

**Woking Site Allocations DPD Examination
Hearing Statement on Behalf of Taylor
Wimpey UK Ltd (Respondent: 06580)**

Matter 2 - Is the SADPD in general conformity
with the Woking Core Strategy?

November 2019

Contents

1.	Introduction	3
2.	Responses to the Issues Raised: Matter 2	4

Appendix 1: Local Authority Representations made following the Woking Core Strategy Review

Appendix 2: Supplementary Report ahead of the Meeting of Woking Council on 18th October 2018

Peter Home
peter.home@turley.co.uk

Client

Taylor Wimpey UK Ltd

Our reference

TAYW2061

13th November 2019

1. Introduction

- 1.1 This statement has been prepared by Turley, on behalf of **Taylor Wimpey UK Ltd** (Respondent: 06580), to the Woking Site Allocations DPD (SADPD) Examination. It responds to the issues and questions outlines under *Matter 2: Is the SADPD in general conformity with the Woking Core Strategy?*
- 1.2 This statement follows our representations submitted in December 2018 in response to the consultation held on the Draft Site Allocations DPD (Regulation 19 version, November 2018). A list of representations and appendices submitted, on behalf of respondent 06580 in December 2018, is as follows (including the WBC consultation online database search references):
- Representations to the Woking Regulation 19 Pre-Submission Site Allocations DPD (HOME_P3);
 - Visioning Framework Document: Land Adjacent to Hook Hill Lane, Woking (HOME_P4);
 - Meeting the Housing Needs of Woking: A Technical Critique (HOME_P5);
 - Sustainability Appraisal for Land Adjacent to Hook Hill Lane, Woking (HOME_P6); and
 - Hook Hill Lane, Woking: Landscape and Visual Appraisal and Green Belt Review (HOME_P7).
- 1.3 This statement refers to and is prepared in support of all the above representations and appendices. However, we have not considered it necessary to address every Issue or question set by the Inspector. Therefore, the responses provided below cover only those areas where Taylor Wimpey consider a response is required to support or to elaborate on their original representations.

2. Responses to the Issues Raised: Matter 2

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?

Q2: Did the Council's review of the Core Strategy pay due regard to the DTC?

- 2.1 It is clear from reading the document setting out the review of the Core Strategy (WBC/SA/E017B) that no regard whatsoever was paid to the Duty to Cooperate in the process of undertaking the review. No reference is made to the Duty or to engagement with neighbouring authorities or to the process of investigating the level of housing needs being met or planned for by other local authorities.
- 2.2 We set out our view on this within our previous representations at the Regulation 19 stage (HOME_P3, paras 2.49 to 2.53). In particular, we pointed to the letters that were sent by representatives of Guildford Borough Council (GBC), Runnymede Borough Council (RBC) and Waverley Borough Council (WaBC). These indicated clearly, not only that there had been no effective engagement with these authorities, but indeed that the process of the review of the Core Strategy had come as a complete surprise to the three local authorities. As these letters do not appear to be within the Examination Library at present, we have attached copies of them at **Appendix 1** below.
- 2.3 We would draw your attention in particular to the letter from GBC, which clearly warns Woking Borough Council (WBC) that the failure to engage constructively, actively and on an ongoing basis with GBC in relation to the review is contrary to both the spirit and legal requirements of the Duty to Co-operate.
- 2.4 It is important to note that, at the point at which the Core Strategy Review was presented to WBC Members for approval, Officers were well aware of the representations made by the three neighbouring local authorities. This is evidenced within the Supplemental Report to Council that was prepared ahead of the meeting of Full Council on 18th October 2018 (and included as **Appendix 2** below). Astonishingly, having been made aware of the concerns of the three neighbouring local authorities, the Woking Officers opted to downplay the concerns and recommended to Members that: *"the representations raise nothing new or significant enough to justify delaying deciding on this matter"*.
- 2.5 This officer advice that the review of the Core Strategy did not come under the ambit of the Duty to Cooperate has been repeated more recently within the 'Officer Responses' to the Regulation 19 representations, as set out in the Issues and Matters Topic Paper of June 2019 (WBC/SA/003). For example, on page 717 in response to our representations on the Duty to Cooperate, the officer response stated: *"Given that the Council did not embark on a modification of the Core Strategy as a result of the review, the requirements of the Duty to Cooperate would not have been engaged."*
- 2.6 Whilst we acknowledge that there is a distinction between a 'review' and the 'modification' of the Core Strategy, we strongly disagree that because WBC engaged only in the former this absolves the local planning authority of adhering to the legal requirements of the Duty. If one considers the legislation under Section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by the Localism Act 2011), it is

clear under Section 33A(3) that activities that can reasonably be considered to prepare the way for, or support, the preparation of development plan documents are within the ambit of the Duty.

- 2.7 In addition to the Duty to Cooperate, we would also point to the failure of WBC to be consistent with the National Planning Policy Framework (NPPF) with respect to the need to undertake effective engagement before setting housing targets. In particular, paragraph 60 is clear that: *“in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”* Woking has evidently failed to do this and moreover appears to be of the view that the review of the Core Strategy was and is not affected either by the Duty or by the wider need for consistency with national planning policy in this regard.

Q3: 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?

- 2.8 Whilst the review of the Core Strategy did take account of the plan-making activity within Waverley and Guildford Boroughs to the south of Woking, no account whatsoever was made of the plan-making position or ability to meet housing needs within Woking’s neighbours to the north, including Surrey Heath, Runnymede and Elmbridge Boroughs. Indeed, the review document (WBC/SA/E017B) does not refer to these three LPAs at all.
- 2.9 We cannot see any logical reason why the plan-making or housing supply positions of the three boroughs to the north of Woking were not taken into account. As we set out within our previous representations (HOME_P3, paras 2.22 to 2.25), WBC had been engaging with all Surrey LPAs in 2017 and 2018 as part of their work on the Local Strategic Statement for Surrey (2016 – 2031) and so would have been generally aware of the plan-making position of all Surrey LPAs and of the fact that some of these LPAs were unlikely to be in a position to meet their own identified housing needs.
- 2.10 Further evidence of the failure of WBC to properly take account of the ability of neighbouring LPAs to meet their own identified housing needs is provided within the letter of Runnymede BC to WBC in October 2018 (see Appendix 1 below). This highlights (on page 3) that it was widely known that Elmbridge Borough had voiced concerns about its ability to meet housing needs and was actively seeking assistance from neighbouring LPAs in this regard. WBC was aware of this position before the Council approved the Core Strategy Review and yet they did nothing about this.
- 2.11 In our view, due to the failings highlighted in our responses to Questions 2 and 3 above, the WBC Core Strategy Review was neither robust nor legally compliant and should therefore be afforded little, if any, weight in the Examination of the SADPD.

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

Q1: 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?

- 2.12 There is no published evidence that the viability of the policies set out within the SADPD have been tested. This is of considerable concern to our client as the Council seems to be relying on the original area-based viability assessment that was undertaken in 2010 by Adams Integra to support the preparation of the Woking Core Strategy (2012). That document does not appear to have been included within the Examination Library, but is available [here](#).
- 2.13 We consider that the 2010 Viability Study is out-of-date as it was prepared prior to the publication of the NPPF and PPG: Viability and does not therefore reflect the relevant national policy and guidance on the approach and methodology for viability studies appropriate to inform the preparation of Development Plan Documents. Further, the 2010 study is based on market data which is approaching 10 years old and therefore bears no relation to the current market position prevailing within the Borough today.
- 2.14 Whilst the 2010 study covers affordable housing, it does not cover other specific requirements of the SADPD, including the Government's optional technical standards for housing (which the study pre-dated). Further, the need to contribute to the provision of self-build plots, is not referred to at all within the study.
- 2.15 A further viability study was prepared by Dixon Searle Partnership (DSP) in late 2012. This can be found [here](#). This study focussed on providing viability evidence to support the introduction of the Community Infrastructure Levy. Whilst a little more recent than the Adams Integra study, the DSP work was nevertheless prepared before the PPG: Viability was published and it was not intended to support the preparation of a Development Plan Document.
- 2.16 In relation to policy requirements, the DSP work applied a blanket allowance of 5.85% to the total build cost in respect of achieving higher sustainable design and construction standards, but there is no evidence to demonstrate that this is sufficient to cover the current policy expectations of the SADPD. As with the 2010 study, no reference was made in the DSP work to the need to contribute to the provision of self-build plots.
- 2.17 Contrary to the PPG: Viability, the Council has not demonstrated that a viability assessment has been used to ensure that policies are realistic, or that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. (PPG Reference ID: 10-002-20190509).

Q6: 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)?

2.18 We will limit our comments to the delivery of affordable homes and the delivery of family housing.

Affordable Homes

2.19 Our previous representations (HOME_P3, paragraphs 2.39 to 2.48 and HOME_P5, Section 4) set out, in some detail, the significant need for affordable homes within Woking and the worsening housing affordability position since the adoption of the Core Strategy. Against this significant level of need, we demonstrated, based on the Council's own monitoring evidence, that the delivery of homes across the Borough was consistently failing to deliver anything approaching the level of affordable housing that would be required to meet the overall target of 35% of all homes to be delivered in the plan period. Indeed, since the adoption of the Core Strategy, the 35% target has been met only once, in 2016/17.

2.20 Based on our previous representations, we estimated that the overall proportion of affordable homes delivered was 21% of all dwellings. However, since the time of writing our representations, a further Authority Monitoring Report was published (December 2018) which indicates that the overall proportion of affordable homes delivered in the 2017/18 year was only 9.5% (although there was also a significant financial contribution in lieu for delivery). This low level of affordable housing delivery is corroborated by the officer response provided to our previous representations (see WBC/SA/003, page 722) which stated that since 2010, the average proportion of homes delivered as affordable homes was only 18%.

2.21 This is clear evidence of a failure of the Core Strategy and we see no evidence within the SADPD that the policies would be put in place to correct this failure. Indeed, the focus of the SADPD on the allocation of brownfield sites within the urban area, and in particular within the town centre area, is not an approach that is likely to achieve a rebalancing of the tenure profiles of new homes being delivered. As has been the case with many of the brownfield redevelopment schemes carried out within Woking's urban area in recent years, we believe that high build costs and the high costs of site redevelopment will adversely impact on scheme viability, such that affordable housing delivery will continue to be negotiated downwards to maintain scheme deliverability.

2.22 Given the low level of affordable homes delivered to date (only 384 in the 8 years since 2010) it remains our view that the level of housing proposed within the SADPD is insufficient to ensure that a total of 35% of all housing delivered over the plan period would be affordable housing. Indeed, of the 2,830 homes that remain to be delivered from the Core Strategy overall target of 4,964, some 1,353 homes would need to be affordable dwellings, which would equate to 48% of all dwellings to be delivered.

2.23 Given the high proportion of dwellings planned to come forward on brownfield and smaller sites with lower affordable housing targets (between 20% and 40%) and the

relatively low proportion of homes coming forward on greenfield sites (with a 50% target), we do not see any realistic prospect of Woking achieving the overall target for affordable dwellings by the end of the plan period. This prospect becomes even more remote when one considers that it is highly likely that there will be further cases where affordable housing delivery on brownfield sites in particular is negotiated down due to site-specific viability considerations.

Family Housing

- 2.24 We set out within our previous representations (HOME_P3, paragraphs 2.32 to 2.38 and HOME_P5, Section 3) that there is a high level of need within Woking for family housing with 3 or more bedrooms. Indeed, the 2015 Strategic Housing Market Assessment (WBC/SA/E022) demonstrated that 61% of those households seeking market housing would require homes of 3 or more bedrooms over the plan period. Our representations also demonstrated that the proportions of family homes being completed since the start of the plan period have been low, averaging less than 34% of all homes being delivered by April 2017, or marginally higher than this when the most recent figures for 2017/18 are taken into account.
- 2.25 One effect of this low level of delivery of family homes is the steep financial premium that continues to be paid for houses (as opposed to flats) in Woking. The average price of a house within the Borough has increased 47% between 2012 and 2017, compared to only a 36% increase in the average price for a flat within the same period (See HOME_P5, Table. 3.3). This clearly indicates evidence of a growing unmet need for family homes.
- 2.26 The last paragraph on page 17 of the SADPD clearly indicates that the problem of delivering insufficient family homes is recognised by the Council. It is stated that this is why the Core Strategy included the focus on releasing Green Belt sites, which was identified as requiring at least 550 dwellings. However, in spite of the clear monitoring evidence of the failure to deliver sufficient family homes since 2010, there have been no significant increases in the level of homes proposed on greenfield sites to be delivered within the plan period. Indeed, there has not even been a recognition by the Council that, due to the failure to deliver sufficient family homes, the greenfield (Green Belt) site allocations should be brought forward for delivery sooner than the 2022 to 2027 time frame envisaged.
- 2.27 In addition, and to make the future prospects of delivering family housing even worse, the level of homes to be delivered on greenfield (safeguarded) sites beyond the plan period (post 2027) has been cut significantly. Whilst the 2015 Draft SADPD proposed some 1,200 dwellings on safeguarded sites, the equivalent figure proposed within the current SADPD is now less than 300 dwellings. We are concerned that this significant reduction in the future housing delivery on greenfield sites will further exacerbate the existing shortage and unaffordability of family housing within Woking well into the future and with little or no prospects of rectifying the situation under the Council's current proposals.
- 2.28 In order to address the evident failure to deliver both affordable homes and family housing since the start of the plan period, we consider that it is critical that additional greenfield sites are released from the Green Belt for allocation and delivery within the remainder of the current plan period (i.e. not being held back to 2022). In addition, either

further Green Belt sites should be safeguarded for housing delivery beyond 2027, or the Council should commit to undertake a further Green Belt Review to support an immediate and robust review of the Core Strategy with a full planning horizon of at least fifteen years.

- 2.29 Further, we consider that Policy GB9 (Land Adjacent to Hook Hill Lane) should be modified to allow for our client's proposal for a sustainably located development of approximately 100 dwellings, in addition to the public open space that the Council is currently seeking. We consider that this proposal should be delivered within the current plan period and not safeguarded, in order to contribute to addressing the existing need for affordable homes and family housing.

Q7: 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?

- 2.30 No. In our reading of the SADPD, none of the site allocations or safeguarding policies specify the housing mix that should come forward and there is no generic housing mix policy within the document. This is not only inconsistent with paragraph 5.75 of the Core Strategy, but is likely to make it even harder for the SADPD to ensure that the development that comes forward is able to deliver sufficient family housing to address the current shortage of larger dwellings across the Borough.
- 2.31 We consider that the Council should be required to estimate the level of family housing that is likely to come forward within the remaining plan period under current proposals. If this proves to be insufficient to meet the needs as expressed in the 2015 SHMA (or ideally more up-to-date evidence), it will provide a clear indication that additional greenfield site allocations will be required to redress the imbalance in the housing mix delivered since the start of the plan period.

Q8: Is there a demonstrable requirement for self-build and custom housing in the Borough and is it clear which allocated sites, if any, are expected to meet this requirement?

- 2.32 We do not consider that the requirement for self-build and custom housing is clear within the SADPD, as we set out within our previous representations (HOME_P3, paragraphs 4.4 to 4.7). The evidence base justifying the requirement set out on page 19 of the DPD is insufficient and is opaque. In particular, we are concerned that none of the previous viability evidence work undertaken by the Council has considered the financial and delivery impacts of including self-build plots within residential allocations. Therefore, we consider that the requirement should be deleted and that, in accordance with national guidance on self-build and custom housebuilding, the Council should work with landowners and site promoters to identify one or more specific sites where the current owner is willing and able to bring forward an appropriately planned development for self-build and custom house building.

(No. of words, not counting the cover page, issues and questions = 3,188)

**Appendix 1: Local Authority Representations
made following the Woking Core
Strategy Review**



Mr Ernest Amoako
Planning Policy Manager
Woking Borough Council
Gloucester Square
Woking
Surrey
GU21 6YL

Via email only
17 October 2018

Re: Review of Woking Core Strategy (WBC18-025)

Dear Mr Amoako,

We understand that a review of Woking's Core Strategy is being presented at the Council meeting on Thursday 18th October 2018 for approval. Guildford Borough Council (GBC) was given no forewarning of the review and have not been consulted on it. Indeed, GBC first became aware of the review on 15th October 2018.

The failure to engage constructively, actively and on an ongoing basis with GBC in relation to the review is plainly contrary to both the spirit and legal requirements of the Duty to Co-operate, see in particular Planning and Compulsory Purchase Act 2004, s.33A(1), (2) and (3)(a), (d)&(e).

GBC would wish to respond substantively to a number of issues within the review, particularly those with cross-boundary implications. However given the limited time-frame it is unable to do so in an informed manner.

However, one point of immediate concern in the review must be raised at this stage. The review considers the issues of local housing need for Woking, as well as the unmet need in the Housing Market Area. It rightly identifies that the objectively assessed need (OAN) for Woking in the 2009 SHMA was 594dpa, and that the 2015 SHMA reduced the OAN to 517dpa. In light of the revised NPPF, it then calculates the OAN (now referred to in the revised NPPF as 'local housing need') for Woking, using the standard method and based on the 2014-household projections, as 409dpa. Following the recent release of the 2016-household projections, application of the standard method reduces the local housing need still further to 266dpa (by GBC's calculations it is 263dpa, but this is a minor difference). Subject to the 3dpa difference in the latest housing need, GBC's provisional view is this part of the review accurately summarises the position.

However, the review then states that "[b]y using the standard method, the unmet need is likely to be 117 dwellings per year". GBC understand that this figure is arrived at by subtracting the housing requirement figure in the Core Strategy (292dpa) from the local

housing figure produced by applying the standard method and 2014-household projections (409dpa). This is plainly flawed. If – as GBC agree is broadly correct – Woking's local housing need is 266dpa based on the application of the standard method and the 2016-household projections, this means that there is no unmet need (the housing requirement of 292dpa being greater than the local housing need of 266dpa). It is illogical to, on the one hand, base the local housing need figure on the latest household-projections, but not then to update the amount of unmet need in light of that figure.

Both the failure to comply with the Duty to Cooperate and the defective logic in concluding that there remains an unmet need of 117 dwellings per year render the review legally flawed.

GBC trust that you will take these concerns seriously. In particular, we request that approval of the review be deferred in order that it can be reconsidered by Officers and that engagement with GBC (as well as other relevant bodies) required by the Duty to Co-operate has been undertaken.

We understand that Runnymede Borough Council are intending to raise concerns of their own relating to the review.

Yours Sincerely,



Tracey Coleman

Director of Planning and Regeneration

Tel: 01483 444 201

Guildford Borough Council

Millmead House

Guildford

Surrey GU2 4BB

17th October 2018

Mr Ernest Amoako
Planning Policy Manager
Woking Borough Council
Gloucester Square
Woking
Surrey
GU21 6YL

By email only to: Ernest.Amoako@woking.gov.uk

Dear Ernest

Woking Local Plan Review

The Council has recently reviewed the agenda items for the 18th October 2018 Woking Council meeting and notes that item 10 is concerned with the review of the Woking Core Strategy. Whilst Runnymede Borough Council welcomes this review, it is disappointed that the recommendation is that there is no need to modify any policies in the Core Strategy despite the officer report acknowledging that there are unmet needs within the Guildford, Waverley and Woking Housing Market Area.

All of Woking's neighbouring local authorities face similar constraints to Woking Borough, including significant Green Belt constraints, ecological constraints and flooding constraints. Runnymede, the Royal Borough of Windsor and Maidenhead, Guildford and Waverley are all good examples of Local Authorities who have worked positively to ensure that they are setting out proposals and policies in their Local Plans to meet their objectively assessed housing needs in full. Having reviewed the 18th October Council report on the Woking Core Strategy review, the Council is not satisfied that Woking Borough Council has taken the opportunity to thoroughly review the adequacy of its evidence base to ensure that it is able to demonstrate that it has turned every stone with the aim of meeting its identified housing needs in full. Runnymede Borough Council is of the opinion that Woking Borough Council has the opportunity to carry out a far more thorough review, including the production of additional evidence to help ensure that the housing needs of the Guildford, Waverley and Woking HMA are met in full. Whilst the covering report to Council notes that, 'Woking is working in partnership with neighbouring authorities to address the unmet needs in the HMA', it is unclear whether there are any further realistic avenues to explore with HMA partners, and what they may be, given that Waverley has already committed to meeting 50% of Woking's unmet needs and given that it appears that Guildford will be asked to meet 20% of Woking's unmet needs. Furthermore, Guildford's response to their Inspector's Matters and Issues indicates that they are unwilling to do any more to meet unmet needs from Woking and that they are of the opinion that the review of the Woking Core Strategy presents the opportunity for Woking to meet its Objectively Assessed Housing Need in full.

If unmet needs are predicted to persist across the Guildford, Waverley and Woking HMA, it is suggested that the current review of the Woking Core Strategy needs to more thoroughly look at gaps in the Council's evidence base. Runnymede Borough Council has particular concerns about the adequacy of the Council's Green Belt evidence. In particular, whilst it is noted that in 2014, Woking Borough Council published a Green Belt Boundary Review, it appears that the brief given to the consultants at this time was constrained, with the report noting that the consultants were only ever asked to identify: 1-Suitable, deliverable and sustainable sites to deliver 550 new homes by 2027; and 2-A further 40ha of land to assist in delivering the housing requirement between 2027 and 2040 (approx. 1200 new homes). Had the

Appendix 2

Green Belt Review had an unconstrained brief it is questioned whether further suitable sites may have been identified.

Furthermore, it is noted that a number of the parcels considered in Woking's 2014 Green Belt Boundary Review were of a significant scale. Since Woking produced its review in 2014, numerous other Local Authorities in the sub region have also reviewed their Green Belt. A number of these authorities (for example Runnymede, South Bucks and Spelthorne) have carried out second stages of their Green Belt Review work to provide a more detailed and thorough assessment of smaller parcels of Green Belt land in their areas. Runnymede felt that this was particularly necessary given that through consultations on its Local Plan, it was noted that a number of representations expressed concerns that the Green Belt parcels assessed in Runnymede's 2014 Green Belt Review were too large in size in some cases. It was argued that if smaller parcels had been considered, different conclusions would have been drawn in terms of how a site performed against the Green Belt purposes. These comments were taken into consideration, and as a result, the Council's consultants Arup recommended to the Council that additional, more spatially focused work could be undertaken. It was suggested that a more finely grained review could be carried out, to better understand the performance of smaller parcels against Green Belt purposes, and their context in relation to the Green Belt as a whole. The output of this second piece of work was that further pieces of land were identified that the Council could release from the Green Belt to meet its identified housing needs. A number of these sites now appear in Runnymede's emerging Local Plan. Given that Woking Borough Council is unable to meet its identified housing needs in full, it is considered that commissioning a second phase of Green Belt Review work could be hugely beneficial if the Council is serious about meeting any unmet housing needs within its area.

As such, contrary to the conclusion drawn in the report to Council it is not considered inevitable that a more thorough review of the Woking Core Strategy and its evidence base would fail to present any additional opportunities to assist Woking meet its unmet housing needs.

There is also concern that of the land being recommended by officers for safeguarding in the drafted Sites Allocations DPD which is an appendix to the 18th October Council report (under item 8-Site Allocation Development Plan Document), Woking's Local Plans Members Working Group has provided steer that only two of the sites in Byfleet should be taken forwards. Sites in Pyrford and Mayford which have the ability to deliver much needed homes are being considered for retention in the Green Belt despite the reasoned justification for the release of these sites presented in the draft DPD and the acknowledged unmet housing needs in the Guildford, Waverley and Woking HMA. It is simply not good enough for Woking to rely on similarly constrained neighbours to meet Woking's unmet needs when it appears that there are further avenues open to the Council which would see Woking's needs met in full in its own Borough.

Furthermore, the covering report to Council on 18th October regarding the Local Plan Review notes that the latest 2016 based population projections suggest that the need for additional homes in Woking may be declining and that under the Government's standardised methodology, the objectively assessed needs for housing in Woking could be set to fall from 409dpa to 266dpa. Whilst Runnymede Borough Council does not dispute that the 2016 based household projections suggest a reduced objectively assessed housing need in many areas, the Government has already confirmed that in light of the 2016 based population projections, it intends to re-consult on amendments to its standardised methodology to ensure that it's 300,000 new homes a year target is met. The consultation is expected later this year. As such, there is concern that it would be premature to rely on the current standardised methodology for calculating housing needs (based on the 2016 based population projections) given that in the short term, changes are expected which are likely to see the OAN for many areas increase again.

Appendix 2

Whilst it is accepted that there are no firm guidelines for carrying out a Local Plan Review, the NPPF states in paragraph 60 that, *'in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for'*. Whilst the issue of unmet needs is touched upon in the covering report of the Woking Core Strategy Review item, this is considered to be at a superficial level. Runnymede Borough Council is not aware of any consultation which has been carried out with neighbouring Local Authorities about the Woking Core Strategy Review which would have presented an opportunity for issues relating to unmet needs in neighbouring areas to be discussed, and for this to have been considered properly in Woking's review. For example, Runnymede Borough Council is aware that Elmbridge Borough Council has been vocal in confirming that it is unlikely to meet its OAN and may need assistance from its neighbours (which could include Woking).

Overall, there is concern that the Woking Core Strategy Review which has been carried out is superficial in nature and lacking sufficient detail and justification to conclude that modifications to the Woking Core Strategy are not required. Runnymede Borough Council is of the view that further evidence needs to be completed before the conclusion can be drawn that Woking Borough Council cannot amend the relevant strategic policies in its Core Strategy to increase its housing target to meet its objectively assessed housing needs in full.

It is noted that the Statement of Common Ground signed by both our Authorities acknowledges that Woking's own evidence base identifies links with Runnymede Borough, including in respect of housing and notes that *'Engagement with authorities [like Runnymede] was concluded to be important through the Duty to Cooperate'*. Furthermore the Statement includes the agreement that there are localised cross boundary links between Runnymede and Woking Borough Council regarding housing matters and agreement that, while in the first instance housing needs will be sought to be met in full within our respective HMA boundaries, both authorities are committed to working together to address housing matters. In light of Woking's decision that no additional evidence is needed to seek to meet housing need within its own boundary, and noting that the Local Plans of Waverley, Guildford and our own Plan in Runnymede have reached a mature stage we would wish to make clear that for these reasons set out in this letter, Runnymede Borough Council feels that it is inappropriate to offer assistance to meet any unmet needs from Woking until such a time that Woking Borough Council has identified that it has turned every stone in meeting its identified housing needs. Woking Borough Council is therefore urged to produce additional evidence to support a more focussed and detailed review of its Core Strategy and carry out consultation with partners under the Duty to Cooperate before concluding that its Core Strategy Review is completed for another 5 years, leaving the question of unmet need in the Guildford, Waverley and Woking HMA unresolved.

Yours sincerely



GEORGINA PACEY
LOCAL PLANS MANAGER

E-Mail: georgina.pacey@runnymede.gov.uk

Tel: 01932 425248

From: Graham Parrott
Sent: 18 October 2018 15:09
To: Ernest Amoako
Cc: Elizabeth Sims; Christopher Storey
Subject: Review of the Woking Core Strategy

Dear Ernest

It has come to our attention that one of the reports that is being considered by your Council tonight relates to the review of the Woking Core Strategy. In essence I understand that you are recommending to your Council that you do not need to carry out a review of the 2012 Core Strategy because you consider that it remains up to date for the purposes of managing development across the Borough.

Until this was drawn to our attention a few days ago, we were not aware that you had carried out such a review or that you had reached this conclusion. The purpose of this email is to make it clear that this is a matter in which this Council has an interest, given the fact that the recently adopted Waverley Borough Local Plan includes an allowance for unmet need arising in Woking. Once we have had the opportunity to consider the report, and its potential implications for Waverley, we intend to write to you further on this matter.

Yours sincerely

Graham

Graham Parrott
Planning Policy Manager
Waverley Borough Council
Tel: 01483 523472
www.waverley.gov.uk

Appendix 2: Supplementary Report ahead of the Meeting of Woking Council on 18th October 2018

COUNCIL – 18 OCTOBER 2018

REVIEW OF WOKING CORE STRATEGY – SUPPLEMENTARY REPORT

Executive Summary

Item 10 on the agenda for Council meeting tonight deals with the review of the Woking Core Strategy. The Council has received representations from Guildford, Waverley and Runnymede Borough Councils regarding this item. The representations are attached at Appendix 1. In summary, they raise the following concerns:

- The Council failed to consult its neighbouring authorities prior to deciding on the review;
- The review should make clear that based on the revised 2016 household projections, Woking will no longer have an unmet need to be met by neighbouring authorities;
- There needs to be a proper review of the Council's evidence base, including a Green Belt boundary review to inform the review of the Core Strategy;
- The review should take the opportunity for Woking to identify more land, including further land in the Green Belt to meet its full objectively assessed housing need.
- Green Belt sites in Pyrford and Mayford which have ability to deliver much needed housing are being recommended to be retained in the Green Belt whilst Guildford and Waverley are being required to meet Woking's unmet need.

Members are advised to note that paragraph 33 of the National Planning Policy Framework (NPPF) require Councils to review their Local Plans to assess whether they need updating at least every five years. The review should be completed no later than five years from the adoption date of the plan. The Woking Core Strategy is over 5 years and the review is therefore overdue. Without the review, the Core Strategy is considered out of date, and in that case the presumption in favour of sustainable development applies. An out of date Local Plan could also have significant implications for calculating the Council's five year housing land supply. For example, without an up to date Local Plan, instead of calculating the housing land supply using the Council's annual housing requirement, the local housing need figure will have to be used. There are therefore serious consequences for delaying decisions on this matter, and Members are advised not to delay their decision as a result of the attached representations.

Regarding the representations themselves, they raise nothing new or significant enough to justifying delaying a decision on the matter.

As highlighted in the Officers' report, there is no prescribed guidance on the format of the review either in the NPPF or in planning legislation. There is also no good practice elsewhere by other local authorities to drawn from. The available national guidance only requires the Council to review the Local Plan and publish their reasons if they felt that no modification is necessary. If the Council were to decide that a modification is necessary, then the timing for doing so will be reflected in the Local Development Scheme for that to be done through the formal plan making process, involving the necessary consultation that it entails. Whilst the concerns of Guildford and Runnymede Borough Councils regarding the failure of the Council to consult them are acknowledged, there is no requirement for the Council to do so given that the Council is not proposing to modify the plan.

The National Planning Practice Guidance (NPPG) sets out what could be considered when undertaking the review of the local plan. Officers have comprehensively considered them in undertaken the review. The review also deal with the evidence base used to inform the decisions on the matter and are satisfied that the evidence base is robust to withstand scrutiny. In particular, no further Green Belt land could be released for development without significantly undermining its purposes and integrity. Paragraph 3.5.22 of the Green Belt boundary review report makes this

Review of Woking Core Strategy

conclusion very clear. Members have since reviewed this evidence and found even less of the limited recommended land to be developable.

Paragraph 60 of the NPPF requires local housing need assessment to be conducted using the standard method in national planning guidance. The national planning guidance expects the latest household projection to be used in calculating the need. In accordance with the above, it is estimated that the local housing need will be 266 dwellings per year. By committing to continue with the 292 annual housing requirement, there would be no unmet need arising from Woking as raised by Runnymede Borough Council.

The review sets out the implications of the various objectively assessed housing needs on the unmet need arising from Woking. It is clear from the analysis that by using the 2016 household projections to calculate the need, there will be no unmet need arising from Woking. Officers have already previously acknowledged and in responding to Councillors questions going to Council tonight that whilst their estimate of the housing need using the 2016 household projections is 266 dwellings per year, there are other calculations that estimate the figure to be 263 dwellings per year. The difference is marginal to give any cause for concern and it is due to how figures have been rounded during the calculation.

Based on the above, Officers will recommend that the representations raise nothing new or significant enough to justify delaying deciding on this matter.

Recommendations

The Council is requested to:

RESOLVE That

- (i) the representations received from Guildford, Runnymede and Waverley Borough Councils are noted, and that they raise nothing new or significant enough to justifying delaying a decision on the review of the Woking Core Strategy.

The Council has the authority to determine the recommendation(s) set out above.

Background Papers: National Planning Policy Statement (NPPF)
Woking Core Strategy
Town and Country Planning (Local Planning) (England) (Amendment) regulations 2017

Reporting Person: Douglas Spinks, Deputy Chief Executive
Email: douglas.spinks@woking.gov.uk, Extn: 3440

Contact Person: Ernest Amoako, Planning Policy Manager
Email: ernest.amoako@woking.gov.uk, Extn: 3427

1.0 Implications

Financial

- 1.1 No additional financial implications.

Human Resource/Training and Development

- 1.2 No additional human resource, training and development implications.

Community Safety

- 1.3 There are no community safety implications.

Risk Management

- 1.4 It is a statutory requirement for local plans to be reviewed every five years. Given that the Woking Core Strategy is nearly six years old, it will need to be reviewed to comply with Government Regulations.

Sustainability

- 1.5 There are no specific sustainability impacts associated with reviewing the Core Strategy. A Sustainability Appraisal was carried out to inform the preparation of the Core Strategy. It concluded that overall, the Core Strategy would contribute towards the sustainable development of the Borough.

Equalities

- 1.6 There are no specific equality impacts associated with the review of the Woking Core Strategy.

Safeguarding

- 1.7 There are no safeguarding implications for reviewing the Core Strategy.

2.0 Conclusions

The representations are noted, however, they raise nothing new or significant enough to justifying delaying a decision on the review of the Core Strategy.

REPORT ENDS

Turley Office
6th Floor North
2 Charlotte Place
Southampton
SO14 0TB

T 023 8072 4888