

APPENDIX 2

By email

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Calls may be recorded for training or monitoring
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Date: 14th December 2018

Dear Mr Amoako

Woking Local Development Documents Site Allocations Development Plan Document Regulation 19 Consultation

I am writing on behalf of Waverley Borough Council, in response to your Council's consultation on the Regulation 19 version of the Site Allocations Development Plan Document.

You will recall that the Council responded to earlier consultations on the proposed Site Allocations DPD. In particular, in February 2017, the Council responded to the consultation on the land east of Martyrs Lane. Although the Council had no objection to that site, the response was more in the context of how this site, and other sites in the Green Belt in Woking, were being addressed in the context of a clear level of unmet housing need in the Borough. At the time, your Council was consulting on the potential to identify the Martyrs Lane site as a site to meet longer term development needs, beyond your current plan period to 2027, as an alternative to six other sites that had also been identified to be safeguarded to meet longer term needs.

Waverley Borough Council responded to say that, in view of the unmet housing need that already existed within Woking, further consideration should be given to whether the six safeguarded sites, the Martyrs Lane site, or both, could be released sooner, in order to meet some of this unmet need.

As you know, unmet need within the Housing Market Area was a major issue during the Examination of the Waverley Local Plan. Although the Council argued that it was not in a position to pick up any of the unmet need from Woking, the Inspector did not agree. As a result, one of the Main Modifications required to make the Waverley Plan 'sound' was an increase in the Local Plan housing requirement of 83 dwellings a year, which represented 50% of the unmet need identified at that time.

In the circumstances, the Council remains concerned that the proposed Site Allocations DPD is only seeking to deliver the housing requirement from the 2012 adopted Core Strategy, of 292 dwellings a year. I understand that the Martyrs Lane site has been

dropped altogether, but there remain a number of 'safeguarded' sites that are currently in the Green Belt and that are intended to meet longer term housing needs.

The Council notes that at the same time that Woking Borough Council approved the Site Allocations DPD for Regulation 19 Consultation, it also agreed a report relating to the Core Strategy. That concerned a review of the Core Strategy to see whether it required updating. The conclusion of that report was that Woking did not need to amend its 2012 Core Strategy and that the housing requirement of 292 dwellings a year should continue.

Notwithstanding this, Waverley Borough Council considers that Woking should be reviewing/updating the Core Strategy to seek to address unmet need. It is noted in the report on the Core Strategy review that if the new standard method for calculating housing need is applied, the annual need for housing reduces from the figure of 517 in the 2015 Strategic Housing Market Assessment (SHMA) to 409 dwellings per annum. The report also states that if the 2016-based projections are used then initial indications are that the need would be around 278 dwellings per annum, which is slightly lower than the Core Strategy requirement. The Council would point out that the Government is clearly concerned about these latest projections, hence the recent consultation on changes to the NPPF, where the Government states that, pending a review of the Standard Method, the 2014, rather than the 2016-based projections should be used. On this basis there is clearly still a level of unmet need within Woking.

It is noted that elsewhere in the report, Woking Borough Council states that the most likely and realistic option for the future housing requirement would be to continue with the annual requirement of 292 dwellings, given the constraints.

Waverley Borough Council does not agree with this approach and still strongly considers that through the Site Allocations DPD or a formal review/update to the Core Strategy, Woking should be doing more to address the unmet need that currently exists. This could be achieved by bringing forward the release of sites that were being safeguarded to meet longer term needs and to reconsider whether the Martyrs Lane site should be identified in addition to the other safeguarded sites.

Yours sincerely

Graham Parrott
Planning Policy Manager