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# Woking Site Allocations DPD: Examination Hearing Statement – Matter 4

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

November 2019

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### Matter 4: Are the allocated sites in the urban area justified and deliverable?

#### 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?*

#### Answer

1.1 The Site Allocations DPD (SADPD) is not accompanied by any specific evidence on affordable housing need or viability, instead relying upon policies in the Core Strategy. The Infrastructure Capacity Study and Delivery Plan (2018) (IDP) is also not considered to provide a comprehensive assessment of the infrastructure needs for specific sites.

#### Explanation

- 1.2 The Core Strategy emphasises that there is a significant need for affordable family housing. Paragraph 2.14 of the Core Strategy sets out that, *'The need for affordable housing for those who cannot afford to obtain housing on the open market is considerable. The Strategic Housing Market Assessment shows that there is a need for an additional 499 new affordable homes per annum. The majority of the unmet need is for family housing.'* Page 20 of the Core Strategy also acknowledges 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 need is further highlighted in the SHMA 2015, which states that 60% of open market units, and 50% of all units, should be provided as 3-bed or 4-bed units (SHMA 2015, Table 79).
- 1.3 The Core Strategy adds that greenfield and Green Belt land are appropriate locations to meet affordable family housing needs. Paragraph 3.7 of the Core Strategy recognises that, *'...there are limited types of uses and local needs, which by their nature can best be met on Greenfield land outside the main centres. Examples of this are housing for the elderly and the need for family homes.'* 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.'*
- 1.4 The Core Strategy therefore makes it clear that there is a shortage of family homes and in particular affordable family homes. As such, to prevent the current situation from worsening, it is critical that the allocated sites are deliverable and can address the specific housing needs that have been identified.
- 1.5 The National Planning Policy Framework 2019 (NPPF 2019) has a clear and focused emphasis on deliverability (as referred to in the response to Matter 2 Issue ii Question 1), noting that, *'Plans are 'sound' if they are:... c) Effective – deliverable over the plan period'* (paragraph 35). There is however, no evidence that the Council has considered the deliverability of any allocated site either within either the Urban Area (UA) (or the Green Belt (GB)). This is particularly relevant to the UA sites, given their inherent complexities and unusual costs, and sites which are reliant on significant infrastructure provision (see response to Matter 3 Question 4). Indeed significant transport improvements are proposed north of the railway and along the A320 and A245 corridors (SADPD page 24) which may affect sites UA4, UA5, UA34, GB4, GB5, GB10 and GB11 in particular. 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 2019.

#### Remedy

- 1.6 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, particularly affordable family housing need.

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**Question 2:** *To what extent would housing sites anticipated to come forward in the next 5 years be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years?*

### Answer

- 1.7 The Council's latest 'Five Year Housing Land Supply Position Statement' (September 2019) assumes that, in the next 5 years, 654 dwellings will come forward on allocated UA sites (plus 222 dwellings on non-allocated UA sites) where, as yet, there is no planning permission. Notably, this figure has been calculated only as a percentage (40%) of the total that these sites are expected to deliver between 2022-2027, to represent the five year land supply period from 1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2024. There is no housing trajectory with associated evidence to provide an accurate assessment of the delivery of each site, contrary to the requirements of NPPF 2019 paragraph 73, which requires that *'Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period.'*
- 1.8 The assumed 40% rate of delivery within the period 1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2024 also takes no account of matters such as where existing occupiers are to be relocated (e.g. UA33, UA34, UA31) and sites where landowner interest is not fully established (e.g. UA30, UA31, UA32) (see response to Matter 3 Question 4). As such it is considered highly unlikely that all of these sites would deliver the amount of housing envisaged by the Council within five years when there is doubt about their current availability. In addition it is important to take into account the need for site preparatory/survey work, applications to secure full planning permission and subsequent lead in times to enable construction and delivery of the dwellings.
- 1.9 The NPPF 2019 has a clear and focused emphasis on deliverability (as referred to in response to Issue i Question 1), 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). However there is no evidence that the Council has considered the deliverability of any UA site. Whilst the identified UA sites may be suitable locations for housing, the objective to promote brownfield/regeneration sites should not prejudice the overarching objective to provide for the housing needs of the Borough as a whole (particularly given the identified need for affordable family housing, as per the response to Matter 2 Issue ii).

### Remedy

- 1.10 Accordingly, in order to demonstrate that all site allocations are deliverable and developable, and thereby ensure the soundness of the plan, relevant evidence must support the SADPD. Should evidence demonstrate that the identified UA sites are not deliverable at the point envisaged or developable during the plan period, additional sites should be released from the GB and allocated to address housing need, particularly family housing need.

**Question 3:** No comment.

**Question 4:** *Several allocations relate to sites which require site assembly before development activity can commence, and with active uses ongoing- how have these factors been taken into account in arriving at the SADPD's phasing and delivery assumptions?*

### Answer

- 1.11 A number of UA sites (e.g. UA33, UA34, UA31) require existing occupiers to be relocated (as referred to in the response to Issue i Question 2). Despite this constraint, the plan assumes that all UA sites will deliver the full quantum of allocated housing by 2027, and 40% within the 5 year period from 1<sup>st</sup> April 2019 to 31<sup>st</sup> March 2024 (referred in the Five Year Housing Land Supply Position Statement (September 2019) (this is in fact a 4 year-period if the SADPD is adopted early next year).

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1.12 As explained in response to Issue i Questions 1 and 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). However there is no evidence that the Council has considered the deliverability of UA sites, and particularly UA sites where existing occupiers are to be relocated.

### Remedy

1.13 Accordingly, in order to demonstrate that all site allocations are deliverable and developable, and thereby ensure the soundness of the plan, relevant evidence must support the SADPD. Should evidence demonstrate that the identified UA sites are not deliverable at the point envisaged or developable during the plan period, additional sites should be released from the GB and allocated to address housing need, particularly family housing need.

**Question 5:** *Does reliance on mixed use sites in the urban area, with undefined quanta of differing uses, provide sufficient certainty that housing requirements would be delivered over the plan period? Is the SADPD sufficiently flexible to adapt to lower than expected housing delivery on mixed use sites?*

### Answer

1.14 The SADPD includes 44 UA site allocations, of which approximately half are mixed-use sites incorporating residential development which equates to approximately 1,500 units (based on the development yields appraised in the SHLAA 2017). A number of these allocations do not define the quantum of non-residential uses envisaged and therefore there is a risk that the actual delivery of non-residential uses could affect expected housing delivery on site. The SADPD does not provide any contingency for this and therefore is a risk that the SADPD will not deliver its full housing requirement set by the Core Strategy.

### Remedy

1.15 Accordingly, in order to ensure that development requirements are met in full and to ensure the soundness of the plan, the SADPD should allocate/safeguard sufficient deliverable and developable sites. Should evidence demonstrate that the identified UA sites are not deliverable or developable, sites should be released from the GB and allocated to address housing need, particularly family housing need.

**Question 6:** No comment.

**Question 7:** No comment.

**Question 8:** No comment.

**Issue (ii)** – No comment.

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