

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 **SA1: Overall policy framework for land released from the Green Belt for development**

Page number **258-262**

Paragraph number **Various**

Are you? Supporting Objecting A combination of these Neutral

Your comment

We do not object to the general principle of prioritising previously developed land over development on land released from the Green Belt as this is in broad accordance with national policy and the principles of sustainable development.

However, we contend that given the lack of capacity in urban areas, clear evidence of need beyond the Core Strategy housing requirement and NPPF requirements for flexibility, there is a compelling case for the allocation of further sites during the plan period.

The Green Belt Review included our client's site in an option 1 scenario, whereby four sites were released for housing development between 2022 and 2027. This scenario was described as providing the greatest '*flexibility in delivery options*' and would therefore help to '*boost significantly*' the supply of housing in Woking. Given this conclusion and the fact that both parcels are recognised in the Site Allocations document as suitable for housing development, we see no justification for reserving these sites for later release. In terms of Green Belt safeguarding the NPPF at paragraph 85 requires that:

"Where necessary, identify in their plans area of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period."

Therefore, safeguarding should only be pursued to meet longer term development needs that stretch well beyond the plan period. As previously set out in our representation, there is a clear need for more housing now, which has not been met to date due to a lack of land being made available. The Green Belt Review, however, now provides evidence that demonstrates that our client's site is suitable for release from the Green Belt that should be enabled to come forward in this plan period to provide a genuine boost to housing supply and meet a level of need closer to the true OAN for the Borough.

There is also the issue that the full scale of the longer term development needs in the Borough are not yet fully understood given that the West Surrey SHMA is still only in draft and is limited to the period up to 2031. Yet, the safeguarded land is expected to be released at any point up to 2040, a point in time where no evidence on future need is available. Conversely, there is empirical evidence of need that exists now yet the Council's approach seeks to

hold back land that could be brought forward to positive effect over the plan period. The effect of this approach will simply be to exacerbate the problem for future generations to deal with, which in our view is not an appropriate or sustainable development strategy for the Council to follow.

The decision to allocate some sites and safeguard others has also not been clearly justified or shown to be the most sustainable strategy in any of the supporting documentation. The Council's approach has, however, already accepted the principle of releasing more land than is needed to meet the Core Strategy minimum housing target of 550 dwellings from Green Belt sources, which in our view indicates that there is no planning reason why our client's site cannot be allocated now to meet a higher proportion of the need and comply with the NPPF requirements for flexibility.

In summary, we recommend that Policy SA1 should be amended to include specific reference to the allocation of our client's site during this plan period.

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

The Policy SA1 should be amended to include specific reference to the allocation of our client's site (GB4 and GB5) during this 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).