



*Mr Ernest Amoako
Planning Policy Manager
Woking Borough Council
Gloucester Square
Woking
Surrey
GU21 6YL*

Via email only
17 October 2018

Re: Review of Woking Core Strategy (WBC18-025)

Dear Mr Amoako,

We understand that a review of Woking's Core Strategy is being presented at the Council meeting on Thursday 18th October 2018 for approval. Guildford Borough Council (GBC) was given no forewarning of the review and have not been consulted on it. Indeed, GBC first became aware of the review on 15th October 2018.

The failure to engage constructively, actively and on an ongoing basis with GBC in relation to the review is plainly contrary to both the spirit and legal requirements of the Duty to Co-operate, see in particular Planning and Compulsory Purchase Act 2004, s.33A(1), (2) and (3)(a), (d)&(e).

GBC would wish to respond substantively to a number of issues within the review, particularly those with cross-boundary implications. However given the limited time-frame it is unable to do so in an informed manner.

However, one point of immediate concern in the review must be raised at this stage. The review considers the issues of local housing need for Woking, as well as the unmet need in the Housing Market Area. It rightly identifies that the objectively assessed need (OAN) for Woking in the 2009 SHMA was 594dpa, and that the 2015 SHMA reduced the OAN to 517dpa. In light of the revised NPPF, it then calculates the OAN (now referred to in the revised NPPF as 'local housing need') for Woking, using the standard method and based on the 2014-household projections, as 409dpa. Following the recent release of the 2016-household projections, application of the standard method reduces the local housing need still further to 266dpa (by GBC's calculations it is 263dpa, but this is a minor difference). Subject to the 3dpa difference in the latest housing need, GBC's provisional view is this part of the review accurately summarises the position.

However, the review then states that "[b]y using the standard method, the unmet need is likely to be 117 dwellings per year". GBC understand that this figure is arrived at by subtracting the housing requirement figure in the Core Strategy (292dpa) from the local

housing figure produced by applying the standard method and 2014-household projections (409dpa). This is plainly flawed. If – as GBC agree is broadly correct – Woking's local housing need is 266dpa based on the application of the standard method and the 2016-household projections, this means that there is no unmet need (the housing requirement of 292dpa being greater than the local housing need of 266dpa). It is illogical to, on the one hand, base the local housing need figure on the latest household-projections, but not then to update the amount of unmet need in light of that figure.

Both the failure to comply with the Duty to Cooperate and the defective logic in concluding that there remains an unmet need of 117 dwellings per year render the review legally flawed.

GBC trust that you will take these concerns seriously. In particular, we request that approval of the review be deferred in order that it can be reconsidered by Officers and that engagement with GBC (as well as other relevant bodies) required by the Duty to Co-operate has been undertaken.

We understand that Runnymede Borough Council are intending to raise concerns of their own relating to the review.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'TCS', is positioned below the closing text.

Tracey Coleman

Director of Planning and Regeneration

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