

Response to Woking Borough Council's Site Allocations Development Plan Document Regulation 19 Publication

Summary

Woking Borough Council has published its Regulation 19 Site Allocations Development Plan Document (WSADPD) and accompanying Sustainability Appraisal Report, Habitats Regulations Assessment and Proposals Map, prior to its submission to the Secretary of State for Examination. The main purpose of the WSADPD is to identify and allocate specific sites to enable the delivery of the Woking Core Strategy (2012), as part of Woking's Local Plan. The WSADPD also safeguards land to meet future development needs up to 2040, which is beyond the present Core Strategy period of 2010-2027. Members are asked to note the publication of the document and the need to formally agree the response sent by officers. Members are also asked to agree that outstanding matters raised through Surrey Heath's response are addressed through ongoing Duty to Cooperate between the two authorities.

Portfolio – Planning & People

Date Portfolio Holder signed off report: 28/11/2018

Wards Affected

All

Recommendation

The Executive is asked to resolve to:

- (i) **NOTE that the Woking Site Allocations Development Plan Document (WSADPD) was issued for comment up until the 17th December 2018.**
- (ii) **AGREE to submit the letter at Annex 1 as Surrey Heath's formal response to the WSADPD;**
- (iii) **AGREE that the matters raised through Surrey Heath's response are addressed through ongoing Duty to Cooperate between Surrey Heath and Woking Councils.**

1. Resource Implications

- 1.1 There are no resource implications arising from the review of, and formulating of a response to the WSADPD beyond those allowed for within the budget for 2018/2019.

2. Key Issues

Background

- 2.1 Woking Borough Council's Core Strategy was adopted in October 2012. The Core Strategy makes provision for the delivery of 4,964 net additional homes, 28,000 sqm of additional office floorspace, 20,000 sqm of warehouse floor space, and 93,600 sqm of retail floorspace for the period between 2010 and 2027. The Core Strategy does not identify specific sites to deliver these proposals. It commits Woking Borough Council to prepare a Site Allocations DPD to allocate specific sites to bring forward the proposals for development.
- 2.2 In 2015 Woking produced a draft Site Allocations DPD which proposed to accommodate future urban growth post 2027 through a series of Green Belt releases to the south of the Woking urban area. This safeguarding strategy was proposed and supported by the evidence base of that time. Surrey Heath did not raise any concerns in relation to the proposed safeguarded sites in 2015 when Woking consulted on its draft Site Allocations.
- 2.3 In early 2017, Woking consulted on a proposal to substitute the proposed safeguarded sites to the south of Woking with a single Green Belt site to the north – Martyrs Lane, Horsell, Woking, close to the Surrey Heath boundary. The 112ha site was proposed to accommodate at least 1,200 new homes from 2027. Surrey Heath raised concerns in relation both local and strategic transport impacts arising from the potential urban extension and welcomed the opportunity for an ongoing dialogue with Woking in respect of the strategic implications of the Martyrs Lane proposals regarding the direction of future urban growth and Green Belt and transport impacts.

Woking Site Allocations Development Plan Document - Publication Version

- 2.4 Woking Borough Council has now produced its Regulation 19 version of the Site Allocations Development Plan Document (WSADPD), published in November 2018. This represents the last opportunity for interested parties to comment on the DPD, prior to its submission to the Secretary of State for Examination.
- 2.5 The purpose of the WSADPD, 2018 is to allocate land for a range of uses to deliver the spatial vision, objectives and development requirements of the Woking Core Strategy 2012.
- 2.6 Officers have considered the document from a Surrey Heath perspective and have noted the following key points:
- Land at Martyrs Lane, Horsell, Woking is not included as an allocation site within the WSADPD. Therefore, Surrey Heath recognises that the concerns previously recorded in relation to this site during the 2017 consultation no longer need to be addressed.
 - The Woking Core Strategy Policy CS10 - Housing provision and distribution plans for 4,964 net additional homes in Woking

Borough between 2010 and 2027. Based on delivery against this figure to date, there is a requirement for 2,830 homes to be met over the remainder of the plan period to 2027. The WSADPD sets out that sufficient land has been identified to ensure the delivery of the residual 2,830 homes, plus additional land to compensate for non-implementation.

- Since the adoption of the Woking Core Strategy, a Strategic Housing Market Assessment for the West Surrey Housing Market Area (HMA) was produced in September 2015. The West Surrey HMA includes Woking, Guildford and Waverley Boroughs. This study concluded an objectively assessed need (OAN) for housing in the period 2013-2033 of 517 homes per year for Woking Borough. More recently, the Government has released a standardised method for calculating housing need which national planning policy and guidance now expect local authorities to use. By applying the standard method, the objectively assessed need figure for Woking is 409 homes per year. The WSADPD sets out that the Core Strategy figure of 4,964 new homes (292 per year) will be met over the Woking Core Strategy plan period through the allocated sites in the document.
- It is understood that Woking is working in partnership with neighbouring authorities in its established HMA to address its unmet housing need. The Government is currently consulting on updates to national planning policy and guidance (October to December 2018). The consultation material includes proposals to adjust the standard method for calculating housing need. It states that the Government will review the formula by the time the next housing projections are issued, with a view to establishing a new method that is consistent with Government's aspiration for 300,000 homes to be built per year in England by the mid 2020's. Surrey Heath Borough is geographically adjacent to the established West Surrey HMA. Surrey Heath is concerned that in the event Woking's housing need figure increases, the provision set out in the Woking Core Strategy and unmet need being met by neighbouring authorities in the West Surrey HMA may fall short of the updated housing need figure. If this situation arises it is expected that Woking should, in the first instance, take steps to meet needs within Woking Borough. Surrey Heath is concerned that housing needs for the West Surrey HMA are met by the authorities within their area.
- Surrey Heath advises that it is currently in the process of preparing a new Local Plan for the period 2016-2032, and using the current format of the Government's standard methodology, cannot demonstrate a supply of sites to fully meet its own housing needs within Surrey Heath Borough. Surrey Heath will therefore not be able to assist with meeting any additional unmet need arising from Woking.

- It is noted that Woking Borough Council undertook an internal review of the adopted Woking Core Strategy in October 2018 and this review concluded the Core Strategy continues to be in general conformity with the provisions of the NPPF and that modifications are not required. Surrey Heath raises concerns in relation to this approach. The WSADPD does not provide allocations that take full account of the floorspace requirements for the land use types such as retail, which are set out in the Woking Core Strategy. This indicates that it is necessary for Woking to prepare a revised Plan, so that land use needs can be reassessed through a fully up-to-date evidence base.
- The Woking Core Strategy sets out that provision will be made for the delivery of 93,600 sqm of retail floorspace over the plan period. Delivery of retail provision over the Core Strategy period 2010 to date has been 8,631sqm leaving a remainder of 84,969sqm retail floorspace still to be delivered by 2027. It is understood that the Victoria Square development in Woking town centre has been granted planning permission and will provide a further 10,967sqm retail floorspace.
- In addition to the allocations in the WSADPD, it is stated that other site opportunities exist in Woking town centre and localities throughout the Borough that will deliver additional development, including a range of retail uses over the coming years. This approach lacks certainty and provides no further information as to where, specifically, these opportunities may exist, and what they might be. Therefore, Surrey Heath raises concerns in respect of the lack of information that is provided in the WSADPD for where and how the retail floorspace specified is to be delivered in Woking Borough. In addition, Surrey Heath is also concerned about the impact of the proposed retail floorspace on other town centres, including Camberley, particularly in the context of changing retail dynamics. It is suggested the Woking ensure their figure for retail floorspace is informed by an up-to-date Retail Study that fully assesses the impacts of new retail floorspace on surrounding town centres. Where updated evidence base documents such as this are required, it is indicative that the internal review of the Core Strategy undertaken by Woking is unlikely to address current needs, and that modifications to the Core strategy are, in fact required.
- The provision of retail floorspace stated in the WSADPD could have significant impacts on infrastructure in neighbouring Boroughs to Woking, including Surrey Heath. In particular, impacts on major routes of the highways network between the Boroughs such as the A322, are a principal concern to Surrey Heath.
- Surrey Heath advises that future duty to cooperate discussions between the two authorities, including joint working to identify funding to implement measures of mitigation along the A320

corridor, should continue to the mutual benefit of both Surrey Heath and Woking Boroughs.

3. Options

3.1 The options for the Executive to consider are to:

(i) **AGREE** to the comments raised by officers as set out in the letter at Annex 1 and to submit them as the Council's formal response to the Woking Site Allocations Regulation 19 Publication Document.

(ii) **AGREE** to the comments raised by officers as set out in the letter at Annex 1 with any additional comments from Executive and to submit them as the Council's formal response to the Woking Site Allocations Regulation 19 Publication Document.

(iii) **NOT AGREE** the response to the Woking Site Allocations Regulation 19 Publication Document.

4. Proposals

4.1 It is proposed that members agree to send the letter of response at Annex 1 as Surrey Heath Borough Council's formal response to Woking Borough Council's Site Allocations Development Plan Document.

5. Supporting Information

5.1 The Woking Site Allocations Development Plan Document, October 2018.

6. Corporate Objectives and Key Priorities

6.1 Underpins the theme of *Place* set out in the Council's Five Year Strategy by monitoring the vision and spatial planning objectives of surrounding authorities and ensuring that Surrey Heath's interests are defended.

6.2 Responding to the publication version of the WSADPD will also enable Surrey Heath to maintain an active engagement with an adjoining Borough where there are matters of strategic importance between the Boroughs.

7. Policy Framework

7.1 The WSADPD which this Agenda Item responds to will, if it is found sound at examination, become adopted as part of Woking's portfolio of DPDs. Together, these DPDs constitute Woking's Local Plan. The Regulation 19 publication version of the WSADPD is the last

opportunity for interested parties to comment before the DPD is submitted to the Secretary of State.

8. Legal Issues

8.1 None arising

9. Governance Issues

9.1 None arising.

10. Sustainability

10.1 None arising.

11. Risk Management

11.1 The WSADPD contains site allocations policies that allocate land for future development or infrastructure. It also provides a strong indication that Woking will retain the Core Strategy and associated Development Plan Documents as its Local Plan for the foreseeable future. A neighbouring authority's Local Plan could have an effect on Surrey Heath interests. Reviewing and, where necessary, challenging the approach taken by Woking through providing a consultation response to the WSADPD reduces the risk of potential adverse impacts on Surrey Heath.

12. Equalities Impact

12.1 No matters arising

13. Human Rights

13.1 No matters arising.

14. Community Safety

14.1 No matters arising

15. Consultation

15.1 This Agenda item is a response to a consultation exercise by an adjoining local authority.

16. PR And Marketing

12.1 No matters arising.

Annexes	Annex 1: Letter of response to the Woking Site Allocations Development Plan document, October 2018
Background Papers	Woking Site Allocations Development Plan Document Regulation 19 publication version – http://www.woking2027.info/allocations
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Consultations, Implications and Issues Addressed

Resources	Required	Consulted
Revenue	✓	✓
Capital		
Human Resources		
Asset Management		
IT		
Other Issues	Required	Consulted
Corporate Objectives & Key Priorities	✓	✓
Policy Framework		
Legal	✓	✓
Governance		
Sustainability		
Risk Management		
Equalities Impact Assessment		
Community Safety		
Human Rights		
Consultation	✓	✓
P R & Marketing	✓	✓

Review Date:

Version: 1