identified housing needs. A number of these sites now appear in Runnymede's emerging Local Plan. Given that Woking Borough Council is unable to meet its identified housing needs in full, it is considered that commissioning a second phase of Green Belt Review work could be hugely beneficial if the Council is serious about meeting any unmet housing needs within its area.

As such, contrary to the conclusion drawn in the report to Council it is not considered inevitable that a more thorough review of the Woking Core Strategy and its evidence base would fail to present any additional opportunities to assist Woking meet its unmet housing needs.

There is also concern that of the land being recommended by officers for safeguarding in the drafted Sites Allocations DPD which is an appendix to the 18th October Council report (under item 8-Site Allocation Development Plan Document), Woking's Local Plans Members Working Group has provided steer that only two of the sites in Byfleet should be taken forwards. Sites in Pyrford and Mayford which have the ability to deliver much needed homes are being considered for retention in the Green Belt despite the reasoned justification for the release of these sites presented in the draft DPD and the acknowledged unmet housing needs in the Guildford, Waverley and Woking HMA. It is simply not good enough for Woking to rely on similarly constrained neighbours to meet Woking's unmet needs when it appears that there are further avenues open to the Council which would see Woking's needs met in full in its own Borough.

Furthermore, the covering report to Council on 18th October regarding the Local Plan Review notes that the latest 2016 based population projections suggest that the need for additional homes in Woking may be declining and that under the Government's standardised methodology, the objectively assessed needs for housing in Woking could be set to fall from 409dpa to 266dpa. Whilst Runnymede Borough Council does not dispute that the 2016 based household projections suggest a reduced objectively assessed housing need in many areas, the Government has already confirmed that in light of the 2016 based population projections, it intends to re-consult on amendments to its standardised methodology to ensure that it's 300,000 new homes a year target is met. The consultation is expected later this year. As such, there is concern that it would be premature to rely on the current standardised methodology for calculating housing needs (based on the 2016 based population projections) given that in the short term, changes are expected which are likely to see the OAN for many areas increase again.

Appendix 2

Whilst it is accepted that there are no firm guidelines for carrying out a Local Plan Review, the NPPF states in paragraph 60 that, *'in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for'*. Whilst the issue of unmet needs is touched upon in the covering report of the Woking Core Strategy Review item, this is considered to be at a superficial level. Runnymede Borough Council is not aware of any consultation which has been carried out with neighbouring Local Authorities about the Woking Core Strategy Review which would have presented an opportunity for issues relating to unmet needs in neighbouring areas to be discussed, and for this to have been considered properly in Woking's review. For example, Runnymede Borough Council is aware that Elmbridge Borough Council has been vocal in confirming that it is unlikely to meet its OAN and may need assistance from its neighbours (which could include Woking).

Overall, there is concern that the Woking Core Strategy Review which has been carried out is superficial in nature and lacking sufficient detail and justification to conclude that modifications to the Woking Core Strategy are not required. Runnymede Borough Council is of the view that further evidence needs to be completed before the conclusion can be drawn that Woking Borough Council cannot amend the relevant strategic policies in its Core Strategy to increase its housing target to meet its objectively assessed housing needs in full.

It is noted that the Statement of Common Ground signed by both our Authorities acknowledges that Woking's own evidence base identifies links with Runnymede Borough, including in respect of housing and notes that *'Engagement with authorities [like Runnymede] was concluded to be important through the Duty to Cooperate'*. Furthermore the Statement includes the agreement that there are localised cross boundary links between Runnymede and Woking Borough Council regarding housing matters and agreement that, while in the first instance housing needs will be sought to be met in full within our respective HMA boundaries, both authorities are committed to working together to address housing matters. In light of Woking's decision that no additional evidence is needed to seek to meet housing need within its own boundary, and noting that the Local Plans of Waverley, Guildford and our own Plan in Runnymede have reached a mature stage we would wish to make clear that for these reasons set out in this letter, Runnymede Borough Council feels that it is inappropriate to offer assistance to meet any unmet needs from Woking until such a time that Woking Borough Council has identified that it has turned every stone in meeting its identified housing needs. Woking Borough Council is therefore urged to produce additional evidence to support a more focussed and detailed review of its Core Strategy and carry out consultation with partners under the Duty to Cooperate before concluding that its Core Strategy Review is completed for another 5 years, leaving the question of unmet need in the Guildford, Waverley and Woking HMA unresolved.

Yours sincerely



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From: Graham Parrott
Sent: 18 October 2018 15:09
To: Ernest Amoako
Cc: Elizabeth Sims; Christopher Storey
Subject: Review of the Woking Core Strategy

Dear Ernest

It has come to our attention that one of the reports that is being considered by your Council tonight relates to the review of the Woking Core Strategy. In essence I understand that you are recommending to your Council that you do not need to carry out a review of the 2012 Core Strategy because you consider that it remains up to date for the purposes of managing development across the Borough.

Until this was drawn to our attention a few days ago, we were not aware that you had carried out such a review or that you had reached this conclusion. The purpose of this email is to make it clear that this is a matter in which this Council has an interest, given the fact that the recently adopted Waverley Borough Local Plan includes an allowance for unmet need arising in Woking. Once we have had the opportunity to consider the report, and its potential implications for Waverley, we intend to write to you further on this matter.

Yours sincerely

Graham

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