



# Elmbridge Borough Council

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Woking SADPD June 2015

28<sup>th</sup> July 2015

Dear Ernest,

## **WOKING 2027 – SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT, JUNE 2015**

Thank you for your email, dated 17<sup>th</sup> June 2015, consulting Elmbridge Borough Council on the Woking Local Development Document – Site Allocations Development Plan Document (DPD) (June 2015).

In responding to the consultation, Elmbridge Borough Council wishes to make general comments on the overarching principles of housing delivery within Woking Borough rather than make site specific comments. It is acknowledged that some proposed development sites are located within close proximity to the Elmbridge/Woking boundary. However, it is understood that any cross-boundary implications are limited and/or can be accommodated/mitigated.

In terms of overall observations, we are generally supportive of the approach Woking Borough Council has taken in seeking to increase the delivery of housing development across the Borough. In particular, taking the challenging step of proposing the release of land currently designated Green Belt. Nevertheless, the Council has some concern that whilst the Site Allocations DPD is set to meet the development needs identified in the Core Strategy, more up to date evidence and issues relating to cross-boundary working suggest a need for the Council to increase the provision of new homes as part of its current plan preparation and not wait until a review of the Core Strategy and/or its Site Allocations DPD.

Elmbridge Borough Council appreciates the Council's desire to continue with the implementation of the Site Allocations DPD on the basis of its post-National Planning Policy Framework (NPPF) Core Strategy. However, as stated in National Planning Policy Guidance (PPG) *'local planning authorities should also consider whether plan making activity by other authorities has an impact on planning and the Local Plan in their area. For example, a revised Strategic Housing Market Assessment will affect all authorities in that housing market*

*area, and potentially beyond, irrespective of the status or stage of development of particular Local Plans'* (Local Plans – Preparing a Local Plan, paragraph 009).

Elmbridge Borough Council is aware that a draft Strategic Housing Market Assessment (SHMA) (December 2014) has been published identifying a need to provide between 1,522 – 2,053 homes per annum between 2001 and 2031, across the West Surrey Housing Market Area (Guildford-Woking-Waverley). For Woking Borough the overall need is said to be between 390 and 588 homes per annum. This represents an increase of approximately 100 – 300 homes per annum above what is currently being planned in the Core Strategy/Site Allocations DPD.

In light of the above, it is the Council's understanding that Woking Borough Council should be seeking to increase housing delivery above the levels set out in the Core Strategy. The Site Allocations DPD identifies opportunities to do this in the form of accelerating the release of safeguarded land currently identified for the period 2027 to 2040. Therefore if safeguarded land contains sites there are available and suitable for development they are required to meet Woking's housing need.

It is considered that these sites are required to meet the identified housing needs of Woking Borough.

Furthermore, even if not considered appropriate by Woking Borough Council to meet the increase in identified housing need, as part of the 'duty to cooperate' consideration should be given as to whether the safeguarded land should be released within the earlier plan period of 2015 to 2027, to meet the wider development needs of the West Surrey Housing Market Area (HMA) (or neighbouring HMAs) where housing need is unlikely to be met. As stated in the NPPF, *'even if a local authority has an adopted Local Plan, it is still required to cooperate with a local planning authority that is bringing forwards its plan'* (NPPF, Duty to Cooperate, paragraph 021).

Commenting on its own work, Elmbridge Borough Council has recently commissioned a SHMA alongside the Royal Borough of Kingston upon Thames; Epsom & Ewell Borough Council; and Mole Valley District Council. Elmbridge Borough Council has also commissioned a Green Belt Boundary Review and as in the process of assessing constraints to future housing delivery within the Borough. Whilst this work is on-going the Council is conscious that it has limited opportunities to meet any increase in its housing figures and may need to approach other neighbouring authorities and HMAs to see if any surplus in its objectively assessed housing need can be accommodated elsewhere.

I hope you find these comments useful in progressing work on the Site Allocations.

Please do not hesitate to contact me if any of the points raised requires further explanation.

Yours sincerely,

Mark Behrendt  
Planning Policy Manager  
Elmbridge Borough Council