



# **WOKINGHAM BOROUGH COUNCIL**

**A Meeting of an INDIVIDUAL EXECUTIVE MEMBER  
DECISION will be held in First Floor 12 - Civic Offices on  
FRIDAY 14 DECEMBER 2018 AT 11.30 AM**

*Heather Thwaites*

Heather Thwaites  
Interim Chief Executive  
Published on 6 December 2018

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# **WOKINGHAM BOROUGH COUNCIL**

## **Our Vision**

A great place to live, an even better place to do business

## **Our Priorities**

Improve educational attainment and focus on every child achieving their potential

Invest in regenerating towns and villages, support social and economic prosperity, whilst encouraging business growth

Ensure strong sustainable communities that are vibrant and supported by well designed development

Tackle traffic congestion in specific areas of the Borough

Improve the customer experience when accessing Council services

## **The Underpinning Principles**

Offer excellent value for your Council Tax

Provide affordable homes

Look after the vulnerable

Improve health, wellbeing and quality of life

Maintain and improve the waste collection, recycling and fuel efficiency

Deliver quality in all that we do

**For consideration by**

**Stuart Munro, Executive Member for Business, Economic Development and Strategic Planning**

**Officers Present**

**Ian Bellinger, Category Manager for Growth and Delivery (Strategy and Commissioning: Place)**

**Callum Wernham, Democratic & Electoral Services Specialist**

<b>IMD NO.</b>	<b>WARD</b>	<b>SUBJECT</b>	
IMD 2018/42	None Specific	<b>WOKING SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT - REGULATION 19 CONSULTATION</b>	<b>5 - 14</b>

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# Agenda Item IMD42

## INDIVIDUAL EXECUTIVE MEMBER DECISION

REFERENCE IMD: 2018/42

<b>TITLE</b>	Woking Site Allocations Development Plan Document - Regulation 19 Consultation
<b>DECISION TO BE MADE BY</b>	Executive Member for Business, Economic Development and Strategic Planning - Stuart Munro
<b>DATE, MEETING ROOM and TIME</b>	14 December 2018 FF12 at 11.30am
<b>WARD</b>	None Specific;
<b>DIRECTOR</b>	Director of Corporate Services - Graham Ebers, Director of Locality and Customer Services - Interim Sarah Hollamby

### OUTCOME / BENEFITS TO THE COMMUNITY

That development proposed through the Woking Site Allocations Development Plan Document has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

### RECOMMENDATION

The Executive Member for Business, Economic Development and Strategic Planning agrees that Wokingham Borough Council:

- 1) Lodges a holding objection to the Woking Site Allocations DPD (Regulation 19) until such a time as Woking Borough Council demonstrates that it is seeking to meet its full housing need – or that this need can be accommodated within its housing market area (HMA) or most closely linked HMA – based on up to date evidence.

### SUMMARY OF REPORT

Woking Borough Council has published its pre-submission version (Regulation 19) Site Allocations Development Plan Document. The document sets out the proposed site allocations to meet the needs identified in the Woking Core Strategy (2012) up to 2027, with safeguarded land to contribute to needs beyond 2027.

This report outlines Wokingham Borough Council's response to the provisions in the plan, including its concerns around whether the Core Strategy sets the most up to date housing target in light of more recent evidence.

## Background

Woking Borough Council is producing a Site Allocations Development Plan Document (hereafter referred to as the Plan), that identifies and allocates specific sites to meet the development needs set out in the Woking Core Strategy (adopted 2012<sup>1</sup>). A public consultation is currently underway on a Regulation 19 proposed submission plan<sup>2</sup> (5 November – 17 December 2018). The adopted Core Strategy itself does not specify sites for development, but sets out the broad strategy that commits Woking to producing a Site Allocations Plan.

Woking consulted on a draft version of the Plan in June-July 2015, at the Regulation 18 stage. At that time, Wokingham Borough Council (WBC) responded to the consultation and expressed concern that the allocations proposed in the Plan did not include flexibility to address the housing needs emerging from the draft West Surrey Strategic Housing Market Assessment (SHMA).

## Analysis of Issues

The Woking Core Strategy indicates that between 2010 and 2027, the following should be delivered in Woking Borough:

- 4,964 net additional dwellings,
- 28,000 sq.m of additional office floorspace,
- 20,000 sq.m of warehouse floor space,
- 93,600 sq.m of retail floorspace and
- 19 pitches to meet the needs of Gypsies & Travellers and Travelling Showpeople.

The housing requirement from the Core Strategy equates to 292 dwellings per annum (dpa). Since the Core Strategy was published in 2012, the West Surrey SHMA<sup>3</sup> (covering Waverley Borough, Guildford Borough and Woking Borough) has been published (September 2015) which identified a housing need arising from Woking borough of 517 dpa (2013-2033). The SHMA recognised that there is a strong relationship between the West Surrey housing market area (HMA) and that covering the Blackwater Valley (centred upon the authorities of Surrey Heath Borough, Rushmoor Borough and Hart District). Therefore, the Blackwater Valley housing market separates Wokingham Borough from the one which includes Woking Borough.

The plan making process of the other two authorities within Woking's HMA has been predicated on the need arising from Woking being 517dpa as identified through the SHMA. Waverley Borough Council adopted its Local Plan Part 1: Strategic Policies and Sites in February 2018. Waverley have therefore committed to 83dpa (2013-2032) on behalf of Woking, which equates to half of Woking's unmet need to 2027, but spread over the longer plan period for Waverley to 2032. Guildford Borough Council, in its main modifications to its submission local plan (September 2018), commits to delivering 42dpa (2019-2034) on behalf of Woking. On the basis of the West Surrey SHMA OAN, there remains a significant potential shortfall of over 1600 dwellings in the period 2013-2027 which the proposed allocations in the Plan do not seek to address and there are no agreements or mechanisms in place to enable this to be addressed.

In 2015, Wokingham responded to the Regulation 18 consultation on the Plan and expressed concerns that the annual housing requirement for Woking Borough could change. For example, due to an increase through a future plan to address the need identified in their Draft SHMA, and that the Plan did not include sufficient flexibility through a mechanism for meeting any change in need. This concern still remains as it is not clear how the unmet need within the HMA, based on the now finalised SHMA evidence, will be met.

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<sup>1</sup> Woking Core Strategy found here: <http://www.woking2027.info/corestrategy/adoptedcorestrategy>

<sup>2</sup> Proposed submission plan found here: <http://www.woking2027.info/allocations>

<sup>3</sup> West Surrey SHMA found here: <http://www.woking2027.info/ldfresearch/shma/SHMA2015>

In July 2018, the government published the revised NPPF which, amongst other matters, introduced a standardised methodology for calculating the Local Housing Need (LHN). The LHN for Woking currently stands at 263dpa. On 26 October 2018 the Government published a consultation on revisions to planning policy and guidance, including proposed changes to the standard method for assessing local housing need. This consultation proposes, for the short term, that the 2014-based projections will provide the demographic baseline for calculating the LHN. If this approach is to be taken forward by the Government, this would result in an LHN for Woking of 466 dwellings per annum (an increase of 203dpa). Though limited weight can be attached to the consultation at this stage, government has been clear in its commitment to increasing housing delivery across the country. It is therefore likely that future housing need evidence will suggest a higher figure than the Core Strategy requirement. For clarity, the table below sets out the various need figures discussed in the paragraphs above.

<b>Origin</b>	<b>Housing Need Figure</b>
Core Strategy 2012	292
SHMA 2015	517
LHN Sep 2018	263
LHN based on current govt consultation	466

In line with the revised NPPF's requirements, Woking BC has undertaken a review of the Core Strategy. Woking BC has concluded that the Core Strategy remains in general conformity with the NPPF and that the constraints of the borough (60% is covered by Green Belt, numerous Special Protection Areas and Special Areas of Conservation, and also extensive flood zones) which have not changed since the adoption of the Core Strategy, do not justify a higher future housing requirement over and above the 292dpa set out in the Core Strategy. The site allocations plan, therefore, continues to address a need of 292dpa. Despite concluding that the Core Strategy remains up to date, there is strong evidence through the SHMA, and through the LHN, that there is likely a higher housing need than set out in the Core Strategy. Woking's strategy for meeting need does not accord with the more recent plan making and evidence based strategy of its HMA neighbours. There is no mechanism for ensuring that unmet need from Woking, based on more recent evidence, is met within the HMA or as close to where it arises as possible.

While there are uncertainties with LHN moving forward, WBC nevertheless considers that the Plan's approach could lead to increased housing pressure on authorities outside of south-west Surrey's housing market. WBC therefore considers that the Plan is not sound as it has not been positively prepared to ensure objectively assessed needs are met as a minimum in accordance with paragraph 35 of the NPPF.

#### Coal Yard/Aggregates Yard adjacent to the railway line, Guildford Road/Bradfield Close

At the previous consultation stage, WBC also expressed concern at the potential housing allocation on an existing storage/transportation site for minerals (site ID: UA41). The provisional allocation of the 2.11ha site sought the delivery of around 422 dwellings up to 2027. This site continues to be included in this latest version of the plan, however the site boundaries have been altered to a reduced area of 1.09ha with an identified capacity of 100 dwellings (now referred to by site ID: UA34).

WBC's previous concern was that the allocation could result in the loss of the only minerals rail depot within Surrey and that if alternative facilities could not be provided, this could result in increased HGV aggregate movements through Wokingham borough. The reduced area of the site appears to reduce the impact on the existing facility which is specifically safeguarded in the Surrey Minerals Plan (adopted July 2011) as a Rail Aggregate Site. The Plan now includes a specific key requirement of this proposed allocation that Surrey County Council, as the Minerals Planning Authority (MPA), be engaged through the development process. The Plan wording

specifically requires that the “MPA will need to be satisfied that future development would not prevent, directly or indirectly, the operational requirements of the site”.

Rail depots are important for the sustainable supply of aggregate not only in Surrey but also the wider south-east. No such facility exists in the Central and Eastern Berkshire (which includes Wokingham Borough along with Bracknell Forest, Reading, and the Royal Borough of Windsor and Maidenhead) and is therefore dependent on such facilities in neighbouring areas. WBC therefore highlights the importance of this rail depot facility. It is WBC’s view that any non-mineral development should not negatively impact on the operation of the rail depot.

The National Planning Policy Framework (NPPF) requires Mineral Planning authorities to ensure a steady supply of minerals. This includes a requirement to safeguard not only mineral resources, but also the infrastructure that supports the supply and processing of minerals. Paragraph 204(e) specifies the need to ‘safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals’.

In addition, the responsibility of integrating effectively with existing businesses is placed on new development through the ‘Agent of Change’ policy (NPPF paragraph 182). Where an existing business could have an adverse effect on the new development, the applicant is required to provide suitable mitigation before the development has been completed. It is not considered acceptable to place unreasonable restrictions on existing businesses as a result of development permitted after they were established.

The safeguarding of rail depots does not preclude the appropriate development of neighbouring areas of land. WBC however recommends that the following underlined wording should be added to policy UA34 in order to make it sound: “*Engage with Surrey County Council (Minerals Planning Authority/MPA) and neighbouring mineral planning authorities...*”.

On the basis that the principle of development is now not acceptable unless there is no impact on the site’s current operation, and with the inclusion of the additional wording suggested above, WBC’s concern would be alleviated and the policy would be sound.

#### Potential extraction site

WBC also previously commented on the inclusion of a housing allocation surrounding ‘West Hall, Parvis Road, West Byfleet’ (previously referred to as GB15, now known as GB10) which is expected to deliver housing between 2022 and 2027. This site is identified in the County Council’s development plan as a concrete aggregate safeguarding site. WBC emphasised that residential development should only occur once aggregates have been extracted, since extraction at this safeguarded site would reduce pressure on Wokingham Borough for providing sand and gravel for use in Surrey. The Plan includes a requirement for specific engagement around this site with Surrey County Council MPA as well as a requirement for prior minerals investigation work in order to prevent the sterilisation of resource. Similar wording was included in the Regulation 18 version of the Plan, and on balance, WBC considers this to be a sound approach.

## **FINANCIAL IMPLICATIONS OF THE RECOMMENDATION**

***The Council faces severe financial challenges over the coming years as a result of the austerity measures implemented by the Government and subsequent reductions to public sector funding. It is estimated that Wokingham Borough Council will be required to make budget reductions in excess of £20m over the next three years and all Executive decisions should be made in this context.***

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	Nil	N/A	N/A
Next Financial Year (Year 2)	Nil	N/A	N/A
Following Financial Year (Year 3)	Nil	N/A	N/A

<b>Other financial information relevant to the Recommendation/Decision</b>
None anticipated.

<b>Cross-Council Implications</b>
None anticipated.

<b>SUMMARY OF CONSULTATION RESPONSES</b>	
<b>Director – Corporate Services</b>	No comments received
<b>Monitoring Officer</b>	No comments
<b>Leader of the Council</b>	No comments received

<b>Reasons for considering the report in Part 2</b>
N/A

<b>List of Background Papers</b>
Appendix A - WBC Regulation 18 Response July 2015

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**INDIVIDUAL EXECUTIVE MEMBER DECISION  
REFERENCE IMD: 2015/23**

<b>TITLE</b>	<b>Council's response to the Consultation by Woking Borough Council on their Draft Site Allocations Local Plan</b>
<b>FOR CONSIDERATION BY</b>	Councillor John Kaiser, Executive Member for Planning & Highways
<b>ON</b>	Thursday 30 July 2015
<b>TIME</b>	9am
<b>WARD</b>	None specific
<b>DIRECTOR</b>	Heather Thwaites, Director for the Environment

**OUTCOME / BENEFITS TO THE COMMUNITY**

That the final Woking Borough Site Allocations Local Plan has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

**RECOMMENDATION**

The Executive Member for Planning and Highways:

- 1) approves the comments outlined in this report; and
- 2) that the comments be submitted as a formal response to the consultation from Woking Borough Council on their Draft Site Allocations Local Plan.

**SUMMARY OF REPORT**

Woking Borough Council's Draft Site Allocations Local Plan details their how they envisage meeting the need for housing, commercial (offices, factories, shops) and social (education and recreational) development required by their Core Strategy (October 2012) over the period 2010 to 2027. Woking Borough is consulting upon their document from 18 June until 31 July 2015.

The proposed response of Wokingham Borough Council to the consultation is that the Council should:

- Raise a concern on the basis that insufficient land is proposed for removal from Woking Borough's Green Belt to accommodate particularly long term growth (2027-2040).
- Raise a concern that the allocation of two sites for residential development will prejudice maintaining the supply of aggregates to meet demand in Surrey, which could have a negative impact on Wokingham Borough These sites are the rail aggregates depot off Guildford Road, Woking and land at West Hall, Parvis Road, West Byfleet; and
- Advise that Woking Borough consult other minerals planning authorities to assess their views on the plan.

## Background

Woking Borough Council indicates that the Draft Site Allocations Local Plan is designed to implement the spatial vision and objectives of their Core Strategy. This indicates that between 2010 and 2027, the following should be delivered in Woking Borough: 4,964 net additional dwellings, 28,000 sq.m of additional office floorspace, 20,000 sq.m of warehouse floor space, 93,600 sq.m of retail floorspace and 19 pitches to meet the needs of Gypsies & Travellers and Travelling Showpeople.

## Analysis of Issues

### ***Addressing housing needs***

Woking Borough's Draft Site Allocation document proposes the removal of sites from its Green Belt to both meet development needs identified in its Core Strategy to 2027 and also the potential requirements from 2027-2040.

However, as the table below indicates, the current annual housing requirement for Woking Borough could change, i.e. increase through a future plan to address the need identified in their Draft Strategic Housing Market Assessment (SHMA), which is scheduled to be finalised during 2015.

Document	Time period	Annual dwelling requirement
Core Strategy	2010 – 2027	292
Draft SHMA	2011 – 2031	390 to 588

*Conclusion* - To ensure increased housing pressure is not placed on authorities outside of south-west Surrey's housing market, it is important that Woking Borough's approach to reviewing Green Belt boundaries adequately addresses the potential needs likely to be generated in the south-west Surrey SHMA. Their approach does not appear to do this. It is therefore recommended that Wokingham Borough Council expresses concern that Woking Borough's amendment to its Green Belt does not adequately address its potential long term development needs.

### ***Minerals***

There are two further areas of concern, one regarding the storage/transportation of minerals and the other regarding a potential extraction site.

#### *Storage/transportation site*

One of the sites provisionally allocated in the Draft Site Allocations Document for around 422 dwellings between 2015 and 2027 is an aggregates rail yard off Guildford Road in Woking (site UA41). The aggregates yard is allocated in the County Council's Local Plan for the off-loading of aggregates from rail and short term storage prior to distribution by road around Surrey.

The Surrey Local Aggregates Assessment 2014 indicates that in 2009, Surrey consumed about 990,000 tonnes of aggregate of which around 745,000 tonnes arrived by rail.

Woking's yard off-loads 300,000 tonnes of aggregate (marine sand and gravel together with crushed rock) annually. Its loss will have an impact on the road network by having to transport minerals further by road, i.e. from other rail depots including potentially those at Theale (between Reading and Newbury within West Berkshire).

The 300,000 tonnes of aggregates off-loaded annually at Woking's rail yard would be equivalent to around 66,400 HGV movements a year (or roughly 265 movements daily (based on Monday-Friday operation)).

*Conclusion* - Therefore, Wokingham Borough Council is concerned that the redevelopment of the aggregates rail yard should only occur if adequate alternative facilities have been provided in Surrey as otherwise there could be increased HGV movements through Wokingham borough.

*Potential extraction site*

Woking borough has allocated surrounding West Hall, Parvis Road, West Byfleet (site GB15). This is also identified in the County Council's Local Plan as a concrete aggregate safeguarding site.

The 2009 national aggregate movement's survey indicated that Berkshire was a net exporter of sand and gravel (also referred to as concrete aggregates) to Surrey. The 2014 Local Aggregate Assessment indicates that Surrey has the 7 year land bank of sand and gravel reserves required by paragraph 145 of the NPPF. However, for this to continue until 2026 further sand and gravel quarries need to be approved in Surrey from the list of sites currently safeguarded, such as the West Hall site.

*Conclusion* - Therefore, since the land adjoining West Hall is safeguarded for potential extraction of sand and gravel, it is essential that the minerals are extracted before it is redeveloped. This therefore this will reduce pressure on Wokingham Borough for meeting Surrey sand and gravel needs. Therefore, Wokingham Borough Council considers that development of the land adjoining West Hall should only occur once the aggregates have been extracted.

***Engagement with mineral planning authorities***

It is advised that Woking Borough Council consults other minerals planning authorities as they may have similar concerns to Wokingham Borough.

***Continual engagement with Woking Borough***

Wokingham Borough Council would welcome the opportunity to work with Woking Borough Council to assess if solutions to the issues identified can be delivered.

**FINANCIAL IMPLICATIONS OF THE RECOMMENDATION**

***The Council faces severe financial challenges over the coming years as a result of the austerity measures implemented by the Government and subsequent reductions to public sector funding. It is estimated that Wokingham Borough Council will be required to make budget reductions in excess of £20m over the next three years and all Executive decisions should be made in this context.***

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	None	Yes	N/a
Next Financial Year (Year 2)	None	Yes	N/a

Following Financial Year (Year 3)	None	Yes	N/a
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<b>Other financial information relevant to the Recommendation/Decision</b>
The budget is based on what we know at this point of time. Further issues, including any arising from future versions of Woking Borough's Site Allocation Local Plan, could have financial implications.

<b>Cross-Council Implications</b>
The identification of sufficient land to meet long term development needs in Woking borough will reduce the likelihood that a shortfall would have to be addressed outside of that authority and therefore minimise impacts for service delivery within Wokingham Borough.

<b>SUMMARY OF CONSULTATION RESPONSES</b>	
<b>Director - Resources</b>	No response received
<b>Monitoring Officer</b>	No response received
<b>Leader of the Council</b>	No response received

<b>List of Background Papers</b>
<p>Consultation documents from Woking Borough Council on their Draft Site Allocations Local Plan: see - <a href="http://www.woking2027.info/allocations">http://www.woking2027.info/allocations</a>.</p> <p>Draft Strategic Housing Market Assessment for South-West Surrey – see: <a href="http://www.guildford.gov.uk/shma">http://www.guildford.gov.uk/shma</a>.</p> <p>Surrey Local Aggregates Assessment 2014, see <a href="http://new.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/minerals-and-waste-planning-annual-monitoring-report">http://new.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/minerals-and-waste-planning-annual-monitoring-report</a>. <b>Error!</b></p> <p><b>Bookmark not defined.</b></p>

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<b>Date</b> 20 July 2015	<b>Version No.</b> 7