
Woking Site Allocations DPD: Examination Hearing Statement – Matter 3

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

November 2019

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Matter 3: Is the SADPD's approach to allocations and safeguarded land in the Green Belt (GB) justified and consistent with national policy?

Issue (i) Does the Woking Green Belt Review provide a robust evidence base to support the policies and allocations of the SADPD?

Question 1: Does the Green Belt Review's focus on land 'parcels' provide a sufficiently fine-grained assessment of the GB?

Answer

- 1.1 No. For the majority of land parcels, there is substantial variation in terms of contribution to the GB purposes throughout the parcel. The methodology assesses the contribution of the entire parcel and does not address the varying contribution that different parts of a particular parcel make to the GB. This results in some sites within the parcel being assessed as contributing far more to GB purposes than is the case.
- 1.2 For example, parcel 20 land includes various character areas. Land to the east of the railway and on the eastern most side of the parcel borders more GB land. Land to the west of the railway line borders the urban area of Hook Heath. To the south of Hook Heath is a parcel of land well contained from the wider countryside by existing housing and infrastructure (addressed in Question 2 below). There is a linear conservation area to the west of the parcel with built form extending westwards.

Remedy

- 1.3 To appropriately consider these different characteristics within the parcels and the individual contribution these different areas make to the GB purposes, the GB Review needs to incorporate a finer-grained assessment of land parcels.

Question 2: Does the methodology of the Green Belt Review place appropriate emphasis on the permanence and purposes of the GB?

Answer

- 1.4 No, because the GB Review is not underpinned by a correct application of the relevant GB purposes and the Review incorrectly incorporates environmental/ landscape designations into the assessment of land against the GB purposes. In addition some landscape designations (incorrectly) informing the GB Review are themselves a local designation not supported by any evidence base.
- 1.5 Our comments regarding 'permanence' are addressed in our response to question 1 of issue vii.

Explanation

- 1.6 Purposes 1-3 are used to inform the GB Review, which is accepted. However, the assessment must correctly apply the purposes.
- 1.7 In 2015, PAS published the document, '*Planning on the Doorstep: The Big Issues – Green Belt*' to provide advice on undertaking GB Reviews. Para 6.7.3 of our representations relating to 'Land north east of Saunders Lane, Mayford' sets out the full guidance for these respective purposes. This guidance questions whether in terms of Purpose 1, well planned development is actually 'sprawl'. It highlights that the second GB purpose is about 'towns' merging and that identity of a settlement is about the character of the place, whereby landscape character can inform this type of assessment. In terms of Purpose 3 and 'safeguarding the countryside', it can be useful to look at which land is under the influence of the urban area. With regards to environmental/ landscape designations, the PAS guidance is clear that, '*We recommend local authorities try to reduce the challenge [about the Green Belt] ... through setting it alongside ... valuable landscapes in deciding where development is to be provided...*'

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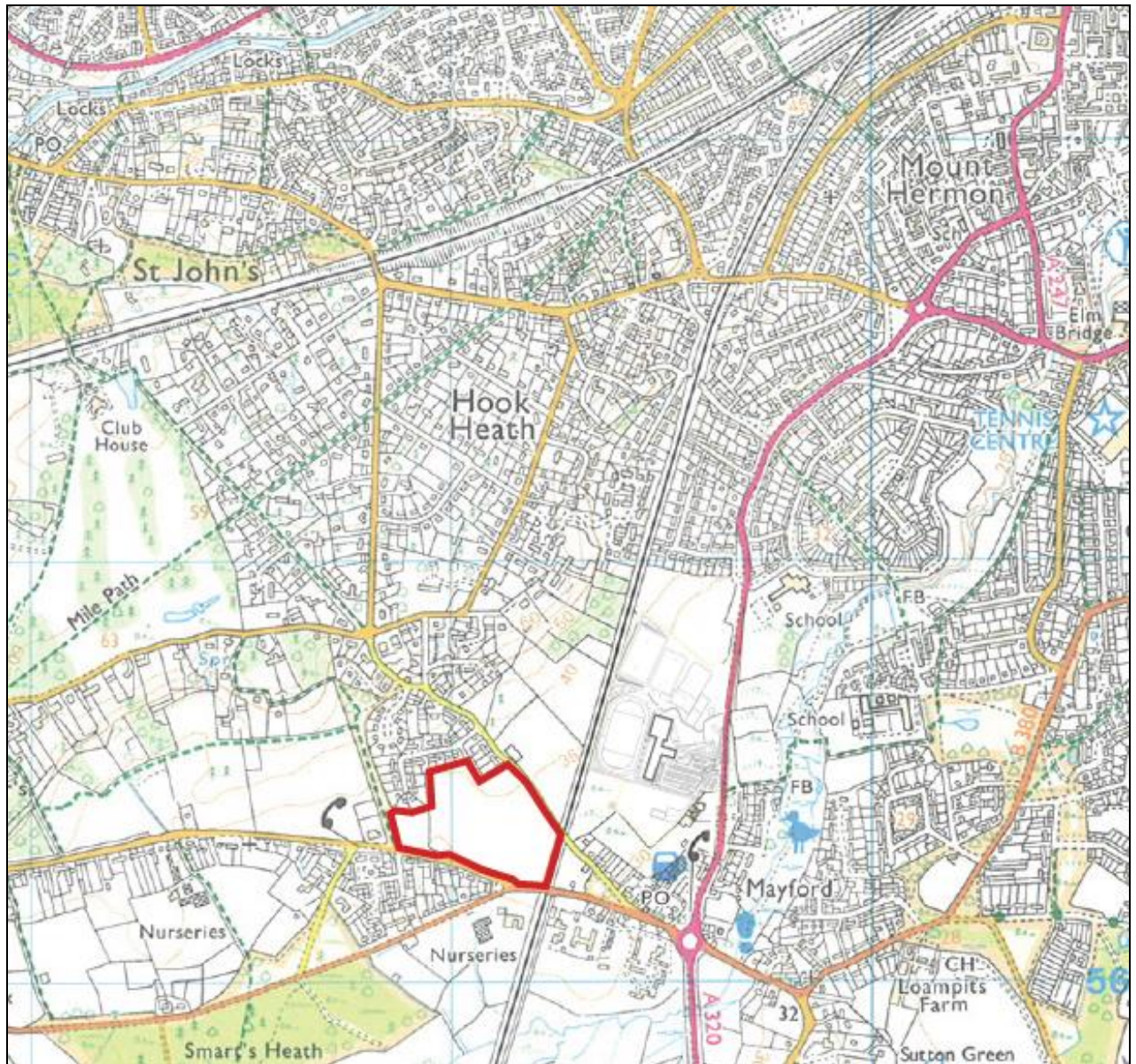
- 1.8 The incorrect application has subsequently skewed the conclusions of the GB Review. For example, when considering parcel 20 (which relates to land around Mayford), Section 3.2.27 of the Council's GB Review includes the analysis below:
- *Part of the land is elevated/ sloping forming part of gentle escarpment. Designation provides protection of this area where a combination of topography and vegetation contains the urban area. Also prevents development and infilling within larger residential plots along Hook Heath Rd (a Conservation Area). Other suitable boundaries do exist along periphery of parcel.*
 - *Development in parcel would not reduce gap between town and north edge of Guildford – gap is already narrower between Mayford / Guildford, although development would reduce gap/ lead to merger with Mayford / ribbon of development along Saunders Lane.*
 - *Designation prevents encroachment onto slopes that are locally exposed and contribute to setting of town (although some areas are more discreet).*
- 1.9 This analysis resulted in the GB Review making the following conclusions:
- Purpose 1 – Part critical/ part major importance to Green Belt
 - Purpose 2 – Major importance to Green Belt
 - Purpose 3 – Major importance to Green Belt
- 1.10 The GB Review incorrectly refers to the local landscape designation, the topography and existing vegetation, development within the conservation area and considers impacts on these components; none of which are purposes of the GB. Additionally, it considers the merging of 'ribbon' development.
- 1.11 We have set out above that we do not consider that the land 'parcels' provide a sufficiently fine-grained assessment of the GB (see our response to Inspector's Q1 above). We have therefore considered a part of parcel 20 (Land north east of Saunders Lane) below by way of an example of the incorrect application of the purposes and it is demonstrated that were the purposes to be correctly applied, this land performs weakly at best against all three purposes.
- 1.12 Purpose 1 – The site is effectively contained by surrounding housing and infrastructure land uses. It represents a discrete land parcel which is closely associated with the surrounding urban environment. The presence of these robust boundaries and the Site's association with the surrounding urban land uses mean that planned development in this location would not result in sprawl and makes little contribution to this purpose.
- 1.13 Purpose 2 – Development would not meaningfully reduce the existing gap between the neighbouring towns of Woking and Guildford which lie some distance to the south. Mayford is not a town and strictly speaking it is not the purpose of GB to protect the separation between towns and other smaller settlements, as noted by the PAS guidance. Given the urban character of this part of Woking, housing in this location which respected the existing frontage with Saunders Lane would not significantly compromise the identity of the town of Woking and the settlement at Mayford. It is therefore concluded that this parcel makes only a weak contribution to GB purposes.
- 1.14 Purpose 3 – All land at the edge of settlement plays some role in protecting the countryside from encroachment. This should be distinguished from a judgement about landscape quality/ condition which is not a GB consideration. However, the GB Review incorrectly incorporates consideration of landscape and heritage into this purpose. The GB in the vicinity of the site contains significant areas of existing development. In addition, the site is enclosed by built development, infrastructure and public open space. This part of the GB therefore has little association with the wider countryside. Given the containment afforded by the surrounding built environment, release of this parcel would not result in encroachment on the wider countryside. Again, the conclusion must be that the site performs poorly against this purpose.
- 1.15 Plan 1 below illustrates the built form as shown on the proposals map, without the GB being shown illustrating the weak contribution this parcel makes to the GB purposes.

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Plan 1 – Example illustration of land within parcel 20 to GB



1.16 Additionally, the assessment of parcel 20 sets out that the designation provides protection of the gentle escarpment. Paragraph 3.5.18 of the GB Review confirms that, '*Whilst the parcel lies within an area identified as 'Escarpment and Rising Ground of Landscape Importance' this local designation is not substantiated through any published or ratified study.*' [our emphasis].

Remedy

1.17 In order to ensure the Site Allocations DPD adopts an appropriate strategy, the GB Review upon which it relies as an evidence base must rely on the correct application of the GB purposes specified in the NPPF and these purposes alone. The Council's GB Review must therefore be revisited and substantially rewritten. If the Council assesses that additional evidence is also required to address other factors, such as environmental/ landscape designations, these should be addressed in separate analyses.

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Question 3: No comment.

Question 4: Does the Green Belt Review's objective of identifying suitable, deliverable sites for 550 homes over the plan period provide an appropriate basis for assessment?

Answer

1.18 No. In addition to our concerns in relation to the Council's GB Review, there are also doubts about the deliverability of some urban area sites that the Council is relying on for its housing supply. Specifically, these concerns relate to the sites' availability for development and where landowner interest is not fully established, land assembly issues and re-provision of existing uses/ occupiers.

Explanation

1.19 Table 1 below identifies examples of UA sites with deliverability concerns.

Table 1

(Note: Table may not include all sites with deliverability concerns)

Site	Landowner interest not fully established	Land assembly issues	Re-provision of existing occupiers	Estimated residential site capacity
UA4		✓		149
UA6		✓		50
UA11		✓		55
UA13		✓		125
UA15		✓		67
UA20		✓		55
UA26		✓		104
UA30	✓			61
UA31	✓		✓	21
UA32	✓			250
UA33			✓	88
UA34			✓	100
UA37		✓		20
Total				1,145

1.20 There is now much greater emphasis on the need to demonstrate the viability and deliverability of development proposals, in particular at the plan making stage. Paragraph 67 of the NPPF 2019 requires that local planning policies identify a sufficient supply of sites *'taking into account their availability, suitability and likely economic viability.'* However, the Council has not presented any evidence demonstrating how these matters are to be addressed to enable delivery.

Remedy

1.21 Given the lack of evidence available to demonstrate deliverability of some UA sites, a greater number than 550 homes is required to be identified within the GB. The Council's GB Review (despite its deficiencies) has identified additional sites to be released from the GB. We consider that additional sites should indeed be released from the Green Belt and that this process should be informed by a robust GB Review evidence base as specified in Q2 above.

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Issue (ii) Do the SADPD's GB allocations and policies accord with national policies and guidance, and do exceptional circumstances exist sufficient to justify the alteration of the GB's boundaries?

Question 1: *To what extent can it be demonstrated that exceptional circumstances exist sufficient to alter GB boundaries as proposed?*

Answer

- 2.1 As set out in section 6.3 of our representations, we agree there is a clear case justifying exceptional circumstances to alter GB boundaries.
- 2.2 As the question refers to the alteration of the boundaries 'as proposed' it will apply to both sites proposed for allocation during the plan period (up to 2027) and those sites proposed for safeguarding for future development between 2027 and 2040 (see paragraph 139 (c) of the NPPF 2019). The favourable parts of the evidence base have been 'cherry picked' resulting in land to accommodate only 270 dwellings being safeguarded for future development despite evidence identifying suitable additional land (notwithstanding the deficiencies of this evidence base). For comparison, the Regulation 18 version of the SADPD recommended safeguarding land to accommodate 1,073 dwellings. The significant reduction in sites proposed for safeguarding, contrary to the evidence base, results in an extreme deficit in the provision of land for future housing.
- 2.3 Our Regulation 19 representations highlight the deficiencies of the Council's evidence base regarding the GB Review and also identify that the Council has failed to follow the evidence base which it relies upon to amend the GB boundaries. The proposed strategy for GB release within the SADPD is therefore neither justified nor consistent with national policy.

Remedy

- 2.4 In order to ensure that exceptional circumstances exist to alter the GB boundaries 'as proposed', the evidence base must be updated to address the shortfall in housing provision that would result. Additionally, other updated evidence, for example relating to affordable housing provision, the need for family housing and deliverability of sites should inform the exceptional circumstances consideration to ensure the strategy is appropriate and justified.

Question 3: *Has the spatial distribution of the SADPD's GB allocations and safeguarded sites taken into account the need to promote sustainable patterns of development?*

Answer

- 2.5 No, the need to promote sustainable patterns of development has not been appropriately taken into account. The GB Review was finalised in January 2014. Since that time the NPPF has been updated and includes an additional section (at paragraph 138) requiring that, when necessary to release GB land, first consideration is given to land which has been previously-developed and/or is well-served by public transport.
- 2.6 Additionally, the assessment of the parcels is now out of date as demonstrated by the assessment of parcel 20. Table 3.8 of the GB Review considers whether each of the parcels are within 1km of existing community facilities including a primary school, secondary school, health centre or community centre. In December 2015 planning permission was given for a new school and leisure centre on Egley Road (PLAN/2015/0703), both of which are now operational. These additional facilities have not been accounted for in the existing sustainability assessment.

Remedy

- 2.7 To address these deficiencies, firstly an up to date appraisal of land parcels against the NPPF 2019 requirements must be undertaken. Secondly, the assessment itself must be accurate and up to date.

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Question 4: *Does the SADPD demonstrate that GB boundaries will not need to be altered at the end of the plan period and define boundaries clearly using physical features that are readily recognisable and likely to be permanent?*

Answer

2.8 No.

Explanation

- 2.9 The Council proposes that the plan period extends for only seven years from adoption of the plan. This is less than half the period of 15 years that the NPPF requires. Beyond the 7-year period, the Council proposes that land to accommodate 270 dwellings is safeguarded for the period 2027 to 2040 (despite the GB Review identifying land to accommodate more than 1,000 dwellings). Whilst the principle of safeguarding land is supported, the quantum of land being safeguarded and the period it is safeguarded for are entirely arbitrary and inconsistent with the NPPF.
- 2.10 Assuming the standard methodology for housing requirement identifies a need comparable to today's figures of 431 dwellings per year, to safeguard land to accommodate only 270 dwellings amounts to approximately 63% of the housing need for one year. This level of provision is clearly inadequate for the specified thirteen year period from 2027 to 2040.
- 2.11 It is entirely unclear why a 'thirteen year' period has been used, which has not been justified and does not meet the requirements of paragraph 139 for any safeguarding 'well beyond' the plan period. Given strategic policies '*should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities...*' this safeguarding period does not even extend to one strategic 'plan period'.

Remedy

- 2.12 To ensure GB boundaries will not need to be altered at the end of the plan period, the evidence base must be updated to address the deficiencies we have identified, namely:
- The GB methodology adopted and ensuring it responds fully to the GB purposes and requirements of the NPPF 2019; and
 - ensuring the length of safeguarding and quantum of land has been robustly considered.
- 2.13 Following this, the alterations to the GB boundaries must follow the Council's own evidence base in its entirety to ensure the strategy is appropriate and justified and meets the NPPF 2019 requirements of being 'based on proportionate evidence'.
- 2.14 We consider the process that the Council has undertaken and the evidence base that has been produced are so flawed that we do not submit detailed comments regarding the boundaries of the altered GB.
- 2.15 No comment on question 5-9.

Issue (iii) Are the GB housing allocations deliverable or developable?

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

Answer

- 3.1 No. The Site Allocations DPD is not accompanied by any specific evidence on affordable housing need (instead relying upon policies in the Core Strategy), nor is any evidence provided on viability. (We have no

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comment on infrastructure requirements or inclusion of local and national standards regarding the GB allocations).

Explanation

- 3.2 Page 20 of the CS states 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.'*
- 3.3 Para 3.7 recognises that housing for the elderly and the need for family homes can best be met on Greenfield land outside the main centres. Further policy CS6 states, *'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.'*
- 3.4 The Core Strategy therefore makes it clear that there is a shortage of family homes and in particular affordable family homes. Unaffordability in Woking is acute. With an affordability ratio of 11.78, Woking is significantly less affordable than the national average (7.83) or the South East (10.38). As a consequence the affordability uplift applicable through the Government's Standard Methodology is the highest possible in Woking at 40%. To ensure unaffordability does not further deteriorate, it is critical that there is certainty over the deliverability of all allocated sites and additionally, address the specific housing needs that exist, such as family housing.
- 3.5 The NPPF 2019 has a clear and focused emphasis on deliverability. A key component to 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 of the allocated sites, either within the 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 housing allocations are deliverable or developable, thereby failing to meet the requirements of the NPPF.

Remedy

- 3.6 In order to ensure the soundness of the plan and demonstrate that all site allocations are deliverable and developable, relevant evidence must be prepared to support the Site Allocations DPD.
- 3.7 No comment on questions 2-6.

Issue (iv) – (vi) – No comment.

Issue (vii) does the SADPD's approach to safeguarded land accord with the Framework?

Question 1: Is it necessary for the SADPD to identify areas of safeguarded land?

Answer

- 7.1 Yes if the SADPD is to accord with NPPF para 139 and ensure that it *'meets longer-term development needs stretching well beyond the plan period'*. However, the approach taken to safeguarding must be clearly and robustly evidence based in order for the approach to be sound. Currently that has not been achieved. The concerns regarding both the quantum of land being safeguarded and the period it is safeguarded for have been addressed above.
- 7.2 The safeguarding of land ensures the permanence of the GB boundaries. However, as above, safeguarding should only be informed through an up to date and robust evidence base.

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Question 2: *To what extent is the amount of safeguarded land included in the SADPD justified?*

Answer

7.3 In short, there is no justification.

Explanation

- 7.4 Page 18 of the Site Allocations DPD confirms that, '*The Green Belt boundary review report (2014) has recommended sites... **for safeguarding to meet anticipated development needs between 2027 and 2040.***' [our emphasis].
- 7.5 Paragraph 1.1.1 of the Green Belt Review confirms that it will, '*...identify potential additional sites to be safeguarded for residential development between 2027 and 2040, approximately 40 hectares of land (this equates to 1200 at 30dph net)*...
- 7.6 There is however no evidence as to how the housing need to 2040 has been calculated. Regardless of the basis for these figures, the submitted Plan proposes that land to accommodate only 270 between 2027 and 2040 is safeguarded.
- 7.7 Assuming the standard methodology for housing requirement identifies a need comparable to today's figures of 431 dwellings per year, to safeguard land to accommodate only 270 dwellings amounts to approximately 63% of the housing need for one year. This level of provision is clearly inadequate for the specified thirteen year period from 2027 to 2040.

Remedy

- 7.8 In order to ensure the soundness of the plan, the evidence base must be updated to address the deficiencies highlighted, then the alterations to the GB boundaries must follow the Council's own evidence base in their entirety to ensure the strategy is appropriate and justified.

Question 3: No comment.

Question 4: *To what extent does the identification of safeguarded land demonstrate that GB boundaries would not have to be altered at the end of the plan period?*

- 7.9 Given the concerns raised regarding the quantum of land being safeguarded, the period it is safeguarded for and the methodology within the Green Belt Review, the GB boundaries would need to be reviewed at the end of the plan period. Our response to Question 4 issue ii) sets out the measures required to avoid this.

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