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22 May 2012

Delivered by Post

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Dear Chris

WOKING LDF CORE STRATEGY - STATEMENT ON NPPF

Thank you for your letter dated 1 May enquiring whether we wished to make any supplemental comments following the publication of the NPPF. I have spoken to our clients Taylor Wimpey West London / West Estates Ltd and they wish to make the following comments.

NPPF confirms the government's presumption in favour of sustainable development. The Council have objectively identified a need for 594 homes per year to meet the housing needs of their area (WBC SHMA, 2009). NPPF requires Local Planning Authorities to positively and proactively explore opportunities to meet these needs (as guided by paragraphs 14, 17 and 47 of NPPF), or provide robust evidence to demonstrate why meeting these needs in full would significantly and demonstrably outweigh the benefits when assessed against NPPF as a whole, or would conflict with specific development restraint policies in the NPPF.

The latest housing trajectory tabled by the Council at the EiP concludes the need to include the Green Belt as an area of search for 550 homes. This is needed if the Council are to accommodate their proposed housing requirement of 292 homes per year in the borough. The Council have not provided any evidence to prove that 550 homes are all that could be accommodated from Green Belt sources, as a Green Belt review would be required to assess this.

In the absence of a review of the Green Belt our clients contend the Council have not provided the evidence NPPF requires to conclude that meeting all or a greater proportion of their objectively assessed housing needs would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, or would conflict with paragraphs 83-85 of the NPPF in respect of Green Belt restraint policies in particular (para. 14, NPPF). In our view such an assessment can only be undertaken following a review of the Green Belt, particularly as the Council have acknowledged the current Green Belt boundaries are unlikely to endure the plan period (Core

Strategy Policy CS6, CS10 and paragraph 5.56). The Council's failure to proactively review the Green Belt to give comfort it is '*capable of enduring beyond the plan period*' is fundamentally at odds with paragraphs 83-85 of the NPPF. The absence of this evidence significantly undermines the Council's justification to plan for less than half of their objectively assessed housing needs, which is required in our view to satisfy paragraph 14 of NPPF. In our view these inconsistencies render the plan unsound under paragraph 182 of NPPF.

In addition, the overall housing quantum adopted for the borough has a fundamental impact on the Council's ability to meet the objectively assessed need for housing in the borough, particularly affordable housing. The housing quantum figure for the borough also directly influences whether the Council can or cannot demonstrate a five year supply of land for housing against these requirements, as required by paragraph 47 of NPPF. We expressed concern with the Council's current housing trajectory at the EiP, which is based on a proposed requirement of 292 homes per year. For brevity we are happy to rely on this submission rather than repeat here. The key point to be made is that the Council are claiming they can provide a five year supply of land on the basis of an annual housing requirement that is less than half the objectively assessed figure the Council present in their evidence base (SHMA, 2009).

Our concerns over five year supply would therefore be exacerbated if the borough housing figure rose to meet some or all of these needs. A lack of five year supply of land to meet such requirements would render the relevant Core Strategy policies for the supply of housing out-of-date under paragraph 49 of NPPF. As stated above and in evidence submitted for purposes of the EiP, we contend that the Council cannot robustly defend its decision to not meet the objectively assessed housing requirement of 594 homes per year in the absence of a Green Belt review. We therefore contend the need to revisit and update the evidence base that informed the Core Strategy requirement and delivery strategy for housing in the borough.

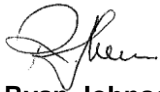
The review of the evidence base should include in our view a Green Belt review. This will enable the Council to objectively assess whether a greater proportion of the housing needs identified by the SHMA can be met within the plan period. We contend this review is required if the Core Strategy is to accord with the requirements of paragraphs 83-85 in respect of Green Belt.

Finally, paragraph 182 of NPPF concerns the examination of plans. This emphasises the need for plans to be positively prepared and based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. The absence of a green belt review reduces in our view the weight that can be attached to the Council's claim of compliance with this test. In addition, we note reference in this paragraph to meet '*unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development*'. There was no evidence presented at the EiP sessions to suggest that Woking Borough Council have assessed any unmet requirements from their neighbouring LPAs, nor evidence to suggest that accommodating such requirements would not be consistent with achieving sustainable development.

In conclusion, for the above reasons our client contends the Core Strategy as currently drafted is contrary to paragraph 182 of the NPPF. The plan lacks a sufficiently robust evidence base to be justified and effective and is contrary with national policy in the NPPF. The absence of a Green Belt review to inform the borough housing requirement and strategy is considered the key omission contributing to this conclusion. This review should be undertaken prior to adoption of the Core Strategy to ensure the housing requirement and distribution strategy is sound.

I hope these comments assist the Inspector in concluding on NPPF related matters and I look forward to receiving confirmation of the Inspector's decision regarding the re-opening of the EiP.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Johnson', written in a cursive style.

Ryan Johnson
Director