

GBC supplementary note on Woking Borough Council's unmet need following approval of their Core Strategy review

1. This note is prepared to supplement the Council's "GBC note on OAN following the 2016-based Household Projections" (GBC-LPSS-033a), and is in further response to the Inspector's ID-10.
2. As explained in GBC's earlier note, Woking Borough Council have undertaken a review of their Core Strategy. Relevant extracts of the review were included in Appendix 2 to the GBC-LPSS-033a, together with a letter dated 17 October 2017 in which GBC raised concerns with Woking Borough Council regarding the apparent basis upon which the latter had quantified the scale of its unmet need in the review. In short, GBC were concerned that the unmet need calculated in the review was based upon the application of the standard methodology using the 2014-based rather than the latest 2016-based household projections.
3. The Council has since become aware that GBC's letter (Appendix 2b as above), along with a supplementary report, was presented at Woking Borough Council's Full Council meeting on 18 October 2018. The latter forms Appendix 1 to this note.
4. In their supplementary report, Woking Borough Council have now clarified their position on the scale of their unmet need, explaining that:

"It is clear from the analysis that by using the 2016 household projections to calculate the need, there will be no unmet need arising from Woking."

5. Woking Borough Council approved the review as per agenda Item 10 of their Council meeting.
6. In this regard, the Council retain the view (as explained with paragraph 25 of its earlier note (GBC-LPSS-033a)) that application of the latest household projections to the standard method means that Woking no longer have any unmet need. This position is now further supported by Woking Borough Council's own confirmation as part of their Core Strategy review that there is no unmet need arising from Woking.
7. The Council note that, when setting out his provisional views on the appropriate housing requirement, the Inspector, understandably, made specific reference to the evidence presented by Woking Borough Council at the hearing sessions. In particular he recorded Woking's evidence at that time as being that "there is an existing level of unmet need in Woking and that this is likely to persist into the future" (ID-6, para 11). Woking's confirmation that there is now no unmet need arising from its Borough represents a significant change of circumstances.

8. In light of Woking Borough Council's own position that there is no unmet need arising from its Borough, GBC is of the view that it would now be unjustified for Guildford to include a contribution to Woking's unmet housing need as part of its housing requirement.
-

Appendix 1: Review of Woking Core Strategy – Supplementary Report

COUNCIL – 18 OCTOBER 2018

REVIEW OF WOKING CORE STRATEGY – SUPPLEMENTARY REPORT

Executive Summary

Item 10 on the agenda for Council meeting tonight deals with the review of the Woking Core Strategy. The Council has received representations from Guildford, Waverley and Runnymede Borough Councils regarding this item. The representations are attached at Appendix 1. In summary, they raise the following concerns:

- The Council failed to consult its neighbouring authorities prior to deciding on the review;
- The review should make clear that based on the revised 2016 household projections, Woking will no longer have an unmet need to be met by neighbouring authorities;
- There needs to be a proper review of the Council's evidence base, including a Green Belt boundary review to inform the review of the Core Strategy;
- The review should take the opportunity for Woking to identify more land, including further land in the Green Belt to meet its full objectively assessed housing need.
- Green Belt sites in Pyrford and Mayford which have ability to deliver much needed housing are being recommended to be retained in the Green Belt whilst Guildford and Waverley are being required to meet Woking's unmet need.

Members are advised to note that paragraph 33 of the National Planning Policy Framework (NPPF) require Councils to review their Local Plans to assess whether they need updating at least every five years. The review should be completed no later than five years from the adoption date of the plan. The Woking Core Strategy is over 5 years and the review is therefore overdue. Without the review, the Core Strategy is considered out of date, and in that case the presumption in favour of sustainable development applies. An out of date Local Plan could also have significant implications for calculating the Council's five year housing land supply. For example, without an up to date Local Plan, instead of calculating the housing land supply using the Council's annual housing requirement, the local housing need figure will have to be used. There are therefore serious consequences for delaying decisions on this matter, and Members are advised not to delay their decision as a result of the attached representations.

Regarding the representations themselves, they raise nothing new or significant enough to justifying delaying a decision on the matter.

As highlighted in the Officers' report, there is no prescribed guidance on the format of the review either in the NPPF or in planning legislation. There is also no good practice elsewhere by other local authorities to drawn from. The available national guidance only requires the Council to review the Local Plan and publish their reasons if they felt that no modification is necessary. If the Council were to decide that a modification is necessary, then the timing for doing so will be reflected in the Local Development Scheme for that to be done through the formal plan making process, involving the necessary consultation that it entails. Whilst the concerns of Guildford and Runnymede Borough Councils regarding the failure of the Council to consult them are acknowledged, there is no requirement for the Council to do so given that the Council is not proposing to modify the plan.

The National Planning Practice Guidance (NPPG) sets out what could be considered when undertaking the review of the local plan. Officers have comprehensively considered them in undertaken the review. The review also deal with the evidence base used to inform the decisions on the matter and are satisfied that the evidence base is robust to withstand scrutiny. In particular, no further Green Belt land could be released for development without significantly undermining its purposes and integrity. Paragraph 3.5.22 of the Green Belt boundary review report makes this

Review of Woking Core Strategy

conclusion very clear. Members have since reviewed this evidence and found even less of the limited recommended land to be developable.

Paragraph 60 of the NPPF requires local housing need assessment to be conducted using the standard method in national planning guidance. The national planning guidance expects the latest household projection to be used in calculating the need. In accordance with the above, it is estimated that the local housing need will be 266 dwellings per year. By committing to continue with the 292 annual housing requirement, there would be no unmet need arising from Woking as raised by Runnymede Borough Council.

The review sets out the implications of the various objectively assessed housing needs on the unmet need arising from Woking. It is clear from the analysis that by using the 2016 household projections to calculate the need, there will be no unmet need arising from Woking. Officers have already previously acknowledged and in responding to Councillors questions going to Council tonight that whilst their estimate of the housing need using the 2016 household projections is 266 dwellings per year, there are other calculations that estimate the figure to be 263 dwellings per year. The difference is marginal to give any cause for concern and it is due to how figures have been rounded during the calculation.

Based on the above, Officers will recommend that the representations raise nothing new or significant enough to justify delaying deciding on this matter.

Recommendations

The Council is requested to:

RESOLVE That

- (i) the representations received from Guildford, Runnymede and Waverley Borough Councils are noted, and that they raise nothing new or significant enough to justifying delaying a decision on the review of the Woking Core Strategy.

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

Background Papers: National Planning Policy Statement (NPPF)
Woking Core Strategy
Town and Country Planning (Local Planning) (England) (Amendment) regulations 2017

Reporting Person: Douglas Spinks, Deputy Chief Executive
Email: douglas.spinks@woking.gov.uk, Extn: 3440

Contact Person: Ernest Amoako, Planning Policy Manager
Email: ernest.amoako@woking.gov.uk, Extn: 3427

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

The representations are noted, however, they raise nothing new or significant enough to justifying delaying a decision on the review of the Core Strategy.

REPORT ENDS