

COUNCIL – 18 OCTOBER 2018

## REVIEW OF WOKING CORE STRATEGY

### Executive Summary

As a consequence of an amendment to Town and Country (Local Planning) (England) Regulations 2012 brought about this year, a local planning authority is now required to review a local development document within the following time periods:

- (a) in respect of a local plan, the review must be completed every five years, starting from the date of the adoption of the local plan, in accordance with Section 23 of the Act (adoption of local development documents); and
- (b) in respect of a Statement of Community Involvement, the review must be completed every five years, starting from the date of adoption of the Statement on Community Involvement, in accordance with Section 23 of the Act.

The 2017 Regulations were published in December 2017 and came into force on 6 April 2018.

Paragraph 33 of the National Planning Policy Framework (NPPF) clarifies this further by emphasising that policies in local and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. The review should be completed no later than five years from the adoption date of the plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly, and they are likely to require earlier review if local housing need is expected to change significantly in the near future.

The Woking Core Strategy was adopted in October 2012. It is nearly six years old. It therefore has to be reviewed to satisfy the above requirements, and to determine whether a modification might be necessary. If Members felt that a modification is required, a programme to do so would be prepared and reflected in the Council's Local Development Scheme (LDS).

There is no detailed Government guidance on what the five yearly local plan reviews should cover or the process for undertaken the review. Similarly, there are no other authorities that Officers are aware of who have undertaken the review to provide example. Officers have therefore sought clarification from the Ministry of Housing, Communities and Local Government (MHCLG), which has confirmed that there is a clear distinction between 'review' and 'modification' and what the Regulation requires first and foremost, is a review of the Local Plan to determine whether a modification might be necessary. Given that the Woking Core strategy is over five years old, MHCLG has advised that the Council must undertake a review to assess whether modifications to the plan would be necessary. MHCLG expects the Council to publish the outcome of the review on its website. If the review were to lead to modifications, MHCLG expects a programme for the preparation of the revised Plan to be prepared and for it to be reflected in the Local Development Scheme. The outcome of the review does not require the approval of MHCLG to be published on the website.

Officers have undertaken the review of the Woking Core Strategy and have concluded that there is no immediate need to modify it either in part or as a whole. Consequently, the Core Strategy continues to be considered up to date to provide the necessary strategic policy framework for managing development across the Borough. The reasons for arriving at this conclusion are set out in the review. Full details are attached in Appendix 1. Once approved, the details of the review will be published on the Council's website.

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## Review of Woking Core Strategy

The latest Statement of Community Involvement (SCI) was approved by Council on 12 February 2015. Its review is therefore not due until 2020.

### **Recommendations**

The Council is requested to:

#### **RESOLVE That**

- (i) the review of the Woking Core Strategy included in Appendix 1 be approved;
- (ii) the Woking Core Strategy continue to be up to date for the purposes of managing development across the Borough;
- (iii) the details of the review be published on the Council's website as soon as it is reasonable to do so after Council's approval;
- (iv) authority be delegated to the Deputy Chief Executive, in consultation with the Portfolio Holder for Planning, to approve any minor changes to the review to reflect new information, including any national guidance before it is published.

The Council has the authority to determine the recommendation(s) set out above.

**Background Papers:** Statement of Community Involvement (February 2015)  
Woking Core Strategy  
Town and Country Planning (Local Planning) (England) (Amendment) regulations 2017

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## 1.0 Implications

### Financial

- 1.1 No additional financial implications.

### Human Resource/Training and Development

- 1.2 No additional human resource, training and development implications.

### Community Safety

- 1.3 There are no community safety implications.

### Risk Management

- 1.4 It is a statutory requirement for local plans to be reviewed every five years. Given that the Woking Core Strategy is nearly six years old, it will need to be reviewed to comply with Government Regulations.

### Sustainability

- 1.5 There are no specific sustainability impacts associated with reviewing the Core Strategy. A Sustainability Appraisal was carried out to inform the preparation of the Core Strategy. It concluded that overall, the Core Strategy would contribute towards the sustainable development of the Borough.

### Equalities

- 1.6 There are no specific equality impacts associated with the review of the Woking Core Strategy.

### Safeguarding

- 1.7 There are no safeguarding implications for reviewing the Core Strategy.

## 2.0 Conclusions

- 2.1 The Council has to review the Woking Core Strategy to satisfy the requirements of the Regulations and the NPPF. The review covers an assessment of how the Core Strategy is delivering against its intended objectives and the Council's key priorities. The extent to which the Core Strategy is also in general conformity with the revised NFFP has also been assessed. Whilst there is no clear Government guidance on what the five yearly review of a local plan should contain, Officer consider this review to be robust and sufficiently comprehensive in assessing the performance of the Core Strategy against its objectives and the requirements it needs to satisfy. Overall, Officers' have concluded that there is no need for the immediate modification of the Woking Core Strategy. The Council should rather continue to focus on its comprehensive delivery without delay.

REPORT ENDS



## Review of the Woking Core Strategy

### Introduction

The following review provides statements on:

- How the Core Strategy is delivering the key aims of Woking 2050.
- How the Core Strategy is delivering the key priorities of the Council.
- How the Core Strategy is in general conformity with national and regional planning policy.
- Whether current evidence since the adoption of the Core Strategy and/or the monitoring of the performance of the policies of the Core Strategy justifies its immediate modification either in part or as a whole.
- Whether or not there should an immediate modification of the Core Strategy.

The Woking Core Strategy was adopted in October 2012. Planning law requires that the national planning policy framework must be taken into account in the preparation of Local Plans and must reflect and where appropriate promote relevant European Union obligations and statutory requirements. The policies of the Core Strategy were assessed against the requirements of the previous NPPF by the Inspector of the Secretary of State at the Core Strategy Examination, and subject to a few proposed modifications, the Inspector found the Core Strategy to be in general conformity with the NPPF. Since the adoption of the Core Strategy, the Government has published a revised NPPF (July 2018). This review assesses how the policies of the Woking Core strategy are in general conformity with the revised NPPF. The following are some of the key requirements of the revised NPPF:

- A standard methodology for calculating housing need;
- Design is given a renewed centrality in development proposals;
- There is a front loading of viability assessment at the plan making stage. The onus is on the applicant to justify whether there is a need for a viability assessment at the development management stage, and it is up to the decision making authority to decide the weight to be given to that, taken into account all other factors;
- A new framework for plan making – strategic and non-strategic plans;
- Expectation for at least 10% of housing requirement to be accommodated on small sites (up to 1 hectare);
- Diversification of Town Centre to ensure its vitality with a strong town centre first policy. Sequential test for town centre uses;
- Introduction of a housing delivery test;
- Continuing protection of the Green Belt – before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy making authority should be able to demonstrate that it has examined fully all reasonable options for meeting its identified need for development;
- Recognition of social rent.

The Core Strategy also has a clear purpose to address issues and challenges of the local area, and its performance is measured on how well it is delivering on this objective. The Council publishes an Annual Monitoring Report (AMR) by 31 December of each year, which sets out how the policies of the Core Strategy are delivering their intended objectives.

As a consequence of an amendment to Town and Country (Local Planning) (England) Regulations 2012 brought about this year, a local planning authority is now required to review a local development document within the following time periods:

- (a) In respect of a local plan, the review must be completed every five years, starting from the date of the adoption of the local plan, in accordance with section 23 of the Act (adoption of local development documents);
- (b) In respect of a statement of community involvement, the review must be completed every five years, starting from the date of adoption of the statement of community involvement, in accordance with section 23 of the Act.

The Regulations were published in December 2017 and came into force on 6 April 2018.

The requirement to review local plans every five years is also emphasised in paragraph 33 of the NPPF. Officers have sought clarification from the Ministry of Housing, Communities and Local Government (MHCLG), who has confirmed that there is a clear distinction between 'review' and 'modification' and what the Regulation requires first and foremost, is a review of the Local Plan to determine whether a modification might be necessary. This is reiterated in the Planning Practice Guidance. Given that the Core Strategy is just over five years old, MHCLG has confirmed that the Council must undertake a review to assess whether modifications to the plan would be necessary. MHCLG expects the Council to publish the outcome of the review on its website. If the review were to lead to modifications, MHCLG expects a programme for the preparation of the revised Plan to be prepared and for it to be reflected in the Local Development Scheme. The outcome of the review does not require the approval of MHCLG to be published on the website.

The Council has committed to prepare three development plan documents – the Core Strategy, the Development Management Policies Development Plan Document (DPD) and the Site Allocations DPD. The Development Management Policies DPD was adopted in October 2016. In this regard, its review is not due until 2021. The preparation of the Site Allocations DPD is on-going. A draft has been published for Regulation 18 consultation, and the Council is yet to consider representations received during the consultation. The Site Allocations DPD will have an in-build mechanism for its own monitoring and review in accordance with the Regulations and the NPPF.

**The Core Strategy** is the key development plan document that sets out the strategic policy context for managing land use in the Borough. It includes:

- A spatial vision of how Woking Borough will develop to 2027;
- The strategic objectives for the Borough which focuses on the key issues and challenges facing the area;
- A delivery strategy for achieving the objectives – in particular, how much development is expected to happen where and by what means;
- Clear arrangement for monitoring and delivery of the policies requirements.

The Core Strategy was adopted on 25 October 2012. It is therefore over 5 years old. A review must be carried out to satisfy the requirements of the amended Regulation. Section 19 of the Planning and Compulsory Purchase Act 2004 requires the local planning authority to have regard to national policies and advice contained in guidance issued by the Secretary of State when preparing local development documents. Table 1 is an assessment of the conformity of the Core Strategy with national planning policy, taking into account ministerial statements and other guidance notes. It is important to highlight that the prevailing environmental constraints of the area has not changed since the adoption of the Core Strategy. The issues and challenges facing the area also remains broadly similar to what

prevailed at the time the Core Strategy was adopted. These factors amongst others provide the context for the review.

**The Statement of Community Involvement** (SCI) sets out how and when the Council will involve the community and other interested stakeholders and organisations in the preparation of its planning policy documents, and also in consideration of planning applications. The latest SCI was approved by the Council on 12 February 2015. Its review is therefore not due until 2020.

## How the Core Strategy will help deliver the key aims of 2050

Woking Borough Council adopted Woking 2050 in September 2015. Woking 2050 aims to achieve the Council's overall vision of 'towards tomorrow today' by:

- Maintaining a high quality natural environment where resources are used wisely and biodiversity is conserved;
- Creating a high quality built environment which meets local needs, and enables an enterprising culture to flourish and the local economy to prosper; and
- Providing, in collaboration with partners, the physical and electronic infrastructure to enable efficient and integrated travel and to support high quality electronic services.

The vision, objectives and policies of the Core Strategy are aligned to deliver the aims of Woking 2050. Specifically, the Core Strategy will help deliver the following:

- It provides a robust policy framework, including policies CS7 (Biodiversity and nature conservation), CS8 (Thames Basin Heaths Special Protection Areas) to help conserve and enhance the biodiversity of the area. The policies will prevent the loss of existing biodiversity assets of the area.
- It provides robust policies for sustainable economic growth. Policies CS2 (Woking Town centre), CS3 (West Byfleet District Centre) and CS15 (Sustainable economic development) promotes strong economic growth at sustainable locations. In particular, by focusing development on previously developed land at the Town, District and Local Centres which are in close proximity to key services and facilities there is significant scope to minimise the need to travel by the car. This will have positive impacts on climate change.
- It provides opportunities for the regeneration of the Priority Places. For example, there is an extant planning approval for the regeneration of a significant part of Sheerwater.
- Policy CS9 (Flooding and water management) directs development away from areas at risk of flooding. The application of the policy takes into account the effects of climate change.
- The Core Strategy ensures that the Council works with its partners to deliver the necessary infrastructure to support development. In particular, Policy CS16 (Infrastructure delivery) and Section 6 of the Core Strategy ensures that infrastructure delivery is aligned to support development. The Core Strategy ensures that development makes appropriate developer contributions to enable the delivery of infrastructure to support development. An Infrastructure Delivery Plan has been prepared to quantify the nature, scale and sources of funding for the necessary infrastructure to support development.
- Transport and accessibility policy (CS18) seeks to link people to jobs and community facilities in a sustainable manner, in particular, by walking and cycling. The policy directs development to the main centres served by a range of sustainable modes to minimise distance travelled and the need to travel by car. The role of public transport is particularly emphasised. The policy seeks to manage parking provision in a sustainable manner. These will help improve the environmental quality of the area.
- Housing policies (Policies CS10 – CS13) seeks to ensure that there are sufficient homes built in sustainable locations that people can afford and which meet the needs of the various sections of the community. For example, Policy CS12: (Affordable Housing) sets the overall target for affordable housing provision at 35% of all new homes. This will help in this area where house prices are relatively higher than the national average.

- Policy CS22 (Sustainable Construction) and CS23 (Renewable and low carbon energy generation) ensures that development impacts on climate change is minimised. It sets strong targets for the efficient use of water and energy and promotes the development of standalone renewable energy schemes where it is appropriate.
- There are a range of other policies in the Core Strategy that supports the creation of 'place' where people would wish to live, work and visit. For example, policies CS17 and CS19 specifically aim to improve the well being of the residents of the borough. The purpose of policy CS17: (Open space, green infrastructure, sport and recreation), is to provide opportunity for people to participate and enjoy sports and recreation and to facilitate effective access to the countryside and the amenity it offers. Policy CS19: (Social and community infrastructure) aims to promote the use of social and community infrastructure and ensures adequate provision of new facilities to accommodate growth in the local population.

## How the Core Strategy is helping to deliver the key priorities of the Council

Woking Borough Council has the following key priorities:

- decent and affordable housing;
- the environment;
- health and well-being; and
- economic development.

The Core Strategy provides a strong policy framework for delivering the above. It makes provision for the delivery of 4964 net additional dwellings of which 35% of the overall housing provision is expected to be affordable housing. It ensures that the provision of housing reflects the nature, type and sizes of housing needed in the area. It supports specialist housing for older people and vulnerable groups. It makes sure that the accommodation needs of Travellers are met. An Economic Viability Assessment has been carried out to ensure that the affordable housing targets do not prevent general market housing from coming forward for development. The Council regularly monitors how the above priorities are being achieved and report the outcomes in its Annual Monitoring Report. This is published by 31 December of each year. To date, overall housing delivery has broadly been in line with the housing requirement. For example, average housing delivery since 2012 when the Core Strategy was adopted is about 302 dwellings per year.

The Core Strategy also ensures that there is an appropriate quantity and range of employment land in the Borough to enable the local economy to function efficiently and enhance its competitiveness. It enhances the economic vitality of the main centres of the Borough and protects existing employment sites to alternative uses. It allows flexibility where justified for employment land with no prospect of being used as a going concern to be re-used for alternative purpose. Significant improvements to the infrastructure and the general environment of the Town centre continue to be made to facilitate its growth and vitality.

There are strong policies to conserve and enhance the biodiversity of the area and protect existing ones. It makes sure that the overall integrity of the Green Belt is protected. There are robust policies to protect the general townscape and landscape of the area to enhance its distinctiveness. The Core Strategy also sets high standards for carbon reduction and efficient use of energy, which will have positive effects on climate change.

There are a range of policies on housing, open space provision, provision of green infrastructure, provision of social and community facilities which will combine to have significantly positive impacts on the well-being of local residents. A Sustainability Appraisal of the Core Strategy concluded that overall, the Core Strategy will improve the well-being of the community. The Core Strategy is therefore fundamental to the delivery of the Council's key priorities.

### **A statement of conformity of the Core Strategy with regional and national planning policy**

There is only one relevant Saved Policy of the South East Plan – Policy NRM6: (Thames Basin Heaths Special Protection Area). Policy CS8: (Thames Basin Heaths Special Protection Areas) of the Core Strategy helps to deliver all aspects of the Saved policy of the South East Plan. The Council is able to identify sufficient SANG land to provide appropriate mitigation of development impacts on the SPAs. The Council also seek contribution towards Strategic Access Management and Monitoring of the SPAs.

Table 1 is a schedule of how the Core Strategy conforms to the key elements of the National Planning Policy Framework.

## **Evidence base studies**

The NPPF requires the preparation and review of local plans to be based on proportionate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, taken into account market signals. In particular, the NPPF requires local plans to be informed by local housing needs assessment conducted using the standard method in national planning guidance and to carry out a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

The Core Strategy was informed by the 2009 Strategic Housing Market Assessment (SHMA) and the 2011 SHLAA respectively, and other evidence base such as Transport Assessment, Sustainability Appraisal and Habitats Regulations Assessment. At the time, the SHMA identified an objectively assessed housing need of 594 dwellings per year. The Secretary of State accepted that given the constraints of the area and the available evidence, a housing requirement of 292 dwellings per year is appropriate. Sufficient land was identified in the 2011 SHLAA to enable the delivery of about 13 years supply of housing against the housing requirement. The Core Strategy identifies the Green Belt and the Town Centre as future direction of growth to identify sufficient land to meet housing need between 2022 and 2027. Land is to be released from the Green Belt to enable the delivery of at least 550 dwellings between 2022 and 2027. The SHMA was reviewed in 2015 to bring it up to date. The SHLAA was reviewed in 2014 and is presently being reviewed. The latest SHMA identifies an objectively assessed housing need of 517 dwellings per year, significantly less than the need identified in 2009 SHMA. By applying the standard method required by the NPPF, the objectively assessed need comes down further to 409 dwellings per year. There is a clear downward trend of the objectively assessed housing need. The 2016 Sub National Population Projections have been published. The 2016 Household Projections have now been published (September 2018). The implications of these on the objectively assessed housing need is being worked out, but the initial indications are that the objectively assessed housing need would come down to about 266 dwellings per year. Adding a 5% buffer to this figure will take the need to about 279 dwellings per year.

The Council has reviewed its SHLAA and has also carried out a Green Belt boundary review. These are informing the preparation of the Site Allocations DPD which will allocate land to enable the comprehensive delivery of the Core Strategy. A draft Site Allocations DPD has been published for Regulation 18 consultation, and there is evidence to demonstrate that sufficient land can be allocated to enable the comprehensive delivery of the Core Strategy over the entire plan period. Land is also being safeguarded to meet future development needs. It is acknowledged that there is an unmet need of about 225 dwellings per year arising from Woking Borough which the Council is working in partnership with neighbouring authorities to address within the housing market area. By using the standard method, the unmet need is likely to be 117 dwellings per year.

Section 5 and paragraphs 24 – 27 of the NPPF require local planning authorities to use their evidence base to ensure that their local plan meets as a minimum their objectively assessed housing needs taken into account the unmet needs of neighbouring areas, as far as is consistent with the policies set out in the NPPF. Under these requirements, joint working should enable local authorities to work together to meet development requirements which cannot wholly be met within their own areas. Waverley Borough Council has recently adopted its Local Plan (February 2018). In accordance with the NPPF, the Waverley Local Plan has committed to meet about 50% of Woking's unmet housing need. This is equivalent to about 83 dwellings per year throughout the life of their local plan. The Guildford Borough Local Plan has just been through a Local Plan Examination (July 2018). The Inspector's Report is yet to be published. In the meantime, the Inspector had indicated during the

hearing that the Guildford Local Plan should be able to meet about 20% of Woking's unmet need.

Average housing delivery across the borough since 2006/07 to date is broadly in line to the 292 dwellings per year housing requirement. Taking into account the period of recession, over the 11 year period there is an under supply of just about 74 dwellings when cumulative completions are considered since 2006. The relatively small under supply figure masks recent trend in housing provision. In 2015/16, 360 dwellings were delivered. In 2016/17, 399 dwellings were delivered. It is therefore reasonable to assume that at least the 292 average housing requirement will be delivered during the plan period. This will be monitored, and where necessary appropriate measures will be taken to ensure the delivery of the requirement. Average housing completions since 2012 when the Core strategy was adopted is about 302 dwellings per year, which is above the 292 annual housing requirement.

### **Five year housing land supply position statement (2017)**

The Council has published its five year housing land supply position statement. It identifies sufficient land to enable the delivery of 7.7 years of housing against the housing requirement. This is over and above the national requirement to identify five years supply of housing land. Combined with the evidence provided in the SHLAA and the proposals in the draft Site Allocations DPD, there is robust evidence to demonstrate that sufficient land have been identified to enable housing delivery over the entire Core Strategy period and enough deliverable sites for at least the next five years.

### **Sustainability Appraisal Report of the Woking Core Strategy**

Paragraph 32 of the NPPF requires local plans and spatial development strategies to be informed by a Sustainability Appraisal that meets the relevant legal requirements. The SA of the Core Strategy assessed various options for housing provision. In particular, three options for housing provision were appraised to assess their impacts using the SA Framework. The options were the provision 292 dwellings per year, 499 Affordable Housing dwellings per year and 594 dwellings per year. The SA Report concluded that the damage that housing delivery of 499 Affordable homes or 594 dwellings will cause to the environment will far outweigh any benefits that they will bring to the borough. The Secretary of State agreed that the SA Report was robust evidence to justify the 292 dwellings per year housing requirement for the Core Strategy. Given that the SA Framework continues to be relevant and the constraints of the area have not change since the adoption of the Core Strategy, the 292 housing requirement should continue to apply during the plan period and the focus should be towards its delivery. Further analysis regarding housing land supply including evidence of the Green Belt boundary review report is provided below to support this conclusion. The Council has reviewed a number of its evidence base studies and none justifies a significant change in the main conclusions of the SA.

### **Other evidence base**

There is proportionate, appropriate and robust evidence to support the Site Allocations DPD and to demonstrate that the Core Strategy can comprehensively be delivered. This includes up to date transport assessments and transport mitigation studies, Green Belt boundary review to ensure that land released from the Green Belt does not undermine its purposes and integrity, a revised Employment Topic Paper and an emerging revised Infrastructure Delivery Plan. An SA of the Site Allocations DPD and a Habitats Regulations Assessment has also been carried out. A full list of the evidence base studies is in Appendix 1 of the Site Allocations DPD. There is nothing presented by way of the available evidence to require an immediate modification of the Core Strategy or to demonstrate that the housing requirement can be increased to meet the objectively assessed need without damage to the environment.

## **Annual Monitoring Report and performance of the policies of the Core Strategy**

Each year, the Council assesses progress on how well the policies of the Core Strategy are performing against their anticipated objectives. The outcome is published in an Annual Monitoring Report by 31 December of each year. The latest AMR was published in December 2017. Taking as a whole, the policies of the Core Strategy are broadly performing well against their objectives. The Core Strategy builds in sufficient flexibility for its application to be tailored to individual merits of proposals to respond to changing circumstances and market signals if they can be justified by evidence. It is not intended to analysis in detail the performance of each policy of the Core Strategy. The AMR provides this information in detail and the link to the various AMRs is provided below.

<http://www.woking2027.info/developmentplan/corestrategy/annualmonitoringreport>.

The following key headline information is however highlighted:

- Housing completions are broadly in line with the 292 annual average housing requirement;
- Without housing delivery at Moor Lane and Brookwood Farm, most new development continues to be focused on previously development land in the main urban areas in accordance with the spatial strategy of the Core Strategy.
- The Town Centre continues to be the main focus of new development.
- Significant progress has been made towards the regeneration of the Priority Places.
- During the last monitoring year, there was no net additional dwelling within the Green Belt.
- Design of development continues to improve, and there is an adopted Design SPD to ensure a continuous trend.
- The Council has identified over five years supply of housing land.
- Sufficient land has been identified in the draft Site Allocations DPD to ensure economic growth. The vitality of the Town Centre is significantly enhanced.
- There is a clear action to maximise the efficient use of land, in particular, at the Town Centre through high density developments.
- There has been a loss of commercial floorspace due to changes to permitted development rights. This continues to be monitored. The Council will take action to retain employment land if there is evidence that this will undermine the economic growth of the area.
- Effective measures have been taken to protect the environment, such as the SPA. For example, sufficient SANG land has been identified to mitigate development impacts on the SPAs
- There is currently only one heritage asset on the 'heritage at risk' register.

The policies of the Core Strategy are performing well in achieving their objectives. There is nothing to justify an immediate modification of the Core Strategy.

## **Estimate of future housing land supply – why the Council should continue to enable the delivery of an annual average of 292 dwellings**

Paragraph 22 of the NPPF emphasises that strategic policies should look ahead over a minimum of 15 years, take account of longer term requirements, and be kept up to date. It is clear from this that the intention of the five yearly reviews of plans is not to continually

change the fundamental strategic decisions of the plan such as alterations to the Green Belt boundary. The need to plan strategically for the long term is at the core of the plan-led approach encouraged by the planning system. This is fundamental to providing the certainty which developers and the general public needs regarding investment decisions and a clear sense of what to expect in local neighbourhoods. Also, the fact a Plan is five years old does not automatically make it out of date.

The Council has carried out a Strategic Housing Land Availability Assessment and a comprehensive Green Belt boundary review to inform its future housing land supply. Based on the evidence, there is clear understanding of the availability of land for development to meet development requirements of this Core Strategy and the next. If the Council is to embark on a preparation of a new Core Strategy with the view to modify the housing requirement, it is estimated that the earliest it could be adopted would be 2020/21. This is based on the experience of plan preparation so far by the Council and that of other authorities. Given the requirement to plan for a minimum of 15 years from adoption of the plan, it is estimated that a revised Core Strategy will have a plan period up to 2035/36, and sufficient land has to be identified to meet development needs over that period. In the 15 year period, based on the available evidence, it is estimated that land can be identified within both the urban area and the Green Belt to enable the delivery of about 4,500 dwellings. This figure includes all the potential sites identified in the Green Belt to enable housing delivery up to 2040 (including the sites identified to be safeguarded in the draft Site Allocations DPD that was published for Regulation 18 consultation. The number of sites and the above figure could change when the Council considers the representations received during the Regulation 18 consultation and the consultation on the land east of Martyrs Lane. The figure is therefore based on a best case scenario). This figure also assumes that the Council will continue with its current approach to high density developments at the Town Centre. If the current approach to densification could not be sustained, an allowance would have to be made to meet employment needs. In that regard, it would be unlikely that the Council will even be able to meet its 292 housing requirement in the next plan period as demonstrated below. It is also important to highlight that the 4,500 figure includes an allowance for development on the back of windfall sites. No allowance has been made for non-implementation. The following options have assessed against the identified housing land supply.

- If the Council is to continue with the 292 per year housing requirement, over the 15 year period it will need to identify land to enable the delivery of 4,380 dwellings.
- If the Council is to plan to meet its full objectively assessed housing need of 517 dwellings per year, it will need to identify sufficient land to enable the delivery of 7,755 dwellings.
- If the Council is to plan to meet future housing growth based on the Government's proposed standard methodology for calculating objectively assessed housing need, it will have to identify land to enable the delivery of 6,135 dwellings (409 x 15).

Given the above analysis on potential housing land supply, it is clear that the most likely and realistic option for future housing requirement in a revised Core Strategy that could be justified within the constraints of the borough would be to continue with the 292 housing requirement. This assumes that the Council will continue to maximise the efficient use of land, in particular, in the Town centre. No purpose would therefore be served by undertaking an immediate modification of the Core Strategy with the hope that the Council would be able to meet its objectively assessed housing need and/or set a higher housing requirement. The new plan is likely to lead to the same housing requirement. Consequently, any such attempt to modify the Core Strategy would be an unnecessary delay to the preparation of the Site Allocations DPD and a significant delay to housing delivery. It could lead to speculative development, uncertainty and could be counter-productive to the Government's overall

objective of boosting housing delivery. Woking has carried out a comprehensive Green Belt boundary review. It is evidenced that no more land could be identified without significant damage to the integrity of the Green Belt. Paragraph 3.5.22 of the Green Belt boundary review report states ‘we do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development’. It will be a misconception that a further Green Belt boundary review could be undertaken to identify more land without significantly undermining the overall purposes and integrity of the Green Belt.

Paragraph 65 of the NPPF requires local authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the plan period. It is clear from the above analysis and the evidence that the 292 annual housing requirement is the most realistic that can be achieved within the constraints of the environment without significant damage to the character and environmental assets of the borough. Meeting this requirement strikes a good and a delicate balance between the need to boost housing growth whilst at the same time protecting the environment from significant damage.

**Table 1: A statement of conformity of the Woking Core Strategy with national planning policy (NPPF)**

Policy	Summary and purpose of policy	Conformity with national planning policy	Recommendation
CS1: A spatial strategy for Woking Borough	The policy sets out the overall scale of development to be provided between 2010 and 2027, the broad distribution of the development and how the built and natural environment will be broadly managed. It directs most new development to previously developed land in town, district and local centres. The policy seeks to protect the heritage assets of the area. The policy identifies the town centre as a transport and an economic hub which will undergo significant change. The policy encourages growth in the District, Local and Neighbourhood Centres according to their hierarchy and function. The policy identifies the ward of Maybury and Sheerwater and Lakeview Estate of Goldsworth Park as Priory Places for specific actions to address pockets of deprivation in the areas. It identifies the Green Belt and Woking Town centre as broad locations for future development between 2022 and 2027. It emphasises the need for high quality design. It commits the Council to the comprehensive delivery of all elements of the Core Strategy and the infrastructure requirements to support it.	Policy in general conformity with the NPPF, in particular, building a strong and competitive economy (para 80 - 82), ensuring the vitality of the main centres (para 80 - 82) and promoting good design (Section 12 of NPPF). Policy is in line with paragraph 117 - 121 regarding making effective use of land, including, use of brownfield land. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. Policy also promotes appropriate densities for development. An example is the density of development being promoted at the Town centre.	No modification is required to the policy.
CS2: Woking Town Centre	The policy sets out the scale and type of development at the Town Centre and identifies the Town centre as the preferred location for town centre uses. Town centre uses are acceptable in principle subject to clear	Policy is in general conformity with Section 7 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues, in particular, it will help enhance the vitality of the Town	No modification is required to the policy.

	requirements of the policy.	centre.	
CS3: West Byfleet District Centre	The Policy sets out the type and indicative amount of development to be accommodated in West Byfleet District Centre and when they are expected to come forward. It safeguards existing community and social facilities as well as existing office floorspace.	Policy is in general conformity with Section 7 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues, in particular, it will help enhance the vitality of the District Centre.	No modification is required to the policy.
CS4: Local and Neighbourhood Centres and shopping parades	Policy seeks to retain town centre uses wherever viable in order to meet day to day needs of the local community. It provides guidance on circumstances where changes of use will be acceptable. It sets out the scale of development to be accommodated at the centres.	Policy is in general conformity with Section 7 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. It will help to provide day to day facilities and service for local communities.	No modification is required to the policy.
CS5: Priority Places	The policy designates the ward of Maybury and Sheerwater and the Lakeview Estate of Goldsworth Park as Priority Places to target resources to improve housing, employment, retail, accessibility and infrastructure.	Policy is in general conformity with para 93 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. It will help address pockets of deprivation in the Ward. Planning application has been approved for the regeneration of parts of Sheerwater, which is a Priority Place identified for regeneration.	No modification is required to the policy.
CS6: Green Belt	Policy protects the Green Belt from inappropriate development. It identifies Broadoaks and the Thames Water Sewage Treatment Works as Major Developed Sites in the Green Belt to allow limited infilling and redevelopment of the sites, without compromising the integrity of the Green Belt. It identifies the Green Belt as potential future direction of growth to meet housing need	Policy is in general conformity with paragraphs 133 – 142 of the NPPF. The concept of Major Developed Sites in the Green Belt is a local designation defined in the Glossary of the Core Strategy and continues to serve a useful purpose. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues, in particular, by offering appropriate protection to the	No modification is required to the policy.

	<p>between 2022 and 2027. A Green Belt boundary review is to be carried out to make sure that any land that is released from the Green Belt does not compromise its overall purposes. Green Belt land will only be released for development only after development needs cannot be met within the urban area.</p>	<p>purposes and integrity of the Green Belt.</p>	
CS7: Biodiversity and nature conservation	<p>Policy seeks to protect the biodiversity assets of the Borough and encourages development to make a positive contribution to biodiversity.</p>	<p>Policy continues to be current and is in line with Section 15 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. It helps to deliver the objectives of Woking 2050 and enhances the biodiversity assets of the area.</p>	<p>No modification is required to the policy.</p>
CS8: Thames Basin Heaths Special Protection Areas	<p>The policy provides the necessary framework to avoid harm to the Thames Basin Heaths Special Protection Areas. The SPA is a designation of European significance.</p>	<p>The policy delivers the requirements of EC Habitats Directive and the Conservation of Habitats and Species Regulations. It is also in line with Section 15 of the NPPF. Wording of Policy has been agreed with Natural England and is in general conformity with the Saved policy of the South East Plan (Policy NRM6). Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. It offers appropriate protection to birds of European significance.</p>	<p>No modification is required to the policy.</p>
CS9: Flooding and water management	<p>Policy seeks to ensure that development is not at risk of flooding or exacerbate flooding elsewhere.</p>	<p>Policy had been agreed with Environment Agency and continues to be current. The Council has updated its Strategic Flood Risk Assessment to make sure there is up to date evidence to inform decision making. It is in general conformity with paragraph 155 - 165 of the NPPF. Policy continues to perform a useful</p>	<p>No modification is required to the policy.</p>

		function in delivering the requirements of the NPPF and addressing local issues. Policy will help to minimise development impacts on flood risk.	
CS10: Housing provision and distribution	Policy sets out the overall quantum of residential development in the Borough and how it will be broadly distributed. It also provides indicative density of housing development at various parts of the Borough. It provides guidance on residential development in Mayford Settlement Area.	The policy sets out a clear housing requirement for the Borough to 2027 in line with Section 5 of the NPPF. It is recognised that the housing requirement is lower than the objectively assessed housing need, but that takes into account the prevailing constraints of the area, including the fact that the urban area is tightly surrounded by the Green Belt. It is a statement of fact that the Core Strategy housing requirement is significantly lower than the objectively assessed housing need. The Secretary of State agreed the housing requirement having taken into account the constraints of the area. The constraints have not changed. The expectation of the NPPF is for local authorities to plan to meet the full objectively assessed housing need. However, the NPPF allows scope for unmet need arising from an authority to be met in the neighbouring area. Woking, Guildford and Waverley Borough Councils forms the same Housing Market Area. Woking has a housing requirement of 292 dwellings per year against an objectively assessed housing need of 517. Using the standard method to calculate the need it comes down to 409 dwellings per year. Waverley Borough Council has adopted its Local Plan (February 2018) and it plans to meet 50% of Woking's unmet need. This is equivalent to 83 dwellings per year. Guildford Borough Council's	No modification is required to the policy.

		<p>Local Plan has just been through an examination. The examination will determine whether they are able to meet any part of the residual unmet need arising from Woking. The Inspector has indicated that the Guildford Local Plan should be able to meet 20% of Woking's unmet need. This is subject to confirmation in the Inspector's final report. All the three authorities have agreed to monitor housing delivery to assess how they are performing against their needs and the needs within the housing market area. The Council has started the preparation of the Site Allocations DPD to identify sites to enable the delivery of the Core Strategy. A Green Belt boundary review has been carried out to identify potential sites that could be released from the Green Belt to meet future housing need from 2022 to 2027 and to seek to safeguard land to meet future development needs between 2027 and 2040. Based on the available evidence on existing constraints, including potential sites that could be released from the Green Belt for residential development, it is unlikely that the Council can identify sufficient land to deliver more than the 292 per year housing requirement in a revised local Plan. In this regard, it is important that the Core Strategy continue to provide the strategic policy context for the continuing preparation of the Site Allocations DPD to ensure its delivery. There will be no significant benefit to be gained by the immediate modification of the policy as the housing requirement is likely to remain the same in a revised Plan, and the other policies continue to play a useful role. If the Council were</p>	
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		<p>to review the Core Strategy, the realistic adoption date is estimated at 2020. Rebasing the Plan period from this date for a 15 year plan period will take the Plan to 2035. On the assumption that the Council will continue to make provision for 292 dwellings per year, it will be required to find additional land to deliver about 2,336 dwellings to cover the entire plan period up to 2035 (i.e. land to deliver housing between 2027 and 2035). This figure assumes that sufficient land had already been identified to meet need up to 2027. The most likely option to achieve the scale of provision will be to bring forward the proposed safeguarded sites and identify further brownfield land at the Town Centre. It will be unlikely for the Council to sustain a case for a reduced housing requirement below 292 in a revised Local Plan whilst at the same time proposing to safeguard land for the next plan period (in this case beyond 2035). Given the constraints of the area, it will be also difficult to find land to deliver any housing requirement higher than the current 292 per year. There are two other important matters of note. The previously developed land identified for housing provision is predominantly in operational employment use. There should be reasonable expectations of the timing of their delivery. Also, whilst the Council has committed to safeguard land to enable housing provision between 2027 and 2040, it has not identified land to meet employment needs during the same period. The assumption is that this will be met by redeveloping some of the existing employment land by intensifying their densities.</p>	
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		In this regard, reasonable assumptions will have to be made on previously developed land that could be used for housing. The review takes all the above into account and concludes that the Policy continues to be in general conformity with the relevant sections of the NPPF, in particular, Section 5 of the NPPF as envisaged by the Core Strategy examination Inspector. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues.	
CS11: Housing mix	The policy requires housing provision to reflect the nature, type and size of housing need.	Policy is in line with paragraph 61 of the NPPF and reflects type of need identified by local evidence. The Council has carried out a revised SHMA. The evidence broadly supports the requirements of the Policy. In any case, the policy allows scope for applications to be determined on their merits taking into account the character and density of the neighbourhood and market signals. The Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. Policy seeks to provide appropriate type of housing that is needed in the local area.	No modification is required to the policy.
CS12: Affordable Housing	Policy sets out the affordable housing requirements of development and the order of priority for their delivery.	Policy is in line with paragraphs 62 - 63 of the NPPF. Policy is justified by the viability evidence used to support the Core Strategy. The Council has adopted the Community Infrastructure Levy. The CIL levy has been set taking full account of the affordable housing requirements of the Core Strategy. The CIL viability evidence post dates the adoption of the Core Strategy. It justifies the affordable housing target and demonstrates that	No modification is required to the policy.

		<p>its provision should not undermine development viability. Further evidence of house price trends has been undertaken and this also justifies the affordable housing requirements. The Council is aware of the latest Government policy not to secure affordable housing from development of 10 dwellings or less (paragraph 63) other than in designated rural areas. The Council has for the time being decided to apply the Government policy. This threshold only applies to part of Policy CS12. Given that the policy continues to be justified by up-to-date evidence and there is significant unmet need for affordable house, the Council will continue to monitor the situation to determine in future whether any action is needed. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. The policy is vital in delivering affordable housing needed in the area.</p>	
CS13: Older people and vulnerable groups	The policy offers an in-principle support for the development of specialist accommodation for older people and vulnerable groups in suitable locations. It sets out the design requirements expected of such accommodation.	The Policy offers in-principle support for specialist accommodation in line with paragraph 61 of the NPPF. There is evidence of increasing number of older people who will continue to need specialist accommodation. In this regard, Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues.	No modification is required to the policy.
CS14: Gypsies, Travellers and Travelling Showpeople	Policy requires the Council to identify land through the Site Allocations DPD process to meet the accommodation needs of Travellers. It sets out criteria for determining planning applications. It protects existing authorised	The policy is broadly in line with national policy set out in <i>Planning Policy for Travellers</i> . The Council has identified a need for 19 pitches up to 2027. It has carried out a Green Belt boundary review to inform the selection of	No modification is required to the policy.

	sites from loss to alternative uses.	sustainable sites to meet the need. The Council is in the process of preparing the Site Allocations DPD to allocate land to meet the need. A draft of the Site Allocations DPD has been published for Regulation 18 consultation. Sufficient land has been identified to meet the entire need over the plan period. Policy also includes relevant criteria for determining planning applications. Policy continues to perform a useful function in delivering the requirements of national policy and addressing local issues.	
CS15: Sustainable economic development	Policy sets out how the Council will accommodate the predicted future growth in economic development. It safeguards land within the employment areas for employment uses.	Policy is in general conformity with Sections 6 and 7 of the NPPF. An Employment Topic Paper has been prepared to demonstrate that land can be identified to meet the employment needs of the area. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues.	No modification is required to the policy.
CS16: Infrastructure delivery	Policy requires the Council to work with other providers and developers to ensure that the infrastructure needed to support development is provided in a timely manner. It seeks to resist the loss of existing infrastructure services and facilities except where it can be justified.	Policy is in general conformity with paragraph 20 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. A key concern of local residents is making sure that infrastructure is provided to support development. The policy will assist in achieving that.	No modification is required to the policy.
CS17: Open space, green infrastructure, sport and	Policy requires development to contribute towards the provision of open space and green infrastructure. It protects the loss of existing open space as a result of development.	Policy is in general conformity with paragraphs 96 - 101 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. Policy will help enhance the social and	No modification is required to the policy.

recreation		environmental characteristics of the area.	
CS18: Transport and accessibility	Policy promotes a well integrated community connected by a sustainable transport system which connects people to jobs, services and community facilities and minimise impacts on biodiversity. It supports proposals that delivers transport improvements and increased accessibility to cycle, pedestrian and public transport networks and interchange facilities. It requires the Council to implement minimum parking standards for residential development and maximum standards for non-residential development.	Policy is in general conformity with Section 9 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. Policy will help minimise development impacts on congestion and pollution. Latest transport studies provide robust evidence to demonstrate that development impacts can be appropriately mitigated.	No modification is required to the policy.
CS19: Social and community infrastructure	Policy requires the Council to work with partners to provide accessible social and community infrastructure. It resists the loss of existing social and community facilities.	Policy is in general conformity with paragraph 20 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. A revised Infrastructure Delivery Plan (IDP) has been prepared to demonstrate that there can be sufficient provision to meet need.	No modification is required to the policy.
CS20: Heritage and conservation	Policy requires development to make positive contribution to the character, distinctiveness and significance of the historic environment, including heritage assets at risk through neglect, decay and other threats. It introduces a presumption against any development that will be harmful to a listed building.	Policy is in general conformity with Section 16 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. The Heritage of Woking Study lists the heritage assets in the area worth protecting. Policy will help to protect and/or enhance them.	No modification is required to the policy.
CS21: Design	Policy sets out clear criteria for development to meet to ensure good quality design.	Policy is in general conformity with section 12 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. The Council	No modification is required to the policy.

		<p>seeks to maximise the efficient use of land through high density development at suitable locations such as the Town Centre. This will only be sustainable and accepted by the community if it is of high quality design. Policy will help to achieve this goal.</p>	
CS22: Sustainable construction	<p>Policy requires new residential development to meet the energy and carbon dioxide and water components of the code for sustainable development at various time periods. It requirements non-residential development above specific threshold to meet BREEAM very good standards. Development should consider connecting to the existing CHP network where feasible. It promotes electric charging points. It requires development to consider the use of sustainable construction techniques that promotes the reuse and recycling of building materials. It encourages development to make biodiversity enhancements such as green roofs and bird and bat boxes.</p>	<p>The Policy has 4 key parts comprising: Code for Sustainable Construction, meeting BREEAM standards, promoting electric charging points, design and construction of new development and ecology and biodiversity. With the exception of the requirement to achieve the Code for Sustainable Construction, all the other aspects of the policy continue to be in general conformity with Section 14 of the NPPF. National policy on the Code for Sustainable Construction has changed since the adoption of the Core Strategy. It is no longer a requirement for development to achieve the Code for Sustainable Construction. New targets for water and energy efficiency have been set by Government to be achieved through Building Regulations. The Council has published guidance on the website to clarify the change in national policy. This will also be reflected in the Climate Change SPD. Policy CS22 has been written to be future proved by anticipating potential changes to national policy. The policy specifically requires development to meet the Code for Sustainable Construction <i>or any future national requirement</i>. In this regard, there is no immediate need to modify the policy in the light of the changes highlighted above. The policy already directs applicants and decision makers</p>	No modification is required to the policy.

		<p>to take into account latest Government policy. Also, the Government has indicated further changes in the future regarding matters such as allowable solutions, which it will be reasonable to wait to assess their policy implications before considering whether modification to the policy is necessary. Significant parts of the policy continue to be in general conformity with the NPPF. Where it is out of date, it is future proved to take into account future changes in national policy. Policy continues to serve a useful purpose.</p>	
CS23: Renewable and low carbon energy generation	Policy encourages the development of standalone renewable energy installations to be determined on a case by case based on their individual merits.	Policy is in general conformity with Section 14 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues.	No modification is required to the policy.
CS24: Woking's landscape and townscape	Policy requires development to provide positive benefits in terms of landscape and townscape character and local distinctiveness. It sets out key requirements for development to meet.	Policy is in general conformity with Section 12 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. The Council has carried out a character study to describe the distinctive characters of the various parts of the borough. The policy will ensure that development does not detract from the character of the area without stifling innovation.	No modification is required to the policy.
CS25: Presumption in favour of sustainable development	Policy reiterates paragraph 14 of the NPPF on presumption in favour of sustainable development.	Policy reflects the requirements of paragraph 11 of the NPPF. Whilst there is a slight change in the wording of the revised presumption in favour of sustainable development, they do not detract from its objectives. Policy continue to be in general conformity with the NPPF. Policy continues to perform a useful function in	No modification is required to the policy.

		delivering the requirements of the NPPF and addressing local issues. Policy continues to encourage the Council to make sure that it has up to date development plan to meet the needs of the community.	
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### **Conclusion**

The review has had regard to the revised NPPF. Based on the above analysis, the Core Strategy continues to be in general conformity with the provisions of the NPPF and helps to deliver the Council's key priorities and the aims of Woking 2050. The constraints of the borough which has not changed since the adoption of the Core Strategy would not justify a higher future housing requirement over and above the current 292 annual requirement. The policies of the Core Strategy continue to help address the key issues and challenges facing the area and the Council's key priorities. Consequently, there is no immediate need to modify any of the policies of the Core Strategy, and in particular, the housing requirement. Section 6 of the Core Strategy commits the Council to ensure the comprehensive delivery of the Core Strategy, and the Council should focus on doing so without delay. The Core Strategy identifies the Site Allocations DPD and the Development Management Policies DPD as key Development Plan Documents that the Council has to prepare to enable the comprehensive and sustainable delivery of the Core Strategy. The DM Policies DPD has now been adopted (October 2016). The Council is in the process of preparing the Site Allocations DPD and has already published a draft for Regulation 18 consultation. As demonstrated above, the Core Strategy continues to provide an up to date strategic policy context for the preparation of the Site Allocations DPD. The Council should continue with the course it has embarked upon to prepare the Site Allocations DPD in an expeditious manner to facilitate the delivery of the Core Strategy. Any significant delay will undermine housing delivery in the area, create uncertainty and could be counter productive to the Government's aim to boost housing delivery. The Core Strategy has an in-built mechanism for its monitoring and review. The Council monitors the performance of each policy and report that in the Annual Monitoring Report, which is published by 31 December of each year. If future monitoring outcomes justify the need to modify the policies of the Core Strategy, the Council will take the necessary steps to modify the Core Strategy accordingly, and will provide a clear programme that will be reflected in the Local Development Scheme.