

WBC44 - Woking Borough Council's response to Inspector Note ID/13

- 1.0 Woking Borough Council has submitted a statement about the implications of the National Planning Policy Framework (NPPF) (WBC/37) and the consequential further modifications to the Core Strategy as a result of that (WBC/43). It has also published a statement and given evidence about the duty to cooperate during the Core Strategy Examination Hearings, in particular, how it has worked with neighbouring authorities in developing the housing policies of the Core Strategy. It is not intended to repeat any of these statements. However, for completeness, it will be helpful if they are read in conjunction with this response. The Inspector has asked the Council to provide:
- an update as to the intentions for each authority within the London Fringe of its annualised average housing figures;
 - an update of the intentions of both Waverley and Guildford Council's of their housing delivery intentions on an annualised basis and across their intended plan periods. On the intention there will be a shortfall in intended provision against need (totals and affordable), how is this to be addressed in the identified housing market area?
- 2.0 The attached table is a factual update as to the intentions for each authority within the London Fringe of its annualised housing figures. This is set against the requirements of Policy LF3: Broad amount and distribution of future housing development of the South East Plan. The table also gives an indication about when the Core Strategies of the various authorities were adopted.
- 3.0 It should be noted that based on a legal challenge, the South East Plan housing requirement for Guildford was withdrawn. Consequently, the requirement for 397 annual average for Guildford set out in Policy LF3 no longer applies. The expectation is that Guildford's housing provision will be derived and justified by an assessment of its local housing need. Guildford is in the process of gathering the evidence base to justify its local need. It intends to publish a housing options paper for public consultation in October 2012. In this regard, its annual housing provision will not be known until sometime in October 2012. Whilst it is difficult at this stage to speculate what the housing requirement for Guildford will be, it is their intention to plan to meet their identified local need. In any case, Guildford Borough Council has given evidence to the Woking Core Strategy Examination to confirm that it will not require Woking to meet any part of its local need.
- 4.0 It is clear from the table that there will be an overall surplus of housing provision (about 6 dwellings) within the London Fringe sub region.
- 5.0 Waverley Borough Council has published a Draft Core Strategy for consultation, which ended on 11 April 2012. It intends to make provision for the delivery of 3,734 net additional dwellings in the period 2011 to 2028. This is equivalent to an annual provision of 230 net additional dwellings. The South East Plan annualised requirement for Waverly is 250 net additional dwellings. Paragraph 6.27 of the Waverley's Draft Core Strategy provides a comprehensive justification for not meeting the entire South East Plan requirement. The paragraph is also clear to emphasise that Waverly will rely on Rushmoor, Aldershot Urban Extension and the Eco Town proposal for Whitehill and Bordon (instead of Woking) to meet any residual need as in terms of housing market area, it has closer links with East Hampshire than it is with

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Woking. For easy reference, a copy of paragraph 6.27 of Waverly's Draft Core Strategy is attached.

- 6.0 Based on the above, it is unlikely that there will be any pressure on Woking to meet any part of Guildford or Waverley's housing requirement.
- 7.0 It is very important to note that the specified requirements for the various authorities often mask actual average housing completions within the various authorities. For example, whilst the average annualised requirement for Epsom and Ewell is 181 as against the South East Plan requirement of 199, its actual average provision between 2006 and 2011 was about 250 dwellings, which is well over the South East Plan requirement. This is the case across Surrey, including Woking which has an average housing provision of about 300 net additional dwellings during the same period.
- 8.0 It can be confirmed that the Council has already submitted a separate statement about the implications of the Planning Policy for Traveller Sites. This was published on 4 April 2012 and both paper and electronic copies have been sent to the Programme Officer. It is also on the Council's website (www.woking.gov.uk).

London Fringe Housing Provision Figures from the South East Plan

District	SE Plan Annualised Average Provision	Current Figure (Annualised Average Provision)	Difference	Core Strategy Status	Notes
Elmbridge	281	225	-56	Adopted 2011	
Epsom & Ewell	199	181	-18	Adopted 2007	
Guildford (part)	N/A	N/A	N/A		Guildford figure was deleted from the SE Plan following a legal challenge.
Mole Valley (part)	188	188	0	Adopted 2009	Figure is for entire Borough.
Reigate & Banstead (part)	375	460	85		Figure is for entire Borough.
Runnymede	161	161	0		161 figures excludes the DEFRA site of 2,500 additional dwellings (total 5,720 or 286 per annum). Council is exploring the release of this site from the Green Belt.
Sevenoaks (part) (London fringe only)	85	80	-5	Adopted 2011	80 annual average relates to London Fringe only. Overall district requirement is exceeded.
Spelthorne	166	166	0	Adopted 2009	
Tandridge (part)	125	125	0	Adopted 2008	Figure is for entire Borough.
Woking	292	292	0		
Sub-Regional Total	1,872	1,878	6		

Paragraph 6.27 of Waverley's Draft Core Strategy

It was open to Waverley, therefore, to revert to the final South East Plan target of 250 new homes a year. However, the Council believes that there are sound reasons for adopting the Option 1 figure for Waverley of 230 a year, as follows:-

- Waverley is not within one of the growth areas or other sub-regional areas in the South East Plan. It is within the 'Rest of Surrey' area. Prior to the detailed work on district allocations, the indicative housing figure for the 'Rest of Surrey' was 220 a year.
- The work carried out in 2005 to determine the district level allocations in Surrey was largely based on the findings of an updated 'Surrey Housing Potential Study'. That was an assessment of the potential to accommodate growth within settlements and on other suitable rural brownfield land. The findings of the Study were very heavily reliant on estimates of future supply of unidentified sites based on past trends. Since then, national policy has changed significantly in relation to windfall sites and the extent to which they can be included in assessment of future supply.
- At the time when this work was being carried out, there was evidence that Waverley was delivering housing above its allocation. However, that also coincided with Planning Policy Guidance Note (PPG) 3, with its prescriptive approach regarding density, including its encouragement of densities of 30 to 50 dwellings per hectare. That policy clearly influenced the schemes being submitted at the time and the ability of the Council to give weight to other factors. In fact the changes made to PPS3 to remove the minimum indicative density figure and to remove gardens from the definition of previously developed land, were due to concerns about the harmful effects that some housing schemes were having on the character of existing residential areas. Many of those 'harmful' schemes would have originated from a time when PPG3 was the national policy. Changes in national policy through PPS3 and the update mean that future supply on urban sites through intensification, infilling etc. is not likely to match the levels of supply being delivered at that time.
- When the South East Plan Examination in Public (EiP) Panel was considering housing numbers, it acknowledged that there was very little potential for Waverley to contribute more than its allocation of 230 a year in a sustainable manner. It said that a small increment above the draft plan figure of 230 could help to meet wider regional housing needs, without adding unacceptably to car-based commuting. However, it was clearly strongly influenced by the evidence that Waverley was outstripping its housing target at the time. As explained above, national policy at the time (i.e. PPG3) encouraged higher density development. That policy no longer exists.
- There are major developments planned in neighbouring authorities that will meet some of the housing needs arising in Waverley. Firstly, in Rushmoor, the recently agreed Core Strategy plans to deliver about 1,800 homes more than required by the South East Plan, including the 4,000 homes planned for the Aldershot Urban Extension. Secondly, there is the Eco town proposal for Whitehill/Bordon. This was included as a strategic allocation in the South East Plan, over and above the specific housing allocation for East Hampshire. Evidence shows the close links between Waverley and East Hampshire in terms of the housing market and commuting patterns such that the impacts of these major housing schemes will extend beyond the respective borough/district boundaries (see the separate section of the plan dealing with cross-boundary issues generally).