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WOKING CORE STRATEGY

WRITTEN STATEMENT: IMPLICATIONS OF THE NPPF ON THE WOKING CORE STRATEGY

Sustainable development

The submitted core strategy is unsound as it fails to perform the social role that is required of planning by the Framework. The core strategy attaches greater importance to environmental considerations and this is at the expense of the social objectives of planning, which includes increasing the supply of housing to meet present and future needs as set out in paragraph 7 of the Framework. The Framework recognises that economic, social and environmental objectives are mutually dependent and these ends need to be pursued simultaneously through the planning system (paragraph 8) and that higher economic growth is necessary to support social and environmental improvements. Paragraph 152 expects local plans to achieve net gains across all three dimensions of sustainable development.

In contrast to the aims of the Framework, the Council has assumed that existing environmental constraints are fixed and immutable and has rolled these existing constraints forward into a new plan.

Both the SHMA and the 2008 based household projections point to levels of need much higher than that which the Council is proposing to meet. The SHMA indicates a need for 594 homes overall per year, of which 343 are market (see page 227 of the SHMA). The Council only intends to provide for 292 homes per year. Such a disparity in supply compared to the need will have adverse social consequences. The Council maintains that it is unable to meet this level of demand owing to 'environmental constraints' yet it is unclear how far it has tested whether those 'environmental constraints' are still fixed and legitimate reasons to override the evidence of housing need as set out in the SHMA. The Council has not considered and tested whether these constraints are still appropriate in order to accommodate a higher housing figure that reflects its own objectively assessed need.

Providing only 292 homes per year will have serious social repercussions. These repercussions need to be assessed by the Council. The Council's Sustainability Appraisal has chosen to ignore this issue. This is clear from a reading of the discussion on pages 8 and 9 of the document. As usual with such studies, the emphasis is on environmental effects alone. Moreover, the report assumes that development is always deleterious to the environment, when higher growth can make a positive contribution to countering environmental deterioration.

If the Council is not to make provision for these homes in its plan, then it needs to make provision elsewhere. The submitted plan is deficient in this respect.

Core planning principles

The submitted core strategy is unsound as it is clear that the Council is not meeting its objectively assessed housing need despite it being a core planning principle that local planning authorities should make every effort to do so. It is notable that Woking's statement (WBC/37) makes no reference to this key failing. The Framework attaches considerable importance to local planning authorities meeting their objectively assessed housing need. This is set out in paragraph 14 (the presumption), paragraph 17 (core planning principles), paragraph 47, and paragraph 182 (a test of the soundness of local plans).

The Council has not demonstrated that it has explored options that might have accommodated the objectively assessed need. It is evident from a reading of the Sustainability Appraisal that the housing target contained in the CS is a capacity constrained target (as set out on pages 8 and 9) based on a land supply that has been identified by applying current constraints, rather than considering how more land might come forward if some of these constraints were to be relaxed or removed (such as de-allocating more Green Belt land). The Council admits that it has not tested the ability to deliver a higher level than the SEP target of 292 homes (page 9 of the Sustainability Appraisal). It states that to do otherwise would have negative impacts on character and environment. This, however, is to assume that there will be negative environmental impacts that outweigh the social benefits of a housing requirement that will address needs and assuming this before testing whether this really is the case. The Council has made a prior assumption that current constraints are fixed and immutable.

The duty to cooperate

The CS is unsound as it has failed to meet the requirements of the Framework with regard to the need for cross-border cooperation to meet objectively assessed development needs including any unmet requirements from neighbouring authorities (paragraphs 179 and 182).

The Council has not presented a plan that shows how Woking's unmet needs will be accommodated by another council. Nor does the plan demonstrate that it has taken into consideration the unmet needs of adjoining councils and how this might impact upon the plan. WBC/01 describes a series of cross boundary relationships but it fails to show what the outcome is of having put these arrangements in place, especially in terms of what conclusion was reached regarding how the authorities would plan to meet the unmet housing need of Woking. The paper WBC/01 contains a sentence in paragraph 3.1 referring to the need to take into account the core strategies of other local authorities when considering housing needs but it does not say anymore than this.

The emails from other local authorities (WBC/20) have been hastily assembled in order to demonstrate that the Council has considered this issue. It is very clear, however, that these were hastily drawn together after the examination had started (some are dated 21 March). The Council clearly did not foresee this being an issue and the other councils appear to be in a state of denial that they have to do anything

in terms of planning for the unmet housing needs of Woking, or that Woking may have to make provision to accommodate theirs. The councils may not want to accommodate each others' refugees, but the Framework requires that they explore the options to consider whether this is possible.

If the Council had considered these issues properly, then it is unlikely it would have submitted the plan currently being examined. Woking would have needed to prepare a plan that accommodated its own full housing requirement as it is very clear that the neighbouring authorities have no intention of accommodating Woking's unmet housing need.

As we have stated previously in our Written Statement to Issue 1, we would submit that insufficient regard has been given to the actions of adjacent authorities and those in the wider housing market and economic area. We are concerned that the CS has had insufficient regard to the new factors and forces that will impinge upon the Borough as a consequence of decisions being made by adjacent local authorities. Many adjacent local authorities (and indeed, some a little further afield) have adopted or are in the process of proposing housing requirements that are lower than the targets set out in the SEP and lower than their objectively assessed level of need. The consequence of this has not been considered by Woking.

Guildford Council has yet to provide an indication of its future housing requirement. Following its legal challenge to the SEP the target in the SEP was deleted. The unresolved planning uncertainties in the case of Guildford (the Council has yet to begin work on a new plan) will result in much lower rates of housing delivery in that district than would have been the case with the SEP embedded in the development plan process. As a consequence new house building is occurring at a low rate in the district (completions over the last six years have never reached the 422 target of the SEP) and its housing problem is being exported to other districts. It is very unlikely that Guildford will advance a housing requirement higher than that in the SEP even though its SHMA indicates a need for 1,194 homes a year.

Runnymede has also yet to begin work on a new Local Plan to replace its Local Plan dating back to 2001. Runnymede's SHMA indicates a need for 541 homes compared to the 286 in the SEP.

Elmbridge has an adopted CS target of 225 per year but this represents a reduction from the SEP target of 281 homes (average completions of 412 dwellings per year over the period 2006-12 does not account for the difference) and compares unfavourably with the SHMA which shows a need for 698 homes. Elmbridge Council has justified this reduction on the basis of localism and the expression of local views that uncertainties over the economy meant that lower growth prospects would reduce housing requirements. Surrey Heath tried and failed to propose a lower housing number than the SEP, and went through modifications at Examination to rectify the numbers. Surrey Heath's most recent SHMA shows a need for 632 homes compared to a SEP target of 187.

	<i>SEP/adopted</i>	
	<i>CS</i>	<i>SHMA</i>
<i>Surrey Heath</i>	187	632
<i>Elmbridge</i>	225	698
<i>Runnymede</i>	286	541
<i>Guildford</i>	422	1194
Total	1120	3065

Woking Council has selectively cited elements of the Localism regime to justify a reduced requirement. It has disregarded the other provisions of Localism regime, as expressed in the draft NPPF. In particular it has chosen to ignore the problem of how it can respond to the looming problem of the unmet housing needs of neighbouring authorities. The submitted CS does not embody a plan that can accommodate these pressures. As such there must now be doubts regarding the conformity of Woking's CS with the Framework.

Given the uncertainties regarding the appropriateness of the levels of provision being made by the adjacent Councils, especially when these plan targets undershoot so substantially the levels indicated by the SHMA, it is unsound for Woking to conclude that its plan is able to respond to any cross boundary housing impacts as the Council asserts in section 2.0 of WBC/01.

Green Belt

The plan is unsound with regard to the Framework and the need for the revision of the Green Belt boundary to be made through the core strategy.

Some development on Green Belt land will be necessary in order to deliver the housing need (as paragraph 5.9 of the CS acknowledges). Land will need to be allocated in the Green Belt to provide for 550 homes so that the Council is able to meet its housing requirement. The Council cannot defer the identification of this site until late in the plan period.

The Framework requires that strategic sites that are necessary to enable the plan objectives to be met should be identified in the core strategy/local plan (see paragraph 47). Because the delivery of the plan relies on the de-allocation of Green Belt land to accommodate a significant element of the overall housing requirement the plan needs to express clearly where this site is going to be. This requires a Green Belt review to be undertaken and completed before the local plan is submitted for examination so that the site that will provide these homes is identified. We note that paragraph 68 of the Framework requires local planning authorities to establish Green Belt boundaries in their local plans. The task of undertaking a Green Belt review to establish a new Green Belt boundary cannot, therefore, be left for some unspecified time in the future, perhaps when another development plan document is to be produced as paragraph 153 discourages the use of other development plan documents. The plan needs to provide certainty.

Furthermore, in view of our doubts regarding the deliverability of the town centre sites the Green Belt site needs to be identified in the CS to provide some flexibility in case these town centre sites fail to come forward at the pace expected. Paragraph 157 of the Framework requires local plans to be flexible in the use and allocation of land.

Ensuring viability and deliverability

The CS is unsound since it has failed to take account of the impact of its policies on development viability and the effect this will have on the deliverability of the plan.

We are very concerned that the housing objectives of the submitted CS are undeliverable because the plan has failed to take into account the results of its own analysis of the cost of local policies on viability, in particular the costs of a) the affordable housing targets; b) the impact of the rising requirements relating to Part L of the Building Regulations and c) the cost of complying with the Code for Sustainable Homes as stipulated in policy CS22 – a local standard that exceeds the national Building Regulations.

The evidence of viability is far from reassuring and it is clear from the viability assessment (as the HBF outlined in its earlier Written Statement for matter 4) that these targets cannot be achieved under current market conditions (paragraph 3.2.9). As the report states:

“there is no doubt that current conditions add up to a negative financial viability impact when compared with how schemes are viewed and pursued in a more stable, confident market.”

The EVA report concludes that the delivery of the targets relies on a return to 2007 market levels (paragraph 17).

Paragraph 174 of the Framework requires plans to be able to facilitate development throughout the economic cycle, not only in the most favourable market conditions. Drawing upon evidence in the Council's *Economic Viability Assessment* report we illustrated the extent to which the application of the AH targets will render the town centre sites unviable. As the plan depends upon these town centre sites coming forward from the date the plan is adopted, not at some distant point in the future, the proposed targets are unsound since they will compromise the deliverability of the plan. The Council, instead, needs to test a lower range of affordable housing targets to assess whether this improves the viability of its allocations.

Furthermore, in accordance with paragraph 173, the Council will need to carry out a more detailed viability assessment that takes into account the cost of other policies introduced by the CS, such as the cost of infrastructure. It is unclear whether the ceiling figure of £5k per dwelling that the Council applies as a rule of thumb to cover all infrastructure costs (see table 10b in appendix IIg) will prove adequate.

There are references throughout the CS to assessing viability on a case by case basis (for example in policies CS12 and CS16). This is contrary to the Framework. It is incumbent upon the Council to ensure that the costs of any local requirements to

be applied to development are viable by providing competitive returns to willing land owners and developers (paragraph 173). The EVA report records negative to low residual land values against many of the development types even when optimum market conditions are assumed (see table 10b).

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