

31 July 2015

Delivered by email

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Dear Ernest

WOKING SITE ALLOCATIONS DPD – REPRESENTATIONS ON BEHALF OF TAYLOR WIMPEY

Thank you for inviting us to submit representations on the Regulation 18 consultation draft of the Woking Borough Council Site Allocations Development Plan Document. On behalf of our client Taylor Wimpey we submit the following information:

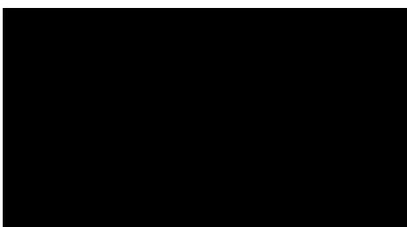
- Representations on matters relating to the draft DPD (this letter)
- Site Promotion Document for Land Adjacent Hook Hill Lane

Taylor Wimpey has an interest in Land Adjacent Hook Hill Lane located to the south of Woking around Hook Heath and Mayford. The site is specifically referred to in the Site Allocations DPD as GB14: Land adjacent to Hook Hill Lane, Hook Heath, Woking, GU22 0PS and proposed to be released from the Green Belt and safeguarded for green infrastructure.

We have reviewed the draft Site Allocations document and as a general point we welcome the Council's proposal for the release of land from the Green Belt, including our client's land interests at Hook Hill Lane. We do, however, have a number of points to make in terms of the phasing and timing of Green Belt release in the context of the true housing need in Woking Borough as well as the development opportunity that can be accommodated on our client's site.

In particular, we do not agree with the conclusions reached in respect of our client's site that Land Adjacent Hook Hill Lane is only suitable to provide green infrastructure. We contend that the site has development potential to deliver around 100 new homes alongside provision of the identified green infrastructure component.

Having reviewed the supporting evidence base (including Peter Brett Associates Green Belt Review, 2014) it appears that the Council consider the escarpment on the site to be prohibitive to developing the site for residential use.



Our client, however, commissioned a detailed site assessment and master planning work to better understand the development opportunity that exists at the site including reviewing the extent to which the escarpment should be considered a constraint. This work includes Landscape and Visual Impact of the site and critique of the Green Belt Review, produced by Barton Willmore.

The Barton Willmore work identifies that the site has a similar landscape context to the surrounding sites recommended for release in the PBA Green Belt Review (parcel 20) but which are concluded to be suitable to deliver residential development. The purported constraint of escarpment on our client's site is therefore inconsistent with conclusions reached on the adjoining sites and we contend that it has therefore been overstated in the supporting evidence base. Our evidence confirms that with a carefully conceived landscape strategy the site has genuine landscape capacity to deliver development for around 100 homes. We would be happy to meet with the Council to go through the Barton Willmore work in further detail as required.

Further we question the justification for the Council's overarching preferred strategy set out in the Site Allocations DPD including why the delivery of GB14 is proposed to be delayed until post 2027. This delay appears contrary to the clear housing delivery objectives within the Woking Core Strategy and the National Planning Policy Framework (NPPF).

Our detailed comments on the document are set out below and repeated on the attached comment forms.

Paragraph / Policy	Comment
<p>Introduction (pages 2-3)</p>	<p><i>Core Strategy housing requirement</i></p> <p>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 required during the plan period to 2027.</p> <p>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 4,000 homes to be delivered to 2027. We note that the sites proposed for allocation in this plan period have a capacity of around 4,077 homes (split between 3,206 on urban sites and 871 on Green Belt sites), which is only marginally above the minimum needing to be delivered.</p> <p>Paragraph 14 of the NPPF emphasises that the presumption in favour of sustainable development means for plan-making that "<i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change</i>", unless any adverse impacts of doing so would outweigh the benefits or in conflict with other policies in the NPPF.</p> <p>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 needs nor provides any flexibility to adapt to rapid</p>

	<p>change.</p> <p>If only a few of the identified sites were not to come forward, the minimum Core Strategy requirement would not be met, which seems a fundamentally flawed approach given the additional land that has been identified in the Council's evidence base as being suitable in principle but which is currently being held back.</p> <p>Therefore, as a headline point we contend that given the evidence of urgent need for housing in Woking Borough (explained further below), there is no justification for the Council to hold back the release of suitable land (including sites in the Green Belt) over this plan period simply because it might result in an over delivery against the adopted minimum 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.</p> <p><i>Urgent housing need in Woking</i></p> <p>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 (2009) identifying an overall need in the Borough of 594 dpa. The 292 dpa Core Strategy figure therefore does not represent Woking's objectively assessed needs as confirmed in paras 78 and 91 of the Inspector's report.</p> <p>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 (produced by GL Hearn) identifying 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 GL Hearn report states that "<i>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.</i>"</p> <p>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.</p> <p>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 HMA.</p> <p>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</p>
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	<p>the Core Strategy in order for it to be found sound:</p> <ul style="list-style-type: none"> • 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. <p>Crucially, in respect of the housing requirement and the need for it to be expressed as a minimum the Inspector at paragraph 83 stated:</p> <p style="text-align: center;"><i>“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.”</i></p> <p>The Inspector was therefore clear that housing delivery over this plan period to 2027 can exceed the minimum figure stated in the Core Strategy.</p> <p>Since adoption of 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 to deliver housing and meet other development needs.</p> <p>On this basis, in the context of need, the Inspector’s comments and evidence of additional land being available in the form of Green Belt release, we consider it fundamentally unsound that the Site Allocations DPD is focused only on meeting the minimum housing requirement.</p> <p>We therefore contend that there is no justification for our client’s site to be safeguarded and held back for release until after the plan period when there is clear empirical evidence to show that current housing need is higher than the Core Strategy minimum requirement. It is our view in this context that the Council’s approach of, in effect, preventing sustainable sites from coming forward in the context of severe housing need does not meet the positively prepared, justified or effective tests of soundness.</p> <p><i>The London Influence</i></p> <p>In March 2015, the Mayor adopted the Further Alterations to the London Plan (FALP). It is acknowledged that London is unable to meet its housing need in full. Given the strong functional relationship between Woking and London, Woking is considered to be an appropriate location that could potentially accommodate some of this shortfall. It is not clear how the Site Allocations has taken into account this shortfall into account.</p> <p>The GLA has held a number of high level meetings with surrounding authorities to consider cross-boundary strategic planning co-operation. We note that Surrey County Council and the Surrey Planning Officers Association</p>
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	<p>attend these meetings. Councils have a duty to cooperate with neighboring authorities on strategic priorities such as housing. However, evidence supporting the Woking Site Allocations in relation to cross boundary cooperation on housing issues appears to be lacking.</p> <p>Given the scale of housing need in Woking it is incumbent on the Council to ensure that a planning strategy is in place to positively address the chronic under supply of housing over the current plan period. The draft plan does not do this by restricting the supply of sites that have been identified as suitable development propositions in the Council's own evidence base. We do not consider it a sound approach, as the Council seeks to do, to defer any re-assessment of need, release of the proposed safeguarded sites and review of overall strategy to vague references in the plan to a future review of the Core Strategy and / or site allocations DPD.</p> <p><i>Summary</i></p> <p>Our preference would be for the Site Allocations DPD to be amended to include additional allocations now. This will ultimately save resources as well as provide sufficient supply over the medium term and allow a healthy proportion of need to be met whilst the Council considers how the overall issue is addressed with further cooperation with its neighbours.</p> <p>However, should the Council decide to progress the Site Allocations DPD without making any further allocations, we contend that a firm commitment to an immediate review of the Core Strategy is required within the plan.</p> <p>The most robust way of committing to the required immediate review would be the addition of a new policy that will set out the timeframe for adopting an updated Core Strategy / comprehensive Local Plan. The new policy should focus both on committing the Council to an immediate review of the Core Strategy as well as putting in place mechanisms that would allow the early release (i.e. pre-2022) of the identified sites from the Green Belt to assist in recovering any shortfall over the plan and provide the required flexibility to address any shortage of supply from urban and allocated Green Belt sources.</p>
<p>Section A – Urban Sites</p>	<p>We have not reviewed the deliverability of the urban sites in any detail at this stage, although reserve the right to do so going forward as the soundness of the plan will depend on the ability for these sites to come forward in the period before 2022. We note, however, that there are many small sites identified (10 to 20 units), which indicates a significant shortage of brownfield land in the Borough.</p> <p>The NPPF requires plans to be flexible and have the ability to respond to rapid change. We are concerned that the plan's reliance on a clearly limited supply of brownfield land combined with limited release of Green Belt land will be too inflexible in practice for the Borough's housing needs to be met.</p> <p>As highlighted in this letter we contend that in view of the available evidence this plan should be allocating more of the Green Belt land currently identified to be safeguarded in the plan period up to 2027 to respond to meeting needs</p>

	<p>in accordance with the NPPF and NPPG.</p>
<p>SA1: Overall policy framework for land released from the Green Belt for development</p>	<p>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 principles of sustainable development.</p> <p>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.</p> <p>The Green Belt Review included our client's site in an Option 1 scenario whereby some of parcel 20 would be required to meet the 550 dwellings minimum requirement. Our client's site was also included in Option 2 that would bring forward parcel 20 first ahead of the other sites recommended for release elsewhere in the Borough.</p> <p>Given the conclusions set out in the Green Belt Review and urgent need for housing we see no justification for reserving our client's site and associated south of Woking land for later release.</p> <p>In terms of the appropriateness of proposing Green Belt safeguarding in this context, the NPPF at paragraph 85 requires that:</p> <p><i>"Where necessary, identify in their plans areas 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."</i></p> <p>Therefore, safeguarding should only be pursued to meet longer term development needs that stretch well beyond the plan period. As previously set out in these representations there is 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 there are sites 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.</p> <p>There is also the issue that the full scale of the longer term development needs are not yet fully understood given the West Surrey SHMA is still in draft and only covers the period 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 are actively holding back land that could be brought forward to positive effect over this plan period. The effect of this approach will be simply 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 be endorsing.</p> <p>The decision to allocate some sites and safeguard others has also not been justified or shown to be the most sustainable strategy in any of the supporting</p>

	<p>documentation. The Council's approach has, however, already accepted the principle of releasing more land that is needed to meet the Core Strategy minimum contribution of 550 dwellings from Green Belt sources, which in our view indicates that there is no planning reason why additional sites cannot now be allocated to meet a higher proportion of need and comply with the NPPF requirements for flexibility.</p> <p>In summary we recommend that Policy SA1 should be amended to include specific reference to the allocation of our client's site (and associated sites to the south of Woking) during this plan period.</p>
<p>GB14: Land adjacent to Hook Hill Lane</p>	<p><i>The Development Opportunity</i></p> <p>We welcome the Council's overall decision to release the site from the Green Belt. This is both commendable and a logical decision given that land south of Woking has long been identified as a suitable location for release from the Green Belt to help meet strategic development needs. As you will be aware land south of Woking was previously recommended for release from the Green Belt in work undertaken for both the Surrey Structure Plan 2002 and South East Plan 2009.</p> <p>We object, however, to the site being considered suitable to deliver only green infrastructure with no provision included for housing. We acknowledge that the Council has made this decision due to the escarpment on the site, which is considered to constrain the ability of the site to deliver housing without leading to harm to landscape character. We submit evidence that refutes this position and demonstrates there is capacity on the site to deliver around 100 homes, which will be a valuable contribution towards increasing housing delivery in the Borough.</p> <p>Our conclusions are based on the various site assessments undertaken including detailed landscape analysis of the site through a Landscape and Visual Impact Assessment and critique of the Green Belt Review prepared by Barton Wilmore.</p> <p>The Barton Wilmore analysis (submitted as part of our representations) identifies that the PBA Green Belt review contained a number of inconsistencies in approach that unjustifiably prejudiced the development potential of our client's site. In short, the Barton Wilmore report provides compelling evidence to confirm that the escarpment has been overstated and our client's site has capacity for development, which should now be recognised in GB14.</p> <p>We also submit a Promotion Document that explores the development opportunity of the site and associated lands south of Woking further. The Promotion Document reviews the site assessments and analysis undertaken and sets out a development concept for how the site can be developed to take into account constraints and deliver residential development.</p> <p>The Promotion Document, whilst confirming that our client's site is suitable to support residential development in conjunction with green infrastructure, also</p>

sets out a vision for how the wider lands south of Woking can be brought forward as a comprehensive strategic development to meet a range of development needs over the current plan period.

Ensuring Delivery of the Green Infrastructure

We maintain our view that GB14 needs to be amended to include delivery for around 100 homes as well as the green infrastructure component. The inclusion of residential within the policy will provide sufficient value in the site to ensure the green infrastructure component will be delivered.

However, should the Council not include residential development in the policy, it is essential to soundness that sufficient policy mechanism are included within the plan to ensure that the green infrastructure envisaged for the site is delivered in conjunction with the other south of Woking sites.

We acknowledge that the Council has attempted to do this by including references to the need for an equalisation agreement between the various landowners within the associated site policies GB8, GB10 and GB11. However, whilst a good start, the reference is too vague in its wording and not clear how this is to be achieved, what land it should relate to and when it needs to be entered into.

In order to be effective and ensure the delivery of GB14 as currently drafted the reference to the equalisation agreement must be a fundamental component of GB8, GB10 and GB11. The wording in these policies must therefore be amended to make explicitly clear that the green infrastructure proposed for GB14 - Land Adjacent to Hook Hill Lane is essential to serve residential development on GB8, GB10 and GB11. The reference to the equalisation agreement between the landowners of GB8, GB10, GB11 and GB14 must then require that the proposed residential development on each site cannot be brought forward until the agreement is in place such is the importance of ensuring lands south of Woking can be developed collaboratively and comprehensively

A comprehensive approach

We contend that the plan would be enhanced by the addition of an overarching policy that requires the residential development lands south of Woking to be undertaken comprehensively. That policy should specify those aspects that are required for all the sites including the need for a robust equalisation agreement across all of Parcel 20 should GB14 not be amended to include provision for residential development. The policy can also set out the appropriate phasing strategy to ensure that the land can be brought forward in a comprehensive and sustainable way.

The submitted Promotion Document demonstrates further how land south of Woking could be developed as a comprehensive masterplan over the plan period.

<p>Comments on other sites south of Woking relating to policies GB8, GB10 and GB11</p>	<p>We support the Council’s decision to propose the GB8, GB10 and GB11 sites are released from the Green Belt.</p> <p>We do not make any further comments on the merits of these site other than to reaffirm our overall point that the Site Allocations DPD and associated policies relating to the land south of Woking need to be considered comprehensively and there is a compelling case for these sites to be allocated in this plan period.</p> <p>As referenced above, we contend that it is necessary for the reference to the equalisation agreement is strengthened to ensure that the proposed GB14 green infrastructure is delivered.</p>
<p>Sustainability Appraisal</p>	<p>In order for the Site Allocations Plan to be found sound it is critical for the Council’s chosen strategy to have been informed by rigorous Sustainability Appraisal to confirm it is the most appropriate strategy when assessed against reasonable alternatives. The NPPG provides guidance on the assessment of alternatives, which are defined as being:</p> <p><i>“Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies of the plan. They must be sufficiently distinct to highlight the different implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable. The appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives.”</i></p> <p>We contend that the not all reasonable alternatives have been tested in arriving at the Council’s preferred Site Allocations Strategy. For example, testing of reasonable alternatives would have required testing the option of the Council’s chosen strategy of safeguarding Green Belt land versus comprehensive release of all the sites in the current plan period to objectively assess the sustainability merits of both.</p> <p>It is evident from review of the SA that this has not been done and the decision to safeguard land has been taken in advance and outside of the SA process. The SA process therefore only focuses on the merits of each individual site but not, crucially, on the decision to safeguard instead of seeking to meet a higher proportion of housing needs during this plan period.</p> <p>Aligned to this is the associated issue of how the Council has gone about selecting its preferred approach for Green Belt release in this plan period. The SA does not provide any supporting evidence to justify why the chosen residential sites were selected ahead of others. Indeed, this is confirmed in para 20.5 of the SA that confirms that how sites were chosen was not included in the SA. This is a further fundamental flaw in the SA process as there is no evidence presented that shows that the preferred approach is the most sustainable and the result of a fair and transparent process and not pre-</p>

	<p>determined.</p> <p>In the absence of the testing of reasonable alternatives, the overarching strategy set out in the plan is fundamentally unsound as it fails the justified and effective NPPF tests as well as contrary to the SA / SEA regulations.</p>
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To summarise the thrust of our representations we request the following points are taken on board:

- Housing need in Woking Borough is far higher than the adopted Core Strategy minimum requirement
- The Core Strategy Inspector explicitly stated that sustainable sites should not be held back on the grounds of exceeding the minimum housing requirement
- The Council's own evidence recommends the release of sustainable sites from the Green Belt and includes detailed policies that will guide their development
- Our client's site is available for immediate development to provide around 100 homes. We contend that the site along with associated land to the south of Woking should be brought forward as a comprehensive development in this plan period
- In the context of need and work undertaken to identify land suitable for release there is no justification for safeguarding sites.

We trust these comments are helpful and look forward to participating in the next stage of the plan. We would welcome a meeting with you to discuss further the development opportunity that exists to the south of Woking. Please do not hesitate to contact us if you would like to discuss our comments further or require clarification.

Yours sincerely

Nick Perrins
Senior Planner

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