

WOKING SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT EXAMINATION

RESPONSE FROM WAVERLEY BOROUGH COUNCIL TO THE INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

MATTER 2: IS THE SADPD IN GENERAL CONFORMITY WITH THE WOKING CORE STRATEGY

Introduction

Under Matter 2, the Inspector has identified as Issue (i) the following:

Issue (i) Are the requirements set out in the Woking Core Strategy (adopted October 2012) (the Core Strategy) justified, up-to-date and consistent with national policy?

This issue is relevant to the responses that Waverley Borough Council has made to the Woking SADPD. Within this Issue, the Inspector has identified three questions. In this response Waverley Borough Council will address these questions. Prior to that, however, it would be helpful to set out some background and context to explain the reasons why Waverley has felt it necessary to make representations on the SADPD.

It is worth saying, at the outset, that Waverley Borough Council is not affected directly by any of the sites proposed for allocation. In essence, Waverley's comments relate to the issue of current unmet need in Woking and whether Woking should be seeking to do more to address this now, given that it is seeking to safeguard land in the Green Belt to meet longer term needs.

Background

The Woking Core Strategy was adopted in October 2012, not long after the publication of the 2012 National Planning Policy Framework (NPPF). The Core Strategy was found to be sound, notwithstanding the fact that the housing requirement of 292 dwellings per annum was considerably below the need identified set out in the West Surrey Strategic Housing Market Assessment (SHMA) at the time. Since then, Woking Borough Council has been working on the SADPD, with the intention of delivering the housing required to meet the Core Strategy minimum target of 292 dpa.

Since then, both Guildford and Waverley, the other authorities within the West Surrey Housing Market Area (SHMA), have brought forward their own Local Plans. The Guildford Local Plan was finally adopted in April 2019. This Plan, which runs from 2015 to 2034 does not include any formal contribution to meeting unmet need from elsewhere in the HMA. However, although the housing requirement is to deliver 10,678 homes over the plan period (562 dpa), if all the sites identified come forward, total provision would be 14,602 homes, giving a headroom of 3,924 homes.

Waverley submitted its Local Plan Part 1: Strategic Policies and Sites for examination in December 2016. The submitted Plan sought to meet Waverley's housing need in full. That need was 519 dpa as set out in the 2015 West Surrey SHMA. The equivalent figure for Woking was 517 dpa, a requirement driven by economic need. Prior to the submission of the Plan, Waverley, Guildford and Woking had produced a draft Statement of Common Ground relating to housing needs. In essence Woking's position was that it was working to deliver the requirement in its Core Strategy, and Guildford and Waverley's position was that they were seeking to deliver their identified needs and were not in a position to pick up any unmet need from Woking. All Councils committed to working together in the future.

Notwithstanding this, the Examination Inspector for the Waverley Local Plan identified the unmet need from Woking and considered that this needed to be addressed. Although Waverley argued during the Examination that it was not in a position to meet any of the Woking unmet need, the Inspector did not accept this position. He considered that Waverley should pick up 50% of Woking's unmet need. The total unmet need from Woking was calculated to be 3,150. This was derived from the difference between the Woking need (517 dpa) and its housing requirement (292 pa) multiplied by 14 (the number of years between the SHMA base date of 2013 and the Woking Core Strategy end date of 2027) (i.e. 225×14). The allocation to Waverley was 50% of this unmet need (i.e. 1,575). This equates to 83 dpa over the whole Waverley Plan period of 2013 to 2032.

This increase in the Waverley housing requirement was one of the Main Modifications required by the Inspector to make the Plan 'sound'. There were some other changes to the Waverley housing need identified through the examination. This resulted in the Waverley OAN being 507 dpa. Taken together with the 83 dpa contribution to Woking's unmet need, the Waverley Local Plan, which was adopted in February 2018, has an annual housing requirement of 590 dpa.

The Waverley Plan was the subject of legal challenges. On 31st October 2019 the Court of Appeal dismissed these challenges, which had concerned the Inspector's reasoning for requiring Waverley to pick up 50% of the Woking unmet need.

In relation to the Woking SADPD, Waverley's position has been that Woking should be considering reviewing its Core Strategy, and bringing forward safeguarded sites, in order to address the immediate unmet need. It was clear during Waverley's Local Plan Examination that Woking had no specific plans to bring forward any review of the Core Strategy. This position contributed to the Waverley Local Plan Inspector concluding that the unmet need from Woking remained and needed to be addressed.

In October 2018 the Council became aware that Woking Borough Council had carried out a review of the Core Strategy. At its meeting on 18th October 2018 Woking Borough Council formally resolved that there was no requirement to update the Core Strategy. Both Waverley and Guildford were only alerted to this a few days before. In

response, the attached email (Appendix 1) was sent to Woking. At the same Council meeting Woking Borough Council also approved the SADPD for Publication for Pre-submission consultation. Waverley subsequently responded to this consultation by letter dated 14th December 2018. This is attached as Appendix 2.

Having set out the background, the Council will now comment on the three questions under Matter 2, Issue (i):

Q1. The Council has undertaken a review of the adopted Core Strategy. How have the Borough's Housing Delivery Test results and any evidenced changes to housing need since the adoption of the Core Strategy informed that review?

The Council would simply comment that there has been a significant amount of unmet need in Woking as evidenced by the 2008 and 2015 SHMAs. As set out above, the need identified in Woking in the 2015 SHMA was driven by the anticipated economic growth. Given the new NPPF, the starting point for identifying Woking's needs, were the Plan to be reviewed, would be through the use of the new Standard Method. Currently, the Government requirement is to use the 2014-based household projections as the starting point for the application of the Standard Method. When Waverley Borough Council made its representations on the Woking SADPD in December 2018, it calculated that Woking's need would be 409 dpa. It clearly shows a continued shortfall between the homes being planned for in Woking and the identified need. It is for this reason that Waverley Borough Council again argued in its representations on the SADPD that Woking should be reviewing/updating the Core Strategy to seek to address current unmet need. The Council further argued that current unmet need could potentially be addressed by bringing forward safeguarded Green Belt sites and reconsidering whether the site at Martyrs Lane, which was excluded from the SADPD, should be identified in addition to the other safeguarded sites.

It is acknowledged that since the Council submitted its comments on the Woking SADPD, the Guildford Local Plan Examination has been completed and the new Local Plan for Guildford has been adopted. During the examination of the Guildford Local Plan, the Inspector considered the issue of whether Guildford should also make a contribution towards meeting unmet need from Woking. The Inspector concluded that the probability was that there was still ongoing unmet need from Woking, not all of which is accommodated by the allowance in Waverley. However, he also concluded that it was unnecessary to make a specific allowance in Guildford's housing requirement. This was because he considered that the likely residual amount of unmet need from Woking could be accommodated within the Guildford Local Plan's headroom (see above).

It would appear, therefore, that the issue of unmet need from Woking has been addressed for the time being. However, the Council would make two comments. Firstly, it would be preferable if Woking could meet its own housing needs. Secondly,

the potential reliance on the Guildford 'headroom' assumes that all of the sites in the Guildford Plan come forward.

Q2. Did the Council's review of the Core Strategy pay due regard to the DtC?

The Council has sought to work with Woking and Guildford to address housing needs across the HMA. Whilst acknowledging the constraints that apply within the HMA, including Green Belt, it has been Waverley's position that Woking should be considering a review of the Core Strategy and to seek to meet its own unmet need. The Council is disappointed that there was not more engagement by Woking with neighbours on its decision in October 2018 that there was no need to update the Core Strategy.

Q3. Did the review of the Core Strategy take into account plan-making activity in neighbouring authorities, such as whether those LPAs are unable to meet all of their identified housing needs?

At the time of the review of the Core Strategy, Woking was clearly aware of the fact not only that Waverley and Guildford were seeking to meet their own needs, but that Waverley was planning to meet some of Woking's unmet need. However, this does not change the Council's view that as a starting point Woking should be seeking to meet its needs. Waverley will have to conduct its own review of the Local Plan by February 2023 at the latest (i.e. 5 years from adoption). Current indications are that the Waverley need, when applying the Standard Method, may increase. Housing need in Waverley, and any unmet need from neighbours, will continue to be a factor to consider when the Council reviews its Local Plan. Clearly the task of seeking to continue to meet its own needs may be easier in Waverley if more is being done by neighbours to meet their own needs.

Conclusions

In summary, Waverley remains of the view that Woking should be doing more to address its current unmet needs and that this could be achieved by considering bringing forward safeguarded sites or including sites that have been rejected.