

OBSERVATIONS ON THE IMPLICATIONS OF THE NPPF ON THE WOKING CORE STRATEGY

1. This note comments on the Woking Core Strategy in the light of the publication of the National Planning Policy Framework and the Borough Council's statement on the implications of the NPPF (WBC/37).
2. There have been significant changes to the NPPF from the draft, which have been commented on by many professional observers and interest groups. Whilst the "presumption in favour of sustainable development" remains (and it is anyway arguable that development planning has always been about development not preservation of the status quo), the concept of sustainability has been more clearly defined, and greater attention given to environmental policy and the green belt.
3. In my and LA21's representations on both the Draft Woking Core Strategy and the Submitted Plan, we argued that the approach of Woking BC to planning was unsatisfactory, particularly on the grounds that:
 - Undue emphasis had been placed on the economic growth aspects of sustainability to the exclusion of other factors
 - The plan was too narrow, both in respect of the emerging "duty to co-operate" and by concentrating on the land use aspects of development
 - There were serious doubts that the planned levels of development could be achieved without significant changes in lifestyle (to reduce resource use and congestion) and the development of suitable infrastructure
 - There was very little recognition of the likely changes in the global environment that could reasonably be expected over the plan period, and alternatives that would result in greater resilience had not been tested (indeed had been dismissed), and
 - There was a conflict between the national policy for green belt and the identification of most of the green belt as an area for growth subject to review in the future.
4. It is my view that WBC/37 still seeks to give primacy to economic development to the exclusion of other important factors. It repeats the argument that the Plan's growth strategy is fully justified, yet the representations and arguments during the hearings suggest that doubts remain about the extent and distribution of growth.
5. The NPPF (box before Para 6) sets out the approach to sustainable development from the UK Sustainable Development Strategy. The first principle is "living within the planet's environmental limits". The Core Strategy does not set out how this can be achieved either strategically or locally. In addition to the evidence cited by me and LA21 in our representations, it is noticeable that further evidence of pressure has recently been published, for example:
 - The imposition of a hose pipe ban in SE England as a result of water shortages;

- The publication by the Environmental Audit Committee of a report into the need for local sourcing of food to meet global food shortages (which has implications on land use and distribution)
 - The statement by Surrey County Council of the need to increase rail capacity at bottlenecks to cope with increased demands (Woking is specifically mentioned).
- 6 Para 8 of the NPPF emphasises that the three roles of sustainability cannot be seen in isolation, and that the planning system should play an active role in guiding development to sustainable solutions (in addition to the statutory role set out in s.19 of the PCPA 2004 (as amended) to consider mitigation and adaptation to climate change). The longer term growth aspirations of the Core Strategy remain largely untested. **In order to be sound, they should be subject to an early review that explicitly considers planetary limits** to reduce the impact that each citizen has on resources within Woking and its sub-region, which is already unsustainable even before further growth is contemplated.

Observations on the main sections of the NPPF and WBC/37

- 7 I consider that our previous representations still stand, but in the following respects the final NPPF reinforces these. Where appropriate, I suggest a possible approach to ensure soundness.
- 8 **Viability of town centres.** Although WBC states that no further modification is necessary, there was discussion at the hearings about the viability of development in Woking town centre. The NPPF reinforces the preference to be given to centres. The Core Strategy discussed the retail hierarchy but is largely silent on the issue of large out of centre retail stores, which are significant in land use and trading locally in parts of the Borough. Car-based retail is inherently unsustainable on transport grounds and undermines local shopping. It is significant that some major retailers are moving from a preference for large car-based sites to smaller convenience stores. A clear statement that the role of out of centre retail will be considered would be helpful in any review to confirm the retail pattern in the Borough. In addition, the land resource represented by out of centre sheds and their car parking can be significant in securing locations to meet future housing needs, thus saving green belt land. At present, such areas would not be considered in SHLAAs, but should be considered in future reviews (including retail sites lying just outside the Borough boundary).
- 9 **Promoting sustainable transport.** Para 35 of the NPPF requires plans to protect and exploit opportunities for the use of sustainable modes and para. 41 refers to safeguarding. The Core Strategy really only considers short term measures, cross referencing to the Infrastructure Delivery Plan. **To be sound and justify longer term growth, a review of the plan should, in conjunction with the duty to co-operate, identify and positively plan for the necessary transport schemes needed to underpin growth and secure more sustainable travel.** Any proposals for additional housing needs to be integrated with (sustainable) transport from the outset (para. 38 of NPPF),

which is another reason for a review before directions of long term growth are determined.

- 10 **Delivering a wide choice of high quality homes.** As discussed in the hearings, it is clear a.) that the full need for affordable accommodation cannot be met over large parts of the SE (probably due largely to national factors) and b.) that there is evidence of authorities not working together to fulfil the policies of the SE Plan (probably inevitable given the summary way in which RSSs were abolished, the late strengthening of the duty to cooperate, and perhaps the unrealistic expectations of the SE Plan which is now coming up against ever-growing environmental and practical issues).
- 11 The NPPF allows a windfall allowance (para 48), and the intentions of WBC (the proposed modification in para 10.9 of WBC/37) are **supported**. My experience in London and SE Strategic Planning and housing capacity work suggested strongly that opportunities for land use change and intensification can be significant under conditions of housing demand. Whether the precise figure of 43 is correct may depend on this demand and the availability of alternatives. I therefore suggest that an explicit reference is made to **this figure being subject to monitoring**.
- 12 Please see comments on the green belt (below) regarding the need for an early and comprehensive review of housing allocations.
- 13 **Promoting healthy communities.** In contrast to the paras. (69-78) of the NPPF, WBC/37 makes only cursory reference to matters which have been growing in importance in development planning over a number of years but which have been largely ignored in the Core Strategy. It is important that plans include policies that will have the effect of improving the health of the population and the facilities available to all members of the community. Because the plan is vague about a.) sustainable transport infrastructure and b.) the location of new housing, it is impossible to ensure that the provisions of NPPF para 70 last bullet can be met. **To make the plan sound, commitment to an early review should include criteria for the development plan to positively improve health.**
- 14 **Protecting Green Belt Land.** The NPPF (paras. 79-92) places great emphasis on green belt policy, the establishment of permanent green belt boundaries (with safeguarding of developable land where necessary) and the need not to approve inappropriate development. WBC's approach to green belt is contrary to these intentions, as evidenced by:
 - i. the blanket approach to the green belt as an area of growth in the Core Strategy, about which there has been much discussion at the hearings, and
 - ii. the recent approval of the MacLaren development, which was both outside the development plan system entirely and which retains the land as "green belt" on the proposals map, even though that land will thereby be incapable of fulfilling any of the green belt's functions. (This is not to argue the precise merits or otherwise of the development, but to highlight the process and implications of granting approval.)

(The proposed definition of Major Developed Sites in WBC/37 does not solve these problems.)

- 15 It is clear from the hearings that different interests have different objectives for the green belt land, especially the housebuilders who argued for an early review and release of green belt land to meet housing demand (and scepticism over the ability of development in the town centre to meet the needs as set out in the NPPF for a range of housing types).
- 16 It seems clear that as there is
- sufficient disagreement over housing in the medium to longer term,
 - no satisfactory policy for the green belt itself,
 - no criteria for any new housebuilding to be in sustainable locations and patterns (as the NPPF requires) and
 - no clarity about how any likely housing will interact with infrastructure, other land uses, or the natural environment / green networks,
- that there should be **an immediate review of all land resources in the Borough (in cooperation with neighbouring authorities and relevant agencies) to establish the extent of and patterns of growth** beyond the immediate period in which current approvals and likely windfalls can meet the generally agreed housing supply figure. Such a review should not be simply to release green belt land for development but to plan a more sustainable Woking, fully meeting the overall requirements of the NPPF and attempting to reconcile the conflicting objectives of green belt (and environmental), and housing development policy. **Without such a commitment, it is hard to see how the Plan can be sound.**
- 17 **Meeting the challenge of climate change.** The NPPF (paras 93-104) has a wider range of policy than the Core Strategy, which is a reflection on the limited expectations of WBC for development planning and the lack of explicit integration with, for example, the council's climate change strategy. This could be rectified in subsequent plans or an early review of the Core Strategy. Whilst WBC concentrates on development management in respect of energy efficiency, the NPPF (in para 95) refers to existing buildings. It would be helpful if there was a **minor modification** to reflect this in the core strategy, seeing that energy is a high priority in the Council's policy making.

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