

RAPLEYS

Planning for
Axis Land Partnerships

**WOKING SITE ALLOCATIONS
DPD
HEARING STATEMENT
MATTER 02**

15 November 2019

Our Ref: HJOA/18-01479

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1 INTRODUCTION

- 1.1 Rapleys are instructed, on behalf of Axis Land Partnerships, to submit written statement to the examination of the Woking Site Allocation DPD. These comments follow on from our Regulation 19 representations, submitted on 13 December 2018, and our submission of Land off Chobham Road to the SHLLA Call for Sites on 21 June 2019.
- 1.2 This hearing statement should be read in the context of these previous submissions.
- 1.3 This statement is concerned with *Matter 2: Is the overall approach of the SADPD in general conformity with the Woking Core Strategy?*

2 ISSUE 1: ARE THE REQUIREMENTS SET OUT IN THE WOKING CORE STRATEGY JUSTIFIED, UP-TO-DATE AND CONSISTENT WITH NATIONAL POLICY?

QUESTION 1 - THE COUNCIL HAS UNDERTAKEN A REVIEW OF THE ADOPTED CORE STRATEGY. HOW HAVE THE BOROUGH'S HOUSING DELIVERY TEST RESULTS AND ANY EVIDENCED CHANGES TO HOUSING NEED SINCE THE ADOPTION OF THE CORE STRATEGY INFORMED THAT REVIEW?

2.1 The review has made no changes to the housing requirement within the Plan, nor has the Plan - as adopted in 2011 - been changed in any way as a result of the review.

2.2 The Housing Delivery Test result in Woking records a result of 153%. However, the stated requirements for the previous three years within the results published by the Government are 245, 247 and 217 dwellings. As a result of the approved review of the Core Strategy, the requirement figures should be 292 for each year (notwithstanding our in-principle objection to the Council's decision not to revise the housing requirement). This has not been recognised within the submission documents.

Another significant change in understanding housing need is the publication of the Standard Method. The adopted Local Plan sets a requirement of 292 dwellings per annum (dpa), in contrast to the Standard Method requirement of 431 dpa.

2.3 The 2015 SHMA set a requirement of 517 dpa, lower than the 594 dpa set by the 2009 SHMA which informed the Core Strategy. The Council has argued that the Green Belt constraints to which the authority is subject remain the same as they did when the Inspector of the 2012 Core Strategy accepted a lower adopted housing requirement than suggested by the 2009 SHMA. It is on this basis that Woking has stated their belief that the housing requirement does not need to be reviewed or changed.

2.4 This assessment, however, ignores several important changes which have taken place since the Core Strategy was adopted in 2012:

- Circumstances in the area, from the perspective of housing availability, have become increasingly pressured since 2012, and local authorities are under ever greater impetus from the Government to increase the delivery of housing;
- The publication of the Standard Method has set a minimum requirement which authorities must meet, as made clear by revised national guidance.

2.5 The section of the PPG covering Housing and Economic Development Needs Assessment states the following regarding alternative approaches to housing need other than the Standard Method:

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.

2.6 In response to this, there is no evidence provided by the Council to suggest that the lower figure is based on assumptions of demographic growth, nor is there robust evidence to show that there are exceptional local circumstances to justify a deviation from the Standard Method: Green Belt is a constraint that affects many authorities, it is neither unique nor exceptional to Woking.

2.7 The review of the Core Strategy did not result in a revision of the document to bring its housing requirement into accordance with the Standard Method. There is no evidence to justify this.

2.8 The failure to plan fully for the needs of Woking renders the SADPD (which seeks to implement the Core Strategy's out-of-date housing target) unsound. It should not be recommended for adoption. It must therefore be withdrawn from examination, and work on a full review of the Local Plan should commence without delay in order for the full minimum requirement to be addressed through the plan-making process within the borough.

QUESTION 2 - DID THE COUNCIL'S REVIEW OF THE CORE STRATEGY PAY DUE REGARD TO THE DTC?

2.9 No. As shown in **Appendix 1**, neighbouring authorities were not consulted on the review process, nor were they aware of the review process until its announcement in the week prior to the approval of the review at the Council meeting on 18 October 2019.

2.10 Woking agreed to approve a review of their Core Strategy after having taken advice from the Ministry of Housing Communities and Local Government (MHCLG) as to what the process should involve. Guildford, Waverley and Runnymede all wrote to Woking not earlier than one day before the Woking Council meeting. These are included at **Appendix 1**. The letters make clear the following:

- The Councils were not informed that the review had taken/was taking place until around the time it was made public in the week before the Council meeting took place;
- The Councils were not consulted on the review;
- There was strong objection to the decision that Woking need not review its adopted housing requirement of 292 dwellings per annum (dpa) in light of the Standard Method requirement of 431 dpa (as calculated by Rapleys).

2.11 Woking Council has clearly not met the Duty to Co-operate within the Core Strategy review, and therefore fails to meet the legislative requirements of Plan making. The SADPD must be recommended for withdrawal from examination, and work commence on a new Local Plan that fully meets the legislative and policy requirements of Local Plans.

QUESTION 3 - DID THE REVIEW OF THE CORE STRATEGY TAKE INTO ACCOUNT PLAN-MAKING ACTIVITY IN NEIGHBOURING AUTHORITIES, SUCH AS WHETHER THOSE LPAs ARE UNABLE TO MEET ALL OF THEIR IDENTIFIED HOUSING NEEDS?

2.12 No. The review did not take into account the identified housing needs of the neighbouring authorities - further, it did not recognise the need to meet Woking's own minimum requirement as set by the Standard Method.

2.13 The Core Strategy review is manifestly unsound as a result of the failure to consider the need both to meet its own housing requirement, and to consider the unmet requirements of others. The SADPD that seeks to implement it is similarly unsound as a consequence. It must be recommended for withdrawal, and work should begin on a new Local Plan.

3 ISSUE 2 - TO WHAT EXTENT WOULD THE ALLOCATIONS, TAKEN TOGETHER, MEET THE REQUIREMENTS SET OUT IN THE CORE STRATEGY?

QUESTION 3 - POLICY CS13 OF THE CORE STRATEGY ANTICIPATES THAT SITES WOULD BE ALLOCATED IN THE SADPD TO MEET SPECIALIST HOUSING NEEDS: TO WHAT EXTENT DOES THE SADPD FULFIL THIS POLICY REQUIREMENT?

3.1 The SADPD does not fulfil this policy requirement, in particular with regard to care homes. This is addressed more fully in our response to question nine of issue two below.

3.2 In short, the plan fails to plan for a sufficiency of residential care, and substantially more land needs to be identified in order to address this.

QUESTION 9 - IS THE REQUIREMENT FOR CARE HOMES AND EXTRA CARE ACCOMMODATION APPROPRIATELY REFLECTED IN THE SADPD?

3.3 No. The need for care homes and extra care accommodation is not appropriately reflected in the SADPD, and substantially more land needs to be identified to meet the recognised need.

3.4 Only one site within the SADPD includes land explicitly allocated for 'housing to meet the accommodation needs of the elderly': GB11 (Broadoaks, Parvis Road, West Byfleet, KT14 6LP). An application has recently been granted on the site for development that includes 155 rooms in Use Class C2. The officer's report for the application, which recommended refusal, states the following at paragraph 27:

Need for such specialist (elderly) accommodation is established and recognised in policy CS13 of the Core Strategy and evidenced in the West Surrey SHMA (2015) which states that there is an estimated need of 918 further specialist housing units for older people in Woking between 2013 and 2033.

3.5 Another site (whilst not allocated) is recognised to have permission granted for an 82 bed care home: Britannia Wharf, Monument Road. However, the site also has a live application for the development of 52 flats in C3 residential use. The SADPD states 'it is likely that one of these proposals will be implemented during the Core Strategy period' but provides no certainty that one of them *will* be delivered, and further that the scheme that comes forward will be the care home.

3.6 Monitoring reports prior to the one published in December 2018 do not record C2 completions, only the amount of floorspace (in sqm) built within the Green Belt for C2 use. These suggest that there has been no C2 development since 2012/13, when 117sqm was completed. The latest monitoring report, which does record C2 completions, notes that 24 C2 bedrooms were completed in 2017/18. This is not sufficient to address the recognised need for specialist (elderly) accommodation within the borough.

3.7 There is no evidence to suggest that all 918 C2 units can or will be delivered between 2013 and 2033, and significantly more land needs to be expressly allocated for care homes and extra care accommodation in order to address this. The SADMD does not meet the requirements set out in the Core Strategy. It should not proceed to adoption, and work should commence immediately on a full review of the local development framework to allow for the development needs of the borough to be recognised and planned for in a sustainable manner.



Mr Ernest Amoako
Planning Policy Manager
Woking Borough Council
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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

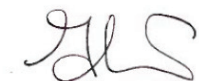
housing figure produced by applying the standard method and 2014-household projections (409dpa). This is plainly flawed. If – as GBC agree is broadly correct – Woking’s local housing need is 266dpa based on the application of the standard method and the 2016-household projections, this means that there 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

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17th October 2018

Mr Ernest Amoako
Planning Policy Manager
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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

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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

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