

Response of Surrey Heath Borough Council to Woking Examination Hearing Matter 7 items I
– iv

Matter 7: Is the Core Strategy’s approach to housing provision sufficiently justified and consistent with national planning policy such as found within Planning Policy Statement 3: Housing (PPS 3)? With particular regard to deliverability and the Duty to Cooperate, will the Core Strategy be effective in meeting the varied housing needs of the Borough over the plan period?

i. *(Note, items i-iv to be taken together.)*

Is the evidence base in support of the housing policies robust and credible? How does this relate to the *National Planning Policy Framework (NPPF)* and associated guidance? To what extent is the content of the *NPPF* particularly satisfied by the Core Strategy? How has the CS been informed by, and is consistent with, the Council’s Housing Strategy?

ii. Is the latest SHLAA1 robust? *(to include: what extent was a joint SHLAA with neighbouring authorities considered? Why was the site size threshold set at 6 units? Should the net increase in housing from sub-divisions be considered in the overall housing supply figures? Why are net housing increases from small sites only included in the overall housing supply figures for the last 5 years of the plan period? Were assumptions made as regards the potential impact of CIL2?)*

iii. To what extent, and in what ways, was the chosen spatial distribution of housing considered against alternatives? Is the spatial distribution of intended housing over the plan period clear?

iv. Does the Council have a demonstrable housing land supply consistent with the *NPPF* *(with particular regard to Section 6)*? Is the intended release of Green Belt deliverable? What reliance is made upon windfalls?

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1. This response has particular regard to how Surrey Heath is approaching the issue of housing supply over the next 15 years, relative to demand, capacity and the evidence which underpins the South East Plan.
 2. Surrey Heath Borough Council adopted its Core Strategy and Development Management Policies Development Plan Document on 1st February 2012. There have been no challenges to this document. Accordingly the housing allocation for the Borough for the period 2011 – 2028 is 3,240 dwellings. This figure is derived from the South East Plan allocation being a combination of the residual requirement for the period up to 2026 plus two extra years requirement for the period up to 2028.

	No of Units (net)
Dwelling Requirement from South East Plan 2006-2026	3,740
Additional Years Annual SEP Requirement to 2028	374
Completions between 1st April 2006 and 31st March 2011	875
Remaining Requirement for period 1st April 2011 to 31st March 2028	3,240 (rounded from 3,239)

3.

4. In respect of consistency with the NPPF, whilst the publication of the submission Core Strategy and Development Management Policies and the subsequent adoption pre-date the publication of the final NPPF, this issue was considered by the Inspector as part of the Examination. The Council's comments on this issue in respect of housing land supply are attached as Annex 1. The Council had initially sought to deliver less than the South East Plan requirement with a housing target that reflected the known ability to deliver avoidance measures to ensure no likely significant effect upon the Thames Basin Heaths Special Protection Area. At Examination in February 2011, this approach was considered by the Inspector to be unsound as he considered it not unreasonable to take the view that further avoidance measures could be delivered and thus housing land supply was not constrained by this issue. In response the Borough Council requested a suspension of the Examination whilst it consulted on revised housing figures and identified three potential options as set out in Annex 2.
5. Following a resumed Examination hearing in November 2011, the Inspector published his report. The Inspector agreed with the approach as set out in Option 1 the Council's preferred option. This option proposed a target in line with the South East Plan. The other options looked at higher figures but concluded that these did not have a reasonable prospect of delivery. The Council also took the view that the exceptional circumstances required to justify the alteration to the general extent of the Green Belt had not been demonstrated. The Inspector agreed with these conclusions (see para 25 of his decision letter below).

25 As noted above, the proposed changes to policy CP3 have been the subject of an additional consultation exercise. In framing its policy approach, the Council considered two further options for increased housing totals, with SHLAA- and SHMA-based targets. While these options attracted some support from the development sector, I accept the Council's assessment that, on the evidence available, neither would have a reasonable prospect of delivery. Indeed, the SHMA-based figure would substantially exceed the potential housing supply set out in the SHLAA. Both targets would be in excess of the figure set out in the SEP, while neither is supported by the revised HRA. In the circumstances, I agree with the Council that the exceptional circumstances that are required by paragraph 2.6 of Planning Policy Guidance Note 2: *Green Belts* (PPG 2) to justify alteration of the general extent of the Green Belt (which would be a likely consequence of either of these options) have not been demonstrated.

6. In considering the issue of housing land supply the Council was very clear that it did not have and could not currently deliver a five year housing land supply due to the difficulty of delivering avoidance measures (SANGS). Furthermore the manner in which SANGs is likely to be delivered within the Borough makes it difficult to envisage being able to deliver a continuous supply for 15 years and thus a shortfall at year 15. Overall, however, sufficient supply will come forward in years 16 and 17 to prevent an shortfall over the plan period as a whole. Thus at Examination there was a conflict with PPS3 on the matter of housing land supply. The Inspector recognised (paragraph 26 of his decision letter below) that the Council's strategy represented a pragmatic attempt to address "a real and pressing local constraint on housing delivery" arising from the difficulty of delivering SANGs. Accordingly he concluded that these circumstances justified departing from national policy in respect of the

need to identify a five year and a fifteen year housing land supply. In doing so he noted that the Council had sought to add flexibility to the plan by allowing for the release of sites within Countryside within the Green Belt if insufficient sites come forward within the settlement areas.

26 The proposed revisions to policy CP3's supporting text include a table showing anticipated phasing. This shows that a five year housing land supply would not be provided – an outcome that is not unexpected given that the difficulty of providing SANG has seriously constrained housing delivery in the Borough in recent years. At best, there was less than 2½ years supply at April 2011. Furthermore, the phasing table suggests that there would also be a shortfall at the end of year 15 – although provision would be made in years 16 & 17. As a result of these factors, the plan's approach clearly conflicts with PPS 3's requirement (paragraph 53) that a continuous delivery of housing should be enabled for at least 15 years from the date of adoption. Nevertheless, the resulting strategy represents a pragmatic attempt to address a real and pressing local constraint on housing delivery. As is accepted by NE, the Council has put in considerable effort in locating land for SANG. On balance, I am satisfied that the circumstances described above justify departing from national policy in respect of this matter.

- 7 It is therefore the view of Surrey Heath that with this flexibility it will achieve delivery of its planned housing allocation and will not impose any requirement on adjoining authorities. The Borough has recently undertaken a call for sites to update its SHLAA and is now preparing the background evidence for an Issues and Options document addressing Site Allocations to be published in Autumn 2012.
- 8 In respect of Woking whilst there are housing market synergies, Surrey Heath's main housing market links are to the west in the Blackwater Valley and Central Berkshire. Surrey Heath is in a housing market partnership with these authorities. The neighbouring Borough of Rushmoor has already delivered its South East Plan housing requirement and will now exceed its requirement. Bracknell Forest has recently published its housing site allocations document and Hart will publish its Local Plan later this year.
- 9 Thus in the event that any shortfall does arise, it is expected that this will be addressed within our housing market area and not within the Borough of Woking.

<p>Policy CP3 – Scale and Distribution of New Housing Sets out how much housing the Borough expects to deliver during the plan period, the proposed phasing and key strategic locations for housing.</p>	<p>Para 19 – plans should set out a clear strategy for allocating sufficient land which is suitable for development..</p>	<p>Consistent</p>	<p>Policy as proposed to be amended in current consultation</p>	
	<p>Para 23 should set out the strategic priorities for the area including housing and economic development requirements.</p>	<p>Consistent</p>		
	<p>Para 28 a clear understanding of housing requirements including preparing a SHMA and a SHLAA</p>	<p>Consistent</p>		
	<p>Para 109 identify and maintain a five year + 20% supply of specific deliverable sites.</p>	<p>Not consistent</p>	<p>Based on identified deliverable sites the CSDMP as proposed to be amended only identifies an 3.6 year supply in the first five year period but sufficient land supply in years 6 - 15 . This shortfall in the immediate plan period reflects the legacy of lack of avoidance measures for the Thames Basin Heaths SPA compounded by current economic recession and downturn in interest from landowners and developers in releasing land for development as a consequence.</p>	
	<p>Identify a supply of specific deliverable sites for years 6-10 and 11-15.</p>	<p>Consistent</p>		
	<p>Not make allowance for windfalls in the first 10 years of supply.</p>	<p>Consistent</p>		
	<p>Illustrate expected rate of housing delivery through a housing trajectory</p>	<p>Consistent</p>		
	<p>Set out approach to housing density to reflect local circumstances.</p>	<p>Not Consistent</p>		<p>Guidance to be given through local character and design SPD and on guidance in Site Allocations DPD</p>
	<p>Set out how empty homes will be brought back into use in accordance with local strategy.</p>	<p>Not Consistent</p>		<p>Council doesn't have an Empty Homes Strategy</p>
<p>Para 110 objectively assessed development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.</p>	<p>Consistent</p>	<p>The CSDMP is set within the context of the need to avoid adverse effect upon the European Sites. The SANGS/SAMM approach was developed to delivered the South East Plan housing figures it is not clear that for significantly higher housing numbers that additional SANGS are deliverable. Given the need to avoid harm to European sites the risk of being unable to meet housing targets or identify a deliverable five year housing land supply increases with higher housing numbers. See para 16 of NPPF.</p>		

Options for housing numbers considered by the Council.

Option	Description	Advantages	Disadvantages
<p>Option 1 Preferred option</p>	<p>To deliver the South East Plan housing allocation up to 2026 plus a further 374 dwellings (based on the South East Plan annual requirement) for the years 1.04.26 – 31.03.28 and an allowance for under provision in 2006 – 2011. Results in a residual allocation of 3,240 net additional dwellings (190 dwellings per year).</p>	<ul style="list-style-type: none"> • Sites in Countryside beyond the Green Belt (CBGB) not required until Years 16-18. If more sites than anticipated come forward in settlements areas or large site within settlement area emerge and further SANGS for these can be found then CBGB sites may not be required at all • Delivers most of development in accordance with preferred spatial strategy • Delivers more housing to meet local need • Relies on housing capacity with a reasonable prospect of delivery. • Retains ability to select better sites for release. 	<ul style="list-style-type: none"> • Requires release of sites within Countryside beyond the Green Belt able to deliver own SANGS in Years 16-18
<p>Option 2</p>	<p>To deliver more than the South East Plan housing allocation based on all capacity identified within the Strategic Housing Land Availability Assessment plus a windfall allowance for years 11-17. Results in an allocation of of 3,755 net additional dwellings (220 dwellings per year).</p>	<ul style="list-style-type: none"> • Delivers more housing to meet local need 	<ul style="list-style-type: none"> • Requires sites to be delivered from CBGB within first 10 years. • Requires sites to be delivered from Green Belt • Does not deliver sustainable development in accordance with preferred spatial strategy. • Even if more sites come forward in settlement area, countryside sites will be required. • Requires release of sites within Countryside beyond the Green Belt able to deliver own SANGS from Year 6 onward • Many Green Belt sites are isolated and as some are small it is unclear how these could deliver their own SANGs • Relies on housing capacity not known to be available within the plan period. • Would require release of all sites in SHLAA (or similar) and assumes all will come forward.
<p>Option 3</p>	<p>To deliver more than the South East Plan housing allocation based on identified need in the Strategic Housing Market Assessment within the constraint of viability. results in some 50% of total identified need being addressed and gives a residual allocation of 12,830 net additional dwellings (755 dwellings per year).</p>	<ul style="list-style-type: none"> • Delivers housing to meet local need within constraint of viability 	<ul style="list-style-type: none"> • Requires substantial sites to be delivered from CBGB and Green Belt. • Would require substantial loss of employment land. • Does not deliver sustainable development in accordance with preferred spatial strategy. • No evidence that sufficient sites are genuinely available to deliver this amount of housing • Would require at least 200 hectares of SANGS for avoidance measures, which is not known to be available or deliverable. • No evidence from past completion rates that housebuilding industry has capacity to deliver this amount of building in the Borough.

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