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12 December 2018

Dear Sir/Madam,

Woking Site Allocations DPD Regulation 19 Publication Document

Thank you for consulting Surrey Heath Borough Council on the Woking Site Allocations Development Plan Document publication version. This letter is the Council's formal response.

Allocated Sites

In 2017, Woking Borough Council consulted on the possibility of substituting safeguarded sites in the earlier Regulation 18 draft Site Allocations DPD with a single site on land east of Martyrs Lane, to meet future development needs. Surrey Heath raised concerns regarding the impact this could have on residents and businesses in Surrey Heath Borough.

Surrey Heath notes that the site east of Martyrs Lane, Horsell, Woking is not included as an allocation in the Regulation 19 publication version of the Woking Site Allocations DPD (WSADPD). Therefore, the previous concerns outlined by Surrey Heath in the 2017 consultation need no longer be addressed in relation to this specific site.

Meeting Housing Need

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. This study concluded an objectively assessed need (OAN) for housing over 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 apply. It is our understanding that, using 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 period through the sites allocated 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. As you will no doubt be aware, 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 is geographically adjacent to the established West Surrey HMA and the Borough Council is concerned that in the event Woking's housing need figure increases, the provision set out in the Woking Core Strategy together with 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 established area.

Surrey Heath is currently in the process of preparing a new Local Plan for the period 2016-2032. Using the current format of the Government's standard methodology, the Council cannot demonstrate a supply of sites that fully meets 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.

Retail Provision and Impacts on Infrastructure

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. It is our understanding that the Victoria Square development in Woking town centre has been granted planning permission and will provide a further 10,967sqm retail floorspace. Surrey Heath now seeks clarification as to how Woking will secure the delivery of the residual 74,002sqm retail floorspace in the Borough over the remainder of the Core Strategy period to 2027.

In addition to the allocations in the WSADPD, the document states 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 concerning retail floorspace and the impact of the proposed retail floorspace on other town centres, including Camberley, particularly in the context of changing retail dynamics.

It is suggested that 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. If 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. Surrey Heath requests that Woking keep us updated on the delivery of any largescale retail proposals, and expects to Woking to work closely with Surrey Heath to address any potential future impacts on cross-boundary infrastructure.

Core Strategy Review

Surrey Heath notes that Woking Borough Council undertook an internal review of the adopted Woking Core Strategy in October 2018 and this review concluded that the Core Strategy continues to be in general conformity with the provisions of the NPPF and modifications are not required. Having reviewed the WSADPD, Surrey Heath has concluded the document 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 may be appropriate for Woking to make revisions to the Core Strategy, so that land use needs can be reassessed through a fully up-to-date evidence base.

Duty to Cooperate

Future duty to cooperate discussions between the two authorities, including joint working to identify funding to implement the measures of mitigation along the A320 corridor, should continue to the mutual benefit of both Surrey Heath and Woking Boroughs.

Surrey Heath would welcome the opportunity, under Duty to Co-operate, to have further discussions with Woking in respect of the points raised in this letter of response.

Yours sincerely,

Planning Policy
Surrey Heath Borough Council