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# Woking Site Allocations DPD: Examination Hearing Statement – Matter 2

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Response on behalf of Martin Grant Homes (Respondent Ref. 06543/2)

November 2019

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## Contents

<b>Matter 2: Is the overall approach of the SADPD in general conformity with the Woking Core Strategy?</b> .....	3
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? .....	3
Issue (ii) To what extent would the allocations, taken together, meet the requirements set out in the Core Strategy? .....	5
Issue (iii).....	7
Issue (iv) .....	7
Issue (v) .....	8
Issue (vi) Is the SADPD supported by adequate consideration of transport issues? .....	8

# Examination of Woking Site Allocations DPD

## Hearings Statement – Matter 2: Conformity with the Woking Core Strategy



### Matter 2: Is the overall approach of the SADPD in general conformity with the Woking Core Strategy?

#### 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?

**Question 1:** *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?*

#### Answer

1.1 The Housing Delivery Test (HDT), measurement as published by MHCLG refers to Woking Borough Council (WBC) delivering 153% of their 'requirement' with an average delivery of 361 dwellings per annum (dpa)<sup>1</sup>. Whilst this position is accepted, given the way the HDT is calculated, it can disguise whether a Council is actually delivering sufficient housing to meet their actual needs (not their 'housing requirement'.)

#### Explanation

1.2 In the case of Woking, their HDT has been calculated on the basis of a 'requirement' to deliver an average of 236dpa.<sup>2</sup> This is because the HDT assesses delivery against the lower of either the adopted requirement or the local housing need<sup>3</sup> (LHN) (with the LHN represented by the 2012 Household Projections in 2015-16 and the 2014 Household Projections in 2016-17 and 2017-18). This is relevant as it demonstrates how the delivery has not been assessed against the 'housing need' in Woking, but a bare minimum requirement. As discussed below, the real need is actually in excess of 450dpa.

1.3 In terms of 'evidenced changes to housing need since the adoption of the Core Strategy', the Council has previously relied upon the chronology of its housing need evidence to support the conclusion that, *'there is a clear downward trend of the objectively assessed housing need'* (page 8 of WBC's 'Review of the Woking Core Strategy'). The report to Council to support the internal review of the Core Strategy referred to the following:

- the SHMA 2009 identified an OAN of 594 dwellings per year;
- an updated West Surrey SHMA (covering Guildford, Waverley and Woking) published in October 2015 set out an OAN of 517dpa for the period of 2013 – 2033 (which does not directly relate to the Core Strategy Plan Period);
- the need as calculated using the standard methodology equates to 409dpa;
- using the 2016 Household Projections would result in the standard methodology coming down to around 266dpa.<sup>4</sup>

1.4 Whilst these housing requirement figures initially indicate a reducing level of need, with more interrogation it is clear that this conclusion is not only too simplistic but also not fully correct. What the evidence shows is that the standard method is pointing to a higher number than the Core Strategy albeit not quite as high as previous assessments of need. The 2014 Household Projections between 2019 and 2029 project annual household growth of 308 per annum. The affordability uplift is calculated on the basis of a ratio of 11.78<sup>5</sup> which means a 49% increase (458dpa)<sup>6</sup>. This is capped at 40% above household projections which results in a figure of 431dpa.

<sup>1</sup> See the HDT Measurement 2018 as published by MHCLG

<sup>2</sup> 245 dwellings per annum in 2015-16; 247 in 2016-17; and 217 in 2017-18 (taken from the 2012 and 2014 Household Projections and reproduced in the HDT Measurement 2018 Tables)

<sup>3</sup> With the LHN replaced by the 2012 Household Projections in 2015-16 and the 2014 Household Projections in 2016-17 and 2017-18

<sup>4</sup> As per the outcomes of the 'Technical consultation on updates to national planning policy and guidance' undertaken at the end of 2018, it was concluded that the 2014 Household Projections should be used for the calculation of the standard methodology (and not the 2016 Household Projections).

<sup>5</sup> See the 2018 Workplace-based Affordability Ratio published by ONS

<sup>6</sup> Using the calculation set out in the PPG  $\left(\left(\left(\text{workplace-based affordability ratio} - 4\right)/4\right)*0.25\right)+1$

# Examination of Woking Site Allocations DPD

## Hearings Statement – Matter 2: Conformity with the Woking Core Strategy



- 1.5 The reason the standard method figure in Woking was calculated as 409dpa in 2018 was because the Council 'reviewed' its Core Strategy requirement and determined it to be up to date. This means that any standard method calculation is capped at 40% above the adopted requirement (which itself was constrained at the time of adoption from a need of 594dpa to a requirement for 292dpa). The standard method in Woking is in effect a cap on an already capped figure.
- 1.6 The PPG is clear about the purpose of the cap and also how it should be taken into account in the strategic planning process. The PPG (paragraph: 007 Reference ID: 2a-007-20190220) confirms that, *'The standard method may identify a minimum local housing need figure that is significantly higher than the number of homes currently being planned for. The cap is applied to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible. The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself. Therefore strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible'*.
- 1.7 The cap is therefore an artificial mechanism to ensure the local housing need is as deliverable as possible. The PPG is clear it doesn't mean the need is lower. Councils should therefore consider whether a higher level of need could be delivered (i.e. go higher than the capped figure) or undertake an early review.

### Remedy

- 1.8 Over the last three years, Woking has delivered an average of 361dpa, clearly exceeding its currently constrained housing requirement and the capped LHN. This highlights the much higher level of need within the authority than is currently being planned for. It therefore follows that the SADPD should enable additional available sites to be delivered to meet this higher level of need, rather than continuing to artificially constrain housing in the Borough.
- 1.9 The Council's GB Review (notwithstanding its methodological shortcomings) has identified additional sites for release from the GB. We consider that additional sites should indeed be released from the Green Belt to enable additional available sites to be delivered to contribute to meeting the need in Woking.

**Question 2:** No comment.

**Question 3:** *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?*

### Answer

- 1.10 No. Woking incorrectly considered only the housing need within the same HMA and not 'neighbouring authorities'.

### Explanation

- 1.11 Unlike the NPPF 2012, the NPPF 2019 makes no reference to the 'Housing Market Area' (HMA). Instead the NPPF 2019 refers to 'neighbouring areas'. Authorities that share a boundary with Woking are Surrey Heath, Runnymede, Elmbridge and Guildford. With regards to housing need, the 'Review of the Woking Core Strategy' considered only those authorities within the same HMA as Woking, i.e. Guildford and Waverley.
- 1.12 Page 16 of the 'Review' acknowledges that the NPPF allows 'scope for unmet need arising from an authority to be met in the neighbouring area.' However, the 'Review' then refers to the fact that, 'Woking, Guildford and Waverley Borough Councils forms the same Housing Market Area...' There is no mention of Surrey Heath, Runnymede or Elmbridge in the entire Review.

# Examination of Woking Site Allocations DPD

## Hearings Statement – Matter 2: Conformity with the Woking Core Strategy

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### Remedy

- 1.13 In order to ensure that the requirement of the NPPF 2019 (paragraph 11) to take into account plan-making activity in neighbouring authorities is appropriately taken into account, additional work with all neighbouring authorities is required.

### **Issue (ii) To what extent would the allocations, taken together, meet the requirements set out in the Core Strategy?**

**Question 1:** *Has the viability of the SADPD been tested and evidenced in accordance with the advice contained in the PPG, and does the viability evidence take into account any policy requirements arising from the SADPD, such as the requirement to make use of the Government's optional technical standards?*

### Answer

- 2.1 The SADPD is not accompanied by any specific evidence on viability and therefore it appears that the specific policy requirements and site allocations have not been informed by viability evidence.

### Explanation

- 2.2 The NPPF 2019 has a clear and focused emphasis on deliverability, requiring that local planning authorities 'identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing' (paragraph 73) and noting that, 'Plans are 'sound' if they are:... c) Effective – deliverable over the plan period' (paragraph 35). A key component of deliverability is demonstrating sites are viable when all policy requirements are considered cumulatively. There is however, no evidence that the Council has considered the deliverability of any site either within the Green Belt (GB) or the Urban Area (UA). This is particularly relevant to the UA sites, given their inherent complexities and unusual costs. The failure to undertake this work means there is no evidence demonstrating the SADPD housing allocations are deliverable or developable, thereby failing to meet the requirements of the NPPF 2019.

### Remedy

- 2.3 In order to ensure the soundness of the plan and demonstrate that all site allocations are deliverable and developable, relevant evidence must be provided to support the SADPD in accordance with the NPPF 2019. Such evidence will also help to determine whether the release and allocation of further or alternative GB sites is required to address housing need, and particularly family housing need.

**Question 2:** *Is the spatial distribution of development allocations in the SADPD in general conformity with the Core Strategy?*

- 2.4 Policy CS10 of the CS sets out the housing provision and distribution and an indicative number of dwellings to be provided in the various locations. Given the doubts about deliverability of several of the UA allocations (see our response to Q4, issue i) of Matter 3), the SADPD must ensure there is sufficient flexibility in the distribution of the dwellings to ensure that the housing provision is delivered.
- 2.5 To achieve this, the SADPD must interpret the 'indicative number of dwellings' in the policy as being a minimum. This interpretation must be applied to both the UA and GB sites.

**Question 3:** No comment.

**Question 4:** No comment.

**Question 5:** No comment.

# Examination of Woking Site Allocations DPD

## Hearings Statement – Matter 2: Conformity with the Woking Core Strategy



**Question 6:** *Would the SADPD allocations deliver a sufficient mix of sites to meet assessed needs for the size, type and tenure of housing for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)?*

### Answer

2.6 The Core Strategy and SHMA 2015 identify a significant requirement for family homes. However, the SADPD allocations include a significant proportion of UA sites which are anticipated to deliver predominantly higher-density flatted accommodation. The SADPD will not therefore deliver a sufficient mix of sites to meet assessed need.

### Explanation

- 2.7 The submission SADPD identifies approximately 2,184 dwellings (plus additional dwellings at site UA44 Woking Football Club) to come forward at the UA sites and approximately 971 dwellings to come forward at Green Belt sites during the Plan period, based on estimated development yields in the SHLAA. Taking account of extant consents for UA sites (which provide a greater number of dwellings than in the SADPD), the supply from UA sites amounts to 2,713 dwellings, equating to almost 75% of all dwellings expected to come forward in the Plan period.
- 2.8 It is assumed that densities<sup>7</sup> above 70dph would provide flatted accommodation only and not housing. There are only 4 UA sites (UA20, UA21, UA23 and UA38) which are anticipated to be developed at densities less than 70dph. It is therefore assumed that only these sites would provide development comprising housing (rather than flatted accommodation). This equates to approximately 87 dwellings, representing less than 4% of all dwellings expected to come forward at UA sites in the plan period.
- 2.9 The Core Strategy highlights that *'There is significant need for family homes, in particular, affordable family homes that cannot all be met in high density flatted accommodation in the main urban centres.'* This is reinforced more recently in the SHMA 2015 which sets out an overall need for 50% 3 and 4 bed units and 80% 2, 3 and 4-bed units across the West Surrey HMA. Given that family accommodation typically requires private amenity space which is accessible, safe and useable, it is necessary for the SADPD to allocate sufficient appropriate sites to meet this particular identified need, including consideration of Green Belt sites. This is particularly important given the high proportion of UA sites proposed for allocation and the anticipated high-density development this will provide.
- 2.10 As confirmed by Core Strategy Policy CS6, *'The Green Belt has been identified as a potential future direction of growth to meet housing need, in particular, the need for family homes between 2022 and 2027.'* Furthermore, Core Strategy Policy CS12 requires that all new residential development on greenfield land provides 50% affordable housing, as opposed to 40% provision on large urban area sites. It is clear therefore that Green Belt sites can address housing needs which cannot be adequately addressed on UA sites, not only in terms of delivering housing, but specifically family housing and additionally affordable family housing.

### Remedy

2.11 Accordingly, in order to ensure that a sufficient mix of sites is identified to meet assessed needs, and to thereby ensure the soundness of the Plan, additional sites outside the UA must be allocated. The evidence base and SA (despite their respective deficiencies) have already identified such sites, including Land north east of Saunders Lane (Ref. SHLAAHEA018) and Land north west of Saunders Lane (Ref. SHLAAHEA019), which would help address this deficiency and should therefore be reconsidered for allocation/safeguarding.

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<sup>7</sup> calculated by applying the estimated development yield of the UA sites with the stated site area (notwithstanding other site-specific factors and mixed uses).

# Examination of Woking Site Allocations DPD

## Hearings Statement – Matter 2: Conformity with the Woking Core Strategy



**Question 7:** Does the SADPD specify the mix of dwellings that specific sites will be expected to provide in line with paragraph 5.75 of the Core Strategy?

### Answer

2.12 The SADPD does not specify a precise mix of dwellings that individual sites will be expected to provide. Instead, the SADPD appears to rely on Policy CS11 of the Core Strategy (as referred to on pages 18-19 of the SADPD), which itself is not prescriptive but which refers generally to compliance with the latest SHMA and consideration of local character. The SADPD should allocate appropriate sites to meet the Borough's housing needs to ensure the soundness of the Plan.

### Explanation

2.13 The reasoned justification to Policy CS12 notes a predominant need for 3 and 4 bed units (over 50%) based on the SHMA 2009. An updated SHMA 2015 has now since been published, to inform the SADPD, and sets out a similar overall need for 50% 3 and 4 bed units across the West Surrey HMA.

2.14 Notably the SADPD allocates a significant proportion of UA sites (approximately 75%), of which around 96% are identified to deliver higher-density development above 70dpa (therefore likely to comprise flats or smaller units), as referred to in the response to Issue ii Question 6 above. However, it is important that the SADPD allocates appropriate sites to meet the Borough's housing needs, including the specific need for family housing identified in the SHMA and Core Strategy, in order to ensure the soundness of the Plan.

### Remedy

2.15 The UA sites identified in the SADPD are unable to deliver the required mix of housing in line with the SADPD evidence and it is therefore necessary that additional allocations are identified at Green Belt sites (such as Land north east of Saunders Lane (Ref. SHLAAHEA018) and Land north west of Saunders Lane (Ref. SHLAAHEA019)) where lower-density family housing can be provided on a sustainable basis.

**Question 8:** No comment.

**Question 9:** No comment.

**Question 10:** No comment.

**Question 11:** No comment.

**Question 12:** No comment.

### **Issue (iii)**

**Question 1:** No comment.

**Question 2:** No comment.

**Question 3:** No comment.

### **Issue (iv)**

**Question 1:** No comment



# Examination of Woking Site Allocations DPD

## Hearings Statement – Matter 2: Conformity with the Woking Core Strategy

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### Issue (v)

**Question 1:** No comment

**Question 2:** No comment

### Issue (vi) Is the SADPD supported by adequate consideration of transport issues?

**Question 1:** No comment

**Question 2:** No comment

**Question 3:** No comment

**Question 4:** No comment

**Question 5:** No comment

**Question 6:** *What measures are in place to mitigate the transport effects of the SADPD and is it clear how actions will be phased to secure appropriate mitigation- is there a reasonable prospect that mitigation measures would be delivered in the planned timescales?*

- 6.1 The GB allocations and safeguarded sites are focused along the A245 corridor (e.g. GB4, GB5, GB10 and GB11). Surrey County Council has identified improvements necessary by 2026 along the A245 corridor to mitigate the impacts from these sites (Potential Mitigation Study for A245, 2017). However, the Infrastructure Capacity Study and Delivery Plan 2018 (IDP) provides no assessment of the costs, funding sources or risks to delivery. There is therefore no certainty that the identified works are deliverable, which in turn will affect the deliverability of the identified GB sites, contrary to paragraph 35 of the NPPF 2019. These improvement works are essential to the delivery of allocated sites and without them there would be unacceptable impacts on the road network contrary to paragraph 109 of the NPPF 2019.
- 6.2 However, the same constraints on development do not exist in other parts of the road network, including south of Woking which was identified as a 'broad location for growth' (Core Strategy Policy CS1). Indeed, sites such as Land north east of Saunders Lane (Ref. SHLAAHEA018) and Land north west of Saunders Lane (Ref. SHLAAHEA019) benefit from being located on a less constrained part of the road network where mitigation would not be required (based on SCC's Strategic Transport Assessment, 2010).
- 6.3 In order to reduce risks regarding the deliverability of identified transport infrastructure improvements and GB allocations, and to realise the opportunities of existing transport infrastructure (paragraph 102 of the NPPF 2019), additional sites within the GB should be allocated (or safeguarded), such as Land north east of Saunders Lane (Ref. SHLAAHEA018) and Land north west of Saunders Lane (Ref. SHLAAHEA019).



**David Jackson**  
Director, Head of Planning

+44 (0) 207 420 6371  
+44 (0) 7967 555796  
djackson@savills.com

**Julia Mountford**  
Associate Director

+44 (0) 1189 520527  
+44 (0) 7976 256133  
julia.mountford@savills.com