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Dear Ernest

**Woking Local Plan Review**

The Council has recently reviewed the agenda items for the 18<sup>th</sup> October 2018 Woking Council meeting and notes that item 10 is concerned with the review of the Woking Core Strategy. Whilst Runnymede Borough Council welcomes this review, it is disappointed that the recommendation is that there is no need to modify any policies in the Core Strategy despite the officer report acknowledging that there are unmet needs within the Guildford, Waverley and Woking Housing Market Area.

All of Woking's neighbouring local authorities face similar constraints to Woking Borough, including significant Green Belt constraints, ecological constraints and flooding constraints. Runnymede, the Royal Borough of Windsor and Maidenhead, Guildford and Waverley are all good examples of Local Authorities who have worked positively to ensure that they are setting out proposals and policies in their Local Plans to meet their objectively assessed housing needs in full. Having reviewed the 18<sup>th</sup> October Council report on the Woking Core Strategy review, the Council is not satisfied that Woking Borough Council has taken the opportunity to thoroughly review the adequacy of its evidence base to ensure that it is able to demonstrate that it has turned every stone with the aim of meeting its identified housing needs in full. Runnymede Borough Council is of the opinion that Woking Borough Council has the opportunity to carry out a far more thorough review, including the production of additional evidence to help ensure that the housing needs of the Guildford, Waverley and Woking HMA are met in full. Whilst the covering report to Council notes that, 'Woking is working in partnership with neighbouring authorities to address the unmet needs in the HMA', it is unclear whether there are any further realistic avenues to explore with HMA partners, and what they may be, given that Waverley has already committed to meeting 50% of Woking's unmet needs and given that it appears that Guildford will be asked to meet 20% of Woking's unmet needs. Furthermore, Guildford's response to their Inspector's Matters and Issues indicates that they are unwilling to do any more to meet unmet needs from Woking and that they are of the opinion that the review of the Woking Core Strategy presents the opportunity for Woking to meet its Objectively Assessed Housing Need in full.

If unmet needs are predicted to persist across the Guildford, Waverley and Woking HMA, it is suggested that the current review of the Woking Core Strategy needs to more thoroughly look at gaps in the Council's evidence base. Runnymede Borough Council has particular concerns about the adequacy of the Council's Green Belt evidence. In particular, whilst it is noted that in 2014, Woking Borough Council published a Green Belt Boundary Review, it appears that the brief given to the consultants at this time was constrained, with the report noting that the consultants were only ever asked to identify: 1-Suitable, deliverable and sustainable sites to deliver 550 new homes by 2027; and 2-A further 40ha of land to assist in delivering the housing requirement between 2027 and 2040 (approx. 1200 new homes). Had the

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Green Belt Review had an unconstrained brief it is questioned whether further suitable sites may have been identified.

Furthermore, it is noted that a number of the parcels considered in Woking's 2014 Green Belt Boundary Review were of a significant scale. Since Woking produced its review in 2014, numerous other Local Authorities in the sub region have also reviewed their Green Belt. A number of these authorities (for example Runnymede, South Bucks and Spelthorne) have carried out second stages of their Green Belt Review work to provide a more detailed and thorough assessment of smaller parcels of Green Belt land in their areas. Runnymede felt that this was particularly necessary given that through consultations on its Local Plan, it was noted that a number of representations expressed concerns that the Green Belt parcels assessed in Runnymede's 2014 Green Belt Review were too large in size in some cases. It was argued that if smaller parcels had been considered, different conclusions would have been drawn in terms of how a site performed against the Green Belt purposes. These comments were taken into consideration, and as a result, the Council's consultants Arup recommended to the Council that additional, more spatially focused work could be undertaken. It was suggested that a more finely grained review could be carried out, to better understand the performance of smaller parcels against Green Belt purposes, and their context in relation to the Green Belt as a whole. The output of this second piece of work was that further pieces of land were identified that the Council could release from the Green Belt to meet its identified housing needs. A number of these sites now appear in Runnymede's emerging Local Plan. Given that Woking Borough Council is unable to meet its identified housing needs in full, it is considered that commissioning a second phase of Green Belt Review work could be hugely beneficial if the Council is serious about meeting any unmet housing needs within its area.

As such, contrary to the conclusion drawn in the report to Council it is not considered inevitable that a more thorough review of the Woking Core Strategy and its evidence base would fail to present any additional opportunities to assist Woking meet its unmet housing needs.

There is also concern that of the land being recommended by officers for safeguarding in the drafted Sites Allocations DPD which is an appendix to the 18<sup>th</sup> October Council report (under item 8-Site Allocation Development Plan Document), Woking's Local Plans Members Working Group has provided steer that only two of the sites in Byfleet should be taken forwards. Sites in Pyrford and Mayford which have the ability to deliver much needed homes are being considered for retention in the Green Belt despite the reasoned justification for the release of these sites presented in the draft DPD and the acknowledged unmet housing needs in the Guildford, Waverley and Woking HMA. It is simply not good enough for Woking to rely on similarly constrained neighbours to meet Woking's unmet needs when it appears that there are further avenues open to the Council which would see Woking's needs met in full in its own Borough.

Furthermore, the covering report to Council on 18<sup>th</sup> October regarding the Local Plan Review notes that the latest 2016 based population projections suggest that the need for additional homes in Woking may be declining and that under the Government's standardised methodology, the objectively assessed needs for housing in Woking could be set to fall from 409dpa to 266dpa. Whilst Runnymede Borough Council does not dispute that the 2016 based household projections suggest a reduced objectively assessed housing need in many areas, the Government has already confirmed that in light of the 2016 based population projections, it intends to re-consult on amendments to its standardised methodology to ensure that its 300,000 new homes a year target is met. The consultation is expected later this year. As such, there is concern that it would be premature to rely on the current standardised methodology for calculating housing needs (based on the 2016 based population projections) given that in the short term, changes are expected which are likely to see the OAN for many areas increase again.

## Appendix 2

Whilst it is accepted that there are no firm guidelines for carrying out a Local Plan Review, the NPPF states in paragraph 60 that, *'in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for'*. Whilst the issue of unmet needs is touched upon in the covering report of the Woking Core Strategy Review item, this is considered to be at a superficial level. Runnymede Borough Council is not aware of any consultation which has been carried out with neighbouring Local Authorities about the Woking Core Strategy Review which would have presented an opportunity for issues relating to unmet needs in neighbouring areas to be discussed, and for this to have been considered properly in Woking's review. For example, Runnymede Borough Council is aware that Elmbridge Borough Council has been vocal in confirming that it is unlikely to meet its OAN and may need assistance from its neighbours (which could include Woking).

Overall, there is concern that the Woking Core Strategy Review which has been carried out is superficial in nature and lacking sufficient detail and justification to conclude that modifications to the Woking Core Strategy are not required. Runnymede Borough Council is of the view that further evidence needs to be completed before the conclusion can be drawn that Woking Borough Council cannot amend the relevant strategic policies in its Core Strategy to increase its housing target to meet its objectively assessed housing needs in full.

It is noted that the Statement of Common Ground signed by both our Authorities acknowledges that Woking's own evidence base identifies links with Runnymede Borough, including in respect of housing and notes that '*Engagement with authorities [like Runnymede] was concluded to be important through the Duty to Cooperate*'. Furthermore the Statement includes the agreement that there are localised cross boundary links between Runnymede and Woking Borough Council regarding housing matters and agreement that, while in the first instance housing needs will be sought to be met in full within our respective HMA boundaries, both authorities are committed to working together to address housing matters. In light of Woking's decision that no additional evidence is needed to seek to meet housing need within its own boundary, and noting that the Local Plans of Waverley, Guildford and our own Plan in Runnymede have reached a mature stage we would wish to make clear that for these reasons set out in this letter, Runnymede Borough Council feels that it is inappropriate to offer assistance to meet any unmet needs from Woking until such a time that Woking Borough Council has identified that it has turned every stone in meeting its identified housing needs. Woking Borough Council is therefore urged to produce additional evidence to support a more focussed and detailed review of its Core Strategy and carry out consultation with partners under the Duty to Cooperate before concluding that its Core Strategy Review is completed for another 5 years, leaving the question of unmet need in the Guildford, Waverley and Woking HMA unresolved.

Yours sincerely



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