

RAPLEYS

Planning for
Axis Land Partnerships

**WOKING SITE ALLOCATIONS
DPD
HEARING STATEMENT
MATTER 03**

15 November 2019

Our Ref: HJOA/18-01479

Contents

1	Introduction	1
2	Issue 1 - Green Belt Review.....	2
3	Issue 2 - Green Belt allocations and national policy.....	2
4	Issue 7 -Approach to safeguarded land	3

Appendices

Appendix 1	Map of Green Belt Review land parcels
------------	---------------------------------------

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

2 ISSUE 1 - DOES THE WOKING GREEN BELT REVIEW PROVIDE A ROBUST EVIDENCE BASE TO SUPPORT THE POLICIES AND ALLOCATIONS OF THE SADPD?

QUESTION 1 - DOES THE GREEN BELT REVIEW'S FOCUS ON LAND 'PARCELS' PROVIDE A SUFFICIENTLY FINE-GRAINED ASSESSMENT OF THE GB?

2.1 No. The Green Belt review divides the areas of review into 31 land parcels, these are shown in **Appendix 1**. These 'parcels' are of a significant size. Details of parcel areas are not provided, but Rapleys considers the vast majority to be well in excess of 50ha. The report does not provide any more detailed assessment than this.

2.2 The Green Belt review does not provide a sufficiently detailed appraisal to assess the contribution that land within Woking makes to the Green Belt's five functions, and the report needs to be significantly updated in order to address this shortcoming.

2.3 In light of the housing requirement in the borough, there is evidently a need to release land from the Green Belt in order to facilitate the delivery of housing within the Plan-making process. The Green Belt review is insufficiently detailed in order to meaningfully inform this exercise.

QUESTION 4 - DOES THE GREEN BELT REVIEW'S OBJECTIVE OF IDENTIFYING SUITABLE, DELIVERABLE SITES FOR 550 HOMES OVER THE PLAN PERIOD PROVIDE AN APPROPRIATE BASIS FOR ASSESSMENT?

2.4 No. The document seeks to identify only 550 homes over the Plan period, which covers less than two years' worth of the adopted housing requirement, and a little over one year of the Standard Method minimum housing requirement. This is an insufficient basis for assessment of Green Belt release over a 20 year Plan period.

2.5 Owing to the lower housing requirement that informs the Green Belt review, the context which informed it was one in which the pressure to increase the supply and delivery of housing was far less than it is now. The document is no longer fit for purpose in shaping an assessment of Green Belt release to meet current requirements, and needs to be updated.

3 ISSUE 2 - DO THE SADPD'S GB ALLOCATIONS AND POLICIES ACCORD WITH NATIONAL POLICIES AND GUIDANCE, AND DO EXCEPTIONAL CIRCUMSTANCES EXIST SUFFICIENT TO JUSTIFY THE ALTERATION OF THE GB'S BOUNDARIES?

QUESTION 1 - TO WHAT EXTENT CAN IT BE DEMONSTRATED THAT EXCEPTIONAL CIRCUMSTANCES EXIST SUFFICIENT TO ALTER GB BOUNDARIES AS PROPOSED?

3.1 The Core Strategy seeks to deliver 292 dwellings per annum. We do not consider this a sufficient target, but despite this there is clear evidence that Green Belt land needs to be released in order to accommodate this requirement. This point is common ground, and is accepted by the Council, as made evidence in their submission documents.

3.2 National policy is clear (paragraph 136 of the NPPF) that Green Belt boundaries may only be revised 'through the preparation or updating of plans [...]. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans'.

3.3 As noted in our statement concerning Matter 1, the SADPD does not contain any strategic policies of its own, and seeks to implement those policies contained within the Core Strategy. Policy CS6 of the Core Strategy states:

The Green Belt has been identified as a potential future direction of growth to meet housing need, in particular, the need for family homes between 2022 and 2027. A

Green Belt boundary review will be carried out with the specific objective to identify land to meet the development requirements of the Core Strategy.

- 3.4 It is clear that there is an allowance for Green Belt release through the SADPD, though the ‘development requirements of the Core Strategy’ as we have discussed in response to Matter 2 (and within previous consultation responses) is no longer in line with national policy guidance, and should be considered to be out-of-date. The requirements of the Core Strategy should be revised in order to reflect the Standard Method requirement of 431 dwellings per annum.

QUESTION 4 - DOES THE SADPD DEMONSTRATE THAT GB BOUNDARIES WILL NOT NEED TO BE ALTERED AT THE END OF THE PLAN PERIOD AND DEFINE BOUNDARIES CLEARLY USING PHYSICAL FEATURES THAT ARE READILY RECOGNISABLE AND LIKELY TO BE PERMANENT?

- 3.5 No. The end of the Core Strategy Plan period is 2027, and the SADPD is explicit in stating that Green Belt boundaries will need to be altered after this in order to facilitate the delivery of the safeguarded sites.
- 3.6 The above quoted Policy CS6 only allows for the release of land up to the end of its Plan period of 2027. In order to release additional Green Belt land beyond this timeframe (up until 2040, as the Core Strategy review document claims) Woking will require a new Local Plan.
- 3.7 A new Local Plan will need to be in place for *inter alia* the express purpose of allowing the release of additional Green Belt land. Far from suggesting that the GB boundaries do not need to be altered at the end of the Plan period, the SADPD is clear that they will require alteration.

4 ISSUE 7 - DOES THE SADPD’S APPROACH TO SAFEGUARDED LAND ACCORD WITH THE FRAMEWORK?

QUESTION 1 - IS IT NECESSARY FOR THE SADPD TO IDENTIFY AREAS OF SAFEGUARDED LAND?

- 4.1 Not in the context of national planning policy. The NPPF does not state that land must be safeguarded, and the far more pressing issue is the identification of additional land in the immediate term to address the housing undersupply within the borough.

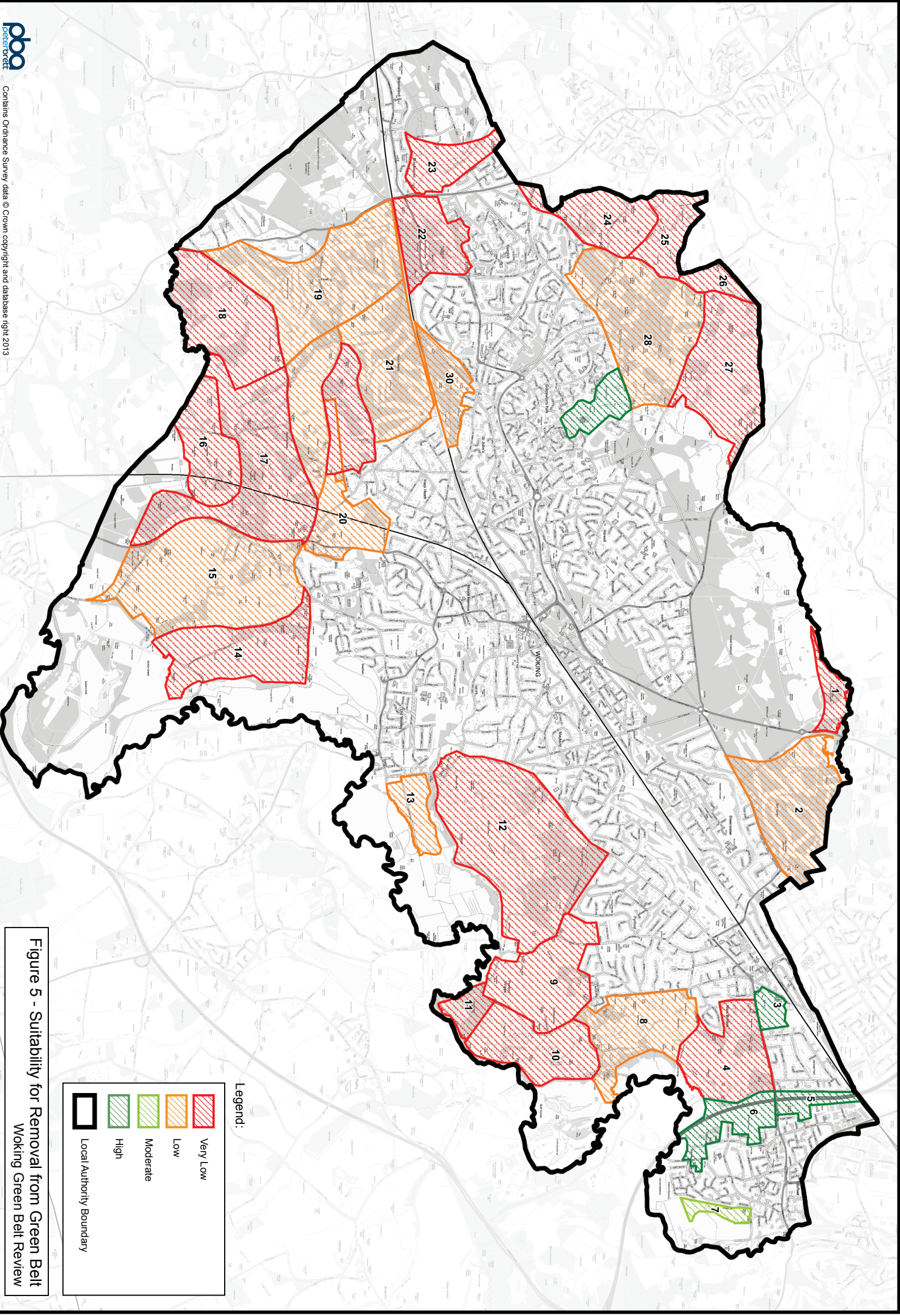
QUESTION 2 - TO WHAT EXTENT IS THE AMOUNT OF SAFEGUARDED LAND INCLUDED IN THE SADPD JUSTIFIED

- 4.2 If the purpose of the safeguarded land is to identify in full the required land for meeting housing from 2027 to 2040, the amount of land is insufficient. It plans for only 292 dwellings per annum (dpa), not the current minimum requirement set by the Standard Method: 431 dpa.
- 4.3 The allocations will need to be supported by new strategic policies identifying the housing need within Woking from 2027 onwards, and in order to be in accordance with national policy they will need to recognise the Standard Method. These strategic policies also need to allow for the release of Green Belt land beyond the existing Core Strategy Plan period.

QUESTION 4 - TO WHAT EXTENT DOES THE IDENTIFICATION OF SAFEGUARDED LAND DEMONSTRATE THAT GB BOUNDARIES WOULD NOT HAVE TO BE ALTERED AT THE END OF THE PLAN PERIOD?

- 4.4 It does not demonstrate this to any extent. Green Belt boundaries will need to be altered through the release of safeguarded sites in order for them to come forward for development without uncertain reliance on Very Special Circumstances.

-
- 4.5 Further, the amount of land safeguarded is not sufficient to meet the minimum housing requirement under the Standard Method. More land will need to be identified and released from the Green Belt in addition to the safeguarded sites in order to meet the borough's up-to-date housing need.



Legend:

	Very Low
	Low
	Moderate
	High
	Local Authority Boundary

Figure 5 - Suitability for Removal from Green Belt
Woking Green Belt Review