



Woking Borough Council

**Examination of the Site Allocations
Development Plan Document (DPD)**

**Response to representations received during
consultation on the Annual Monitoring Report (AMR) 2019**

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Woking Borough Council's Response to representations received during consultation on the Annual Monitoring Report (AMR) 2019.

The issues are summarised in italics followed by the Council's response.

- 1.0 *The Ministry of Housing, Communities and Local Government has published the latest Housing Delivery Test (HDT) covering the period from April 2016 to March 2019. The HDT uses the figure of 431 homes as representing housing provision for 2018/19. This demonstrates that Woking's Core Strategy is out of date, and consequently, the Government has sought to use the standard method to calculate the HDT. Woking has used an incorrect figure of 292 dwellings per annum for 2018/19 in calculating the HDT. This is incorrect and the standard method should rather be used as basis for calculating the housing requirement. There would be little point to adopt a SA DPD that continues to deliver a housing requirement of 292 dwellings per year that is out of date. The claim that Woking passed the HDT is also inaccurate. The evidence shows that it failed the HDT.*
- 1.1 The relationship between the review of the Core Strategy and the preparation of the Site Allocations DPD was comprehensively covered in the Council's response to the Inspector's Matter, Issues and Questions - Matter 2 (WBC/SA/033) and was well debated at the SA DPD Examination Hearings. This matter has also been clarified by the High Court in the case between Gladman Development Limited and Wokingham Borough Council and by the Court of Appeal regarding the case between Oxted Residential Limited and Tandridge District Council. The two case are on the SA DPD Examination webpage.
- 1.2 Paragraph 33 of the National Planning Policy Framework (NPPF) requires Local Plans to be reviewed to assess whether they need updating at least once every five years. The Planning Practice Guidance (PPG) provides guidance on what to take into account when undertaking a review of the Local Plan. The Woking Core Strategy was adopted in October 2012 and reviewed in October 2018. The review followed guidance in the Planning Practice Guidance. The review concluded that no update is required. It is stressed that the fact a Local Plan is five years old does not automatically mean it is out of date, and any assumption to that effect would be a misreading of national policy. The Ministry of Housing Communities and Local Government (MHCLG) was made aware of the review of the Core Strategy before it was undertaken. A copy of the Core Strategy Review was sent to MHCLG immediately after it was approved by Council. The Secretary of State would have intervened using default powers if it was felt that the review was unsound, and certainly, the Secretary of State would not have waited about 18 months to inform the Council on the back of the HDT that the review was unsound. There was no legal challenge to the process or outcome of the Review. It would therefore be wrong to suggest that the Core Strategy is out of date because data included in the HDT.
- 1.3 The HDT is a distinct process to measure housing delivery over time based on a prescribed method set out by Government. Local Authorities who fail the test are expected to prepare an action plan to set out how they are intending to meet their housing requirement. In the case of Woking, the Government's published data

indicates that it has passed the test and is not required to take any action. In any case, this process should not be conflated with the Review of the Core Strategy or the preparation of the SA DPD, which have clear purposes set out in the Local Development Scheme. The Council is already aware that the figure of 431 dwellings had been used for 2018/19 in calculating the HDT, and has queried that with MHCLG. The correspondence between the Council and MHCLG can be provided on request. The assertion that the Council has failed the HDT is factually incorrect.

- 1.4 It is important that the SA DPD is prepared expeditiously to facilitate the delivery of the Core Strategy. To stop its preparation to undertake the review of a Core Strategy that was only reviewed in October 2018 because of a HDT process and a snapshot of housing delivery over one year would be unacceptable and an unjustifiable delay, something that national policy is seeking to avoid. It is important to emphasise that the unmet need arising from Woking based on the standard method is being met by the Guildford and Waverley Local Plans in accordance with national planning policy. There is no basis for reviewing the Core Strategy to meet unmet needs as suggested.

- 2.0 *Woking's decision not to review the Core Strategy to meet housing need based on the standard method goes against national policy. There should be an urgent review of the Core Strategy in order to bring forward a spatial strategy that can deliver the full range of housing tenure, types and size required.*

- 2.1 The SA DPD allocates land to deliver the range of housing needed across the Borough. It makes provision for Affordable Housing in accordance with Policy CS12 (Affordable housing) of the Core Strategy. Policy CS11: Housing mix of the Core Strategy provides guidance on the mix of sizes of dwellings that development would be expected achieve. Land is allocated to meet the needs of the elderly such as GB11. Sufficient land has been allocated to meet the accommodation needs of Travellers such as GB10. The Council has met its requirement for self-build accommodation. This matter has been fully addressed in the Council's response to the Inspector's Matters Issues and Questions (WBC/SA/033) (ii.6.1). There is no need for the Core Strategy to be reviewed to provide the range of homes that the Borough needs because it already contains such policies.

- 3.0 *Net additional dwellings completed for 2018/19 was 231. This is below the Core Strategy requirement of 292 dwellings per year and certainly below the housing need of 431 dwellings per year. The focus on development within the 'rest of the urban area' and Woking Town Centre will continue to result in high density development of smaller units, which does not reflect the aims of the Core Strategy. Land north-west of Saunders Lane and Land north east of Saunders Lane must be considered for allocation on the DPD.*

- 3.1 The focus of development at the main centres of the Borough is the right approach to the spatial distribution of development that would be encouraged. Policy CS1: (A spatial strategy for Woking Borough) of the Core Strategy provides a clear direction on

the spatial distribution of development across the Borough. It requires most new development to 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. 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. The claim that the approach in the SA DPD's to focus most development in the main centres does not reflect the aims of the Core Strategy is therefore incorrect. In finding the Core Strategy sound, this is what the Inspector of the Secretary of State had to say about the spatial strategy '*with due regard to its means of production, the CS provides the most appropriate spatial strategy for sustainable development within the context of the Borough with clear objectives for the plan period in accord with the aims of national planning policy*' The spatial strategy should be encouraged for its contribution towards sustainable development. The allocation of land north-east and north-west of Saunders Lane will certainly not reflect the aims of the Core Strategy or help achieve sustainable development, and should not be considered.

- 3.2 The Council accepts that housing completions for 2018/19 was below the housing requirement of 292. It is typical for completion figures to go up and down in a given year and the 231 figure is a snapshot of housing completions for one year. It does not provide sufficient basis to call for the review of the Core Strategy. A useful indicator would be average completions over a reasonable period of time. For example, during the 2019/20 monitoring year, housing completions up to end of February 2020 is 303 dwellings with a month still to go before the end of the monitoring year on 31 March 2020. This is above the 292 requirement. Overall, average completions since the adoption of the Core Strategy is broadly in line with the Core Strategy requirement. There is no justification to allocate additional Green Belt land to deliver more homes on the basis of one year's figure.
- 4.0 *The five year housing land supply was calculated using an out of date Core Strategy housing requirement. A number of the UA site are not anticipated to come forward/commence until at least 2024/25.*
- 4.1 The Core Strategy was adopted in October 2012 and reviewed in October 2018 in accordance with paragraph 33 of the NPPF. It is therefore up to date to provide the strategic policy context for the preparation of the Five Year Housing Land Supply Position Statement. The Council has provided evidence to the Examination on the planning status of the allocated sites to demonstrate that they have the realistic prospect of coming forward during the plan period. The SHLAA also provides evidence of deliverability. In addition, the SA DPD allocates significantly more sites to enable the delivery of more homes over and above what is required to cater for the risk of non-implementation. The SA DPD therefore builds in sufficient cushion to address any concerns of non-implementation.

- 5.0 *The density of development across all locations exceeded the indicative density ranges of Policy CS10 of the Core Strategy. There is a need for affordable family homes that cannot be met by high density flatted accommodation in the main urban centres. In order to meet identified local needs additional suitable sites such as land north-east of Saunders Lane and land north-west of Saunders Lane should be considered for allocation in the SA DPD. Also, most of the housing that were completed were 1 and 2 bedroom flatted accommodation. There is a need for affordable family homes.*
- 5.1 It is government policy to encourage high density development at sustainable locations. The spatial strategy for the Borough is in general conformity with this policy. Exceeding the indicative densities of Policy CS10 is not a failure of policy but a positive outcome. It is also not an indication that the right types of homes are not being provided. About 75% of the homes provided since the adoption of the Core Strategy are 2 or more bed homes in line with Policy CS11 of the Core Strategy. The SA DPD also allocates sufficient Green Belt land to ensure a balance in the provision of the nature and type of homes needed in the Borough. The Core Strategy had estimated that land would need to be released from the Green Belt to enable the delivery of 550 dwellings to achieve a good balance in housing provision. Excluding Broadoaks (GB11), the SA DPD allocates Green Belt land to enable the delivery of about 766 new homes. This is significantly above what is required. There is no justification for allocating more Green Belt land.
- 6.0 *Only 33 affordable housing units were delivered in 2018/19 against a yearly requirement of 102 dwellings. This forms part of a trend of under delivery of affordable housing. 25 dwellings out of the 33 that were completed were on Green Belt/safeguarded sites. This demonstrates that sites outside the urban area can deliver much higher proportion of affordable housing. The number of people on the Council's housing register increased from 1,046 in 2017/18 to 1183 in 2018/19, which demonstrates evidence of need and demand that outweighs supply. There is also a continuing worsening trend in the affordability ratio for housing in Woking. Given the inherent complexities and unusual costs for developing UA sites, should evidence demonstrates that the identified UA sites are not deliverable, additional site such as land north-east of Saunders Lane and land north west of Saunders Lane should be allocated in the SA DPD.*
- 6.1 The Strategic Housing Market Assessment (SHMA) provides evidence of need for Affordable Housing, which the Council does not dispute. Policy CS12 (Affordable Housing) of the Core Strategy provides the policy context for ensuring that relevant developments make appropriate provision towards Affordable Housing. This matter was comprehensively discussed at the SA DPD Examination Hearings. The Council submitted a statement in its response to the Inspector's Matters, Issues and Questions (WBC/SA/033). The statement provides evidence to demonstrate that overall, the Council is making significant strides towards meeting its Affordable Housing requirement at a period when Government policy has changed to exempt development of up to 9 dwellings making any contribution towards Affordable Housing provision. A Table summarising Affordable Housing provision to date at the Examination Hearings (WBC/SA/041) can be accessed by this link:

<https://www.woking2027.info/allocations/sadpdexam/affhousingfigs.pdf>. There is no justification to release additional Green Belt land to enable delivery of Affordable Housing. As a statement of fact, none of the 25 Affordable Housing dwellings referred to in the representations were on Green Belt land.

- 7.0 *The nature and type housing delivery demonstrates the residential element of site UA44 is suitable for low density development and that having a high density development as promoted by Goldev will result in the imbalance of housing supply across the borough.*
- 7.1 The Inspector has indicated in his Post Hearings Letter that he would want a modification to Policy UA44 to include an indicative quantum of residential development anticipated on the site. The SA DPD will be modified accordingly. However, the actual density for any development on the site would be determined through the development management process. For information, planning application has been submitted for development of the site. This is yet to be determined.
- 8.0 *The case for the need for Heritage Parkland at site GB17 is not proven. The site is not available for the proposed use and no funding has been identified to progress it. The Council has not meaningfully engaged with Burhill Developments Limited regarding the availability of the site. Site GB17 should not be allocated.*
- 8.1 The Inspector has suggested that he would liaise with the Council to formulate a soundly based approach to the site. The outcome will be published for consultation.
- 9.0 *The robustness of the Council's spatial development strategy and the over reliance on brownfield sites is questioned. It would not deliver the type of housing the borough needs. Additional Green Belt land should be released to meet development needs of this plan period and beyond.*
- 9.1 The spatial strategy will ensure sustainable development across the Borough. The SA DPD strikes a good balance between urban and Green Belt sites to ensure that the right types of housing would be delivered to meet local needs. This matter is also covered in some of the sections above, in particular, section 3.
- 10.0 *The AMR is badly presented with graphs and codes that means nothing to the layman. It should be simplified to show for example the number of schools, hospitals and doctor's surgeries that are going to be built.*
- 10.1 Every year the Council seek ways to improve the presentation of the AMR. The comments will be taken into account in preparing the next AMR.

- 11.0 *The SA DPD should be modified to take account of the supply of C2 housing at Broadoaks. All other C2 dwellings should be counted. It would also be helpful to have a list of homes build in the Green Belt against the target of 550 homes agreed in the Core Strategy.*
- 11.1 Generally the housing completion figures take into account the delivery of C2 units and all homes built regardless of their location, including on Green Belt land. The SA DPD allocates land to enable the residual amount of homes needed to meet the housing requirement for the rest of the plan period. Modifications are proposed to GB11 to reflect the current status of the site. This will be published as modification for consultation.
- 12.0 *The SA DPD does not take into account latest information to enable the Council to justify the release of Green Belt land. Infrastructure to support homes planned for West Byfleet is totally inadequate. No explicit plan for infrastructure provision to support development. No justification to build Travellers pitches at land surrounding West Hall.*
- 12.1 The Council is satisfied that the SA DPD is based on relevant, up to date and proportionate evidence in accordance with paragraph 31 of the NPPF. The Council submitted a list of core documents to inform the Examination Hearings.
- 12.2 The SA DPD is also informed by an up to date Infrastructure Delivery Plan (IDP). The IDP is sufficiently comprehensive and robust and has been prepared with the active involvement of the relevant infrastructure providers. It identifies the range of infrastructure needed to enable the sustainable delivery of the SA DPD, when they will be provided, by whom and at what costs.
- 12.3 The Council has carried out a Travellers Accommodation Assessment to justify the need for 19 Travellers pitches up to the end of the plan period. Based on a sequential approach encouraged by Policy CS14 of the Core Strategy, the land surrounding West Hall is in a sustainable location to make a contribution toward meeting the accommodation needs of Travellers.