

Woking Site Allocations DPD Examination Hearing Statement on Behalf of CALA Homes (Respondent: 06748/2)

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

November 2019

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Client

CALA Homes

Our reference

CALW3004

13th November 2019

1. Introduction

- 1.1 This statement has been prepared by Turley, on behalf of CALA Homes (Respondent: 06748/2), for the Woking Site Allocations DPD (SADPD) Examination. It responds to the issues and questions outlined under *Inspector's 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 on the Draft Site Allocations DPD (Regulation 19 version, November 2018). A list of representations and appendices submitted, on behalf of CALA Homes (respondent 06748/2) 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 (Palmer_D2);
 - Meeting the Housing Needs of Woking: A Technical Critique (Palmer_D2);
 - Vision Statement for Land Adjoining Hillside, Woking (Palmer_D2); and
 - Land Adjoining Hillside, Woking: Landscape and Visual Appraisal and Green Belt Review (Palmer_D2).
- 1.3 This statement is prepared in support of, and refers to, the above representations and appendices.
- 1.4 Additional information to support elements of our submissions is attached as an appendix to this Statement and comprises:
- Updated Review of Woking's Housing Needs for CALA Homes (November 2019)
 - Supplementary Report to Woking Council in Respect of Core Strategy Review, 18 October 2018
- 1.5 We have not considered it necessary to respond to all of the questions raised by the Inspector in relation to this matter and thus the responses set out subsequently relate only to those issues where CALA Homes consider that a response is required to support, or 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?

Q1: 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 the housing need since the adoption of the Core Strategy informed that review?

- 2.1 Although the Woking Core Strategy was adopted more than seven years ago, the Council has persisted with the stance that the internal review of its Local Plan which was undertaken in 2018 satisfies the requirements of paragraph 33 of the NPPF and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is the case notwithstanding that paragraph 33 of the NPPF states that: *"Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly..."*
- 2.2 Our submission to the Regulation 19 DPD Consultation included a report entitled "Meeting the Housing Needs of Woking a Technical Critique" (December 2018) [Appendix 1 to Palmer_D2] . That report identified the real scale of need for different types and tenures of housing and the consequences of failing to plan more positively for those needs. In particular the report highlighted that:
- The DPD proposed allocation of housing land was limited to meeting the adopted Core Strategy figure of 292 homes per annum whereas application of the standard method indicated a need for 431 homes per annum in Woking;
 - The original Core Strategy intention, that unmet need from Woking would be met in the from neighbouring authorities of Guildford and Waverley, was unrealistic given the growing level of unmet need across the West Surrey HMA;
 - The Core Strategy had been particularly ineffective at meeting the need for family housing and for affordable housing in Woking.
- 2.3 Turley has produced a short update paper "Updated review of Woking's housing needs" (November 2019) – hereafter referred to as the "Update Report". This paper, and the original report which it prefaces, are attached as Appendix 1. Both the original (December 2018) and updated (November 2019) reports describe the *"evidenced change in housing need"* which planning policy for Woking should address.
- 2.4 The Updated Report demonstrates that as of November 2019 there is a need for at least **1,898 dwellings per annum** (capped figure) across the West Surrey Housing market Area (HMA) including **430 dwellings per annum** (capped figure) in Woking based on the application of the Standard Method. This is set out in Table 1.1 of the Update Report.
- 2.5 The Council's Regulation 19 Consultation Issues and Matters Topic Paper (WBC/SA/003) considers the issue of whether the DPD should allocate more land to meet housing need than the Core Strategy requirement (Issue 14.0 - page 34 et seq).

The Council states that the Site Allocations DPD has a clear purpose which is to “to identify specific sites to enable the delivery of the Core Strategy” (para.14.2). It goes on to state (para 14.7) that:

“It would be simplistic and bad planning for the Site Allocations DPD to allocate further land for development to meet Woking’s objectively assessed housing need up to 2027. It is highlighted that it is not the purpose of the Site Allocations DPD to determine the housing requirement for the Borough. That is the distinct purpose of the Core Strategy.”

2.6 The above statement by the Council conveniently disregards the facts that:

- The opportunity to review the Core Strategy in light of evidenced changes to housing need was not taken by the Council in 2018. Rather, the Council embarked on a very limited and essentially internal review of the adopted Core Strategy.
- The NPPF (paragraph 33) indicates that “*relevant strategic policies will need updating (our emphasis) at least once every five years if their applicable local housing need figure has changed significantly*” yet the Council continues to seek to circumvent updating its policy to deal with the clearly evidenced rising need across the HMA.
- The Core Strategy plan period is from 2010 – 2027. If the Site Allocations DPD were to be found sound and adopted in 2020 it will effectively only be planning for eight years rather than the fifteen year requirement of the NPPF.

2.7 In our judgement, and to paraphrase the Council’s statement at para. 14.7 of document WBC/SA/003, it is too simplistic and bad planning to ignore the housing need derived by applying the standard method across the HMA. The review of the Core Strategy undertaken by the Council was a missed opportunity in this regard and, to the extent that the review was not subject to independent scrutiny or evidence testing, it should be afforded limited weight.

2.8 The opportunity remains for the Site Allocations DPD to identify land and sites capable of delivering housing beyond the 292 dwelling Core Strategy requirement which was intended as a minimum level of provision. This was clearly stated in the original Core Strategy Inspectors Report (WBC/SA/E017A) which stated:

“The available evidence when taken as a whole..... is sufficient to enable a conclusion to be reached that an average housing completion figure of 292 dwellings per annum is reasonable provided it is seen as an average minimum and not an absolute target” (paragraph 83).

The Inspector’s Report also noted:

“Given the availability of fresh data which will indicate the accuracy or otherwise of the anticipated housing trajectory and the need to ensure the permanence of green belt boundaries beyond the plan period, the Council may consider it prudent to undertake its GB review in a manner that identifies sites capable of delivering more than the identified minimum requirement of new dwellings.”

- 2.9 It would not be inconsistent with the spatial strategy of the CS for the Site Allocations DPD to identify additional sites to allow the clearly evidenced changes to housing need (as described in the reports at Appendix 1) to be more fully met. Indeed, such an approach would go some way to demonstrating that the DPD has been “positively prepared” (as a pre-requisite for the plan to be found sound by virtue of paragraph 35 of the NPPF)

Q2: Did the Council’s review of the Core Strategy pay due regard to the Duty to Co-operate?

- 2.10 It is clear from the Council’s document setting out the review of the Core Strategy (WBC/SA/E017B) that the Duty to Cooperate did not feature in the process of undertaking the CS Review.
- 2.11 Indeed, whilst the Report of the Core Strategy Review is listed in the Inquiry Core Documents (WBC/SA/E017B) a Supplementary Report which was also taken to Council on 18 October 2018 is not referenced. We have attached this report at Appendix 2.
- 2.12 The Supplementary Report addresses (and appends) representations which were submitted by Guildford Borough Council (GBC), Runnymede Borough Council (RBC) and Waverley Borough Council (WaBC) which confirmed clearly that there had been no effective engagement with these authorities.
- 2.13 The letter from GBC specifically warns Woking Borough Council (WBC) that the failure to engage constructively, actively and on an ongoing basis with GBC in relation to the Core Strategy review is contrary to both the spirit and legal requirements of the Duty to Co-operate. We consider that it is also contrary to the advice of the original Core Strategy Inspector who confirmed that:
- “It will be incumbent upon the Borough and its neighbours to ensure that the processes and outcomes related to the Duty to Cooperate are honed further to maximise the sustainable delivery of suitable housing.” (WBC/SA/E017A, para. 82).*
- 2.14 WBC Officers were fully aware of the representations made by neighbouring local authorities at the point that the CS Review was presented to Council. The Supplemental Report (included at Appendix 2) appended the letters of representation which highlighted significant concerns in relation to the superficial nature of the Review and the wider implications of this superficial approach. Notwithstanding the clearly articulated and substantive concerns raised, the Woking Officers’ Report recommended to Members that: *“the representations raise nothing new or significant enough to justify delaying deciding on this matter”*.
- 2.15 The officer advice also indicated that the review of the Core Strategy, as opposed to a ‘modification of the Core Strategy, did not come under the ambit of the Duty to Cooperate. This view is repeated more recently in the Issues and Matters Topic Paper of June 2019 (WBC/SA/003).
- 2.16 We do not accept that the Council can circumvent the Duty to Co-operate in the manner suggested. Such an approach would conflict with Section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by the Localism Act 2011) which makes

it clear that that activities that can reasonably be considered to prepare the way for, or support, the preparation of development plan documents are covered by the Duty to Co-operate.

- 2.17 Paragraph 35 of the NPPF indicates that to be considered to have been “*positively prepared*” a plan strategy must be “*informed by agreements with other authorities*, so that unmet need from neighbouring areas is accommodated where it is practical to do so”. Paragraph 60 is equally 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.*” The failure of WBC to engage meaningfully with adjoining authorities pursuant to the Duty to Co-operate significantly undermines the CS Review.

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?

- 2.18 The review of the Core Strategy took account of plan-making activity in Waverley and Guildford Boroughs to the south of Woking however no account was taken of the plan-making activity, or unmet housing needs, of boroughs to the north (Elmbridge, Runnymede and Surrey Heath).

- 2.19 The implications of WBC’s failure to properly consider the ability of neighbouring boroughs to meet their own identified housing needs are well-articulated in Runnymede’s letter to the Council in October 2018 (see Appendix 2). That letter concludes:

“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.”

- 2.20 As noted in our response to Q.2, the short-comings of the CS Review mean that it should 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?

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)?

- 2.21 Our representations to the Regulation 19 version of the Site Allocations DPD highlighted that insufficient provision was being made to meet the need for family housing and affordable housing in the Borough. This remains our contention and is

supported by the evidence of our reports “Meeting the housing needs of Woking – a Technical Critique” (December 2018) and “Updated Review of Woking’s Housing Needs (November 2019) (see Appendix 1).

- 2.22 The Update Report notes (para.5) that: *“Previous conclusions around the inability of the Core Strategy to deliver much-needed family and affordable housing remain valid; with no substantive new evidence that would necessitate a further review of the evidence previously submitted. The Council appears to have subsequently conceded that an overt focus on the urban area would generally deliver flats rather than family housing. This re-affirms the importance of a positive approach which would allocate additional sites capable of providing family homes and affordable housing”.*

Affordable Housing

- 2.23 Our representations to the Regulation 19 DPD (Palmer_D2: paragraphs 2.16 – 2.18 and Appendix 1: Section 4) demonstrated the significant need for affordable homes within Woking and the worsening housing affordability position since the adoption of the Core Strategy.
- 2.24 The Council’s own monitoring evidence, demonstrates that that the delivery of affordable homes is consistently below the level required to meet the overall target of 35% creating a growing backlog of households in need of affordable housing.
- 2.25 The Council’s monitoring report demonstrated that in the 2017/18 year the proportion of affordable homes delivered was only 9.5%. Since 2010, the average proportion of affordable homes delivered has been 18% (see WBC/SA/003).
- 2.26 There has been a clear failure to deliver the affordable housing needed within the Borough. In large part this can be attributed to the focus on the allocation of brownfield redevelopment sites within the town centre area where higher site costs and build costs have impacted on scheme viability to preclude the delivery of affordable housing. In making this point, we do not disagree with the identification of the town centre as a focus for future development, as this is clearly aligned with national policy and will deliver significant regeneration benefits: an inevitable corollary of this approach however is that it will deliver significantly reduced levels of affordable housing. Development management decisions on a number of key town centre sites have seen nil affordable housing accepted on the basis of submitted viability evidence. The key town centre redevelopment at Victoria Square for example, is currently under construction and will deliver 429 residential units (all of which will be studios or 1 and 2-bed apartments) in 2021but none will be affordable. By way of contrast, developments at Brookwood Farm and Moor Lane will deliver 688 dwellings of which 62% will be family homes and 45% will be affordable.
- 2.27 Given the low level of affordable homes delivered 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 will be affordable housing or that the fully evidenced need for affordable housing will be met. Given the historic level of under-provision of affordable housing, some 1,353 homes would need to be delivered as affordable dwellings for the 35% target to be met.

Family Housing

- 2.28 Our representations to the Regulation 19 DPD (Palmer_D2: paragraphs 2.13 – 2.14 and Appendix 1) set out the high level of need for family housing with 3 or more bedrooms. 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 (Palmer_D2, Appendix 1, and Table 3.1). This equates to circa 250 such dwellings per annum.
- 2.29 Our representations also demonstrated that the proportions of family homes being completed since the start of the plan period have been relatively low, amounting to only one-third of dwellings delivered.
- 2.30 The low level of delivery of family homes has a number of consequences:
- It means that the housing needs of a large part of the market are not being addressed;
 - It may act as a disincentive to people wishing to locate to Woking;
 - It reinforces the steep financial premium for houses (as opposed to flats) in Woking (Palmer_D2, Appendix 1, para. 3.11 and Table 3.3)

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. This clearly indicates evidence of a growing unmet need for family homes.

- 2.31 The problem of delivering insufficient family homes is recognised by the Council (Regulation 19 SADPD, page 17) however, notwithstanding the clear monitoring evidence of the failure to deliver sufficient family homes since 2010, there has been no commensurate proposal to increase the number of homes proposed on greenfield sites within the plan period. This will only serve to exacerbate current issues regarding the paucity of supply and lack of affordability of family housing.
- 2.32 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 CALA Homes' site at Egley Road should be allocated for residential development as part of allocation GB7. As will be demonstrated in our statement in relation to Matter 3, there is no justification for the proposed designation of the site as an area of local separation. It is a well-located, sustainable and deliverable site (as recognised by the DPD evidence base) which can contribute to meeting the unmet need for family and affordable homes.

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?

- 2.33 Paragraph 5.75 of the CS forms part of the Reasoned Justification for policy CS11: Housing mix which states that all residential proposals will be expected to provide a mix of dwelling types and sizes to address the nature of local needs.

- 2.34 None of the SADPD allocations specifies the housing mix that should come forward and, in the absence of such specification, it is not possible to confirm the number of larger dwellings which will be delivered. There was an explicit recognition that site allocations on land to be released from the Green Belt would have a particular role to play in meeting the identified need for family homes however, at present, the Site Allocations DPD is ambiguous as to the mix of dwellings that will be delivered.
- 2.35 The value of the SPD in ensuring that the need for family housing is met would be improved by confirming the capacity of the proposed allocations to deliver family homes / larger dwellings. If the conclusion of such an exercise demonstrated that the level of provision was below the evidence based need for such housing then the case for additional allocations would be reinforced not only on the basis of absolute housing need but on the basis of the need to create balanced and sustainable communities in line with Policy CS11.

**Appendix 1: Updated Review of Woking's
Housing Needs (Turley for CALA
Homes), November 2019**

Updated review of Woking's housing needs

CALA Homes

November 2019



Turley

Introduction

1. Turley last year produced a report – included at **Appendix 1** – that critically reviewed the housing need position in Woking, on behalf of clients including CALA Homes¹. This was prepared during a period of consultation on the pre-submission version of the Site Allocations Development Plan Document (DPD), which had sought to deliver the adopted requirement for 292 dwellings per annum set through a Core Strategy that was adopted in 2012. This followed an earlier ‘review’ by Woking Borough Council (‘the Council’) which claimed that there was no need to review the housing requirement².
2. The Council has persisted with this approach, as reflected in the draft DPD submitted for Examination in July 2019. Ahead of the hearing sessions, the examining Inspector has acknowledged the Council’s ‘review of the adopted Core Strategy’ but questioned whether ‘the requirements set out’ therein are ‘justified, up-to-date and consistent with national policy’, and explicitly asked:

*“How have...any evidenced changes to housing need since the adoption of the Core Strategy informed that review?”*³
3. Our previous report, included at Appendix 1, concluded that the Council’s approach is not justified from the perspective of evidenced housing needs. While the current requirement was adopted in the knowledge that it would not meet the housing needs of Woking, with an expectation that neighbouring authorities would resolve any shortfall, there has been a demonstrable reluctance to do so. Housing provision in this area has therefore failed to reach the level that had previously been evidenced as needed, and crucially *continues* to be evidenced in the context of the new standard method for determining the ‘minimum’ need for housing. Given this change in the context since the Core Strategy was prepared, examined and adopted, our report encouraged the Council to reconsider its position by taking a more proactive approach to the identification of land that would provide for evidenced needs in excess of the adopted housing requirement.
4. **This short paper demonstrates that this conclusion remains valid, despite the Council’s response⁴, and of direct relevance to the questions raised by the Inspector examining the DPD.** It proves that there remains an unmet need within the wider housing market area even following the adoption of the Guildford Local Plan earlier this year, and clarifies the outcome and implications of a national consultation that had been ongoing at the time of reporting.
5. **Previous conclusions around the inability of the Core Strategy to deliver much-needed family and affordable housing equally remain valid**, with no substantive new information that would necessitate a further review of the evidence previously

¹ Turley (December 2018) Meeting the housing needs of Woking – a technical critique

² Woking Borough Council (October 2018) Review of the Woking Core Strategy

³ Examination of Woking Site Allocations Development Plan Document – Inspector’s Matters, Issues and Questions (Matter 2, issue (i), question 1)

⁴ Woking Borough Council (June 2019) Issues and Matters Topic Paper: Summary of Key Issues Submitted with Officers’ Response & Summary of Individual Representations Received with Officers’ Response and Recommendations

submitted. The Council appears to have subsequently conceded that an overt focus on the urban area would generally deliver flats, rather than family housing⁵. This reaffirms the importance of a positive approach that would allocate additional sites capable of providing family homes, and affordable housing.

Evidence of a continued unmet need in the housing market area

6. The DPD was submitted for examination on 25 July 2019, some six months after the date from which the policies of the revised National Planning Policy Framework (NPPF) apply⁶. As such, the standard method should be used to determine the ‘*minimum*’ numbers of homes needed⁷, both locally in Woking and within the long-established West Surrey housing market area⁸ (HMA).
7. As of November 2019, this suggests that there is a need for **at least 1,898 dwellings per annum** throughout the HMA, including 430 dwellings per annum in Woking. The latter notably exceeds the need for 409 dwellings per annum claimed by the Council, as it incorporates the latest available data as required by Planning Practice Guidance (PPG).
8. Table 1.1 outlines the calculation for each authority in the HMA. It highlights that both the overall need, and the need implied for Woking, is capped. This slightly lowers the output of the formula – from 1,945 and 457 dwellings per annum respectively for the HMA and Woking – but ‘*does not reduce housing need itself*’ such that ‘*strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible*’⁹.

Table 1.1: Outcome of Standard Method in West Surrey (dwellings per annum)

	Woking	Guildford	Waverley	Total
Latest adopted requirement	292	562	590	1,444
Baseline (2014-based; 2019-29)	308	526	388	1,222
Affordability ratio (2018)	11.78	12.53	16.05	–
Affordability adjustment	48.6%	53.5%	75.3%	–
Local housing need, uncapped	457	807	681	1,945
Local housing need, capped¹⁰	430	787	681	1,898

Source: Turley analysis

⁵ *Ibid*, paragraph 1.8

⁶ MHCLG (2019) National Planning Policy Framework, paragraph 214

⁷ *Ibid*, paragraph 60

⁸ Appendix 1, paragraph 2.9

⁹ PPG Reference ID 2a-007-20190220

¹⁰ Capped 40% above higher of latest adopted requirement or baseline

9. The scale of this need, and the deficient supply response throughout West Surrey, can be fully appreciated by recognising that an average of only 909 dwellings per annum have been delivered over the past five years for which data is currently available¹¹ (2013-18). The authorities therefore need to effectively double the recent rate of provision, as a minimum.
10. Both Guildford and Waverley have adopted Local Plans within the past two years, in April 2019 and February 2018 respectively. They collectively require provision for 1,152 dwellings per annum, meaning that – in combination with the Woking Core Strategy – adopted policy requires the provision of **only 1,444 dwellings per annum**. This equates to only 76% of the capped need implied by the standard method, with adopted plans thus providing only three homes for every four needed each year.
11. A similar shortfall is apparent when adopted requirements are compared with earlier assessments of need, completed in the context of now superseded national policy and guidance. The 2015 Strategic Housing Market Assessment (SHMA) evidenced a need for 1,729 dwellings per annum across the three authorities, falling slightly to 1,678 dwellings per annum once subsequent reviews in 2017 were taken into account¹². The Inspector examining the Guildford Local Plan concluded that there was a slightly lower need for housing in the borough, yet there still remained evidence of a need for some 1,586 dwellings per annum even after this adjustment¹³. This remains 10% higher than adopted housing requirements, but inevitably carries less weight in the context of the revised NPPF.
12. It is acknowledged that the Inspector examining the Guildford Local Plan envisaged the buffer beyond its housing requirement to provide some capacity to meet the unmet needs of Woking, given that it identifies sites capable of delivering 769 homes annually against a requirement for 562 dwellings per annum. However, this would merely reconcile a shortfall against need previously evidenced in the context of now superseded national policy, with the authorities' collective provision for circa 1,650 dwellings per annum under this scenario still remaining around 250 homes short of the minimum annual need now implied by the standard method. This is considered to represent a conservative estimate of any shortfall, as it maximises use of the buffer applied to housing supply in Guildford which the NPPF actually requires to '*ensure choice and competition in the market for land*', '*account for any fluctuations in the market*' and '*improve the prospect of achieving the planned supply*'¹⁴. Such a buffer was found to be necessary in Guildford due to '*past persistent under-delivery*'¹⁵.
13. On this basis, while adopted housing requirements in West Surrey could be generously seen to meet a need for housing that had been evidenced several years ago, the scale of this need – in the context of applicable national policy – has undoubtedly risen. It cannot be reasonably seen to have been '*resolved*', as the Council appears to claim,

¹¹ Appendix 1, Figure 2.1

¹² Appendix 1, Table 2.1

¹³ The need for 654 dwellings per annum presented at Table 2.1 for Guildford has been substituted to reflect the Inspector's conclusion that 562 dwellings per annum are needed in the borough (Inspector's Report, March 2019)

¹⁴ MHCLG (2019) National Planning Policy Framework, paragraph 73a, b and c

¹⁵ Planning Inspectorate (March 2019) Report on the Examination of the Guildford Borough Local Plan: strategy and sites, paragraph 45

and this equally appears to conflict with its previous commitment to '*continue to explore how unmet needs within the HMA may be accommodated, once the housing requirements for Guildford and Waverley have been confirmed*'¹⁶.

14. This situation is precisely why the NPPF requires planning policies to be regularly reviewed:

*"Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. **Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly**; and they are likely to require earlier review if local housing need is expected to change significantly in the near future"*¹⁷

15. The Council's circumvention of a rising need for housing within the wider HMA, and retention of its adopted housing requirement, is not considered to be justified or appropriate on this basis. It conflicts with its previous commitment to '*strive to meet the objectively assessed housing need within the West Surrey Housing Market Area*', which now stands at around 1,900 dwellings per annum and is clearly not being met in full through adopted policy¹⁸. There is now a clear but potentially missed opportunity to use the standard method as a means to '*align respective evidence base studies with common methodologies and assumptions to ensure consistency*'¹⁹. It is considered that this should have formed the basis for a more comprehensive review of the Core Strategy, or as a minimum should have led to the identification of additional sites capable of delivering beyond its housing requirement.

Clarity on the treatment of 2016-based household projections

16. The previous report was prepared at a time when there remained a degree of uncertainty around the treatment of the 2016-based household projections, released in September 2018. The Council had made the claim, for example, that '*Woking will be over providing against its need*' when the lower 2016-based household projections were incorporated within the standard method²⁰. Our report emphasised why such a conclusion was unfounded, given the Government's fundamental concerns about the new methodology used to develop these household projections and their reliability for the purposes of assessing housing needs. Reference was made to the solution that the Government had proposed at the time, that of retaining the 2014-based household projections as the demographic baseline for the purposes of applying the standard method.

¹⁶ Woking Borough Council (July 2019) Site Allocations Development Plan Document Duty to Cooperate Statement, paragraph 1.25 and Appendix 3a

¹⁷ MHCLG (2019) National Planning Policy Framework, paragraph 33

¹⁸ Woking Borough Council (July 2019) Site Allocations Development Plan Document Duty to Cooperate Statement, Appendix 3a

¹⁹ *Ibid*

²⁰ Woking Borough Council (2018) Woking Strategic Housing Land Availability Assessment, paragraph 1.10

17. Within this context, it is relevant to now note for the avoidance of doubt that the Government formally responded to the consultation in February 2019 and confirmed that:

“Having taken the responses into account, the Government considers that its proposed approach to providing the demographic baseline for the standard method is the most appropriate approach for providing stability and certainty to the planning system in the short-term”²¹

18. It proceeded to state that:

“The changes to underlying assumptions in the population projections and methodological improvements to the household projections had led to significant variations in housing need at a local level, something that needs addressing in the short term...”²²

19. The Government also restated its continued view that:

“...the 2016-based household projections should not be used as a reason to justify lower housing need. We understand residents’ concerns about not using the latest evidence, but for the reasons set out in the consultation document we consider the consultation proposals to be the most appropriate approach in the short-term”²³

20. The PPG was subsequently updated to reflect this position, unequivocally confirming that:

“Any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework...It is not considered that these projections provide an appropriate basis for use in the standard method”²⁴

21. As such, any continued reference to the 2016-based household projections within the Council’s evidence base should be assumed to be unintentional, and disregarded. This appears to have been conceded by the Council²⁵.

²¹ MHCLG (2019) Government response to the technical consultation on updates to national policy and guidance: a summary of consultation responses and the Government’s view on the way forward, p6

²² *Ibid*, p7

²³ *Ibid*, p7-8

²⁴ PPG Reference ID 2a-015-20190220

²⁵ Woking Borough Council (June 2019) Issues and Matters Topic Paper: Summary of Key Issues Submitted with Officers’ Response & Summary of Individual Representations Received with Officers’ Response and Recommendations, paragraph 1.5

Appendix 1: Technical critique submitted during Regulation 19 consultation, December 2018

Meeting the housing needs of Woking – a technical critique

Site Allocations DPD – Regulation 19
Consultation

December 2018

Turley

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Client

Taylor Wimpey and CALA Homes

Our reference

TAYW2061

December 2018

Executive Summary

1. Woking Borough Council ('the Council') is currently consulting on a pre-submission version of its Site Allocations Development Plan Document (DPD) which is intended to identify land and allocate specific sites to enable the delivery of the Woking Core Strategy, which was adopted in 2012. The Site Allocations DPD is also intended to safeguard land to meet future development needs beyond the present Core Strategy period, from 2027 to 2040.
2. In publishing the DPD for consultation, the Council has also published a 'review' of the Woking Core Strategy. While this acknowledges that the adopted Core Strategy is more than five years old, it claims that there is no need to undertake a full review of its policies. This position is not supported for reasons explored within this report and within the wider submissions made on behalf of our clients. On the basis of the Council's claim, however, the DPD continues to propose that housing land is therefore limited to seeking to meet the adopted Core Strategy policy to provide for 292 homes per annum.
3. This report has been prepared on behalf of Taylor Wimpey and CALA Homes to provide a critical review of Woking's housing needs situation as it currently exists. It does not consider the extent to which environmental or policy constraints (including the Green Belt) affect the ability to meet identified housing needs, nor the overall legitimacy of the Council's review of its Core Strategy. These aspects are covered elsewhere in our clients' submission, with this report highlighting both the real scale of need for different types and tenures of housing and the consequences of failing to plan more positively to meet these needs.
4. It was acknowledged upon adoption of the Core Strategy in 2012 that the housing requirement fell considerably short of meeting the full need for housing in Woking; despite its location within an area of significant housing need pressure. This required and envisaged contribution towards addressing this unmet need from the neighbouring authorities of Guildford and Waverley, to ensure that needs across the housing market area was met in full. Across both authorities – but most recently through the ongoing examination of the Guildford Plan – there has been a clear reluctance to accommodate this unmet need, with misguided assertions more recently that this need has reduced or no longer exists. Whilst policy responses across the HMA have been slow to emerge, levels of housing completions have also fallen short of the full evidenced need across West Surrey, with the result being a growing level of unmet housing need.
5. The previously evidenced scale of need across the housing market area has also recently been reinforced as a minimum where consideration is given to the Government's recently concluded consultation on changes to the standard method. There is therefore no evidence to support the Council's claim that the full scale of housing need within the HMA has fallen. The standard method indicates a need to provide a minimum of 1,727 dwellings per annum across the housing market area, including 431 homes per year in Woking. **Adopted and emerging plans provide for only 1,470 homes per year across the housing market area. This clearly falls short of**

meeting the calculated ‘minimum’ needs in full. This failure to plan for this level of need must also be considered in the context of a recognition that the uncapped (step 2) calculation of need under the standard method is itself notably higher than the 1,727 homes per annum figure.

6. The Site Allocations DPD is being prepared within this context, which has notably changed since the Core Strategy was developed, examined and adopted. From a housing need perspective, there is a clear justification for the Council revisiting policies on the planned provision of housing as there is evidence of significant unmet housing needs across the housing market area. **The Council must reconsider its position that a review of the Core Strategy is not necessary, and take a more proactive approach by identifying land which provides for needs beyond the level suggested therein.**
7. Equally, there is evidence that the Core Strategy has been particularly ineffective at:
 - **Meeting the need for family housing in Woking**, which has been consistently evidenced by the Council. The 2015 SHMA suggested that circa 250 homes with three or more bedrooms are required each year in the borough, but only 495 homes of this size have been completed since 2012 (i.e. over the first five years of the plan period). Recent delivery has been skewed towards flats and smaller housing, such that two thirds of all new homes completed have contained only one or two bedrooms. A long-term reliance on such sources of supply brings risks given the volatility of town centre markets, and homes of this type and size can be expected to meet only a segment of the borough’s full housing needs. There has already been evidence of an increased outflow of family-aged residents aged 25 to 44 when compared to longer-term trends. The dominance of flats has also reinforced and worsened the price premium paid for houses in the borough, with the average price paid also having increased significantly over the past five years; and
 - **Meeting the need for affordable housing in Woking**, in the context of recent evidence that 375 such homes are needed each year to clear a sizeable and growing backlog while meeting newly arising needs in future. An average of 60 affordable homes have been delivered annually since the Core Strategy was adopted, which falls considerably below need. The reliance on flats and smaller housing is evidently influencing this significant under-provision against need. This strongly highlights that in order to make any significant headway into addressing the need for affordable housing greater emphasis must be placed on enabling the future delivery of much-needed affordable housing through larger family-housing led developments.
8. When reflecting on the above in the context of the NPPF and PPG, it is considered that the Council must adopt a more positive approach to allocate additional sites for housing, particularly those able and suitable to provide much needed family housing and affordable homes.
9. The wider representations provide additional detail on the level and nature of development which could be provided through sites submitted by each of our clients.

10. It is of note that these sites would offer the potential to contribute additional housing which would be predominantly aimed at meeting the needs of families. This recognises the location of the sites and their proximity to existing social infrastructure, including educational facilities.
11. It is also anticipated that the sites would deliver a range of policy compliant tenures, thereby contributing importantly to the provision of much needed affordable homes.

1. Introduction

1.1 Woking Borough Council ('the Council') is currently consulting on a pre-submission version of its Site Allocations Development Plan Document¹ (DPD) which is intended to identify land and allocate specific sites to enable the delivery of the Woking Core Strategy², which was adopted in 2012. The Site Allocations DPD is also intended to safeguard land to meet future development needs beyond the present Core Strategy period, from 2027 to 2040.

1.2 In publishing the DPD for consultation, the Council has also published a 'review' of the Woking Core Strategy³. While this acknowledges that the adopted Core Strategy is more than five years old, it claims that there is no need to undertake a full review of its policies. Specifically with regard to the housing requirement it is concluded that:

*"No purpose would... be served by undertaking an immediate modification of the Core Strategy with the hope that the Council would be able to meet its objectively assessed housing need and/or set a higher housing requirement... Woking has carried out a comprehensive Green Belt boundary review. It is evidenced that no more land could be identified without significant damage to the integrity of the Green Belt"*⁴

1.3 This report has been prepared on behalf of Taylor Wimpey and CALA Homes to provide a critical review of Woking's housing needs situation as it currently exists. It does not consider the extent to which environmental or policy constraints (including the Green Belt) affect the ability to meet identified housing needs, nor the overall legitimacy of the Council's review of its Core Strategy. These aspects are covered elsewhere in our clients' submission, with this report highlighting both the real scale of need for different types and tenures of housing and the consequences of failing to plan more positively to meet these needs.

Appreciating the context of high housing need in Woking

1.4 Woking forms part the West Surrey Housing Market Area (HMA), alongside neighbouring Guildford and Waverley. The adoption of the Woking Core Strategy and the more recent examination of Local Plans in both Guildford and Waverley have reaffirmed the extent to which the area faces significant housing need pressures. This reflects a recent historic failure across the HMA to provide the quantum and mix of homes needed to accommodate a growing population and respond to market demand, which is strongly influenced by the area's proximity to the overheated London housing market.

1.5 It is acknowledged that Woking was the first authority in the HMA to progress an NPPF compliant plan through to adoption. However, the Plan was adopted over six years ago, and the evidence of housing need and demand confirms that the area continues

¹ Woking Borough Council (November 2018) Site Allocations Development Plan Document: Regulation 19 Consultation

² Woking Borough Council (October 2012) Woking Core Strategy

³ Woking Borough Council (October 2018) Review of Woking Core Strategy

⁴ *Ibid*, page 14

to suffer from acute issues arising from a sustained failure to provide for the homes which are needed. With the protracted examination of the Guildford Local Plan, it is also the case that the full needs of the HMA remain unaccounted for in the planned provision for housing needs across the area. In the context of a clear reluctance from other parts of the HMA to actively and positively plan for Woking's unmet needs, the onus must be on the Site Allocations DPD to adopt a more pro-active approach to identifying land to provide for needs above that prescribed as a minimum within the adopted Core Strategy.

- 1.6 A failure to plan for the homes which are needed will lead to a further exacerbation of acute affordability issues, which are having significant adverse and detrimental consequences for those local households which are most vulnerable and that are currently being excluded from the housing market.

Addressing the need for different types and tenures of housing in Woking

- 1.7 Paragraph 59 of the National Planning Policy Framework (NPPF) clearly states that:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”⁵

- 1.8 To ensure that Local Plans deliver the homes needed, their identification of an appropriate supply of land must therefore be based upon:
- An understanding of the geographies of housing market need, to ensure that new homes are provided where needs arise;
 - An appreciation of the segmentation of the market with regards to different needs for different products (size, tenure etc) generated by different groups in the housing market; and
 - A consideration of the above factors to ensure that the demand for new homes is understood in the context of the proposed supply to ensure that housing land is developed and boosts supply.
- 1.9 The Council’s proposed approach to identifying an appropriate supply of residential land in the Site Allocations DPD has not adequately considered these aspects. Specifically, it is considered that the Council has failed to recognise the needs of those households that will not occupy the smaller high density housing which accounts for an unrepresentative proportion of proposed supply. This includes families with children and those in need of affordable housing, both of whom account for an important segment of the overall market demand based on the Council’s own evidence.
- 1.10 This report considers the latest available evidence in the context of the NPPF and accompanying Planning Practice Guidance (PPG) to provide evidence in support of each of these areas of concern. It is concluded that the Council must more thoroughly

⁵ MHCLG (2018) National Planning Policy Framework, paragraph 59

review its planned approach to housing provision, and particularly allocate additional sites that are able and suitable to provide much needed family housing and affordable homes.

Report structure

1.11 This report is structured as follows:

- **Section 2 – A changing context for planning for housing need** – a concise overview of the changing policy context for planning for the provision of housing need in Woking, alongside a consideration of the latest evidence of changing market housing need and demand pressures to affirm evidence of a sustained high need for housing in Woking and its HMA.
- **Section 3 – The need for family housing in Woking** – analysis of the latest evidence to understand the scale of existing and projected need for housing for families. This is set in the context of an assessment of the profile of new housing delivered in Woking under the Core Strategy.
- **Section 4 – Local affordable housing need** – consideration of the latest evidence of affordable housing need in Woking, and a critical assessment as to the extent to which needs are being met through the policies of the adopted Core Strategy.
- **Section 5 – Conclusion** – a summary of the implications of the review, drawing upon analysis in preceding sections.

2. A changing context for planning for housing need

- 2.1 As set out in Section 1, the Council successfully adopted its Core Strategy in 2012. Where the Plans in the other two authorities have taken notably longer to progress, and in the case of Guildford is still being examined, this has meant that the borough has been able to implement a plan-led approach to meeting housing needs.
- 2.2 Whilst subsequent sections consider in more detail the extent to which the application of the Core Strategy has allowed the differing needs of households in Woking to be met in terms of the overall scale of provision, the Council has been clear to accept that *'it is a statement of fact that the Core Strategy housing requirement is significantly lower than the objectively assessed housing need'*⁶.
- 2.3 In this context it is also important to acknowledge that the planned requirement for 292 dwellings per annum was derived from the South East Plan⁷ and evidence within the 2009 Strategic Housing Market Assessment⁸ (SHMA) for West Surrey. This was not based on an objective assessment of housing need – as required under the previous NPPF – or the formulaic identification of a *'minimum annual housing need figure'* as now required by the revised NPPF⁹.
- 2.4 In the six years since the adoption of the Core Strategy, the extent and scale of the acknowledged housing crisis has continued to grow nationally. The scale of housing need and demand evidenced as of now presents a notably different context to that in which the Core Strategy was developed, examined and adopted.
- 2.5 Addressing the housing crisis has become an increasing priority for the Government. In the last two years, this has been articulated through the publication of a Housing White Paper, and most recently through the revised NPPF and PPG. Policy changes have been squarely aimed at *'delivering the homes this country needs, in the places people want to live'* and ensuring that *'local planning authorities plan for the right homes in the right places, in an open, transparent and sustainable way'*¹⁰.
- 2.6 This section initially considers the current policy position across the West Surrey HMA to understand the extent to which evidenced needs are being provided for in this context. This recognises the advanced nature of the current generation of Local Plans, which are aimed at meeting needs as of today.
- 2.7 Consideration is then given to the latest position on the *'minimum'* housing need, following the standard method now prescribed by the NPPF and PPG in Woking and across the HMA. This forms a more up-to-date and important context for the Site Allocations DPD, recognising in particular its stated purpose of safeguarding land for

⁶ Woking Borough Council (October 2018) Review of Woking Core Strategy

⁷ This is confirmed at paragraphs 75 and 77 of the Local Plan Inspector's Report (2012)

⁸ Fordham Research (2009) West Surrey Strategic Housing Market Assessment

⁹ PPG Reference ID 2a-002-20180913

¹⁰ MHCLG (2018) Technical consultation on updates to national planning policy and guidance, paragraphs 1 and 2

beyond the current plan period. Specifically, this analysis considers the extent to which the Council's assertion that *'there is a clear downward trend of the objectively assessed housing need'*¹¹ stands up to scrutiny.

- 2.8 Finally, the section highlights the importance of identifying an appropriate supply of land to provide for the range of housing needs in addition to ensuring the supply of the overall number. This is considered to be of particular significance for the land to be provided for under the Site Allocations DPD in Woking with specific segments of market need then considered in more detail in the remaining sections of the report.

A picture of housing provision policy in the West Surrey HMA

- 2.9 The existence and operation of a West Surrey HMA is longstanding, with this comprised of the whole authority areas of Woking, Waverley and Guildford. Indeed, this functional geography was acknowledged within the 2009 Strategic Housing Market Assessment¹² (SHMA) for West Surrey, which was prepared to inform the Woking Core Strategy. The geography was retained as the basis for the 2015 West Surrey SHMA¹³.
- 2.10 The earlier 2009 SHMA was not prepared in the context of the NPPF and PPG. The 2015 SHMA contained an objective assessment of need (OAN) for the whole HMA which was also broken down to individual authorities. This was reviewed by its authors in 2017 to support the progression of the Guildford Local Plan¹⁴, albeit the review did not involve a full OAN update and instead recalculated the HMA need to account for the adopted Waverley Plan figure. It retained the previously calculated OAN for Woking. The concluded OAN within these studies are shown at Table 2.1.

Table 2.1: SHMA evidence of OAN (dwellings per annum)

SHMA	Woking	Guildford	Waverley	HMA Total
2015	517	693	519	1,729
2017 Review	517 ¹⁵	654 ¹⁶	507 ¹⁷	1,678

Source: 2015 West Surrey SHMA and 2017 Review

- 2.11 At a basic level, Government monitoring confirms that this need – calculated from a base date of 2013 – has not been met through the provision of new housing across West Surrey, with a shortfall of around 4,000 homes arising over the past five years. This is illustrated in the following chart.

¹¹ Woking Borough Council (October 2018) Review of Woking Core Strategy

¹² Fordham Research (2009) West Surrey Strategic Housing Market Assessment

¹³ GL Hearn (September 2015) West Surrey Strategic Housing Market Assessment

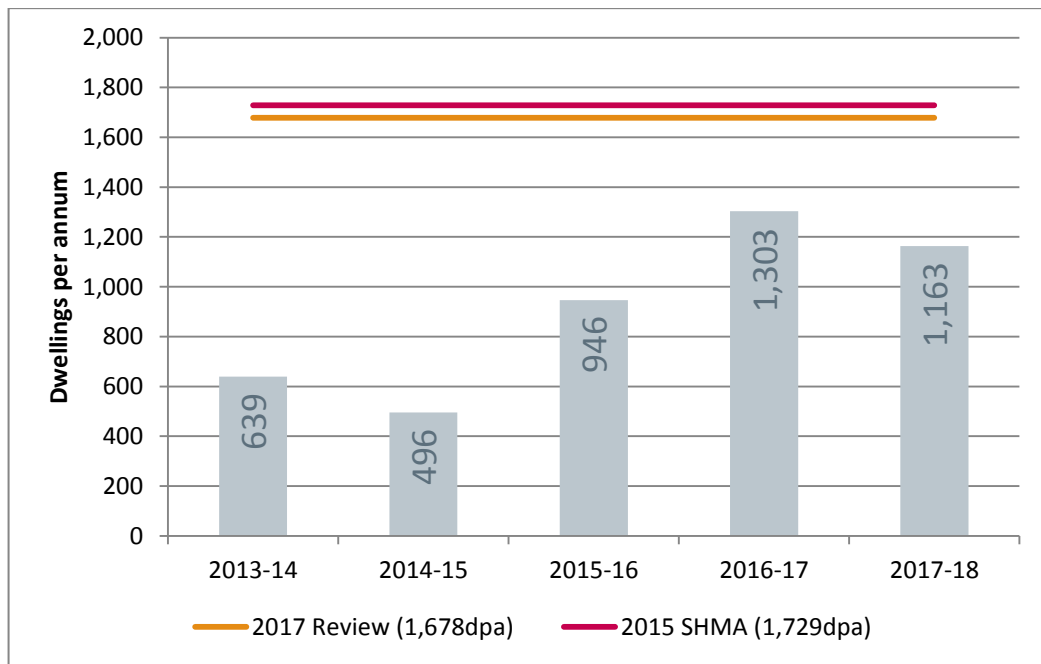
¹⁴ GL Hearn (2017) Review of Housing Needs Evidence across West Surrey HMA

¹⁵ 2015 SHMA

¹⁶ 2017 SHMA Addendum

¹⁷ Adopted Waverley Local Plan, 2018

Figure 2.1: Comparing Net Completions with Need (2013 – 2018)



Source: MHCLG, 2018

- 2.12 The need for housing within Woking must be considered in the context of the full picture of need across the HMA. This accords with the evidence cited above, with the 2017 review confirming that:

“It is prepared in a context where there is an ongoing commitment of the three authorities to joint working to assess and meet the HMA’s housing needs as set out in the West Surrey Statement of Common Ground”¹⁸

- 2.13 As set out in section 1, Woking’s Core Strategy was adopted with a policy to provide for 292 homes per annum over the plan period (2012 – 2027). While its adoption preceded the publication of guidance on the method for calculating OAN, the Inspector referenced the 2009 SHMA in observing that such a level of provision fell below ‘any measure’ of the borough’s housing needs, specifically citing the conclusion that 499 affordable homes are needed annually in Woking¹⁹. This SHMA also identified an ‘apparent shortfall of 594 dwellings per annum’ in the borough, based on survey data²⁰.

- 2.14 The Inspector was clear to identify that:

¹⁸ GL Hearn (November 2017) Review of Housing Needs Evidence across West Surrey HMA, paragraph 1.8

¹⁹ Planning Inspectorate (2012) Report on the Examination into Woking Local Development Documents Core Strategy July 2011 Local Plan, paragraph 78

²⁰ Fordham Research (2009) West Surrey Strategic Housing Market Assessment: housing needs and market assessment survey for Woking Borough Council, paragraph S37

“With regard to the NPPF, the CS intention to deliver 4,964 dwellings over the plan period will not meet the full objectively assessed needs for either market or affordable housing in the Woking element of the housing market area”²¹

2.15 The Inspector also confirmed that:

“The available evidence indicates that Woking Borough will not meet its own housing needs and that the intended local plans of its two West Surrey neighbours are not currently intending to address the shortfall. The picture is evolving but it therefore appears that the need for housing as identified by the West Surrey SHMA is yet to be clearly reconciled in plan making terms across the three boroughs”²²

2.16 Through the examination of the Waverley Local Plan, the Inspector’s Report confirmed the unmet need arising from Woking as being 3,150 dwellings²³. This was calculated by comparing the 2015 SHMA’s OAN with the adopted requirement of 292 dwellings per annum over the plan period (2010 – 2027). The unmet need was therefore 225 dwellings per annum over the 14 years of the plan period, from the base date of the SHMA (2013).

2.17 In arriving at the housing requirement in the adopted Waverley Plan, the Inspector confirmed that it was reasonable for Waverley to accommodate 50% of this unmet need (1,575 dwellings). It was considered reasonable for the Plan to accommodate this need over its longer 19 year plan period (2013 – 2032) despite a recognition that the unmet need arose over a shorter period i.e. (2013 – 2027) aligned with the Woking Core Strategy.

2.18 For the Inspector examining the Guildford Plan – noting that this remains ongoing – there was therefore a residual unmet need of 1,575 dwellings, which remained unaccounted for within the planned provision across the HMA.

2.19 Through the process of the Guildford Local Plan, a number of additional data releases have prompted recalculations of housing need beyond that established through the 2017 SHMA Review. At the time of the hearings in summer 2018, this included the 2016-based sub-national population projections (SNPP). In accounting for the datasets available at the time, the Inspector published an interim note in which he arrived at a recommended OAN of 630 homes per annum for Guildford over its plan period (2015 – 2034)²⁴. In addition to this OAN, in establishing an appropriate requirement for which the Plan provided adequate land, the Inspector indicated that he would expect Guildford to meet a proportion of Woking’s unmet needs. His recommendation was that the Guildford Plan provide for an additional 41 homes per annum over the plan period, uplifting the OAN to suggest a total need to provide 671 homes per annum in the borough. Significantly, in arriving at this conclusion, the Inspector noted that:

²¹ Planning Inspectorate (2012) Report on the Examination into Woking Local Development Documents Core Strategy July 2011 Local Plan, paragraph 78

²² *Ibid*, paragraph 79

²³ Planning Inspectorate (2018) Report on the Waverley Borough Local Plan Part 1, paragraph 26

²⁴ Jonathan Bore (22 June 2018) Inspector’s guidance note for Hearing Agenda Item 14 (Boosting housing supply and early years provision)

“I do not give much weight to exercises that seek to cross refer to the draft standard methodology or re-calculate household projections in Woking to try to demonstrate that the residual unmet need no longer exists. It is outside the scope of the Guildford Local Plan Examination to establish a new OAN for Woking. There will be many considerations to take into account when it comes to considering Woking’s housing requirement through its Local Plan Review. Meanwhile the evidence of Woking Borough Council clearly indicates that there is an existing level of unmet need and that this is likely to persist into the future”²⁵

- 2.20 The Inspector’s interim conclusions are recognised by Woking Council within their review of the Core Strategy where reference is made to the Inspector’s view that the Guildford Local Plan should be able to meet around 25% of Woking’s unmet need. From a simple arithmetic perspective, this infers that a significant proportion (c.25%) of the unmet needs of Woking – as quantified by the Inspector in his examination of the Waverley Plan – remain unaccounted for. This equates to around 800 homes in total.
- 2.21 Despite what would appear to be a clear position and one which the Inspector examining the Guildford Plan has been clear to conclude on, Guildford Borough Council (GBC) has continued to claim that the scale of housing need in Guildford and across the HMA has fallen, with issues raised through its Main Modifications consultation. Recently, this has included the presentation of a new and lower OAN for Guildford²⁶ (562dpa), based on the integration of 2016-based household projections that were published in September 2018.
- 2.22 Furthermore, as part of evidence submitted to the Examination, GBC has also sought to highlight the implications of the Woking Site Allocations DPD, and the review of the Woking Core Strategy. It has claimed through submissions to its own Examination that this review should be undertaken using the current NPPF, and the standard method for calculating housing need. GBC claims that this eradicates the unmet need of Woking, meaning that its Plan no longer needs to address this issue.
- 2.23 This statement was made in advance of the recent Government technical consultation on the PPG and the standard method, the implications of which are considered further in the following sub-section. Aside from the technicalities of this issue, however, it is important to note that in the case of Guildford it is clear that every effort has been made by the Council to seek to not provide for the needs of Woking outside of their own calculated OAN. This position will be tested again in a further round of hearings within the Guildford EiP scheduled for February 2019 but reaffirms the importance, going forward, of Woking seeking to ensure that it explores every opportunity to plan for and provide for its own housing needs.

The latest evidence of housing need across the HMA

- 2.24 The adopted and emerging generation of Local Plans have been prepared and examined under the former NPPF and PPG, which have now been superseded. Under the revised NPPF, there is a mandatory need for Local Plans to be reviewed every five years, with the importance of ensuring that policies relating to the provision of a

²⁵ *Ibid*, paragraph 11

²⁶ Guildford Borough Council (October 2018) GBC note on OAN following the 2016-based Household Projections

sufficient number and type of homes being a critical consideration as to the justification for undertaking earlier reviews.

- 2.25 The Council's claim that it is not necessary to review the Core Strategy is predicated upon an understanding or position that:

"There is a clear downward trend of the objectively assessed housing need. The 2016 Sub National Population Projections have been published. The Household Projections are expected to be published in September 2018²⁷. The implications of these on the objectively assessed housing need will be closely monitored, but the indications are that the objectively assessed housing need could come down even further"²⁸

- 2.26 A review of the Council's wider evidence base also reveals a perception that 'Woking will be over providing against its need' by continuing with the Core Strategy requirement, as:

"The NPPF introduced a standard method for calculating housing need. Using the latest 2016 household projections to calculate the objectively assessed housing need for the Borough, Woking will be required to make provision for at least 263 net additional dwellings per year"²⁹

- 2.27 This section considers the latest evidence to test this position. Importantly, this considers not only Woking's housing needs but the evidenced needs across the HMA. This recognises the longstanding acknowledged need to ensure housing is provided of sufficient quantity and type across this functional geography.
- 2.28 The introduction of a new standard method for calculating housing needs through the revised NPPF was one of the 'radical reforms' proposed by Government in response to the national housing crisis. This was aimed at minimising delays in plan-making and ensuring that local authorities cannot 'duck potentially difficult decisions' by advancing an alternative methodology³⁰.
- 2.29 The Government first published its proposed method for consultation in September 2017³¹, and it was retained unchanged during consultation on the revised NPPF which closed on 10 May 2018³². The subsequent publication of the revised NPPF in its final form on 24 July 2018 confirms that a 'local housing need assessment conducted using the standard method' should be used to 'determine the minimum number of homes needed' (our emphasis) following the transition period, unless 'exceptional circumstances justify an alternative approach which also reflects current and future

²⁷ This statement was made in a document published in October 2018, and the reasons for referring to a future publication of new household projections is therefore unclear

²⁸ Woking Borough Council (October 2018) Review of Woking Core Strategy, page 10

²⁹ Woking Borough Council (2018) Woking Strategic Housing Land Availability Assessment, paragraph 1.10

³⁰ DCLG (2017) Fixing our Broken Housing Market – the housing white paper, paragraph 14

³¹ DCLG (2017) Planning for the right homes in the right places: consultation proposals

³² MHCLG (2018) National Planning Policy Framework: draft text for consultation

*demographic trends and market signals*³³. It also requires ‘any needs that cannot be met within neighbouring areas’ to be taken into account³⁴.

- 2.30 Alongside the revised NPPF, the PPG has also been updated to reference the method originally proposed by Government. This uses the ‘*most recent*’ official household projections as the ‘*baseline*’, and formulaically adjusts this figure to take account of the relationship between median house prices and earnings. The overall scale of adjustment is capped at 40% above recently adopted housing requirements, or household projections if higher than requirements adopted more than five years ago.
- 2.31 The reissued guidance is clear to confirm that ‘*assessing housing need is the first step in the process of deciding how many homes need to be planned for*’³⁵. It also reaffirms the position in the NPPF that the formula is ‘*to identify the minimum number of homes expected to be planned for*’ and ‘*does not produce a housing requirement*’³⁶.
- 2.32 While the updated PPG is now formally in place, the Government has signalled its intention to imminently change this guidance on the standard method³⁷. It has recently consulted on proposals to:
- Specify that 2014-based household projections will provide the demographic baseline when assessing local housing needs using the standard method, over the short-term;
 - Make clear that 2016-based projections are not a justification for lower housing need; and
 - Review the formula over the longer term with a view to establishing a new method by the time the next projections are issued in 2020.
- 2.33 These proposed changes were triggered by the release of the 2016-based household projections on 20 September 2018, which:
- “...result in the national minimum annual housing need calculated using the standard method falling significantly; from approximately 269,000 homes prior to the publication of the updated household projections, to approximately 213,000 based on the updated data. This is below the 217,350 homes delivered last year”*³⁸
- 2.34 While the Government has considered ‘*whether it needs to change its aspirations for housing supply in light of the new household projections*’, it has concluded that ‘*it is not right*’ to change its aim of delivering 300,000 homes annually by the mid-2020s and significantly boosting the supply of homes³⁹. This recognises that:

³³ MHCLG (2018) National Planning Policy Framework, paragraph 60

³⁴ *Ibid*, paragraph 60

³⁵ PPG Reference ID 2a-001-20180913

³⁶ PPG Reference ID 2a-002-20180913

³⁷ MHCLG (October 2018) Technical consultation on updates to national planning policy and guidance

³⁸ *Ibid*, paragraph 10

³⁹ *Ibid*, paragraph 11

- Part of the implied reduction in housing need is attributable to changes in the method for converting population change into estimates of household formation, drawing upon shorter-term trends that focus *‘more acutely on a period of low household formation where the English housing market was not supplying enough additional homes’*. The Government is clear in its view that *‘methodological changes are not a reason why the Government should change its aspirations’*⁴⁰;
 - Household projections are constrained by housing supply, meaning that actual household growth cannot exceed the number of additional homes which are actually supplied;
 - Past under-delivery has resulted in a pent-up demand for housing, in the absence of the homes in which new households could have historically formed. This leads the Government to conclude that *‘there is a case for public policy supporting delivery in excess of household projections, even if those projections fall’*⁴¹;
 - A more responsive housing supply – through authorities planning for more homes – can more effectively address declining affordability, relative to an approach that is less responsive; and
 - Fewer people across England now live in areas where housing can be purchased with 4 years’ earnings, while substantially more live in areas where over 8 years’ earnings are required to buy a home.
- 2.35 The consultation considered how planning policy can support a market that delivers 300,000 homes each year, in a way that provides authorities and communities with *‘stability and certainty’* and is responsive to both *‘movements in projected households’* and *‘price signals’*. There is also a principle that policy should support *‘a market that works for everyone’*⁴².
- 2.36 With consultation on the proposed changes having closed on 7 December, there currently remains a degree of uncertainty around the method. However, it is clear at the current point in time that local authorities are expected, through plan-making, to be proactive in seeking to boost housing supply, and avert a continued worsening of the housing crisis.
- 2.37 Whilst it is recognised that consultation on the proposed changes has only recently closed (7 December) the rationale presented by the Government for its proposals are changes of significance in understanding the changing evidence of housing need in Woking and the HMA.
- 2.38 As acknowledged in the ongoing adoption and examination of other Local Plans in the HMA, the publication of the 2016-based population and household projections introduced a degree of uncertainty in the calculation of need under the previous

⁴⁰ *Ibid*, paragraph 11

⁴¹ *Ibid*, paragraph 11

⁴² *Ibid*, paragraph 18

guidance. A clear contributing factor to the Government's proposals is the need to provide '*stability and certainty*' in the calculated housing need to assist the process of plan-making. This forms one of three underlying principles established through the consultation.

- 2.39 Table 2.2 presents the outcome of the standard method, taking account of the Government's proposals. This shows that the formula suggests a need for some 1,931 dwellings per annum, prior to the capping at a level that is 40% higher than the baseline.

Table 2.2: Outcome of Standard Method in West Surrey HMA (dpa)

	Woking	Guildford	Waverley ⁴³	Total
Baseline (2014-based)	308	537	389	1,233
Affordability ratio	12.21	12.53	14.5	–
Affordability adjustment	51.3%	53.3%	65.6%	–
Outcome	465	823	643	1,931
Capped (40% above baseline)	431	752	544	1,727

Source: ONS

- 2.40 The PPG states that '*the cap is applied to help ensure that the minimum local housing need figure...is as deliverable as possible*'. It is clear that '*the cap...does not reduce housing need itself*', confirming that:

*"...strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible"*⁴⁴

- 2.41 Table 2.3 compares the capped outcome of the standard method against the level of housing provision in adopted and emerging plans across the HMA, as well as the previous SHMA evidence (as shown in Table 2.1).

⁴³ Although the standard method would technically cap any figure 40% above the up-to-date adopted requirement for Waverley (cap of 826dpa against a requirement for 590dpa), this has no effect on the calculation for the borough

⁴⁴ PPG Reference ID 2a-007-20180913

Table 2.3: Standard method vs Emerging / Adopted Plan requirements (dpa)

	Woking	Guildford	Waverley	Total
2015 SHMA	517	693	519	1,729
Standard Method	431	752	544	1,727
2017 Review	517 ⁴⁵	654 ⁴⁶	507 ⁴⁷	1,678
Emerging / Adopted Plans	292	671	507	1,470

Source: Latest Plan positions and Turley calculation of standard method in line with MHCLG consultation, 2018

2.42 This clearly shows that at a minimum or starting point level, current plans across the area will fall short of meeting the latest likely calculation of housing need, even with the cap in place. It is also important to note that across the HMA the calculated need is almost exactly aligned with the scale of need identified in the earlier 2015 SHMA (1,729dpa). This does not support a position whereby there is evidence of falling housing needs across the functional HMA within which Woking is located. Acknowledging the asserted reliance on other authorities in the HMA to meet its housing needs the reticence of GBC to provide for the full needs in the current generation of Plans therefore forms an important context.

2.43 In the case of Woking itself the standard figure of 431 homes per annum, whilst lower than the previous OAN, is some 48% higher than the housing requirement set out within the adopted Core Strategy, and used as the basis for the Site Allocations DPD. This poses a clear challenge as to the extent to which such an approach remains appropriate outside of any consideration of environmental constraints.

2.44 In considering the apparent ‘fall’ in the estimation of housing needs in Woking itself, it is of critical importance to recognise that both the previous OAN and the current standard method calculation are heavily predicated upon the level of need projected on the basis of trend-based demographic projections. In understanding a trend of lower demographic based projections, and therefore housing need in Woking, it is important to acknowledge that within any trend-based projection there is a degree of circularity as they are manifestly influenced by local levels of new house building. As the Government’s consultation noted⁴⁸ in quoting the ONS:

“...the projections are based on recent actual numbers of households and are not adjusted to take account of where homes have been needed in recent years but have not been available. Therefore, if more homes are built, the increased availability of homes may result in more households forming. The opposite is also true – if fewer homes are built then fewer households are able to form”⁴⁹

⁴⁵ 2015 SHMA

⁴⁶ 2017 SHMA Addendum

⁴⁷ Adopted Waverley Local Plan, 2018

⁴⁸ MHCLG (October 2018) Technical consultation on updates to national planning policy and guidance

⁴⁹ ONS (2018) What our household projections really show

- 2.45 The Core Strategy adopted a ‘constraint based’ requirement which will through its imposition continue to have an impact on the level of population and household growth which can be accommodated.
- 2.46 Table 2.4 shows net housing completions from the start of the plan period in Woking. It is of note that since the Core Strategy was adopted in 2012 the borough has seen the delivery of on average about 302 dwellings per annum. This closely aligns with the Core Strategy requirement and evidently falls short of any recent assessment of housing need. This strongly indicates that significant caution should be placed on any assertion that needs are reducing, with this more likely to be a modelling consequence of constraining supply.

Table 2.4: Net Housing Completions in Woking (2010/11 – 2017/18)

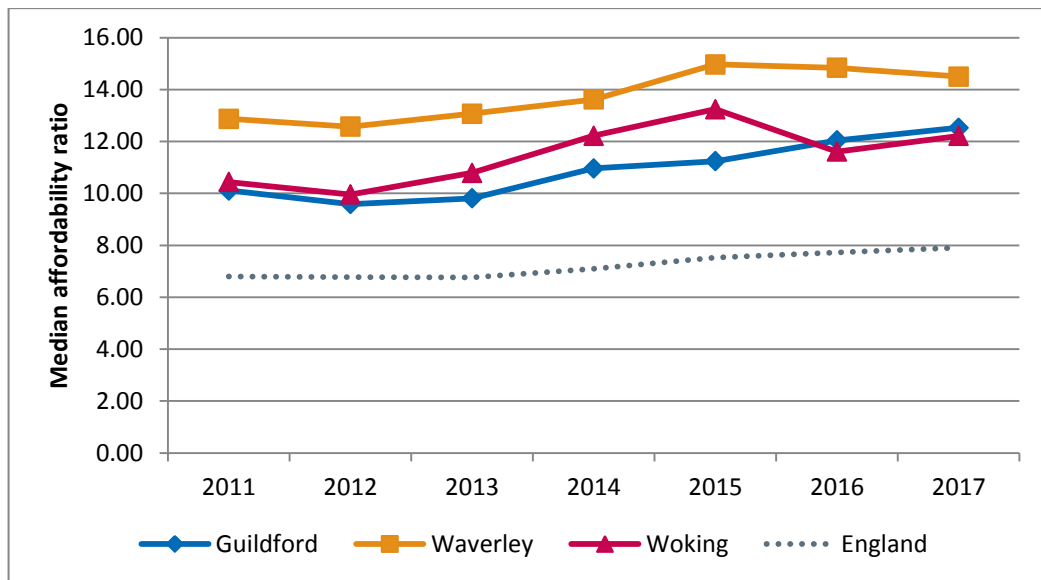
	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Homes	148	175	273	370	66	360	399	345

Source: WBC monitoring records (October 2018)

- 2.47 Indeed in reality it is clear that in four of the last five years net completions have been higher than the adopted requirement, by as much as 37% in 2016/17. This is important in the context of the PPG, which confirms that higher levels of delivery are a potential indication of greater housing need⁵⁰.
- 2.48 A more appropriate way of assessing need in the context of the balance with supply is to understand the changing market signals across the HMA. In considering both the clear local worsening of affordability and the sustained scale of imbalance, it is important to keep in mind that the Government views any authority with a ratio of 4 or above as needing to boost housing supply above that needed to accommodate demographic projections of need.
- 2.49 The severity of the local issues related to affordability must be benchmarked against the national average, the extent of which have been used to define the Government’s identification of the housing crisis and an acknowledgment that home ownership is currently unaffordable for many people.
- 2.50 Figure 2.2 shows change in the median affordability ratio since 2011, noting that this dataset is integral to the Government’s standard method for calculating housing need.

⁵⁰ PPG Reference ID 2a-010-20180913

Figure 2.2: Change in Median Affordability Ratios (2011 – 2017)



Source: ONS

2.51 This clearly indicates that there is no reason to reasonably suggest that that the need or demand for housing in Woking or across the HMA is easing. The evidence shows that:

- Collectively and separately the authorities all record affordability ratios which are considerably above the national average. This places them very much in the Government's thinking as authorities which should be doing more to ensure supply is boosted above minimum needs; and
- Since the adoption of the Woking Core Strategy affordability has worsened in Woking and to an even greater extent across the other two authorities.

2.52 The Council's position to justify that the need for housing is falling in Woking is untenable in this context. Indeed the sustained position to plan for a level of new homes in Woking coupled with the delays in plan-making elsewhere across the HMA has manifested itself in a worsening set of circumstances for households looking to access housing. Such an approach must not be sustained if conditions are not to continue worsening.

The changing housing need context and the spatial distribution of new homes

2.53 Alongside planning for a sufficient number of homes, it is of equal importance that full consideration is given to the need for different sizes and types of home in Woking. This is particularly important when recognising the ambition of the Site Allocations DPD to plan to provide for the land needed over a longer time horizon to 2040.

2.54 The draft DPD states that:

“Consideration of the options for the distribution of development throughout locations in the Borough – for example the quantity of residential development to come forward in Woking Town Centre and the wider Urban Area and that to take place within the Green Belt – was a fundamental part of preparing the Core Strategy”⁵¹

- 2.55 It is important to recognise, however, that both the underpinning evidence and the wider housing market context have changed in the years since the Core Strategy was prepared and examined, as outlined throughout this section. This is evident when referring back to the Inspector’s Report in 2012:

“Whilst reservations have been expressed in relation to the effectiveness of the CS to secure certain levels of development to meet the needs of the Borough, for example housing, there is insufficient evidence to conclude that the approach of the CS is not founded on suitable evidence or that the stated approach to growth is not robust. The Council’s reliance upon data from the Office of National Statistics is not flawed and the evidence contained within the Population Topic Paper updated in 2011 is adequate to underpin the spatial approach of the CS for the plan period, notwithstanding the alternative methodologies which can be employed to secure population forecasts”⁵²

- 2.56 This highlights the dated nature of the underpinning evidence which informs the spatial strategy under Policy C2 of the adopted Core Strategy, and the extent to which it was recognised that future evidence could potentially inform a more substantiated critique of the approach.

- 2.57 In considering the extent to which the policy approach has supported the provision of housing to meet needs in full, it is also important to recognise that the Inspector concluded:

“Having evidenced the need for a GB review and mindful of the need to ensure a sufficient housing land supply, I can identify no overriding planning merit in delaying the intended review. Indeed, an argument of some weight can be made that a review of the GB should have informed the CS itself... Amongst other evidence, the available SHMA is indicative of a housing need that cannot be met within the Borough over the plan period. The evidence provided to the SEP and underpinning the CS itself indicates that a balanced approach to housing delivery, including the consideration of environmental constraints and urban capacity, could reasonably secure an average of 292 dwellings per year until 2027 only with the release of land within the GB”⁵³

- 2.58 Furthermore, the Inspector was clear to assert that:

“Whilst, it may be sequentially preferable, particularly in relation to the sustainability aims of the CS and with the NPPF in mind, to focus upon the capacity of urban areas to provide housing over the earlier years of the plan, the decision to delay any review of the GB increases considerably the risk of an insufficient land supply being available to

⁵¹ Woking Borough Council (November 2018) Site Allocations Development Plan Document: Regulation 19 Consultation, p15

⁵² Planning Inspectorate (2012) Report on the Examination into Woking Local Development Documents Core Strategy July 2011 Local Plan, paragraph 16

⁵³ *Ibid*, paragraph 33

*meet housing needs over the entire plan period. This would indicate an ineffective plan... Given the extent of overall housing needs within the Borough and the need to ensure precision and flexibility within the CS to ensure effective delivery of residential development, such a risk would be reduced and efficiencies in the plan making process increased by simultaneously reviewing the GB in conjunction with the production of the Site Allocations DPD*⁵⁴

- 2.59 It is of note in this context that the Inspector examining the Core Strategy was under the impression that the review of the Green Belt would take place before 2016/17, alongside a review of the Site Allocations DPD which was then expected to be adopted in 2014.
- 2.60 The fact that this review is now entering 2019 reinforces the urgency of ensuring a supply of land is identified which meets the needs of all households in the borough.
- 2.61 The NPPF recognises that the *'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies'*⁵⁵. This includes reference to those households who require affordable housing as well as a range of different household groups. Those specified include families with children, older people and people who rent their homes.
- 2.62 The consequences of the supply which has been supported to date under the Core Strategy and the planned provision under the DPD are considered further in the remaining sections of this report, with a specific focus on the needs of families with children and affordable homes. It is these two areas of need specifically for which the failure to accelerate the plan-making process in the context of changing needs are considered to be most acute.

⁵⁴ *Ibid*, paragraph 34

⁵⁵ MHCLG (2018) National Planning Policy Framework, paragraph 61

3. The need for family housing in Woking

- 3.1 A need for larger, family housing has been consistently evidenced in Woking. The 2009 SHMA, for example, identified that over half (53%) of the annual housing 'shortfall' in the borough related to dwellings with at least three bedrooms, particularly when focusing on market housing⁵⁶ (56%).
- 3.2 This was reinforced by the 2015 SHMA, which more conventionally assessed need in the context of the NPPF and PPG. As shown in the following table, this estimated that some 61% of households in need of market housing in Woking require at least three bedrooms, with almost one in four (23%) requiring at least four bedrooms.

Table 3.1: Evidenced Need for Different Sizes of Housing in Woking (2013 – 2033)

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	11%	28%	38%	23%
Affordable	50%	24%	22%	3%

Source: GL Hearn, 2015

- 3.3 When applied to the OAN concluded in the SHMA, the above suggests that circa 250 homes with three or more bedrooms are required each year in Woking, across all tenures⁵⁷. This alone clearly approaches the adopted requirement for 292 dwellings per annum, which, as referenced in the preceding section, did not claim to meet housing needs in full.
- 3.4 As a result, the profile of housing delivery in Woking since adoption of the Core Strategy shows that the evidenced need for family housing in the borough has not been met, in absolute or indeed proportionate terms. In contrast to the profile of need two thirds of all new dwellings have contained only one or two bedrooms, with only 495 larger homes completed in total over the five year period covered by published monitoring⁵⁸.

⁵⁶ Fordham Research (2009) West Surrey Strategic Housing Market Assessment: housing needs and market assessment survey for Woking Borough Council, Figure S5

⁵⁷ Based on its assumption that 35% of new housing is affordable (paragraph 8.12), with the tenure-specific size splits applied to the residual figures

⁵⁸ Based on review of Annual Monitoring Reports

Table 3.2: Profile of Recent Completions in Woking (2012 – 2017)

	2012 – 2017	% of total completions
Net completions	1,468	100%
1 bedroom	361	25%
2 bedrooms	612	42%
3 bedrooms	284	19%
4+ bedrooms	211	14%
Flats	832	57%
Houses	636	43%

Source: Woking Borough Council

- 3.5 The imbalance in the profile illustrated above is in no small part a result of the supply of new homes in Woking being dominated by the provision of flats, with this type of housing having accounted for over half (57%) of all completions since 2012.
- 3.6 Outside of issues this raises as to the extent to which this skewed profile of supply means that the needs of large parts of the market are being left unaddressed it also raises concerns as to the overall deliverability of the identified supply.
- 3.7 The recent profile has evidently been a defining feature of the current market cycle in Woking, but there is no evidence that such a profile of development can be sustained in the borough over a prolonged period of time. The volatility of town and city centre markets is widely acknowledged, as a consequence of their '*increasingly investor-driven*' nature⁵⁹. This can mean that investors react to market downturns by selling their property – accelerating a downward spiral of house prices – while the high turnover of residents can rapidly lead to people living elsewhere if centres are no longer viewed as attractive. The prospect of downturns that coincide with oversupply of one and two bedroom flats in particular has been highlighted, alongside a caution that young people are happy to live in central locations for only a '*short phase of their lives*'⁶⁰. This naturally limits the size of central markets, and renders them sensitive to the underlying drivers of demand.
- 3.8 As well as putting at risk the extent to which delivery levels of new homes are sustained as referenced above, such a profile of development in Woking can be expected to have met only a segment of the borough's housing needs, particularly when considered that the vast majority (77%) of one and two bedroom homes in Woking are occupied by households without children⁶¹. In contrast, households with dependent or non-dependent children account for the majority (52%) of those occupying larger housing with at least three bedrooms.

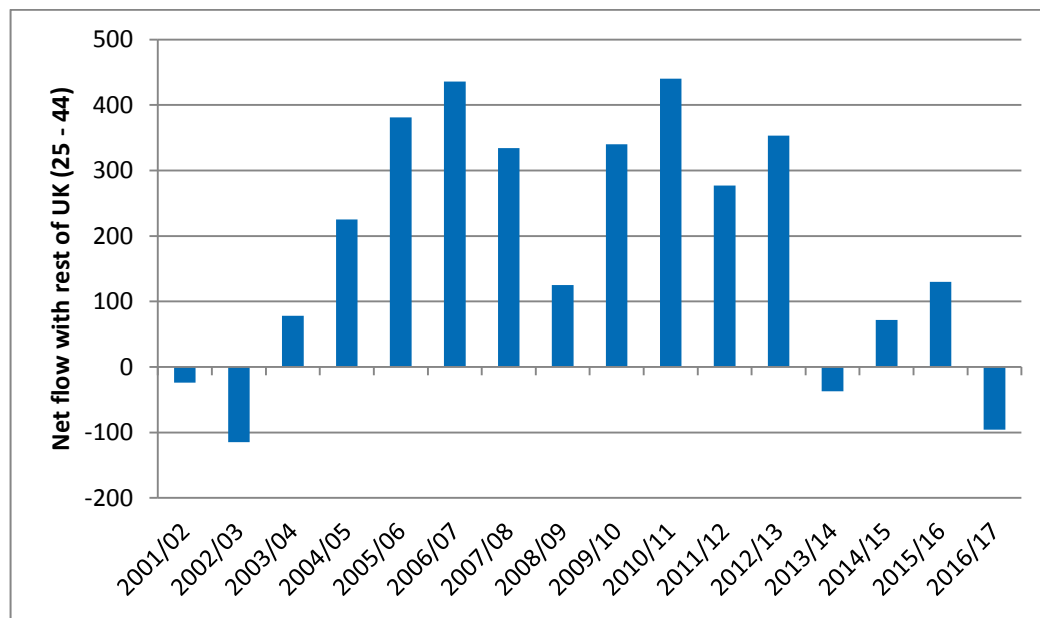
⁵⁹ Centre for Cities (2005) Faulty Towers? City Centre Housing Markets in the UK

⁶⁰ *Ibid*

⁶¹ Census 2011

- 3.9 The demographic impact of this skewed development profile over the plan period to date is already apparent. The following chart quantifies the annual net flow of family-age (25 – 44) people into Woking, to capture prospective first-time buyers and other new families. The chart compares the inflow from other parts of the UK with the outflow⁶².

Figure 3.1: Net Migration from Rest of UK to Woking (25 – 44 years)



Source: ONS

- 3.10 While the borough evidently saw a sustained net inflow of this cohort over the decade to 2013, this has changed markedly over the past four years. This departure followed the adoption of the Core Strategy, and coincided with the profile of development introduced at Table 3.2. It has culminated in a net outflow in 2016/17 that was larger than recorded in all but one of the preceding fifteen years.
- 3.11 The skewed nature of recent supply has also reinforced the premium that is already paid for houses (as opposed to flats) in Woking, with Land Registry data showing that the average price paid for a house in the borough last year was more than double the price paid for a flat. While both have grown considerably over the past five years, it is notable that the price paid for housing has increased to a greater extent. This signals a more acute imbalance between supply and demand for this type of housing.

Table 3.3: Change in Average Price Paid for Houses and Flats in Woking (2012-17)

	2012	2017	Change
Houses	£394,781	£582,084	47%
Flats	£203,762	£277,451	36%

Source: Land Registry

⁶² ONS (2018) Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland

- 3.12 The Council appears to have recognised the need to address the issues associated with its recent development profile confirming that:

*“The nature of the sites that are considered to be developable in the medium – long term are primarily in Town Centre locations that are likely only to be suitable for high density flatted developments. The implication of this is that the Council would not be able to achieve an appropriate mix of housing types and tenures to meet all types of local need and demand...”*⁶³

- 3.13 The Council does, however, appear to be resisting a review of this strategy, and is satisfied with ‘its current approach to high density developments at the Town Centre’. It claims that ‘no purpose would...be served’ by reviewing this position⁶⁴. This is despite the clear need to increase provision of family housing in Woking, and indeed the requirement to do so to accord with the NPPF. The ‘amount and variety of land’ is therefore critical in this regard⁶⁵.
- 3.14 The Council’s apparent failure to adequately respond to this issue will continue to have adverse effects on the operation of the local housing market. In the context of the evidence of a need for housing suitable for families and the imbalance in the profile of stock delivered so far in the Core Strategy period it is considered essential that the Council makes every effort to meet the pressing need for family housing in Woking, through the Site Allocations DPD.

⁶³ Woking Borough Council (November 2018) Site Allocations Development Plan Document: Regulation 19 Consultation, p17

⁶⁴ Woking Borough Council (October 2018) Review of Woking Core Strategy, p13 – 14

⁶⁵ MHCLG (2018) National Planning Policy Framework, paragraph 59

4. Local affordable housing need

- 4.1 The NPPF specifically references the need to assess the needs of those who require affordable housing, and reflect this need within planning policies⁶⁶.
- 4.2 This section reviews the Council's published evidence on the need for affordable housing in Woking, and considers the implications of more recent indicators in this regard. It subsequently considers the extent to which this need has been met through recent delivery.

Need for affordable housing

- 4.3 Going back to the evidence underpinning the adopted Core Strategy, the Inspector's Report confirmed that the then-latest SHMA evidence identified a need for 499 affordable homes each year over the plan period⁶⁷.
- 4.4 This broad scale of need was reinforced by the 2015 SHMA, which identified an annual need for 375 affordable homes in Woking. While this was lower than the previous estimate, it continues to far exceed the adopted Core Strategy housing requirement. Importantly, in this context a review of the various components of the calculation confirms that:
- **Some 1,285 existing households in Woking were classified as living in unsuitable housing**, and were considered unable to afford market housing. This surpassed the estimate from the 2009 SHMA⁶⁸ (1,029) to suggest a worsening position. The calculation assumes that this current backlog is cleared over twenty years, but it would clearly be preferable to meet this outstanding need at the earliest possible opportunity. Indeed, the calculation in the 2009 SHMA was predicated upon the backlog being cleared within five years, with such an approach aligning with guidance that was previously issued by Government⁶⁹;
 - **A need for 578 affordable homes will be annually generated by newly forming households and existing households falling into need from other tenures.** This is more than double the 247 affordable homes expected to become available each year in the borough, based on re-lets of the existing stock; and
 - **Woking had the smallest number of affordable homes in the pipeline (405),** when compared to the other HMA authorities.
- 4.5 The above provide a clear indication that the need for affordable housing is and will continue to be a key issue for the borough.

⁶⁶ MHCLG (2018) National Planning Policy Framework, paragraph 61

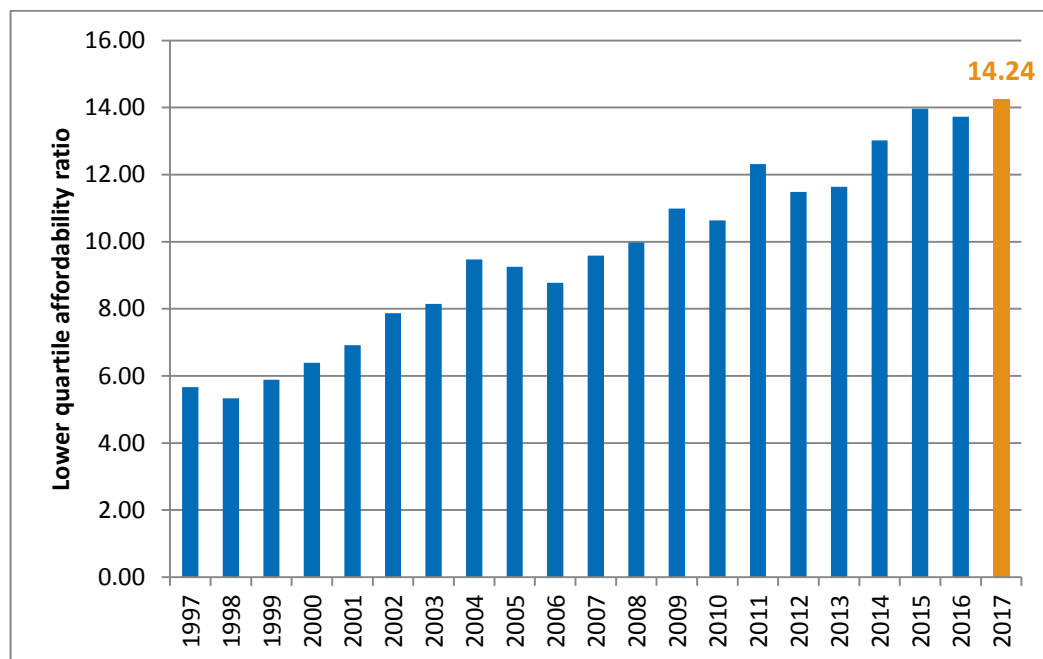
⁶⁷ Woking Borough Council Core Strategy Local Plan, Inspector's Report (2012), paragraph 78

⁶⁸ Fordham Research (2009) West Surrey Strategic Housing Market Assessment, Table S3

⁶⁹ PPG Reference ID 3-035-20140306

- 4.6 While the calculation has not been updated since 2015, there are no signs of a significant improvement, and indeed in looking at a number of updated datasets a worsening trend is evident.
- 4.7 The number of households on the Council's waiting list, for instance, has grown over the past two years, as confirmed by its published monitoring⁷⁰. While this is not directly comparable to the figures presented in the SHMA, it confirms that there were some 1,704 households which had registered a need for affordable housing in the borough as of 2017. This was 11% higher than recorded two years previously, and evidently exceeds the backlog estimated in the SHMA. This provides a strong indication that the available supply of affordable housing is falling short of meeting needs.
- 4.8 The relationship between earnings and house prices at the entry-level, which is a key contributor to younger households entering the housing market, has also deteriorated further since 2015. The ratio between lower quartile house prices and earnings in Woking is now at an unprecedented level, requiring over 14 years' income to purchase a home⁷¹. This evidently represents a fundamental obstacle for the majority of households looking to access entry level housing and is a key illustration as to the severity of the local housing affordability issues those living in the borough face.

Figure 4.1: Lower Quartile Affordability Ratio in Woking (1997 – 2017)



Source: ONS

⁷⁰ Woking Borough Council (2017) Annual Monitoring Report 2016-2017, Table 4

⁷¹ The focus on lower quartile affordability ratios reflects the approach of the 2015 SHMA, which takes 'lower quartile prices...to reflect the entry-level point into the market' (paragraph 6.7) within its affordable housing need calculation

Track record of delivering affordable housing

- 4.9 The Council's published monitoring confirms that only 301 affordable homes have been provided in Woking since the Core Strategy was adopted in 2012, equating to an average of approximately 60 affordable homes each year.
- 4.10 In total this level of provision is not even sufficient to meet the need anticipated in a single year, based on the former and most recent estimates in the SHMA (375-499 homes per annum). This is no doubt a factor that has contributed towards the growing backlog of households in need of affordable housing, as highlighted above.
- 4.11 This supply shortfall is still more apparent when considered that 89% of these affordable homes were delivered in the past two years (2015 – 2017). Prior to this point, only 33 affordable homes had been delivered over three years, equating to an average of only 11 such homes per year.

Table 4.1: Affordable Housing Completions in Woking (2012 – 2017)

	2012/13	2013/14	2014/15	2015/16	2016/17	Total
Affordable homes	13	15	5	102	166	301
Cumulative	13	28	33	135	301	301

Source: Woking Borough Council

- 4.12 The monitoring confirms that this increase was supported by two developments in particular, at Brookwood Farm and Moor Lane (also known as Kingsmoor Park). These schemes have accounted for 84% of the affordable homes completed over the past two years. Comparing Table 4.1 with the earlier analysis of overall housing completions (Table 2.3), confirms that affordable housing has accounted for only 21% of all homes provided in the borough since 2012. This evidently *includes* the contribution from Brookwood Farm and Moor Lane. Prior to these sites starting to deliver it is notable that in the previous three years (2012 – 2015) a significantly poorer position was achieved (5%).
- 4.13 It is important to note that even in the more recent years the level of affordable housing delivered has fallen significantly short of the target set at Policy CS12 of the Core Strategy, which aims to secure 35% of all homes as affordable housing.
- 4.14 Permission for Brookwood Farm and Moor Lane was granted in 2013, and they will collectively provide a total of 299 affordable homes upon completion⁷². This represents 45% of the 668 homes provided through the schemes, which are orientated towards larger housing⁷³.
- 4.15 This is important as it reveals the potential of sites of this nature to contribute positively towards meeting the significant evidenced need. In contrast in the earlier

⁷² Woking Borough Council (2016) Annual Monitoring Report 2015-2016, p24

⁷³ It is understood that 412 units with three or four bedrooms are proposed across both schemes, equating to 62% of all homes

years where flatted developments dominated the supply this was an important factor behind such low levels of delivery being recorded.

- 4.16 This is illustrated in Table 4.2 which clearly shows that affordable housing delivery in Woking has recently peaked in those years when houses and larger homes were delivered in greater volumes and accounted for a greater proportion of overall development. These are the only years in which this proportion has approached or exceeded the 35% target set in the Core Strategy. Conversely, the years in which development was particularly skewed towards flats delivered a notably smaller volume of affordable homes.

Table 4.2: Profile of Development and Affordable Housing Completions (2012-17)

	2012/13	2013/14	2014/15	2015/16	2016/17	Total
Completions	273	370	66	360	399	1,468
...of which houses	38 (14%)	60 (16%)	48 (73%)	261 (73%)	229 (57%)	636 (43%)
Affordable homes	13	15	5	102	166	301
% of overall delivery	5%	4%	8%	28%	42%	21%

Source: Woking Borough Council

- 4.17 The development of larger family housing over the past two years has also had a positive impact on the type of affordable housing provided in Woking, with a greater mix of houses and flats being delivered. This has been a long-term issue in the borough, as confirmed by the Council's monitoring:

*"Since the adoption of the Local Plan in 1999 the vast majority of affordable units secured through planning have been 1 or 2 bedroom flats. The Council's Strategic Housing Market Assessment 2009, however, identifies a need for affordable family housing"*⁷⁴

Implications

- 4.18 There is evidently a significant need for affordable housing in Woking, which has not been met through recent supply. There are signs that this position is worsening.

- 4.19 The PPG states that this need should be:

*"...considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments"*⁷⁵

- 4.20 The analysis in this section clearly indicates that the imbalanced profile of development that has been generally seen over recent years in Woking – and indeed the longer-term – has not provided the number or type of affordable homes needed in the borough.

⁷⁴ Woking Borough Council (2017) Annual Monitoring Report 2016-2017, p56

⁷⁵ PPG Reference ID 2a-027-20180913

Provision has only increased where larger, family housing has been developed, albeit this has continued to fall significantly below evidenced needs.

- 4.21 This clearly indicates that the future delivery of much-needed affordable housing in Woking is dependent, to a significant degree, upon the future provision of larger family-housing led developments. As per the PPG, *'an increase in the total housing figures'* to increase the provision of such sites can be expected – and must be considered – to *'help deliver the required number of affordable homes'* in Woking⁷⁶.

⁷⁶ *Ibid*

5. Conclusion

- 5.1 This report has been prepared on behalf of Taylor Wimpey and CALA Homes to critically review the current housing needs situation in Woking.
- 5.2 It takes account of the ongoing consultation on a pre-submission version of the Site Allocations DPD, which identifies land and allocates specific sites to enable the delivery of the Woking Core Strategy and safeguards land beyond the end of the current plan period (2027). Based upon a published review of its Core Strategy the Council has not proposed a modification of its adopted requirement for 292 dwellings per annum. This position is not supported for reasons explored within this report and within the wider submissions made on behalf of our clients.
- 5.3 It was acknowledged upon adoption of this requirement in 2012 that such a level of provision would not meet the full need for housing in Woking; despite its location within an area of significant housing need pressure. This required and envisaged contribution towards addressing this unmet need from the neighbouring authorities of Guildford and Waverley, to ensure that needs across the housing market area was met in full. Across both authorities – but most recently through the examination of the Guildford Plan – there has been a clear reluctance to accommodate this unmet need, with misguided assertions more recently that this need has reduced or no longer exists. Whilst policy responses across the HMA have been slow to emerge, levels of housing completions have also fallen short of the full evidenced need across West Surrey, with the result being a growing level of unmet housing need.
- 5.4 The previously evidenced scale of need across the housing market area has also been recently reinforced as a minimum, where consideration is given to the Government's recently concluded consultation on changes to the standard method. There is therefore no evidence to support the Council's claim that the full scale of housing need within the HMA has fallen. The standard method indicates a need to provide a minimum of 1,727 dwellings per annum across the housing market area, including 431 homes per year in Woking. **Adopted and emerging plans provide for only 1,470 homes per year across the housing market area. This clearly falls short of meeting the calculated 'minimum' needs in full.** This failure to plan for this level of need must also be considered in the context of a recognition that the uncapped (step 2) calculation of need under the standard method is itself notably higher than the 1,727 homes per annum figure.
- 5.5 The Site Allocations DPD is being prepared within this context, which has notably changed since the Core Strategy was developed, examined and adopted. From a housing need perspective, there is a clear justification for the Council revisiting policies on the planned provision of housing as there is evidence of significant unmet housing needs across the housing market area. **The Council must reconsider its position that a review of the Core Strategy is not necessary, and take a more proactive approach by identifying land which provides for needs beyond the level suggested therein.**
- 5.6 Equally, there is evidence that the Core Strategy has been particularly ineffective at:

- **Meeting the need for family housing in Woking**, which has been consistently evidenced by the Council. The 2015 SHMA suggested that circa 250 homes with three or more bedrooms are required each year in the borough, but only 495 homes of this size have been completed since 2012 (i.e. over the first five years of the plan period). Recent delivery has been skewed towards flats and smaller housing, such that two thirds of all new homes completed have contained only one or two bedrooms. A long-term reliance on such sources of supply brings risks given the volatility of town centre markets, and homes of this type and size can be expected to meet only a segment of the borough's full housing needs. There has already been evidence of an increased outflow of family-aged residents aged 25 to 44 when compared to longer-term trends. The dominance of flats has also reinforced and worsened the price premium paid for houses in the borough, with the average price paid also having increased significantly over the past five years; and
- **Meeting the need for affordable housing in Woking**, in the context of recent evidence that 375 such homes are needed each year to clear a sizeable and growing backlog while meeting newly arising needs in future. An average of 60 affordable homes have been delivered annually since the Core Strategy was adopted, which falls considerably below need. The reliance on flats and smaller housing is evidently influencing this significant under-provision against need. This strongly highlights that in order to make any significant headway into addressing the need for affordable housing greater emphasis must be placed on enabling the future delivery of much-needed affordable housing through larger family-housing led developments.

- 5.7 When reflecting on the above in the context of the NPPF and PPG, it is considered that the Council must adopt a more positive approach to allocate additional sites for housing, particularly those able and suitable to provide much needed family housing and affordable homes.
- 5.8 The wider representations provide additional detail on the level and nature of development which could be provided through sites submitted by each of our clients.
- 5.9 It is of note that these sites would offer the potential to contribute additional housing which would be predominantly aimed at meeting the needs of families. This recognises the location of the sites and their proximity to existing social infrastructure, including educational facilities.
- 5.10 It is also anticipated that the sites would deliver a range of policy compliant tenures, thereby contributing importantly to the provision of much needed affordable homes.

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**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

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



*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

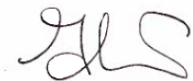
housing figure produced by applying the standard method and 2014-household projections (409dpa). This is plainly flawed. If – as GBC agree is broadly correct – Woking's local housing need is 266dpa based on the application of the standard method and the 2016-household projections, this means that there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

A handwritten signature in black ink, appearing to read 'TCS' or similar, written in a cursive style.

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

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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
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