

WBC Core Strategy Examination (March 2012)

Matter 1: With due regard to its means of production, does the Core Strategy (CS) provide the most appropriate spatial strategy for sustainable development within the context of the borough? Does it contain clear objectives for the plan period in accord with the aims of Planning Policy Statement (PPS) 12?

CS1-5: Vision, Objectives and Places

1. *What is the relationship between the CS and the SE Plan? Is the former consistent with the latter? Does the CS reflect adequately the aims of the SEP, for example in relation to sustainable development (CC1), climate change (CC2), resource use (CC3) and sustainable design / construction (CC4)?*

Whilst the Government have not indicated a specific date for the abolition of RSS, we understand there is strong possibility this could be prior to the adoption of the WBC CS. As a consequence, we feel there is a greater need to ensure the evidence base underpinning the CS is robust. Whilst the SEP is a starting point, the WBC evidence base should demonstrate why growth assumptions in the SEP remain suitable for the borough or indeed why others may be more appropriate. We elaborate on this below in relation to question two.

2. *What is the evidence supporting the principle of sustainable growth that underpins the CS? How has the CS approach to sustainable development evolved in relation to alternatives? Is the evidence base in support of the chosen strategic approach robust and credible against alternatives? To what extent was a strategy that did not promote growth considered?*

We note WBC have recently issued note WBC/01 in response to the Inspector's clarification questions. However, whilst this indicates some joint meetings and working arrangements with adjoining authorities, it does not provide evidence of how WBC have taken account of the cross boundary development pressures with adjoining authorities. WBC acceptance of the SEP housing figures in CS1 and CS10 for example implies all other adjoining authorities will do the same, as the quantum of housing directed to WBC in the SEP took account of that directed to adjoining authorities within a sub-regional context. If this context is removed, then what evidence has WBC to demonstrate they have discharged their duty to co-operate on such matters, as set down by Section 110 of Localism Act?

The aforementioned issues are raised given the lack of evidence presented by WBC to support the retention of the SEP housing figures. Whilst the SEP figures were debated and agreed in the context of the sub-region in 2009, the proposed revocation of the SEP places a duty on WBC to demonstrate why the SEP figures remain the most appropriate for the borough to 2028. The SHMA (2009) for example indicates the housing figure for the district should ideally be around 594 homes per year, rather than the 292 homes per year currently proposed. The SHMA reaches this conclusion having regard to the exceptional and mounting need for affordable housing in the borough, particularly for family accommodation. For example, the SHMA indicates affordable housing need alone would require over 499 dwellings to be provided for each year. We are not aware of any further demographic modelling analysis undertaken by WBC to support a lower figure, such as the widely used Chelmer Model or other housing / economic growth models being used by many LPAs across the South East to inform the drafting of their Core Strategy DPD at present. The question arising therefore is what the implications of WBC not accommodating this need are and has this been agreed and accounted for in adjoining authorities CS documents?

The WBC SA indicates higher growth options have been tested and discounted owing to environmental constraints. However it is unclear to what extent these constraints have been reassessed in the context of social and economic growth now facing the borough for the plan period to 2027. For example, WBC have dismissed higher growth options on environmental constraint grounds, including the green belt, but have not as yet undertaken a green belt review to justify this approach. In reviewing development plan documents, Para 2.12 of PPG2 encourages LPAs to *'satisfy themselves that green belt boundaries will not need to be altered at the end of the plan period...they should consider the broad location of anticipated beyond the plan period, its effects on urban areas contained by the green belt and on areas beyond it, and its implications for sustainable development.'* This has not been undertaken and WBC have progressed their spatial strategy on the basis of accommodating 292 homes per year within the urban area as far as possible (we summarise below our concerns with respect to WBC land supply assumptions), with any residual requirement directed to broad locations in the green belt. The presumption being that a green belt review is not to be undertaken until 2016/17. However the availability of such a review at the outset would have surely informed the debate on whether WBC could in fact accommodate more of their housing needs within the borough.

We have significant concerns with such a reactive approach to plan preparation, which falls contrary to national guidance in PPG2 (as indicated above) and PPS3. Paragraph 55 of PPS3 in particular requires LPAs to proactively plan for housing growth to provide greater certainty over at least a 15 year period. Where it is not possible to identify sufficient deliverable and developable supply to meet this requirement, broad locations or strategic sites for growth should be indicated on a key diagram. WBC have not been able to achieve this given the absence of a green belt review and have not shown such locations on the Key Diagram. WBC have instead included figure 3 of the CS indicating broad areas that a future green belt review will be directed towards. However, there is no evidence to indicate why certain areas have been excluded or included. The key to Figure 3 indicates 'broad locations for growth', yet it is clear little or no advanced planning for infrastructure has been factored into the CS Spatial Strategy, as the distribution of growth within this area is not known. This is contrary to the proactive approach advocated in paragraph 4.8 of PPS12. This defers key strategic decisions that may impact on the effectiveness of the CS to be delivered within the plan period. This is a particular concern when we look into more detail at the land supply assumptions WBC adopt to inform their spatial strategy and distribution of growth to 2027.

Table 2 of WBC published AMR (Dec 2011) indicates a 460 dwelling shortfall may occur in the 2022-2027 period. This is WBC justification for a deferred review of the green belt and why CS1 refers to the need for a green belt review within the plan period.

After completions, Policy CS1 indicates WBC is to provide for 4,964 net additional dwellings in the period 2010-2027. WBC indicates in CS10 that this will be met through the provision of approximately:

740 Homes – Existing Safeguarded Local Plan Allocations -Moor Lane and Brookwood Farm
2500 homes – Woking Town Centre
1170 homes – Urban sites (inc. 210 windfall allowance)
550 homes – Green Belt (release post 2021/2022)

If one examines each in turn however doubt is raised over the delivery assumptions made by WBC to inform their CS.

Existing Safeguarded Sites

The latest SHLAA update (2011) indicates that neither safeguarded site has an extant planning permission for this level of development. WBC are seeking to carry these forward into the Core Strategy DPD as formal allocations to help meet some of the CS housing requirements. Brookwood Farm was allocated as a safeguarded site in 1993 and carried into the adopted WBCLP in 1999. Policy GB6 of the adopted LP indicates this site is not formally allocated in the Local Plan for development, but reserved for long term use if the proven need arises. We would question therefore why WBC feel it is appropriate to allocate this site in the

Core Strategy DPD and not re-consider this alongside other locations through an up to date review of the green belt. We contend that Brookwood Farm and arguably Moor Lane should be reconsidered to ensure they remain suitable and deliverable allocations in the context of growth to 2028 and available alternatives, not just carried forward.

Both sites are yet to secure comprehensive planning consents and the SHLAA (2011) acknowledges the Moor Lane site has potential access difficulties associated with common land matters that need to be resolved before progressing the site. Despite the above, WBC indicate in Fig 1 of their AMR (Dec 2011) housing trajectory that Moor Lane will deliver 400 homes at a rate of 80 per year over the next five years. Brookwood Farm is stated to be capable of delivering 300 units over these five years at a rate of 60 per year. We attach evidence at Appendix 1 that brings into question these delivery rates, even if required planning permissions were forthcoming. Appendix 1 indicates house builder single outlet completion levels in 2010-11 were around the 25-30 dwellings per year mark. Not only is WBC significantly higher than this, the trajectory assumes an even delivery every year for five years for both sites. Both are unrealistic in our view and call into question the Councils assumptions at the outset.

Woking Town Centre

The latest SHLAA (2011) does not indicate sufficient sites to meet the 2300 or even 2500 dwellings indicated towards the town centre. Past completion trends in the town centre also include a significant proportion of flats. A continuation of this trend seems unlikely given the market downturn in the provision and bank funding for such accommodation. The WBC SHMA also acknowledges a greater need for family homes. The land take implications for this in the town centre do not appear to have been sufficiently evidenced. Nor has WBC included a non-implementation allowance for such an uncertain source of supply, particularly as a proportion of that directed to the town centre is to be delivered from sites yet to be identified.

In addition, we would question the viability and delivery assumptions WBC attribute to the town centre, particularly having regard to s106 and / or CIL requirements over the plan period. Table 10 of WBC Affordable Housing EVA assumes a s106 requirement of £5000 per unit and pre-recession sales values at the upper end of the market in support of a 40% affordable policy requirement. This appears to indicate viability at the upper end of the market, but does not account for the impact of this across a development as a whole. It is understood the HBF are likely to cover this area in greater detail, therefore in the interests of brevity we will not go into further detail here. We do however support the need for greater analysis of this on the delivery assumptions WBC make.

In our view, the above justifies the need for a non-implementation allowance to be applied to the housing quantum proposed by WBC, particularly in Woking town centre. One would normally expect to see a modest slippage allowance of 10% or more to ensure housing delivery is maintained over the plan period.

Urban Sites

As we will elaborate in Matter 7, we have concerns over the inclusion of a windfall allowance and the delivery expectations and land take expectations WBC anticipate from urban sources of supply. The CS consistently acknowledges the exceptional need for housing, particularly affordable and family housing in the borough. The latter is quoted by WBC as a spatial ground for growth within the green belt in the latter phases of the plan period. However, the substantial need for family housing is present now and increases each year WBC do not address the issue proactively. As WBC acknowledge in paragraph 6.6 of their Housing Topic Paper in 2010, *'It should be noted that the vast majority of sites identified as developable during the latter part of the plan period are located within the town and village centres and are only likely to be suitable for high density flatted developments, often as part of a mixed-use scheme. It is therefore important that, when considering the identification of broad locations for future development, that type of housing needed in Woking in terms of size, type and tenure (as described in Section 5) is taken into account.'*

The impact of changes to PPS3 on the density assumptions, weight to the attached to existing character of urban areas and hence yields assumed for WBC urban potential is unclear from the evidence base presented, as is WBC decision to include 210 units from unknown sources without first demonstrating a lack of alternatives through a green belt review. The implications of this for housing land supply and hence the residual need for strategic releases from the green belt are matters for the CS and not the subsequent Site Allocations DPD. We will elaborate further on this in Matter 7, but make the point here to highlight the influence such matters have had on the spatial strategy adopted by WBC in the CS.

Green Belt

In light of the above, we would question how WBC have arrived at such a low growth figure to accommodate in the green belt from search areas devised in the latter phases of the plan. Equally we question the effectiveness of a spatial strategy that does not proactively plan for growth in the green belt at the outset, indicating evidenced based search areas for growth or strategic sites to instil a measure of certainty. WBC have not adequately evidenced the quantum of growth directed to the borough, nor have WBC provided robust evidence to justify the expected urban capacity. We therefore question the effectiveness of the current CS to deliver evidenced housing requirements for the borough within the plan period.

As an example, last year's borough completions are shown to be 145 dwellings, yet WBC anticipate this rising and being sustained at around 346 units per year over the next five years. As we have shown above, even without testing the remaining SHLAA site delivery assumptions, there is doubt cast over the delivery expectations adopted by WBC in the first five years of the plan period. Add to this the potential NPPF requirement to provide 20% additional choice for the first five years and rolling thereafter and we would question the validity of WBC claim on having a five year housing land supply at present. As a consequence, WBC justification for deferring consideration of green belt matters to 2016/17 is called into question and undermines the spatial strategy approach as currently proposed.

Conclusion

We do not feel WBC have adequately justified the quantum of development to be directed to the borough, particularly when SHMA evidence indicates a much greater need. WBC has not indicated how cross boundary housing pressures have been assessed and how this has influenced WBC decision to retain the SEP housing requirements. The housing land supply delivery assumptions that underpin the spatial strategy are not sufficiently robust to give certainty they will be delivered within the plan period, nor is WBC decision to defer addressing the residual requirement for green belt releases to 2016/17. For these and the above stated grounds the CS is considered currently unsound, as it has been shown to be contrary to national guidance and ineffective in its approach to delivery of much needed housing growth, particularly for affordable and family housing within the plan period.

To remedy this, further housing quantum analysis and cross boundary working would be required to establish an evidence based housing figure for the borough. The SHLAA / Woking Town Centre land supply assumptions should be revisited and sufficient certainty and contingency instilled to arrive at a realistic urban capacity estimate for the borough. A green belt review would also need to be undertaken to inform and justify decisions on the ability of the borough to accommodate growth options set down by the housing quantum evidence base. Strategic sites or at the least search areas for such sites should then be included on the Key Diagram and consulted upon. The former would create greater certainty from the outset and allow necessary infrastructure planning to form part of the CS process as required by PPS12, with detailed briefs / SPDs to follow. The latter option would potentially allow the Core Strategy to proceed to adoption fastest, with a Site Allocations DPD then progressed to shortlist and allocate sites for release as soon as appropriate.

WBC CS approach has and continues to focus growth south of Woking at Brookwood Farm and Moor Lane (700 dwellings in total) and now directs substantial growth to the town centre (2500 dwellings). In light of this, we contend that in reviewing the green belt for the plan

period to 2027 there is a case to look at the role and benefits of growth at and around other settlements. We therefore support WBC stance to reviewing the green belt holistically, rather than focused on just Woking itself. We elaborate on this further under Matter 2 in support of the identification of search areas west of Byfleet for residential and community/leisure based uses.