

James Stevens
Home Builders Federation

WOKING CORE STRATEGY

WRITTEN STATEMENT: MATTER 2

Does the CS take a justified and effective approach to issues relating to the Green Belt (GB) and the natural environment which is consistent with national planning policy?

CS6 – Green Belt

1. *Is the Council's approach to GB consistent with the advice of PPG2? What evidence underpins the approach advocated within Policy CS6? Should the GB be an area of potential growth?*

The policy as drafted is unsound as it will prove ineffective.

Relegating the Green Belt review to 2016/17 will not allow the land to be identified and released in sufficient time to enable this land to be granted permission and developed to contribute to meeting the housing requirements of the Borough. Strategic land promotion, assembly and development is a long term undertaking and coordinating this development with the necessary infrastructure requirements will require the land to be allocated in the plan at the outset to ensure that the land will be developed in time to deliver the housing requirements of the plan. The failure of the Council to carry out such a review prior to submission of the plan means that the plan is ineffective and consequently unsound.

Local Plans are strategic documents that provide certainty over the next 15-20 years. PPS3 requires local authorities to identify a 15 year supply of *deliverable* land where possible. Woking's local plan, by the time it is adopted in 2012 (at the earliest) will provide just 15 years. Some development on GB land will be necessary in order to deliver the housing need (as paragraph 5.9 of the CS acknowledges). This meets the exceptional circumstances test of PPG2. The imminent demise of the SEP means that the Council cannot rely on somewhere else taking its unmet housing need (as we have discussed in relation to Matter 1).

PPS12 requires that strategic sites that are necessary to enable the plan objectives to be met should be identified in the core strategy/local plan. A GB review is necessary and this should really have been completed prior to the submission of the local plan with the proposed sites identified. Furthermore, given the questions that we and other developers have raised regarding the deliverability of the numbers proposed in Woking Town Centre, and our doubt as to whether the Council really does have a robust and deliverable ten year land supply, the ability to allow development to come forward on allocated GB land within the next ten years will

need to be allowed for earlier in the plan as a contingency, quite apart from meeting housing needs for years 2022-2027.

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