

## Your views

Please complete a separate copy of pages 3 and 4 of this questionnaire for each individual site or section that you wish to comment on.

**Which consultation document does your comment concern?** Please tick one option only:

- Site Allocations DPD       Sustainability Appraisal Report       Habitat Regulations Assessment  
or  General comment (not specific to any one of the consultation documents)       Suggest a new site

**Which site or section of the document does your comment concern? (if applicable)**

Please state all that apply:

Site reference: (please select and note number) UA / GB **GB4 & GB5**

Section title **Introduction**

Page number **2-3**

Paragraph number **Various**

**Are you?**  Supporting       Objecting       A combination of these       Neutral

**Your comment**

*Core Strategy housing requirement*

Page 3 confirms that the purpose of the document is to allocate land to meet the Core Strategy requirements, which for housing is considered to be the delivery of 4,964 dwellings. However, it is important to note that the Core Strategy housing requirement of 4,964 (or 292 dwellings per annum) is only the minimum that is required during the plan period to 2027.

In terms of delivery to date, the Five Year Housing Land Supply Position Statement (December 2014) identifies that 964 dwellings (net) have been completed since the start of the plan period, which leaves a minimum of 4,000 homes to be delivered to 2027. We note that the sites proposed for allocation in this plan have a capacity of around 4,077 homes (split between 3,206 on urban sites and 871 on the Green Belt sites), which is only marginally above the minimum requirement.

Paragraph 14 of the NPPF emphasizes that the presumption in favour of sustainable development means for plan-making that “*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change*”, unless any adverse impacts of doing so would outweigh the benefits or would result in conflict with other policies in the NPPF.

In this case Woking’s housing requirement of 292 dpa is only the minimum that should be provided and as accepted at the Core Strategy examination, does not represent objectively assessed needs. The Draft Allocations plan is therefore in conflict with NPPF para. 14 as it neither allocates enough land to meet objectively assessed need or provides any flexibility to adapt to rapid change. The Draft Allocations document relies on the delivery of housing from a small number of sites over the plan period, despite acknowledging that further sites are suitable for development though it’s safeguarding policies.

In summary we consider that given the clear evidence of urgent housing need in Woking Borough, there is no justification for the Council to hold back the release of suitable land (including sites within the Green Belt) over the plan period simply because it might result in an over delivery of housing against the adopted Core Strategy housing

requirement. We do not consider this to be an approach that accords with the NPPF's positively prepared, justified or effective tests of soundness.

### *Urgent housing need in Woking*

To emphasize our position it is relevant to consider the issue of housing need in Woking. During the Core Strategy examination process, the affordable housing need alone was accepted as being 499 dwellings per annum with the West Surrey SHMA identifying an overall need in the Borough of 594 dpa. The 292 dpa figure in the Core Strategy does not therefore represent the objectively assessed need as confirmed in paras. 78 and 91 of the Inspector's report.

The Council has since sought to update its evidence base with the commissioning of the West Surrey SHMA update, with the draft version published in December 2014. This identified an OAN for Woking (using a NPPF / NPPG compliant methodology) between 390 and 588 dpa in the period to 2031, the upper range influenced by achieving greater levels of economic growth. The report states that *"In the absence of development constraints, the higher end of the range shown above could potentially be considered to represent the full 'objectively assessed need' (OAN) for housing."*

It is evident that both the analysis that informed the Core Strategy and subsequent update work demonstrates that the true picture of housing need in Woking over the plan period will remain significantly higher than the 292 dpa requirement set out in the adopted Core Strategy.

The Inspector accepted the 292 dpa in 2012 principally due to the absence of a Green Belt review, meaning no evidence was available to confirm if any land could reasonably be released from the Green Belt to assist in meeting a higher proportion of the identified need. The Inspector also noted the opportunity for joint working with adjoining authorities as having potential for some unmet need to be met elsewhere in the housing market area.

In balancing the housing need issue in the absence of a Green Belt review (that could have identified additional supply to support a higher housing requirement) the Inspector duly chose to make two fundamental changes to the Core Strategy in order for it to be found sound:

- The housing requirement must be expressed as a minimum (and not a target); and
- The Green Belt review being completed as soon as possible and required to inform the Site Allocations DPD.

Crucially, in respect of the housing requirement and the need for it to be expressed as a minimum, the Inspector at paragraph 83 stated:

*"Nonetheless, the evident need for housing within the Borough is such that any additional housing provision that meets the sustainable aims of both the CS and the NPPF should not be resisted solely on the grounds of over provision beyond the annual average figure."*

The Inspector was therefore clear that housing delivery over this plan period to 2027 can exceed the minimum figure stated in the Core Strategy.

Since the Core Strategy the Council has published its Green Belt Review prepared by Peter Brett Associates (July 2014) to inform the site allocations process in accordance with the recommendations made by the previous Inspector. The Green Belt Review identifies a range of sites that are considered suitable for release from the Green Belt for delivering housing and meeting other development needs.

On this basis, in the context of need, and the Inspector's comments and evidence of additional land being available in the form of Green Belt releases we consider it fundamentally wrong that the Site Allocations DPD is focused only on meeting the minimum housing requirement.

We therefore contend that there is no justification for our client's safeguarded Green Belt site to be held back,

when there is clear empirical evidence to show that current housing need is higher than the Core Strategy minimum requirement. It is our view that the Council's approach of, in effect, preventing sustainable sites coming forward in the context of severe housing need does not meet the positively prepared, justified or effective tests of soundness.

**Proposed modifications** – please explain what changes you consider should be made, if any (for example, changes to the text, a site boundary, etc.)

The safeguarded Green Belt sites should be allocated within the Plan period.

These comments are page \_\_\_\_ of \_\_\_\_ pages.

### More comments?

If you would like to make additional comments about other proposed sites or sections of any of the consultation documents, please complete further copies of pages 3 and 4 of this questionnaire. Please ensure that these are firmly attached with the main questionnaire - including pages 1 and 2 providing your details - and return this by email or post to the Council (contact details on page 2).