

HJOA/18-01479

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Dear Sir/Madam,

Re: Representation to the consultation on Woking's Authority Monitoring Report, published December 2019

Rapleys are instructed, on behalf of Axis Land Partnerships, to submit written representations to the consultation on Woking's Authority Monitoring Report (AMR) of December 2019. These comments follow from Regulation 19 representations for the Site Allocations DPD (submitted on 13 December 2018), our submission of Land off Chobham Road to the SHLLA Call for Sites (21 June 2019), and our hearing statements to matters 1, 2, 3 and 4 of the examination of the Site Allocations DPD (November 2019).

This representation should be read in the context of these previous submissions.

The AMR was published in December 2019, and reports on *inter alia* an account of the Borough's housing delivery over the past year. Headline figures concerning housing are:

- The housing requirement is (and remains) 292 dwellings per annum (dpa);
- 231 dwellings have been completed in the past year;
- A Housing Delivery Test result of 113% is claimed (though revised figures have been published that put the result at 97%);
- A 5 Year Housing Land Supply of 9 years (2,913 units against a requirement of 1,619 which includes past undersupply of 82).

Each point (requirement, delivery, supply and affordability) go to the heart of the housing position in Woking, and comment is made on each in turn below. In summary:

The December 2019 AMR makes several claims, many of which are subject to challenge in so far as they concern housing:

- The claim that the housing requirement in the borough is 292dpa is inaccurate, and the figure of 431 should be used in accordance with the Standard Methodology;
- The most recent HDT shows that the Government consider the Standard Method to apply as of 2018/19;
- The claim that Woking has passed the HDT is no longer accurate, and the most recent figures show that the Council have failed;

- The claim of a deliverable supply equal to of 2,913 units over the next five years is inaccurate, and at least 876 units should be removed from this figure.

Requirement

The requirement of 292dpa is supported by an unorthodox review of the Core Strategy which was carried out (without apparent co-operation with neighbouring boroughs) in late 2018.

The Core Strategy, when adopted in 2012) was supported by a Strategic Housing Market Assessment that stated a housing requirement of 517dpa, but the strategy proposed a figure of 292dpa on the grounds that local circumstances (in particular the Green Belt) made the provision of a larger quantity of housing unsustainable.

Since then, the Government has made legislation requiring Local Plans to be reviewed at least once every five years, and published the Standard Method, by which housing requirements are to be calculated for all authorities in England.

Woking's decision not to update the Core Strategy in order to accommodate the material change to national policy wrought by the Standard Method goes against the thrust of national policy. The implementation of this target through the adoption of the Site Allocations DPD should not be considered a sound strategy.

Woking's justification that the delivery of more housing would require the release of Green Belt land does not withstand scrutiny, especially in light of recent events both within the region and on the national stage.

Speaking at the Create Streets Foundation on 27 February, the minister for housing told local authorities 'you will need to build on Green Belt land.' More recently still, in an article published in the Times on 04 March, the head of the Government's infrastructure advisory body, Sir John Armitt, called on ministers to ease restrictions on Green Belt development, stating 'At the moment the housing stock in this country covers only one per cent of our landmass. Green belt covers 13 per cent.'

Reflecting this, Mole Valley approved the draft of the Local Plan on 28 January 2020. Where the previous Plan (adopted on 2009) stated a target of 188 dpa, the new Plan uses the Standard Method of 449 dpa. These figures, and this increase, is strikingly close to those at Woking (a 2012 Core Strategy of 292dpa, against a Standard Method of 431dpa. Like Woking, Mole Valley is heavily constrained by Green Belt, and around one third of the housing is proposed on greenfield land within the draft Local Plan.

It is simply not sustainable for Woking to maintain that it cannot deliver its housing requirement because of Green Belt constraints. Ministers and government advisors have made it explicitly clear that such development must take place, and nearby authorities are upholding the guidance and policy issued by the Government despite being subject to the same constraints. Not only this, but the unmet need will have to be met through in neighbouring authorities. These, like Woking, are subject to Green Belt constraints.

The Standard Method requires Woking to deliver at least 431 dwellings per annum, and this figure should be part of the development strategy.

Delivery

Since the AMR was published, the Government has released the latest Housing Delivery Test (HDT) results. Woking's result is 97%, and the claim that it has pass the test with a delivery of 113% is no longer accurate. In the year 2018/19, Woking reported a net increase of 231 only dwellings, its lowest since 2014/15 (when it delivered only 66 units).

It is also noteworthy that the HDT result for 2019 states that Woking's requirement for the year 2018/19 was 431 (i.e. the Standard Method figure) and not the Core Strategy stated requirement of 292dpa. The 2019 HDT only accepts 292 as a requirement up to 2016/17 (i.e. no further than 5 years after the Core Strategy adoption).

The figures are prepared by the national government and have clearly been reviewed since 2018 HDT results (which set a requirement of 247 in 2016/17, not 292 as in the 2019 edition).

As evidenced in their assessment of Woking's housing requirement, the Government clearly do not regard Woking's review of the Core Strategy to be legitimate, and on this basis, it cannot be considered a sound platform from which to allocate land. The Site Allocations DPD does not meet the Standard Method requirement of 431dpa and should not proceed to adoption.

Supply

Woking claim a five-year housing land supply (5YHLS) of 9 years when assessed against their claimed requirement of 292dpa. Putting aside for one moment any concerns about the figure, they are clearly not as constrained as they claim. A 9-year housing land supply does not tally with the claim that 292dpa is the maximum that the borough can reasonably accommodate.

Paragraph 73 of the NPPF is clear on how a 5YHLS statement should be presented:

Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

In order to be 'deliverable' sites must meet the definition of the word as set out in the glossary to the NPPF:

To be considered 'deliverable', sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

The housing supply within Woking's AMR does not include a breakdown of the sites, but one is given in the Housing Land Supply Position Statement of 2019 (to which the AMR refers). This document states that the sites included within the 5YHLS for which permission has not been granted equate to 876 dwellings. These do not meet the NPPF's definition of 'deliverable' and should be excluded.

Removing these gives a supply of 2,037, and a reduced supply of 6.3 years. Not only this, the supply position should recognise the Standard Method requirement of 431dpa (as, indeed, the HDT result does). Apply this gives a 5YHLS of 4.5 years.

On this basis, the Council are unable to demonstrate a 5YHLS, and this position will not be changed by the adoption of the Site Allocations DPD.

Conclusions

The December 2019 AMR makes several claims, many of which are subject to challenge in so far as they concern housing. As an evidence base document the AMR is not sound, and neither Woking nor the Site Allocations DPD can rely upon it in order to justify the proposed housing strategy.

The AMR should be revised, and Site Allocations DPD amended accordingly, in order to reflect the points made above. The reality is that the Site Allocations DPD cannot provide the required level of housing stipulated by the Standard Method, and it should not proceed to adoption. Woking should recognise the Standard Method, and should conduct a full Review of the Local Plan in order to release Green Belt land and ensure that this target can and will be met.

Yours faithfully,

Henry Asson

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