

Carter Jonas

**MATTER 4: ARE THE ALLOCATED SITES IN THE
URBAN AREA JUSTIFIED, CONSISTENT WITH
NATIONAL POLICY AND DELIVERABLE?**

**HEARING POSITION STATEMENT SUBMITTED ON BEHALF OF
BURHILL DEVELOPMENTS LTD**

Woking Borough Council – Site Allocations DPD Examination in Public

November 2019

Contents

1 Introduction.....3

2 Issue (i) is the SADPD’s approach to the provision of housing in the urban area justified and deliverable?.....3

Question 1.3

Appendix A - Affordable Housing Analysis

1 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Burhill Developments Limited (BDL) who own land to the rear of 79 – 95 Lovelace Drive, Teggs Lane, Pyrford which was identified as GB11 in the draft Site Allocations Development Plan Document ('SADPD') that was considered by the Local Development Framework Working Group at its meeting on 5th September 2018. For the avoidance of any confusion, we hereafter refer to the land as 'the Site'. Comments throughout this Hearing Statement will also refer to GB19 (Woking Palace, Carters Lane, Old Woking) which is owned by BDL and has been proposed by the Council to deliver a Heritage Parkland / Country Park. BDL is opposed to GB19.
- 1.2 BDL has submitted duly made representations to each stage of the SADPD and this includes submissions to the Council's Regulation 19 consultation (in December 2018) where comment was made on the soundness of the SADPD, the Sustainability Appraisal ('SA') and matters of legal compliance. This submission must be read in the context of, and in conjunction with these earlier representations.

2 ISSUE (I) IS THE SADPD'S APPROACH TO THE PROVISION OF HOUSING IN THE URBAN AREA JUSTIFIED AND DELIVERABLE?

Question 1. Are the policy requirements related to the sites informed by evidence of affordable housing need, infrastructure requirements, the inclusion of local and national standards and a proportionate assessment of viability?

- 2.1 No. Whilst the general wording of the Urban Area ('UA') allocations are in accordance with the affordable housing targets as set out at Policy CS12 of the Core Strategy ('CS') as they must be, the Council has not taken into account the low levels delivered over the last ten years which is addressed below. Thus, it cannot be considered that the viability of the allocations have been informed by up to date viability evidence. The SADPD is based on an Economic Viability Assessment dated 2010 which was last updated in January 2013 to support the Council's Community Infrastructure Levy ('CIL') examination. The PPG at paragraph: 002 (Reference ID: 10-002-20190509) is clear, *'it is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies'*. Given the assessment was completed almost ten years ago, it is clear that the viability of the allocations proposed have not been informed by up to date evidence and will not create realistic and deliverable policies which can achieve the level of affordable and the mix of dwellings the Core Strategy and NPPF require.
- 2.2 The market residential elements of the UA allocations are predominantly brownfield which are expensive to remediate and deliver which typically results in schemes that do not deliver policy level compliant levels of affordable housing. The up to date evidence that supports this finding is set out in the Council's most recent Annual Monitoring Report ('AMR') (December 2018) (WBC/SA/E045) at p.22 where it states that the viability assessments submitted in support of a number of planning applications for residential development on brownfield sites has demonstrated that *"the required proportion of affordable housing would be unviable"*. In

approving these schemes, the Council has consistently failed to achieve its own target for the delivery of affordable housing in the borough, thereby failing to meet the objectives of Policy CS12 to deliver 1,737 affordable homes in Woking.

- 2.3 We have assessed all of the draft UA allocations in the SADPD that include residential within the allocation and the attached schedule (Appendix A) (Affordable Housing Analysis – Tab 1) reveals that the number of units proposed on these sites totals 3,284 of which 1,141 were proposed to be affordable. The affordable units represent 34.7% of the total.
- 2.4 The second schedule (Affordable Housing Analysis – Tab 2) reveals that on eleven of the allocations that have been the subject of planning approval, 1,006 residential units were expected to be delivered on these sites, and 266 were assumed to be affordable. The affordable represented 26.4% of the total. However, the schemes actually only yielded 13 affordable units which is 1.3% of the total. This was achieved on just one of the eleven sites.
- 2.5 So the consented UA allocations have resulted in an under supply of 253 affordable units.
- 2.6 This analysis of recent residential approvals on brownfield UA sites shows that low levels of affordable housing are being consented in Woking. However, it is possible to achieve the stated target of 50% affordable housing on greenfield sites because these schemes can viably support delivery of this level of affordable housing.
- 2.7 In simple terms therefore, the over reliance in the draft spatial development strategy on residential development on brownfield sites will continue to ensure that the Council fails to achieve its target for the delivery of affordable housing. The Council’s own evidence confirms that the overall target to provide 35% of all units as affordable has only been achieved twice out of the last 10 years (figure 9 – *Proportion of housing completions by tenure, since 2008*) in the Council’s 2017-2018 AMR (December 2018 – WBC/SA/E045). Analysis of delivery of affordable housing on eleven UA sites has shown that the affordable housing is just over 1% of the total.
- 2.8 The requirement for affordable housing in Woking cannot be clearer given the affordability level of 11.09 against the national average of 7.88 (source: ONS, House Price to Resident Earnings Ratio, Table 5 <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>). Consistent with many local authorities in England and Surrey, the affordability ratio in Woking is increasing. The increases in the ratio since the adoption of the CS are summarised below:

	2012	2013	2014	2015	2016	2017	2018
Woking affordability ratio	7.61	8.33	9.14	10.70	10.70	11.07	11.09

- 2.9 It is evident that Woking's existing spatial development strategy is failing to deliver the affordable housing required under Policy CS12 and the affordability ratio is worsening.
- 2.10 The only realistic response to this systemic failure is to increase the supply on greenfield sites in order to increase the supply of affordable housing units and get closer to achieving the policy target of 35% of all new homes being affordable (Policy CS12).
- 2.11 We therefore contend that despite the failure of an updated viability assessment of the proposed UA allocations, the need for affordable housing will continue to grow as the cumulative shortfall is compounded. This approach is neither justified or effective nor consistent with the Framework. The strategy in the SADPD is systematically flawed.
- 2.12 This analysis shows that the SADPD's approach to the provision of housing in the urban area is not justified and is leading to under delivery of affordable housing, contrary to Policy CS12 and the CS Inspector's proposed modification which was accepted by the Council to bring forward the *"proposed review of the Metropolitan Green Belt to ensure the effective supply of housing land"* (page 2).
- 2.13 The strategy of the SADPD is not informed by up to date evidence of affordable housing need because if it was, it could not reasonably continue with a strategy that deliberately under provides affordable housing when there is an opportunity to release adequate land from the Green Belt to contribute to the delivery of affordable housing.