

WBC Core Strategy Examination (March 2012)

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 (PPS3)? With particular regard to deliverability, will the Core Strategy be effective in meeting the varied housing needs of the borough over the plan period?

CS10-14: Housing

1. Is the evidence base in support of the housing policies robust and credible?

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 2027. We are not aware of any further demographic modelling analysis undertaken by WBC or in partnership with neighbouring authorities to calculate a local housing provision figure or support the retention of the SEP figure. We therefore question how "justified" WBC is in retaining the SEP figures without this evidence.

The WBC SHMA (2009) represents the principal evidence base informing housing policies within the emerging CS. This 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 (499 homes a year).

The WBC SA indicates higher housing growth options, including those of the SHMA, 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 the 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 whether higher levels of growth could be accommodated. 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 housing policies 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. Given the acute affordable housing need in the borough this would appear a necessary action to demonstrate the plan is "justified" (4.52, PPS12, 2008).

2. Is the latest SHLAA robust?

The latest SHLAA (Oct 2011) indicates there is land available to develop approximately 3,160 dwellings, with an additional 210 dwellings possible from unknown sources. The SHLAA confirms this potential has largely been deduced through the use of density yardsticks, having regard to exemplar schemes that may typify the area around each site. However, such schemes were approved and built to reflect previous planning policy and not that now emerging in the Core Strategy to 2027. For example, Policy CS11 of the CS and paragraph

5.72 below this set out the housing mix the Council will seek to achieve on all sites, subject to density and character considerations. There is no reference to this however in the assessment process undertaken in the SHLAA, nor the land take and yield implications of accommodating such a policy shift. The increased requirements for family homes for example may well reduce the anticipated yield from urban sources of supply and hence require more land to be identified from the green belt. However, WBC seem to have omitted assessment of such matters and defer their consideration instead to the latter phases of the plan through broad location releases.

WBC acknowledge this in paragraph 6.6 of WBC 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.'* We would contend that it is equally as important to consider the land take implications for emerging policy CS11 in the SHLAA. Indeed, the SHLAA indicates this should form part of the assessment at paragraph 8.1, *'SHLAA guidance states that the housing potential of each site should be guided by the existing or emerging plan policy,...*

In addition, the latest SHLAA (2011) makes a number of assumptions to deduce a deliverable and developable supply of housing land. This includes assumptions to overcome potential site constraints, be they physical, viability or market driven. Given such uncertainty one would normally expect to see evidence of discounting to reflect a reasonable non-implementation allowance. There does not appear to be evidence of such discounting, rather an unrealistic assumption that all SHLAA sites will come forward at the levels indicated. This does not in our opinion represent a robust approach to SHLAA production, as it does not effectively justify the quantum of development WBC indicate is required from green belt search areas, nor WBC grounds to defer a green belt review to the last phase of the plan period.

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. However, this varies between districts and should be evidence based in itself.

Finally, we would question the approach WBC have taken to the two existing safeguarded sites in the SHLAA. 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 2027 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 the SHLAA and again 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 attached evidence at appendix 1 of our Matter 1 Statement that brings into question these delivery rates, even if required planning permissions were forthcoming. This indicates house builder single outlet completion levels in 2010-11 were around the 25-30 dwellings per year mark. Not only are WBC delivery assumptions 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.

The indicated capacity of these two sites (740 homes) should not be treated as effectively urban SHLAA sites. They are green belt SHLAA sites that should be assessed alongside others to determine which should be released. The two sites yield should be added to the 460 home deficit WBC currently identified in the SHLAA (which we contend should be higher for the aforementioned grounds). This shortfall would therefore be the residual requirement to be found from broad locations or sites in the Green Belt.

4. Does the Council have a demonstrable housing land supply consistent with PPS3? Is the intended release of Green Belt deliverable? What reliance is made upon windfalls?

The Council cannot demonstrate an evidence based quantum of development suitable for the plan period, nor a deliverable or developable housing land supply for a fifteen year period consistent with PPS3. Policy CS10 and the CS Key Diagram does not identify deliverable or developable sources of land to accommodate the retained SEP housing requirements (which are as yet unsubstantiated by WBC evidence). Instead, the location, delivery and infrastructure implications of a sizeable proportion of supply are deferred to a subsequent review of the CS and/or Site Allocations DPD or are uncertain by their windfall nature. This is not justified by any specific evidence, other than the fact this evidence has not been produced as yet (ie the green belt review etc). WBC include windfall sources of supply to reduce the deficit and defer the remaining deficit for future consideration. This does not provide the certainty PPS3 seeks over a 15 year period and is not therefore justified or effective.

In light of the concerns raised above regarding the robustness of the SHLAA, we would also 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 housing policies that do 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.

Paragraph 55 of PPS3 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 and delivery 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.

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 CS10 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 and release to 2021/22. 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. In the absence of evidence justifying the need to rely on windfall sources of supply, contrary to guidance in PPS3, WBC should also treat windfall as additional contingency over and above identified supply. The 210 windfall allowance in the last phase of the plan should therefore be added to the shortfall, along with any non-implementation allowance from SHLAA sources to arrive at a robust green field residual requirement.

A green belt review would also need to be undertaken to inform and justify decisions on the ability of the borough to accommodate sustainable 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 (in addition to green belt policy grounds alone). We therefore support WBC stance to reviewing the green belt holistically, rather than focused on just Woking itself.

TW/WE have submitted a GB review of land west of Byfleet (Matter 2 – Appendix 1), indicating lands that are capable of release without harm to the objectives of GB policy and represents a sustainable location for growth in all other respects. This provides comfort that land west of Byfleet remains suitable to include as a search area for future green belt release. In addition, this represents one of the few locations at Byfleet not impacted by flooding. This therefore provides an opportunity to accommodate growth to meet the social and economic needs of Byfleet within the context of the borough as a whole. The adjacent lands controlled by West Estates are also available to provide additional community and leisure facilities and SANG provision in close proximity to such development (Matter 2 – Appendix 2). The community benefits arising directly from this and related s106/CIL and New Homes Bonus related sources of funding will benefit Byfleet residents and the wider community as a consequence of development at this location. We commend this location for inclusion as a strategic site for release or location for a search area for release from the green belt in the CS.

To avoid unnecessary repetition, we are happy to revert to our submission stage representations in respect of all other housing policy questions raised under Matter 7.