

**MATTER 6: DOES THE SADPD SET OUT
EFFECTIVE MECHANISMS FOR MONITORING
AND IMPLEMENTATION?**

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

Woking Borough Council – Site Allocations DPD Examination in Public

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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) DOES THE SADPD SET OUT EFFECTIVE MECHANISMS FOR MONITORING AND IMPLEMENTATION?

- 2.1 We respond to the specific questions arising in relation to Matter 6 below.

Question 2. Does the monitoring framework set out a clear set of indicators against which to assess the effectiveness of the SADPD's policies and allocations?

- 2.2 No. The monitoring framework referred to in the SADPD links to the Core Strategy's (CS) monitoring indicators where at paragraphs 5.104 and 5.119 of the CS it states "*should the monitoring indicators (below) indicate that demand outstrips supply; the Council may review the policy and seek to allocate additional sites to meet need*". There was an opportunity through the production of the SADPD to allocate additional sites to increase the supply of the housing. This opportunity has been missed by the Council.
- 2.3 If the demand for affordable housing outstrips supply because of delivery problems, it shouldn't be that the Council may review the policy, but rather, there should be a requirement to review the policy and seek to allocate additional sites to meet the identified but unmet need. The fact that the delivery of affordable housing has only achieved the 35% target twice out of the last 10 years (figure 9 – *Proportion of housing completions by tenure, since 2008*) in the Council's 2017-2018 Annual Monitoring Report ('AMR') (2017-2018) (December 2018 – WBC/SA/E045) should be a clear indicator that the current spatial strategy is flawed. Given the SADPD's continued focus on the development of town centre / brownfield sites, the flaw will be perpetuated and demand for affordable housing will only worsen. Forcing people out of the borough to live elsewhere and travel longer distances for work in the borough is not a sustainable solution.

- 2.4 We therefore suggest the delivery of affordable housing (amongst other matters) should be monitored by a trigger incorporated in the SADPD and which is linked to a specified number of years of the target not being achieved and whereby, additional sites are allocated in order to meet need preferably from allocated and /or safeguarded land.
- 2.5 This will ensure the effectiveness of the SADPD and provide for a sound strategy.

Question 3. Does the monitoring framework set out clear actions that could be taken should development not come forward at the rate anticipated in the SADPD?

- 2.6 No. See response to Question 2 above.

Question 4. Is the SADPD clear in terms of the triggers for such action?

- 2.7 No. We propose that a trigger is included which links the previous years of under supply. We therefore suggest the trigger is “seven years of under supply of affordable housing over a ten year period will require the Council to review the relevant policy”.