

Agenda Item IMD42

INDIVIDUAL EXECUTIVE MEMBER DECISION

REFERENCE IMD: 2018/42

TITLE	Woking Site Allocations Development Plan Document - Regulation 19 Consultation
DECISION TO BE MADE BY	Executive Member for Business, Economic Development and Strategic Planning - Stuart Munro
DATE, MEETING ROOM and TIME	14 December 2018 FF12 at 11.30am
WARD	None Specific;
DIRECTOR	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 2012¹). A public consultation is currently underway on a Regulation 19 proposed submission plan² (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 SHMA³ (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.

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

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

³ 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.

Origin	Housing Need Figure
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

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

Cross-Council Implications
None anticipated.

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

Reasons for considering the report in Part 2
N/A

List of Background Papers
Appendix A - WBC Regulation 18 Response July 2015

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