

**WOKING
CORE STRATEGY DPD
EXAMINATION**

**HEARING 1:
Vision, Objectives and Places**

HEARING DATE:

Tuesday 20 March 2012

STATEMENT

PREPARED BY:

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For

Martin Grant Homes Ltd

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Executive Summary: Test of Soundness

PPS12 sets out the principal components to be included in local spatial plans.

Paragraph 4.42 of the PPS requires that in order to be “sound” a core strategy should be justified, effective and consistent with national policy.

PPS3 sets out the specific outcomes that the planning system should deliver. It also sets out a requirement for development plans to take into account evidence of current and future levels of need and demand for housing and affordability levels based upon, inter alia, local and sub-regional evidence of need and demand as set out in SHMAs. This duty to cooperate is carried forward under Part 6 (Sec.110) of the Localism Act 2011, the requirements of which are relevant to the examination of the soundness of the Core Strategy.

In order to be justified the Core Strategy (CS) must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives. Effective means that the document must be deliverable, flexible and able to be monitored.

For the reasons set out in our submissions, we are of the view that the Core Strategy fails the following PPS12 tests of soundness:

Justified

The suggested approach to (i) housing delivery; and (ii) distribution does not represent the most appropriate strategy when considered against the reasonable alternatives.

Effective

The approach to addressing housing growth and delivery has not been demonstrated to be either deliverable or flexible.

Consistent

The proposals are not consistent with national policy in that they fail to provide a sufficient supply of deliverable/developable housing land.

The draft CS should be amended in accordance with our detailed representations.

In accordance with our recommendations we are of the view that additional technical work is required to be undertaken in relation to the Green Belt. This would need to be followed by a further round of public consultation and re-examination of the changes before the plan could be found sound.

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?

Is the evidence in relation to the settlement hierarchy and the intended levels of development robust? Does the evidence support the effectiveness of the CS in these regards?

Summary

- 1.1. As set out in our Matter 2 and 7 Statements, the Council's approach to the planned delivery of the overall quantum of housing to be met during the plan period (2010 to 2027) is neither justified nor effective in so far as it fails to represent the most appropriate strategy when considered against the reasonable alternatives and nor does it provide either a deliverable or flexible strategy.
- 1.2. Even at the level of housing growth proposed in the submission draft CS (which is lower than the housing need identified in the evidence base) the Council has failed to demonstrate that the components of housing supply on which they rely are deliverable (within five years) and/or developable at the point envisaged. Accordingly, there is a demonstrable need to undertake a review of the Green Belt now and provide for strategic allocations, including as part of the baseline supply, in order to:
 - i. Ensure the delivery of the requisite number of dwellings in helping to meet the 4,694 dwelling requirement identified by the Council as being the appropriate level of growth in the period to 2027.
 - ii. Ensure that both the quantitative and qualitative housing needs are met in a timely manner.

Statement of Case

Q1

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 (Policy CC1), climate change (CC2), resource use (CC3) and sustainable design/construction (CC4)?

- 1.3. In R (CALA Homes South Limited) v Secretary of State for Communities and Local Government (No. 2) the Court of Appeal concluded that whilst the Government's intention to abolish Regional Strategies through primary legislation could be a material planning consideration in making development control decisions, it is not capable of being a material consideration in plan-making decisions.
- 1.4. The CALA Homes judgements have established that as matters now stand, and in relation to plan making, LPAs must work within the current framework of the SEP.
- 1.5. SEP Policy SP5 sets out the case for a selective review of Green Belt boundaries across the South East, referring to only 5 locations, including to the south of Woking, focusing on the area to the south of the town.
- 1.6. For the reasons set out in our Matter 2 Statement, and in order to be in conformity and consistent with the SEP, the Core Strategy should identify land to the south of Woking as the location for a review of the Green Belt in helping to meet identified housing needs and necessary amendments are need to CS1, CS6 and CS10.

Q2

Is the evidence base in support of the chosen strategic approach robust and credible against alternatives?

- 2.1. The chosen strategic approach which serves to delay preparation of a Green Belt review until 2016/2017 and the subsequent release of Green Belt land for development until post 2022 does not represent a robust and/or credible strategy when considered against the reasonable alternatives.

- 2.2. The evidence base identifies a need to review the Green Belt in order to identify sites for development in meeting both the qualitative and quantitative demand for housing during the plan period. However, predicated upon the delivery assumptions set out in the SHLAA (the findings of which remain to be tested at the Matter 7 Session) Green Belt releases are constrained until the last five years of the plan period (post 2022). We do not accept that this represents the most appropriate strategy when considered against the reasonable alternatives.
- 2.3. An alternative approach, suggested in order to make the plan “sound”, is to progress one of two possible modifications to the Core Strategy as follows:
- (i) For the LPA to undertake a review of the Green Belt on land to the south of Woking, and thereafter consult on specific sites/areas of search and changes to the Core Strategy followed by a further examination session to consider the soundness of the changes; or
 - (ii) Revise the wording of the Core Strategy to require the subsequent Site Allocations DPD to undertake a review of the Green Belt to the south of Woking and for specific sites to be allocated in the DPD and released prior to 2022.

Q7

Is the CS aligned and coordinated adequately with the Sustainable Community Strategy? Are there areas of discord/omission? Does the CS reflect local distinctiveness adequately?

- 3.1. The Woking Community Strategy sets out six key themes to inform and deliver local priorities. It is used alongside the Surrey Sustainable Community Strategy and both documents form Woking’s Sustainable Community Strategy (“SCS”).
- 3.2. Theme 2 seeks to ensure a “clean, healthy and safe environment” which requires the provision of infrastructure in-line with development.

- 3.3. Theme 4 relates to housing which includes, inter alia, exploring through policy and action, ways in which all local people have a reasonable expectation of a decent, appropriate and affordable place to live.
- 3.5. The over-reliance on the delivery of sites from within the urban areas identified through the SHLAA, the failure to undertake a review of the Green Belt and the failure to plan for a level of housing to meet identified needs results in a discord with certain of the themes contained in the SCS.
- 3.6. As set out at paragraph 5.56 of the Core Strategy, these “urban” sites are only likely to be suitable for high density flatted developments. The implication of the reliance on the delivery of such forms of development is that the Council will be unable to be able to achieve an appropriate mix of housing types and tenures to meet needs identified in the SHMA.
- 3.7. In seeking to address local housing needs through preparation of the CS, the Council’s Issues and Options Consultation Paper (Oct 2009) identified three possible levels of growth as follows:

	Annual No. Dwellings	Total for Plan Period 2006 to 2026
Revoked South East Plan	292	5,840
Annual Need evidenced through local research	499	9,980
Annual Demand Evidenced through local research	594	11,880

- 3.8. The Council’s Strategic Housing Market Assessment (“SHMA”) estimates that there is a need for 499 new affordable homes in the Borough every year. This is almost twice that of the South East Plan (“SEP”) target figure.
- 3.9. The 594 figure per annum is the demand identified by the Borough’s evidence base. This is equivalent to 11,880 dwellings for the period 2006 to 2026 and is also twice that of the SEP requirement.
- 3.10. The planned level of growth at 292 dwellings per annum is significantly below the identified levels of need set out above. Accordingly, the evidence base points to a need to plan for a materially higher number of dwellings than currently proposed in the draft CS.

- 3.11. The level of housing growth to be met during the plan period will not meet the identified need for housing. The commensurate level of flatted forms of development and affordable housing to be provided are unlikely to meet identified needs.
- 3.12. In addition to the above, the SCS also requires commensurate levels of supporting infrastructure to be provided alongside housing development.
- 3.13. For the reasons set out in our Matter 2 and 7 Statements, we are concerned that the Core Strategy will fail to deliver the requisite type and amount of housing to meet identified needs.
- 3.14. Part of the evidence base to preparation of the Core Strategy includes the Infrastructure Capacity Study and Delivery Plan (Dec 2011).
- 3.15. The Infrastructure Capacity Study and Delivery Plan sets out the likely impact of development planned through the LDF and the mechanisms in place to ensure that the additional infrastructure necessary to support new development is provided over the Plan period.
- 3.16. Section 7 relates to education provision, and states that it is essential that plans are put in place to meet demand arising from net additional development.
- 3.17. The anticipated scale and demand for primary and secondary school places is a significant issue for Woking (paragraphs 7.43 and 7.52 refer).
- 3.18. We have not seen any evidence setting out how the growth in housing numbers, to be met in the main, through high density urban intensification, will make the necessary provision toward education provision e.g. can the existing schools accommodate the additional pupils generated from the planned housing development?
- 3.19. There is a discord between the content and objectives of the SCS and the approach to housing delivery contained in the Core Strategy.
- 3.20. We support the identification of urban extensions following a review of the Green Belt as urban extensions can generally provide and/or facilitate a commensurate amount of supporting infrastructure to support the additional development including, where required, new school provision.

Q9

Does the CS contain sufficient justification of its policies? Is more explanation needed of how the policies relate to the key objectives identified within Section 3? Do the objectives link the vision with the policies adequately? Is it sufficiently clear how the policies meet the needs of the Borough identified in the course of the CS preparation?

- 4.1. Our response to this question is set out in the context of the principal spatial considerations concerning housing need, housing delivery and the need for a review of the Green Belt.
- 4.2. Policies CS1, CS6 and CS10 require modification in order to make them sound e.g. although there is a demonstrable need for a review of the Green Belt (policies CS6 and CS10 refer), there is no mention of this need in overarching Policy CS1 which provides the spatial strategy for the Borough during the plan period.
- 4.3. As to the 13 objectives set out at paragraph 3.3 of the Core Strategy, there is clear conflict at objective 1 between enabling a diverse range of housing and requiring development to be high density.
- 4.4. The need to undertake a review of the Green Belt and provide for sustainable urban extensions should be identified as a key objective given that the delivery of an appropriate quantum and mix of housing is central to meeting identified housing needs. This cannot be achieved without a review of the Green Belt.

Q10

Does the CS acknowledge adequately cross border issues? (Evidence relating to the duty to cooperate?)

- 5.1. Section 110 of the Localism Act places a duty upon LPAs to cooperate with neighbouring authorities in the preparation of their development plan documents. The “duty” came into effect on 15 November 2011 and is applicable to preparation of the submitted Core Strategy.

- 5.2. WBC/01 sets out the Council's statement in relation to the duty to cooperate.
- 5.3. As set out in WBC/01, the only partnership working that has been undertaken in relation to housing is in relation to the SHMA (page 7 refers).
- 5.4. For the purpose of the Duty to Cooperate, the adjoining authorities are those within the London Fringe Sub-region as set out in the SEP (Policy LF3 refers).
- 5.5. Paragraph 20.2 of the SEP identifies that the housing challenge within the London Fringe Sub-region is to:

“Deliver sufficient homes and provide a well integrated mix to meet the needs of the area, including affordable housing for which there is a very high need in this sub-region.”

- 5.6. Policy LF3 adds that:

“In managing the supply of land for housing and in determining planning applications, local planning authorities should work collaboratively to facilitate the delivery of the following net additional dwellings in the sub-region..”

- 5.7. Notwithstanding the above requirements, there is no reference in WBC/01 to any attempts by the Council to consider the “delivery” of the overall quantum of housing required within the London Fringe sub-region during the plan period.
- 5.8. Following the legal challenge to the proposed urban extension in the adjoining administrative area of Guildford Borough and the delay to preparation of its Core Strategy as well as that for Runnymede and the reduced housing requirement set out in the Core Strategy for Elmbridge, there remains some considerable doubt as to the Council's ability to demonstrate that they have prepared a plan that accords with provisions set out in the Duty to Cooperate.
- 5.9. To conclude, we do not accept that the Borough Council has fully acknowledged and/or addressed cross border issues in relation to housing delivery.

Q11

Does the CS provide sufficient detail on how much development is intended to happen, where and when?

- 6.1. Although policies CA1 to CS6, CS10 and the supporting text (including paragraphs 5.55 to 5.70 and Figure 4) provide sufficient clarity in setting out the anticipated timing and location of development during the plan period, we remain of the view that the spatial strategy (lack of a Green Belt review and the restriction placed upon the release of Green Belt sites until post 2022) fails to represent the most appropriate strategy when considered against the reasonable alternatives.

Q15

Does CS1 indicate sufficient attention to matters of sustainability and does it provide a spatial approach in accord with PPS12 2.2-2.7?

- 7.1. Paragraph 2,3 of PPS12 states that spatial planning plays a central role in the overall task of place shaping and in the delivery of land whilst paragraph 2.4 states in relation to housing that spatial planning ensures that the necessary land is available at the tight time and in the right place to deliver the new housing required.
- 7.2. For the reasons set out in our Matter 2 and 7 Statements, we do not accept that the Core Strategy provides a reasoned spatial approach in accordance with PPS12.

Q25

Has the deliverability of town centre developments been considered fully with particular regard to viability and the provision of infrastructure and affordable housing where necessary?

- 8.1. The delivery assumptions underpinning the reliance on town centre growth are not founded upon a credible evidence base given that there are a number of viability and land ownership constraints to bringing certain of the sites

forward for development. Details are set out in Annex B to our matter 2 Statement.

Recommendation

- 7.1. Additional technical work is required to be undertaken in relation to the Green Belt, followed by a further round of public consultation and re-examination of the changes before the plan could be found sound.
