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(Representations submitted by email to [planning.policy@woking.gov.uk](mailto:planning.policy@woking.gov.uk).)

**Re: Site Allocations DPD Consultation**

Dear Sir/Madam,

This letter is in response to the current consultation on the Woking Site Allocations DPD Consultation. Whilst in response to this consultation, the representation is focussed on the Council's decision to continue preparation of the Site Allocations DPD as opposed to undertaking a wider comprehensive review of the Core Strategy. In preferring to continue preparation of the Site Allocations DPD we contend that this document is not sound as it is not positively prepared or effective.

**Review of Woking Core Strategy**

Having considered the Review of the Woking Core Strategy (October 2018), Gladman believe that the Council has taken the wrong option in progressing the Site Allocations Development Plan Document. We are concerned with several conclusions made in the review and this will be detailed further below.

Gladman welcome that upon adoption of the revised National Planning Policy Framework (NPPF 2018), the Council reviewed the strategic policies of the Woking Core Strategy, as set out in Paragraph 33 of the NPPF 2018. However, we fail to see when considering the Framework as a whole (Paragraph 3), that modifications are not required. At the time of the review the Core Strategy has less than 9 years to run. Paragraph 22 of the NPPF 2018 is clear that strategic policies should look ahead over a minimum of 15-year period adoption.

The Woking Core Strategy was adopted with unmet housing needs, which the review document quantifies as 225 dwellings per annum. Waverley has recently adopted its Local Plan with a commitment to meet about 50% of Woking's unmet housing need, with Guildford's Local Plan, currently undergoing examination, expected to accommodate around 20% of Woking's unmet housing need. Even with significant assistance from Housing Market Area partners there will be remaining unmet housing needs arising from Woking in the period to 2027. There is therefore strong justification for the undertaking of a wider review of the strategic policies of Woking Core Strategy now, rather than the continuation of the preparation of the Site Allocations DPD. A review of the Core Strategy,

amending the plan period up to 2035 and beyond, could incorporate the work on the Site Allocations DPD that has been undertaken to date.

Undertaking a wider review could provide much greater certainty that the housing needs of Woking will be met in the current plan period and beyond, as currently continuing preparation of the Site Allocations DPD would result in houses that are needed in the plan period having not been delivered, with the needs of Woking's residents having not been met.

Further, when considering the Sustainability Appraisal Report of the Woking Core Strategy the review states that the constraints of the area have not changed since the adoption of the Core Strategy and that the delivery of more of Woking's housing need would cause damage to the environment that will far outweigh any benefits that they will bring to the borough. Gladman do not contend that the constraints of the area have not changed however now it is clear the extent that the HMA partners can assist in delivery of Woking's unmet need it is highly likely that the social and economic benefits of delivering more housing in Woking would be much greater, even capable of outweighing the impacts on the environment. It is important to note this should be considered in the context of the significant negative social and economic impacts of not delivering the remaining housing needs of Woking. It is important to strike the right balance in protecting the environment whilst also ensuring that housing needs of the residents of Woking can and will be met.

The review states that the Green Belt boundary report states at paragraph 3.5.22 that it does not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development and uses this as a justification for not modifying the Core Strategy. This may well be the case but each of these parcels could contribute to the housing needs of a modified plan period with Waverley and Guildford potentially assisting with any further identified unmet need when each of these Local Plans is reviewed.

It is further claimed that undertaking modifications to the Core Strategy would mean that the earliest a review could be adopted is 2020/2021. This is of the Councils own making and it could have instead been focussing resources on undertaking a review now. As stated above, and within the review itself, much of the work has already been undertaken for addressing housing needs in Woking over an extended plan period. Progress on the Site Allocations DPD has been disappointingly slow and the Council has had a significant period of time to ensure the preparation of the Site Allocations DPD. The Governments 2017 Housing White Paper clearly states that too often difficult decisions are being ducked. If the country is to solve the national housing crisis this cannot continue to be the case. The Council should have therefore sought to progress a comprehensive review of the Core Strategy including an extension to the plan period.

Gladman note that concerns have been raised by Woking's HMA partners regarding the Duty to Cooperate. This is a significant failing of the review of the Core Strategy. We would have expected to see some level of engagement with HMA partners regarding the Core Strategy review. Paragraph 26 of the NPPF 2018 is clear effective and on-going joint working between policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. Having failed to consult HMA partners on the Core Strategy Review is a fundamental flaw of the review.

## **Safeguarding of Sites**

As highlighted above, Gladman recognise that much of the work needed to be able to undertake a comprehensive review of the Core Strategy including the modification and extension of the plan period has already been completed. There is a stronger justification for the allocation of the identified proposed safeguarded sites from the Green Belt in an extended and modified plan period. At the present time, Gladman consider it to be a difficult task trying to justify removing sites from the Green Belt but not having allocated them for development now when it is clear that the housing needs of Woking up to 2027 are not going to be met.

To conclude, we do not consider that progressing with the Site Allocations DPD rather than modifying the Core Strategy is a sound approach. The Site Allocations DPD is not positively prepared because it would not meet the remaining unmet needs identified in the Woking Core Strategy, and it is not agreed by other authorities that the Site Allocations is the best approach. It is not effective as cross-boundary strategic matters will not have been dealt with and have in fact been deferred.

Should it be necessary we will appreciate the opportunity to discuss the issues raised in the examination to the Site Allocations DPD.

Yours faithfully,

Richard Agnew  
Gladman Developments