



Woking Core Strategy EiP

Statement on Matter 7 – Housing

Prepared on behalf of:

The Burhill Group Ltd (Respondent No. 009)

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1. Introduction

- 1.1 This Statement has been prepared on behalf of the Burhill Group Ltd in amplification of their objections made to the Submission Draft Core Strategy. This Statement relates specifically to Matter 7 and the issue of whether the Core Strategy represents a coherent and effective approach to meeting the Borough's housing requirement referred to in Policy CS10 and supporting text of the Core Strategy.
- 1.2 This Statement should be read alongside those made by the Burhill Group Ltd on Matters 1 (Managing Growth) and 2 (Natural Environment).
- 1.3 Burhill Group Ltd is the owner of the Pyrford Estate, which consists of circa 1,000 acres of land located between Old Woking to the west, Pyrford to the north east, and the River Wey to the south. There are varying types and quality of arable land, woodland and open land within the Estate. There are also a large number of existing buildings located throughout the Estate, including the Hoebridge Golf Centre, a pay and play course open to the public.
- 1.4 The Burhill Group Ltd understand that this Examination is not concerned with evaluating the suitability or otherwise of land within the Green Belt, which is for consideration through the Green Belt review in 2016/2017.

2. Matter 7 – Housing

- 2.1 The Submission Draft Core Strategy has been prepared on the basis that it cannot be clear on where a substantial proportion of the required development (particularly housing) will be accommodated. This lack of clarity relates to the last five years of the Plan period, and means that the Core Strategy does not fully meet the requirements of national planning guidance in PPS3 (paragraphs 7 and 55).

Policy CS10 Housing Provision and Distribution

- 2.2 Policy CS10 sets out the overall dwelling requirement for the Borough of 4,964 dwellings over the period 2010 – 2027. As we set out in our Statement on Matter 1, we consider that the locational/spatial strategy for accommodating those dwellings is over-reliant on delivery within Woking town centre and correspondingly under-reliant on delivery on land currently within the Green Belt, especially in relation to family housing.
- 2.3 As is stated in policy CS10, the provision of circa 2,300 new homes within the town centre equates to development at a density of at least 200 dwellings per hectare (dph). Developing at such a density means that the type of residential accommodation will be dominated by flats, and, if delivered, would create a significant concentration of relatively small new homes within an urban environment that can only cater to certain parts of the Borough's housing demand and need.
- 2.4 As is well documented elsewhere, the focus on delivering relatively dense residential development over the past decade has led to a surplus of such stock in many places, and the Government has taken steps to facilitate a better balance of new housing stock by removing the minimum density of 30dph that was included within PPS3.
- 2.5 The evidence base behind the Core Strategy (West Surrey Strategic Housing Market Assessment 2009) (WSSHMA) notes that Woking Borough has a higher proportion of flats than the national average¹. The strategy of building more flats will exacerbate this over-provision until family housing is built at the end of the Plan period.
- 2.6 Table S10 of the WSSHMA acknowledges that the housing stock across the Study Area contains a large proportion of detached properties and that some rebalancing of the stock towards smaller, terraced and semi-detached properties could be encouraged, although it also notes that this would need to be done within strict limits given the character of the Study Area².
- 2.7 Although Woking town centre has seen some relatively dense development within it over the past decade, we do not consider that there will be the levels of demand for smaller flatted units that would be required to sustain delivery of 2,300 new homes within the town centre. In our view this is unrealistic and results in a Core Strategy that is likely to prove ineffective in planning for the Borough's housing requirements over the Plan period.
- 2.8 **With regard to the soundness of the Core Strategy, we remain unconvinced that the proposal to accommodate almost 50% of the Borough's housing requirement within the town centre is an effective strategy for meeting the Borough's housing demand and need.**
- 2.9 **Less emphasis should be placed on high density urban housing and more on achieving a balance of house types. Such a shift is in our view inevitable over time, as development will not come forward at the required density or rate, and simply underlines the urgent need to undertake a comprehensive Green Belt review.**

¹ West Surrey SHMA Pg.8 Figure S3 Dwelling Types (Fordhams Research 2009)

² Ibid Pg. 24 Figure S10 Key Themes and Drivers

Policy CS12 Affordable Housing

- 2.10 We acknowledge and support the Council's general approach to its objective of achieving delivery of 1,737 affordable homes in the Plan period as one that recognises the different cost/infrastructure and viability profiles of the different sizes and nature of sites.
- 2.11 Although that is the overall approach, it seems not to be applied to development of greenfield sites and we can find no evidence to justify the statement in Policy CS12 that *"all new residential development on greenfield land will be required to provide 50% of dwellings to be affordable, irrespective of the site size or number of dwellings proposed"*.
- 2.12 Simply because greenfield sites do not have the same issues of ground contamination, they may still have costs associated with preparation of the site for development, including creation of suitable development platforms, provision of necessary infrastructure to serve the development, as well as other costs that may be associated with the development.
- 2.13 There also appears to be an inconsistency in the way that land in public ownership is treated, as Policy CS12 explicitly acknowledges the potential to negotiate provision subject to an assessment of financial viability. Land in public ownership may be greenfield as well as brownfield and thus there appears to be no reason why the acceptability of an assessment of viability is not also applied to land in private ownership.
- 2.14 There are many examples of planning permissions in nearby authorities where there has been a necessary and successful negotiation of S.106 contributions including the proportion of affordable housing secured on greenfield sites, and we see no reason why the need to assess viability is not referenced to development of greenfield sites in this policy.
- 2.15 **With regard to soundness, we are concerned that the policy will be ineffective and is unjustified without inclusion of a reference to testing the viability of development on greenfield land.**
- 2.16 **References to greenfield land should also acknowledge the potentially different cost and viability profiles of different sizes of site (as it does for previously-developed land in the earlier part of the policy).**

Policy CS13 Older People and Vulnerable Groups

- 2.17 Policy CS13 acknowledges the need to provide for homes for older people but we are concerned that there is not enough emphasis on identifying and allocating suitable sites for facilities such as care homes and care villages.
- 2.18 The Housing Needs and Market Assessment Survey for Woking (Fordham Research 2009) found that almost a quarter of all households in the Borough contain only 'older people' (men aged 65+ and women 60+). This equates to over 9,000 households where the inhabitants are continuing to live either unassisted or with visits from family or friends/care workers to support their home life.
- 2.19 This finding serves to highlight the significant level of demand for care home facilities, and underlines the need for the Borough Council to be proactive in allocating appropriate sites for new care home/care village facilities over the Plan period. The Survey also identifies that many of the Borough's larger houses are under-occupied, with one or perhaps two elderly people living in a house that could provide a home for a family if made available. Provision of care villages and care homes can help to free-up this under-occupied space through a range of living environments, from housing with minimal care services, through to close-care for those with such needs.
- 2.20 The care village model not only provides a range of accommodation types (from Independent Living Units to Assisted Living Units to Close Care Nursing Units) but also services including gym/pool, shop, café/restaurant, hairdressers and other day to day services and facilities. Such facilities are often also open to the general public to use. Care

villages are designed as sustainable living environments with energy efficient buildings and sustainable transport programs, and can make a strong contribution to the Borough's housing stock.

- 2.21 Policy CS13 should include a stronger acknowledgment of the need to allocate sites for care home/care village facilities and commit to doing so immediately.**