

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

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

November 2019

Contents

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

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 outlined under *Matter 3: Is the SADPD's approach to allocations and safeguarded land in the Green Belt justified and consistent with national policy?*
- 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 in support of all of 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 3

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

Q1: Does the Green Belt Review's focus on land 'parcels' provide a sufficiently fine-grained assessment of the GB?

- 2.1 Figure 3 of the Woking Green Belt Review (WGBR) shows the 'parcels' that were used for assessment purposes. Many of these parcels represent large tracts of land, for example, Parcels 14, 15, 17, 19, 20 and 21, to the south of Woking. Whilst identifying parcels of this scale may be appropriate for an initial stage of assessing the performance of broad areas against the five purposes of the Green Belt (GB), it is not a sufficient evidence base upon which to base the detailed site allocations and safeguarding policies envisaged by the SADPD.
- 2.2 We would have expected WBC to carry out a second stage of their GB Review work to provide a more detailed and thorough assessment of smaller parcels of GB land in their areas. This should have focussed on the parts of the larger parcels that were adjacent to existing built-up areas or other areas being considered for release from the GB. The need for a more detailed or 'fine-grained' Stage 2 GB assessment is standard practice and has been undertaken by a number of Woking's neighbouring LPAs, including Runnymede (March 2017) and Spelthorne (December 2018).
- 2.3 Generally speaking, part of the impetus for a 'Stage 2' assessment derives from the number and content of consultation representations received on the outcomes and approach of the 'Stage 1' assessment work. In Woking's case, it is concerning that, in spite of numerous representations following the consultation on the Land East of Martyrs Lane proposal in 2017, no further work on the assessment of the GB as a whole was undertaken, except the limited work by Hankinson Duckett Associates in relation to the Land East of Martyrs Lane site itself.
- 2.4 We acknowledge that the WGBR did subdivide some of the 'preferred parcels' (those proposed for release) for the final stages of site selection and these are shown on Figure 8 of the WGBR. Crucially, this approach was only taken following the review of the performance of the larger parcels against the GB purposes. No assessment was made of the GB performance of the smaller areas identified, nor indeed was the GB performance of any sub-divisions within the 'rejected' parcels assessed. We consider that if the GB performance of smaller areas had been assessed by WBC, different conclusions would have been drawn and further potentially suitable GB releases could have been proposed for allocation or safeguarding.

Q4: 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?

- 2.5 Our previous representations (HOME_P3, paragraphs 2.26 to 2.27) set out our views in relation to this question. Overall, the WGBR conflated the two distinct tasks of reviewing

the performance of GB areas on the one hand, and seeking additional GB sites for release for development on the other. These tasks should have been kept separate. As it was, the objective of the WGBR to identify sites to deliver 550+ dwellings inappropriately influenced and skewed the overall process of reviewing the performance of GB land.

- 2.6 At the time the WGBR was commissioned, the Borough had an up-to-date housing target of 292 dwelling per annum (dpa). Therefore, following an objective process of reviewing the performance of GB land, it would have been legitimate at that time to seek to release sufficient land to achieve only 550 dwellings. However, over time the current adopted housing target has become out-of-date and has significantly increased. Therefore, it is no longer appropriate to constrain the GB review and greenfield site selection processes to delivering only 550 dwellings. In this regard, given the limited weight that can be afforded to the October 2018 Core Strategy Review, we consider that the SADPD is not justified as it is not based on an appropriate strategy which takes account of up-to-date proportionate evidence and the resulting housing need.

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?

Q3: Has the spatial distribution of the SADPD's GB allocations and safeguarded sites taken into account the need to promote sustainable patterns of development?

- 2.7 WBC has considered whether the sites proposed for GB allocations and safeguarded sites would represent sustainable development. This was taken forward through both the WGBR (2014) and the subsequent Sustainability Appraisal work. However, there are a number of respects in which the national policy within paragraph 138 of the NPPF has not been taken into account.
- 2.8 First, as we have referred to within our statement on Matter 2, the overall level of proposed GB releases, and the timing of these (i.e. not earlier than 2022) fails to ensure that an appropriate housing mix will be delivered and, in particular, sufficient family housing. The Council is aware (as stated on page 17 of the SADPD) that a consequence of their strategy to prioritise the redevelopment of brownfield land is the risk of failing to achieve an appropriate mix of dwellings. However, over the course of the preparation of the SADPD the total number of homes that will be delivered on sites proposed for release from the GB has decreased significantly, when compared to the original proposals within the 2015 Draft SADPD (WBC/SA/014).
- 2.9 Second, the Council's proposals have failed to take into account the ability to achieve sustainably located housing to the south of Woking, west of the Portsmouth/Waterloo railway line. These parts of GB Parcel 20 have been identified within the WGBR as being suitable for release from the GB and having the potential for sustainable development. They have since been subjected to a sustainability appraisal and found to be generally sustainable locations for residential development. Nevertheless, in spite of Officer recommendations on two separate occasions for these areas to be safeguarded for

future residential development, Woking Members have opted, on both occasions and for largely political reasons, to remove the sites from the SADPD¹.

- 2.10 In relation to our client's site at Land Adjacent to Hook Hill Lane, our previous representations (HOME_P3, paragraphs 3.14 to 3.46), in addition to the Visioning Framework Document (HOME_P4) and the site-specific Sustainability Appraisal (HOME_P6) each go into considerable detail demonstrating how the site is sustainably located for residential development. This has been acknowledged by WBC, most recently within the Officer responses to our Regulation 19 representations (see WCB/SA/003, top of page 716). Nevertheless, WBC has failed to take this into account in the drafting of the Policy for Site GB9 within the SADPD. In light of the pressing need for family housing and affordable homes and the sustainable location of the site, we urge the Council to further modify Policy GB9 to include a proposal for around 100 dwellings in addition to the green infrastructure currently proposed.

Q4: 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?

- 2.11 WBC has been consistent throughout the preparation of the SADPD that it was necessary to identify and to safeguard a range of GB sites for housing delivery within the next plan period (i.e. beyond 2027) to ensure that the GB boundaries would not need to be changed when the Core Strategy was reviewed. However, whilst the aspiration has remained, the approach to ensuring this aspiration can be realised has evolved significantly over time, such that it is no longer feasible that the currently proposed safeguarded sites would be sufficient to avoid further changes to the GB boundary when the Core Strategy is eventually robustly reviewed.
- 2.12 Our previous representations (HOME_P3, paragraphs 3.1 to 3.13) set out this evolution of the WBC approach in some detail. This highlighted that the level of homes that can be delivered on the safeguarded sites has changed from 1,074 identified within the 2015 Draft SADPD, to approximately 1,200 proposed at the time of the 2017 consultation on Land East of Martyrs Lane, and finally down to 270 proposed in the Pre-Submission SADPD of November 2018. We note that in the July 2019 version of the SADPD the Council is no longer identifying the level of housing, but the sites remain the same as in November 2018 (GB4, GB5 and GB8). Even allowing for some flexibility in the eventual level of housing to be achieved at these three small sites, it seems unlikely that more than 300 could be delivered. This represents approximately a single year of supply under the currently adopted target and significantly less than one year of housing supply under the current OAN (using the standard methodology).
- 2.13 We have seen no evidence to demonstrate that when the Core Strategy is eventually reviewed, the existing urban areas of Woking will be able to meet the entire housing need for the period 2027 to 2040, save for the +/-270 homes capable of being delivered on the three safeguarded sites. It follows that there is a high probability that Woking will

¹ These changes to the Draft SADPD were made at the meetings of Full Council; first on 20th October 2016 and subsequently on 18th October 2018.

be required to undertake further GB review evidence and release additional sites to meet the housing needs of the next plan period.

- 2.14 We believe that the most appropriate approach to reduce the likelihood of future GB boundary changes would be to re-instate the previously proposed safeguarded sites to the south of Woking, west of the Portsmouth/Waterloo railway line. Further, Policy GB9 (Land Adjacent to Hook Hill Lane) should be modified to allow for the delivery of around 100 dwellings within this site, to be provided alongside green infrastructure (the proposed safeguarded use). To put this in context, 100 homes will involve a land-take of no more than 8 acres, leaving approximately 12 acres for green infrastructure.

Q6: Is GB release appropriately phased to assist urban regeneration, and to ensure that as much use as possible is made of suitable brownfield sites and under-utilised land?

- 2.15 The SADPD seeks to hold back delivery on the GB allocations until 2022 to 2027. Whilst an approach which encourages prioritisation of redevelopment on brownfield sites is appropriate under national policy, this must be balanced against the unintended negative consequences that we have highlighted within our statement on Matter 2. In summary, holding back greenfield development within the Borough has been contributing to a long-term and severe shortage of family homes. This is indirectly contributing to housing unaffordability by creating a perverse incentive for a significant market premium to be added onto the price of houses, as opposed to flats, due to the relative scarcity of supply in the marketplace.
- 2.16 In light of the existing deficits in both family housing and in affordable homes, we consider that the phased approach to GB allocations should be removed and that policies should seek deliver these as soon as possible. We also consider that additional sites should be identified for release from the GB, within the current plan period, to assist in redressing the imbalanced housing delivery profile within the Borough.

Q7: Do the allocations contain appropriate provisions to mitigate adverse effects to landscape character where this has been highlighted as an issue in the Green Belt Review?

- 2.17 The first point to make is that the WGBR did not undertake a detailed landscape character study. The approach used was to provide a 'strategic overview' of the prevailing character of the parcels and their potential sensitivity to change and potential for accommodating a strategic level of development (see WBC/SA/E018, paragraph 3.4.5). Equally, at the time of preparing the WGBR there was no up-to-date landscape character work upon which PBA were able to draw. Further, paragraph 3.4.5 of the WGBR states that the PBA landscape character work was undertaken through a combination of views from publically accessible locations and Google Earth. Thus, it is reasonable to conclude that errors could have been made or that the assessments could have been somewhat inaccurate/subject to limitations.
- 2.18 In relation to GB Parcel 20, reference within the WGBR is made to the local designation (Escarpment and Rising Ground of Landscape Importance – Core Strategy Policy CS24).

However, as the WGBR notes at paragraph 3.5.18, this designation is not substantiated through any published or ratified study. Therefore, the Council's evidence base on landscape and visual assessment is lacking.

- 2.19 Considering the comments of the WGBR in relation to the portion of Parcel 20 that includes our client's site (referred to as WGB0020f or 20f), please see our previous representations (HOME_P3 paragraphs 3.38 to 3.46). To elaborate further, we can see that in one part of the WGBR, a summary assessment was made that the more steeply sloping and more elevated areas of the escarpment are more visually exposed and thus more sensitive to development in landscape and visual terms (paragraph 3.5.18). However, in a later section, the emphasis was altered slightly to the 'upper slopes and the ridgelines' being areas that are not suitable for development.
- 2.20 Whilst this may simply be a case of sloppy phrasing within the report, we find it difficult to reconcile these two references. Further, in light of the absence of any corroborating evidence, we consider that the WGBR does not provide the evidential basis to conclude that it is not possible to mitigate the landscape/visual impact of residential development at the site to the east of Hook Hill Lane (GB9).
- 2.21 On behalf of our client, Barton Willmore undertook a Landscape and Visual Appraisal and Green Belt Review (HOME_P7). This evidence, far more detailed than that undertaken as part of the WGBR, concluded that parts of the GB9 site would indeed be suitable for residential development, subject to appropriate mitigation at the detailed design stage. Further, it was demonstrated that development and mitigation would be possible to achieve in conformity with Policy CS24 due to the positive way in which that policy has been drafted (see in particular HOME_P3, paragraphs 3.20 to 3.31).

Q9: The key role that Woking's GB plays in providing recreational opportunity is identified in the Sustainability Appraisal Report. Consequently, to what extent do the SADPD's GB proposals accord with the Framework insofar as it states that planning policies should enable and support healthy lifestyles, especially where this would address identified local health and well-being needs, for example through the provision of safe and accessible green infrastructure?

- 2.22 We support the need for Woking's GB proposals to promote the provision of appropriate green infrastructure to support health and well-being. In relation to Site GB9, in which our client has an interest, it is accepted that the provision of a strategic green infrastructure resource at this location would greatly assist in meeting the needs of new and existing residents, as well as helping to preserve the most sensitive slopes of the escarpment. However, we have two key points of difference with the Council:-
- 2.23 First, we do not accept that it is impossible to mitigate the impact of an element of residential development at this site. Our accumulated up-to-date evidence base demonstrates, in high-level terms at least, how this could be achieved. The need to achieve residential development on part of the site relates to the issue of deliverability and the reasonable expectations of the landowner in order to release part of the site for green infrastructure provision.

- 2.24 Second, we differ in relation to the timing of delivery. We see no logical reason to hold back delivery until beyond 2027 when there is an existing need for family housing and affordable homes. We also consider that there is an existing and growing need for high quality green infrastructure within this part of the Borough, not least due to the recent and anticipated new development within the Mayford area. Amending the allocation of the site to include residential development will facilitate green infrastructure provision and allow the delivery of family and affordable dwellings within the plan period.

Issue (vi) are the SADPD's other GB allocations and policies justified and effective?

Q1: GB9 is a safeguarded site to provide green infrastructure-given the nature of the proposal is removal of the site from the GB justified?

- 2.25 We consider that the Council is justified in seeking to remove site GB9 from the GB designation. The site, as enlarged under the Council's proposed modifications (July 2019), now represents an isolated area of GB, surrounded by development on three sides and with Hook Hill Lane separating the southern boundary from the remainder of the GB. Thus, both in physical and perception terms, the site is isolated from and poorly related to the wider GB to the south.
- 2.26 The Council has indicated that the need to release the site from the GB stems, in part at least, from the need to ensure that there are defensible permanent GB boundaries, as set out in the NPPF. This view is evident, for example, within the Officer response to our Regulation 19 representations within WBC/SA/003 (page 716, 2nd paragraph). We support this rationale.
- 2.27 Where our views differ from the Council is that we consider that WBC's proposals, as currently drafted, are highly unlikely to be achievable or deliverable at the point that they are required to come forward. There has been no engagement between the Council and the landowner nor with the controlling developer in relation to the availability of the site for a development comprising entirely of green infrastructure. On the one occasion that Turley was able to discuss the site with WBC Policy Officers², we were told that the deliverability of the SADPD's proposals are not Officers' concern.
- 2.28 As our previous representations have consistently sought to demonstrate, delivery of the site, both to achieve the Council's aspiration for a significant green infrastructure resource and also to protect the most sensitive higher slopes of the escarpment, is possible, but will require an element of residential development to be included within the policy in order to provide a reasonable incentive for the landowner to bring the site forward.

² At a meeting with Ernest Amoako in May 2017.

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

Q1: Is it necessary for the SADPD to identify areas of safeguarded land?

- 2.29 Identifying safeguarded land for future development is a policy choice that is provided by national planning policy and which WBC has consistently adhered to during the preparation of the SADPD. If an appropriate and sufficient quantity of safeguarded land is identified, the approach can significantly reduce the likelihood that GB boundaries will need to be altered when the Core Strategy is reviewed, as the sites to meet future housing needs on greenfield land will have already been identified, thus providing helpful planning certainty.
- 2.30 However, we consider that WBC's current approach is not appropriate as far too little safeguarded land has been identified to meet the future need for homes. As we set out under Issue ii, Question 4 above, the quantum of homes that can be delivered on the identified safeguarded sites has reduced to less than 300 and this makes it highly likely that the approach will fail and that a further full review of the GB (and subsequent GB release) will be required to identify further greenfield sites for future housing delivery.
- 2.31 WBC has engaged in 'muddled thinking' on this issue and a firm decision is needed immediately. One option would be to identify additional safeguarded sites, ensuring that the quantum of homes that can be delivered makes a realistic contribution to future needs, which is likely to be at the very least the 1,200 homes originally conceived in the brief to the WGBR. Alternatively, the policy should be abandoned in favour of an immediate and robust review of the Core Strategy, preceded by a new, comprehensive GB Review exercise.

Q2: To what extent is the amount of safeguarded land included in the SADPD justified?

- 2.32 We have covered our response to this question within the responses above. The Council has not justified its approach to the level of safeguarded land identified. Indeed, as our previous representations show (HOME_P3, paragraph 3.6 in particular), the current SADPD was drafted by Officers to include a significantly greater quantity of safeguarded land. However, much of this was 'stripped out' by WBC Members at the meeting of Full Council on 18th October 2018, leaving only three sites to deliver only 270 homes beyond 2027. This process has been driven by political decision-making and not by any clear or logical strategy.

Q4: 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?

- 2.33 The identification of safeguarded land is helpful in providing some certainty about the future development prospects of those sites identified. However, as we have set out in our responses above, the number of sites now proposed to be safeguarded for residential development is only three and the total quantum of homes that can be

delivered on these sites is less than 300. Therefore, as an overall strategy, this approach fails to provide any certainty whatsoever that GB boundaries would not have to be altered at the end of the plan period.

(No. of words, not counting the cover page, issues and questions = 3,481)

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

T 023 8072 4888