



# Elmbridge Borough Council

... bridging the communities ...

Civic Centre  
High Street, Esher  
Surrey KT10 9SD  
01372 474474

contactus@elmbridge.gov.uk  
elmbridge.gov.uk

Mr Ernest Amoako  
Planning Policy Manager  
Woking Borough Council  
Civic Officers  
Gloucester Square  
Woking  
Surrey, GU21 6YL

contact: Mark Behrendt  
Planning Policy Manager  
direct line: 01372 474829  
e-mail: mbehrendt@elmbridge.gov.uk  
my ref: Woking SADPD January 2017  
your ref:

14<sup>th</sup> February 2017

Dear Mr Amoako,

## **WOKING 2027 – SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT, CONSULTATION ON LAND TO THE EAST OF MARTYRS LANE**

Thank you for your email, dated 6<sup>th</sup> January 2017, consulting Elmbridge Borough Council on the Woking Local Development Documents – Site Allocations Development Plan Document (DPD) – Consultation on Land to the East of Martyrs Lane (January 2017).

In responding to this latest consultation, Elmbridge Borough Council wishes to make some site specific comments in regard to the potential safeguarding of land to the east of Martyrs Lane to meet the future development needs of Woking Borough up to 2040. The Council would however, also like to use this opportunity to re-emphasise those points made previously in response to the 2015 Regulation 18 Consultation insofar as the overarching principles of housing delivery within Woking Borough and the evidence base upon which various approaches are being considered. Whilst it is understood that this consultation is only seeking site specific responses, it is the overarching principles of housing delivery that ultimately inform each Councils' Local Plan preparation including, their respective site selection process and approach to safeguarding land for future development.

In terms of overall observations, the Council remains generally supportive of the approach Woking Borough Council has taken in seeking to increase the delivery of housing development across the Borough. In particular, taking the challenging step of proposing the release of land currently designated Green Belt. Nonetheless, the Council is still concerned that whilst the Site Allocations DPD is set to meet the development needs identified in the Core Strategy, more up to date evidence published by Woking Borough Council suggests the need to consider whether it could go beyond its current target and whether the proposed safeguarded sites should be brought forward earlier.

Elmbridge Borough Council is aware that a Strategic Housing Market Assessment (SHMA) (September 2015) has been published identifying a need to provide 1,729 homes per annum between 2013 and 2033, across the West Surrey Housing Market Area (Guildford-Woking-Waverley). For Woking Borough the overall need is said to be 517 homes per annum. This represents an increase of approximately 225 homes per annum above what is currently being planned in the Core Strategy / Site Allocations DPD.

In light of the above, it is the Council's understanding that Woking Borough Council should be seeking to identify opportunities to increase housing delivery above the levels set out in the Core Strategy. The previous Regulation 18 consultation identified opportunities to do this in the form of accelerating the release of proposed safeguarded land currently identified for the period 2027 to 2040. Therefore if safeguarded land contains sites that are available and suitable for development within the current plan period they could be used to meet unmet housing need identified in the West Surrey HMA or other neighbouring HMAs.

As part of the 'duty to cooperate' consideration should be given as to whether the safeguarded land should be released within the earlier plan period of 2015 to 2027, to meet the wider development needs of the West Surrey Housing Market Area (HMA) (or neighbouring HMAs) where housing need is unlikely to be met. As stated in the NPPF, 'even if a local authority has an adopted Local Plan, it is still required to cooperate with a local planning authority that is bringing forwards its plan' (NPPF, Duty to Cooperate, paragraph 021).

The Council recognises that there may be other constraints preventing safeguarded sites from coming forwards in the immediate plan period e.g. infrastructure. However, within the consultation document it is unclear whether this is the case in this situation.

Commenting on its own work, Elmbridge Borough Council has recently published its Local Plan: Strategic Options Consultation (December 2016). Under its preferred option the Council has identified some opportunities for amending the Green Belt boundary in Elmbridge Borough to meet increasing housing need. However, it is clearly stated that due to the constraints of Green Belt and other environmental designations, that the Council will use the duty to cooperate to enquire as to whether other authorities have the potential to meet some of our need. As set out in paragraph 179 of the NPPF 'joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas - for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework'.

### **Land to the East of Martyrs Lane**

Focusing on the site specific matters, it is unclear from Woking Borough Council's own evidence base and Consultation Document as to how the above land has emerged as a potential option for removal from the Green Belt and set aside to meet future development needs.

The Woking Green Belt Boundary Review Final Report (January 2014) identifies this area as being located within Parcel 2 which has been assessed as having 'low' suitability as an area of search when it comes to Green Belt. Under each of the three Green Belt purposes considered, the Parcel is judged to be of '**major importance**'.

Notwithstanding that Parcel 2 is considered to be 'sustainable' in comparison to other Parcels (Figures 6 & 7), the overall conclusion is that it should be retained land in the Green Belt and

is not identified in Figures 9 & 11 as a recommended Parcel / Site for removal from the Green Belt to accommodate new development.

Furthermore, Woking Borough Council's response to our comments made during the first Regulation 18 Consultation, as set out in the Draft Site Allocation DPD Response Document (June 2016) and the individual responses, state 'the Green Belt boundary review has revealed that apart from the sites that are recommended to be released from the Green Belt for development, no further site could be identified for development without damaging the purpose and integrity of the Green Belt'. Given that this document was published in June 2016 it is assumed that reference to those sites considered suitable refers to those in the Green Belt Boundary Review and / or the first Regulation 18 Consultation document only.

Elmbridge Borough Council would therefore strongly question the rationale behind the consideration of this area as a potential safeguarded site and why, this area is being considered in principle as well as a substitute to the six areas listed in paragraph 1.11 of the Consultation Document. No documentation has been presented detailing why this approach would be more sustainable and the Council would question why substituting areas is being considered if all areas are considered acceptable in sustainability and Green Belt terms.

### **Cross-Boundary Implications & Duty to Cooperate**

Elmbridge Borough Council would like to raise our concern that cross-boundary issues have not been discussed prior to this consultation being brought forwards. For example, this consultation does not appear to be supported by any additional transport assessments which identifies the potential impact of any proposed development on both the local and strategic road network. Our particular concern is any impact on the A245 and A318 which straddles our Borough boundaries and is a key route between our two areas and in particular Brooklands Business Park / Industrial Estate.

This options has also not been accounted for in our own transport assessment work in support of our Local Plan preparation which looks at the wider implications on the road network of development taking place outside our Borough boundary.

I hope you find these comments useful in progressing work on the Site Allocations.

Please do not hesitate to contact our Planning Policy Manager, Mark Behrendt if any points raised requires further explanation.

Yours sincerely,

Mrs Karen Randolph  
Portfolio Holder for Planning Services  
Elmbridge Borough Council