



Woking Borough Council

Development Management Policies Development Plan Document (DPD)

SA/SEA Adoption Statement

October 2016



Produced by the Planning Policy Team

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1. Introduction

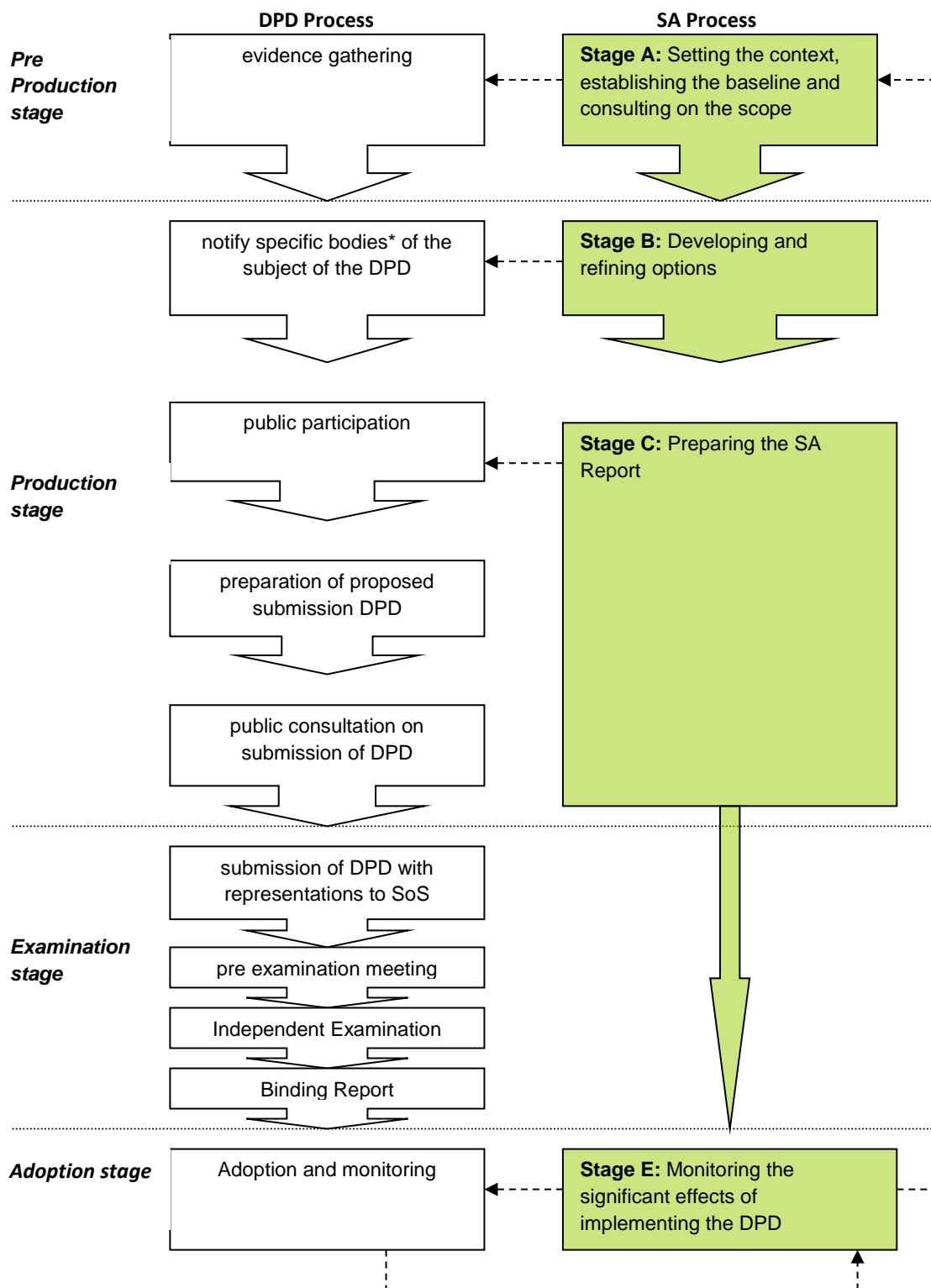
- 1.1. Woking Borough Council adopted the Development Management Policies Development Plan Document (the DPD) on 20 October 2016. It sets out detailed policies to guide decisions on development in the borough. Once adopted, it becomes part of the statutory Development Plan for the borough which includes the already adopted Core Strategy (2012). The Development Plan is the main consideration in the determination of applications for planning permission. As an integral part of the preparation of the DPD, and in accordance with the Planning and Compulsory Purchase Act 2004, the DPD has been subject to Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA) of the plan. A Habitat Regulations Assessment (HRA) was also undertaken to assess potential impacts of the DPD on internationally important conservation sites. Information on the HRA is provided in Section 6.
- 1.2. In accordance with the requirements of Article 9 of the Strategic Environmental Assessment Directive (SEA) 2001 and Regulations 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004, this statement has been prepared to accompany the adopted DPD in order to provide the following information:
 - a) how environmental considerations have been integrated into the DPD;
 - b) how the environmental report has been taken into account (i.e. the Sustainability Appraisal for the DPD, incorporating Strategic Environmental Assessment);
 - c) how the results of public consultation on the DPD and Sustainability Appraisal have been taken into account (including where appropriate those opinions of European Member States);
 - d) the reasons for choosing the DPD as adopted, in the light of the other reasonable alternatives; and
 - e) the measures that are to be taken to monitor the significant environmental effects of the implementation of the DPD.
- 1.3. The DPD was submitted to the Secretary of State for public examination in February 2016. The Planning Inspector held a hearing on 10 May 2016. The Inspector's Report of the examination into the plan was received in August 2016, which found the DPD to be sound subject to a number of modifications. The modifications were incorporated into the DPD, and the Council resolved to adopt it on 20 October 2016.
- 1.4. This statement sets out how the legal requirements in paragraph 1.2 have been addressed for the DPD. It should also be noted that further information on the SA process can be found in the SA Report, consultation reports and the Planning Inspector's Report, all of which can be found on the Council's website at: www.woking2027.info/management.

2. How environmental considerations have been integrated into the development plan document and how the sustainability appraisal report has been taken into account

- 2.1. In preparing the Development Management Policies DPD (the DPD), the Council undertook a Sustainability Appraisal (SA). The SA Report is a requirement of the Planning and Compulsory Purchase Act 2004. Its purpose is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of plans. National Planning Practice Guidance advises that the SA can include the Strategic Environmental Assessment (SEA) as required by the European Union Directive 2001/42/EC (SEA Directive), which covers only the environmental considerations relating to plan-making, and this was the approach used in the assessment of the DPD. Therefore, throughout the remainder of this statement reference to SA implies both SA and SEA.
- 2.2. The European legal requirement in the SEA Directive is for an 'Environmental Assessment Statement' to cover how environmental considerations have been covered in the 'Environmental Report' (SA Report). Since the national interpretation of this through the Environmental Assessments of Plans and Programmes Regulations is that social and economic considerations in decision making should also be covered, this statement covers all three areas, but with a focus on environmental considerations. Where this statement refers to 'sustainability' it includes reference to environmental considerations, as well as social and economic considerations.
- 2.3. The main purpose of the DPD is to provide the necessary framework for the delivery of the requirements of the Core Strategy. The DPD comprises detailed Development Management policies that expand on the strategic policies of the Core Strategy to help determine day to day planning applications. The Core Strategy has been subject to a comprehensive SA that has been considered at Examination. The National Planning Policy Framework (NPPF) emphasises that assessments should be proportionate and should not repeat policy assessments that have already been undertaken. The SA of the DPD was carried out in this context, recognising that the parent strategic policies in the Core Strategy that they seek to deliver had been comprehensively assessed.
- 2.4. Government advises that SA should form an integrated part of the plan preparation process in order to inform the appraisal of options for the emerging local plan¹. The preparation of the DPD has considered and integrated sustainability factors (including environmental factors) by undertaking the SA in an iterative manner. The SA was undertaken in parallel with the DPD preparation process and has influenced and informed each stage of plan development. The SA process identified potential effects of the DPD and put forward recommendations to avoid or minimise negative effects, or enhance positive effects. These recommendations were taken into account by the Council whilst reviewing the policies at key stages through extensive consultation with members of the public and statutory bodies. The key stages are examined in more detail in the following paragraphs and depicted in Diagram 1 below.

¹ See paragraphs 165 and 166 of the National Planning Policy Framework:
<http://planningguidance.communities.gov.uk/>

Diagram 1: Stages of Development Management Policies DPD preparation showing where sustainability considerations were taken into account via the Sustainability Appraisal process



*The specific consultation bodies are listed in the Town and Country Planning, Local Development, England, Regulations 2004, as amended.

SA Scoping Report (February 2014)

- 2.5. The first stage in the production of the SA and thus the consideration of sustainability factors began in the preparation of the SA Scoping Report which set the context, the sustainability appraisal objectives, established the baseline and decided the scope. This occurred at the 'pre-production' stage of the DPD process i.e. evidence gathering stage, and was completed by the Council in February 2014. The process is mainly about gathering information to inform the SA process and addresses the following key tasks:
- a) identification of other relevant policies, plans, programme and sustainability objectives that have a bearing on the DPD. For example, the SEA Directive requires environmental protection objectives established at an international level to be taken into account in the SA;
 - b) collection of baseline data of issues that the DPD has to address and their underlying trends. This provides a useful basis for the prediction and monitoring of effects of the DPD;
 - c) identification of sustainability issues and indicators. This provides opportunity for the key sustainability issues of the DPD to be defined. Attempts were made to link the baseline data to the key sustainability issues;
 - d) developing the SA Framework. This allows consistency in the description of the sustainability effects of the policies and proposals, which is a key requirement of the Directive; and
 - e) Consulting on the scope of the SA. Public involvement is a key and integral part of the process. The Act requires various specific bodies to be consulted. They include Natural England, the Environment Agency and English Heritage (now Historic England). These bodies were invited to inform the Council on any issues they would want taken into account in the SA process. They were consulted on a draft Scoping Report and their representations taken into account before the document was published. See Section 3 for more details.
- 2.6. It was originally intended that the Core Strategy Scoping Report (2010) be used as a basis for all documents subsequently produced as part of Woking Local Development Documents preparation. However, having reviewed the Core Strategy Scoping Report it was concluded that various sections required updating, including the relevant policies, plans and programmes and the baseline information. An updated Scoping Report was thereby produced and set out the extent of and methodology for the SA of the Development Management Policies DPD.
- 2.7. The scoping exercise identified a number of sustainability issues (including environmental issues) which were integrated into the SA Framework, for example:
- to reduce the risk of flooding;
 - to protect and enhance the borough's important landscapes, habitats, flora and fauna;
 - to reduce pollution levels (air, water, light, noise);
 - to promote sustainable modes of transport and reduce the need to travel;
 - to secure the protection and enhancement of the historic and natural environment;
 - to ensure the provision of green space and access to the countryside;
 - to enable the delivery of green infrastructure.
- 2.8. The information collated from the review of policies, plans and programmes was complimented by a detailed baseline review, comprising data for 20 different sustainability indicators. The wide range of indicators included data on biodiversity, natural resources, climate, landscape and socio-economic issues. This exercise,

together with analysing the key characteristics of the borough (including its natural environment), gave rise to key sustainability issues for Woking Borough. Using this information, the Council then went on to create an SA Framework, which would be used to appraise each of the preferred policies against a series of 'SA objectives'. The 20 SA objectives identified during the preparation of the Core Strategy – themselves subject to extensive consultation – were amended to ensure they were the most appropriate for the purposes of appraising the Development Management Policies DPD. As a result, 17 SA objectives were proposed (shown in Table 1 below).

- 2.9. The SA objectives formed the basis of all stages of assessment – at each iteration, policies and proposals would be assessed against them. The coverage of sustainability issues in the objectives means that the DPD has been systematically and consistently assessed to identify effects, and ensure the matters identified are considered as part of the DPD production.

Table 1: Sustainability Appraisal Objectives

Social objectives: supporting strong, vibrant and healthy communities	
Sustainability Appraisal Objectives	What the appraisal will look for:
Objective 1: Provision of sufficient housing which meets the needs of the community and which is at an affordable price	Match the housing type to need; cost of appropriate housing relative to disposable incomes especially for less well off people; whether people might be forced to move away from their chosen communities or workplaces to afford housing.
Objective 2: Facilitate the improved health and well-being of the population and reduce inequalities in health	Patterns of development that make walking and cycling easy and attractive as routine modes of transport; development that contributes to positive well-being e.g. pleasant surroundings and living conditions, avoidance of noise and pollution and better community facilities; development that avoids exposing communities (particularly more deprived communities) to more pollution or noise, and that give all access to leisure, recreation, health services and open spaces.
Objective 3: Reduce vulnerability to flooding and harm from flooding to public well-being, the economy and the environment	New development and infrastructure should not be built in areas at risk from flooding.
Objective 4: Reduce poverty, crime and social exclusion.	Whether lower incomes are enough to buy a reasonable standard of living – taking account of e.g. housing and travel costs; avoidance of kinds of economic development that e.g. make people on lower incomes have to spend more on travel; development that designs out crime by e.g. providing passive surveillance, avoiding 'dead' spaces and providing round the clock activity; quality and accessibility of schools, colleges, libraries; encouragement of a diversity of choice of employment, and educational and other service provision as part of regeneration efforts.
Objective 5: To improve accessibility to all services and facilities	Distance to, and ease of accessing, schools, shops, places of work, recreation and cultural activities; patterns of development that allow people to meet more needs within local communities, reduce the need to travel and provide a range of activities for a broader

	range of people.
Environmental objectives: protecting and enhancing our natural, built and historic environments	
Sustainability Appraisal Objectives	What the appraisal will look for:
Objective 6: Make the best use of previously developed land and existing buildings	Encouragement of development of previously developed land rather than greenfield sites where possible (taking into account the biodiversity and natural value of the land). Promotion of higher densities in accessible locations.
Objective 7: Minimise air, light and noise pollution	Development that minimises pollutants and exposure to pollutants; development that helps improve air quality; approaches to transport that will reduce traffic emissions.
Objective 8: Reduce land contamination and safeguard agricultural soil quality	Development that helps remediate contaminated land to suitable use; avoid development of high quality agricultural land.
Objective 9: Conserve and enhance biodiversity	Protection and enhancement not only of designated areas, but of wildlife interest everywhere; development that creates more habitats and strengthens links between areas providing wildlife habitat to increase adaptation to climate change.
Objective 10: Conserve and enhance and where appropriate make accessible for enjoyment the natural, historic and cultural assets and landscapes of Woking	Location and design of development to respect and improve: landscape character, townscape character and settlement pattern, and diversity and local distinctiveness; protection of culturally and historically significant assets, qualities and sites including non-designated assets such as locally valued features and landmarks.
Objective 11: Reduce the causes of climate change – particularly by increasing energy efficiency and the production of energy from low and zero carbon technologies and renewable sources – and adapt to its impacts	Opportunities to generate renewable energy or utilise renewable energy technologies; development that is energy efficient; development that achieves high sustainable construction standards; development that reduces the need to travel and minimises the adverse impact of emissions arising from the use of transport; development that conserves and enhances the green infrastructure network; development incorporating sustainable drainage systems.
Objective 12: Reduce the impact of consumption of resources by using sustainably produced and local products	Greatest possible reuse of old material in new construction; provision for reuse and recycling; development that achieves high sustainable construction standards.
Objective 13: Reduce waste generation and disposal and achieve sustainable management of waste	Provision for composting, digestion, recycling in new development.
Objective 14: Maintain and improve water quality of the region's rivers and groundwater, and manage water resources sustainably	Development which minimises water consumption and maximises use of rainwater/grey water; development that minimises risk of pollution; development that provides adequate wastewater and sewerage infrastructure.

<p>Objective 15: Reduce the need to travel, encourage safe, sustainable transport options and make the best use of existing transport infrastructure</p>	<p>Development patterns that reduce the need to travel, such as ensuring that people can live closer to their work and closer to shops and services. Promotion of higher densities in more accessible locations. Avoid developments that generate further road traffic or negatively affect highway safety. Access bus routes and stops, and safe, attractive and direct routes for cyclists and walkers. Patterns of development that support their use e.g. short distance to local services, concentration of amenities in town, district or local centres.</p>
<p>Economic objectives: building a strong, responsive and competitive economy</p>	
<p>Sustainability Appraisal Objectives</p>	<p>What the appraisal will look for:</p>
<p>Objective 16: Maintain high and stable levels of employment and productivity, and encourage high quality, low impact development and education for all</p>	<p>Availability of suitable employment opportunities, which allow people to make a sufficient income; avoiding kinds of economic development that (e.g.) raises housing costs or make people on lower incomes have to spend more on travel modes (e.g. car travel); encouraging a diversity of choice of local employment which better matches local educational capacity.</p>
<p>Objective 17: Provide a range of commercial development opportunities to meet the needs of the economy and, in particular, support and enhance the economies of town, district, local and neighbourhood centres.</p>	<p>Maintenance and enhancement of businesses meeting local needs; encouragement to local businesses (especially those adopting sustainable practices); promotion of local markets in goods and services; development that facilitates greater integration with key economic sectors of the region.</p>

2.10. The Scoping Report was subject to consultation between 13 January to 16 February, lasting 5 weeks, as required by Regulation 12(6) of the SEA Regulations. A list of consultees can be found in Appendix 5 of the SA Scoping Report. The responses and subsequent modifications made to the Scoping Report are set out in Appendix 5 (Table A1) of the final report, found on the Council's website: www.woking2027.info/management/dmdpd/management.pdf. See Section 3 of this statement for more details.

Sustainability Appraisal of the draft Development Management Policies DPD (February 2015)

2.11. Following consultation on the SA Scoping Report and recommendations being incorporated into the final SA Framework, the Council produced a first draft of the DPD.

Appraisal of DPD objectives and options

2.12. Paragraph 167 of the National Planning Policy Framework (NPPF) emphasises that 'assessments should be proportionate, and should not repeat policy assessment that has already been undertaken. Where possible the local planning authority should consider how the preparation of any assessment will contribute to the plan's evidence base'. The SA of the DPD was carried out in this context, recognising that the parent strategic policies and objectives that they seek to deliver had already been comprehensively assessed during the SA of the Core Strategy (2012). The SA

Report of the Core Strategy can be found on the Council's website: www.woking2027.info/corestrategy/cssubmission/sapd.

- 2.13. The overall purpose of the DPD is to facilitate delivery of the Core Strategy, and the objectives of the draft DPD were therefore exactly the same as the objectives of the Core Strategy. No purpose would have been served by repeating that in the SA of the DPD. Similarly, the SA of the Core Strategy involved a comprehensive appraisal of options for addressing the issues which the Core Strategy, and for that matter the Development Management Policies DPD, sought to address. Again, it was decided that no purpose would be served by repeating the appraisal of options in the SA Report of the Core Strategy, as advised by the NPPF. This approach was not in any way intended to downplay the importance of SA of options and objectives as an essential part of the SA process - it should be emphasised that care was taken to make sure that the outcomes of the appraisal of Core Strategy were used to inform the preparation of the DM policies. Again, the relevant key outcomes of the SA of options of the Core Strategy were taken into account in the preparation of the DM policies.
- 2.14. The Core Strategy SA of options can be accessed on the Council's website at www.woking.gov.uk/planning/policy/ldf/sustappraisal/saof_alternativeoptions. The options that were appraised include the scale, type, mix and broad locations for development, including housing, provision of green infrastructure to service development, use of sustainable transport modes, use of previously developed land, sustainable development and options for development in the Green Belt. The Council, and later the Inspector at Examination stage, was satisfied that the policies of the Development Management Policies DPD had a clear relationship to these options. The key outcomes of the SA of options that had direct relevance and were taken into account when preparing the DM policies include:
- Green Belt should be released to meet development needs;
 - Modest growth to be allowed in local centres;
 - Where relevant, new development should provide travel plans setting out how additional journeys will be managed;
 - New development should provide cycle parking;
 - Improve cycle and pedestrian infrastructure into development;
 - Make annual provision for 292 net additional dwellings.
- 2.15. The Sustainability Appraisal made an assessment of the social, environmental and economic implications of non-implementation of the Development Management Policies DPD. It was found that development proposals would be judged against out-of-date policies leading to unplanned and unmanaged growth in the borough. Focusing on environmental implications:
- without the Green Spaces Policies there could be an uncoordinated approach to ensure that development is supported by adequate Green Infrastructure;
 - policies on Rural Workers Dwellings, Farm Shops and Retail Nurseries would help sustain rural economic growth and diversification in appropriate locations in the Green Belt – without these it would be difficult to effectively assess these types of proposals;
 - without the Housing and Economic Policies there would be more pressure to build on Green Belt land – they would help concentrate development on previously developed land in a sustainable manner;
 - improvements in terms of environmental pollution, air and water quality, noise and light pollution and biodiversity levels would not be fully realised without the policies of the DPD.

Appraisal of policies of the draft Development Management Policies DPD

- 2.16. The SA was carried out as an integral part of preparing the Development Management policies with an in-built mechanism for using the outcome of the SA to inform, modify and/or refine the wording of the policies. A comprehensive appraisal of the emerging DM policies against the SA Framework demonstrated that overall, the policies of the DPD when implemented would have positive impacts on the sustainability objectives and consequently on sustainable development. There were only a few policies with negative impacts, for example, the effects of developing garden land on biodiversity. Where these negative impacts were identified, mitigation measures were built into the policies to reduce and/or overcome any negative effects. For example, the DPD includes a policy on Green Infrastructure to enhance the overall biodiversity of the area. The policies of the DPD were carefully balanced to provide adequate mitigation measures to address potential conflicts. Recommended mitigation measures included:
- development on garden land should take into account the biodiversity value of the site (addressed in Policy DM10 Development on Garden Land);
 - development should be encouraged to promote sustainable transport modes (addressed in Policy DM21 Educational Facilities);
 - residential development should make provision to mitigate the impacts of development on the Thames Basin Heaths Special Protection Areas (addressed in Policy DM11 Sub-divisions, specialist housing, conversions and loss of housing).
- 2.17. In addition, an assessment was made of the cumulative impacts of the policies against the SA Objectives. It was found that the overall impacts were positive – particularly for those objectives focusing on the environment - for example:
- the DPD policies would have positive impacts on reducing vulnerability to flooding (SA Objective 3), particularly Policy DM1 on Green Infrastructure Opportunities (related to Sustainable Urban Drainage Systems) and Policy DM10 Development on Garden Land;
 - positive impacts on minimising air, light and noise pollution (SA Objective 7) stemming from the implementation of Policy DM6 Air and Water Quality and DM7 Noise and Light Pollution;
 - positive impacts on reducing land contamination and safeguarding agricultural soil quality (SA Objective 8) via Policy DM8 Land Contamination and Hazards;
 - the Green Space Policies would have positive impacts on conserving the natural landscape of Woking (SA Objective 10) and on reducing the causes of climate change (SA Objective 11).
- 2.18. The draft SA Report was published alongside the draft DPD for public consultation to allow the statutory bodies and members of the public to comment (in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012). Further details are provided in the SA Report, available on the Council's website at www.woking2027.info/management/dmdpdreg19/sadmdpd19.pdf.

Sustainability Appraisal of proposed Submission DPD (October 2015)

- 2.19. The Council considered the representations received during the Regulation 18 consultation and updated the SA Report where relevant. The representations were broadly supportive of the approach taken. However, the Environment Agency made some very useful suggestions on how the Sustainability Appraisal Framework and

assessment could be improved to more effectively take into account environmental considerations, including:

- adding a list of challenges under climate change considerations, and how green infrastructure policies could help mitigate negative effects;
- amending some of the scoring for policies to show positive impacts rather than neutral impacts;
- adding a mitigation measure – that development where relevant should incorporate buffer zones to reduce water pollution from run-off from development;
- modifying SA Framework Objective 3 by adding ‘make sure that further growth does not exacerbate existing flooding situation’;
- modifying the SA Report to take into account groundwater quality where relevant;
- improving the targets and indicators for water quality and updating the baseline data with the latest figures on ecological status of water bodies;
- suggested mitigation measures incorporated into scoring against Policy DM1 to ensure long-term negative effects on Suitable Alternative Natural Greenspace and Sites of Nature Conservation Interest are avoided;
- clarification of the definition of Green Infrastructure and its mitigating role.

2.20. The majority of representations resulted in improvements to the wording of policies and supportive text – see Section 3 for further details.

2.21. Appendix 10 of the Consultation Statement summarises the responses received at Regulation 18 public consultation, including the modifications made to the Sustainability Appraisal (and subsequently how environmental considerations were better taken into account). The Consultation Statement can be found on the Council’s website at: www.woking2027.info/management/dmdpds/dmdpdcsub/dmdpdcsub.pdf.

2.22. Any revised outputs of the Sustainability Appraisal as a result of the modifications were taken into account in the ongoing preparation of the DPD. The iteration of policies as the proposed Submission version emerged allowed for the amendment and refining of policy wording, which would help deliver more sustainable development. The SA played an integral role in fine-tuning the policies, as well as the supportive text.

2.23. The proposed Submission DPD and SA Report were then approved for public consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 12), which took place between 26 October 2015 and 7 December 2015.

Examination Stage and Sustainability Appraisal Considerations (Spring 2016)

2.24. Following Regulation 19 consultation on the proposed Submission DPD a total of 29 responses were received. Only one representation was made in relation to the SA Report, which suggested that updated water quality data be used against which Objective 14 could be assessed. The Council accepted this and proposed a minor modification to the SA Report. The Publication version of the DPD and supporting documents, including the SA Report, were then submitted to the Secretary of State on 29 February 2016 for Examination in Public, which then took place in May 2016.

2.25. The examination process led to the Inspector concluding that with a series of modifications being made, the Development Management Policies DPD met the criteria for soundness as set out in the NPPF. The modifications involved a number

of amendments to the policies and supporting text to improve their clarity and purpose, and to conform with the latest Government policy. Following discussions during the examination process, the Council also prepared a Schedule of further Modifications – these were all of a minor nature, correcting typographical errors, terminology and the like, and did not affect the substance or soundness of the DPD. Both the Main Modifications and Schedule of further Modifications were published for formal consultation during May and June 2016. None of the modifications suggested by the Inspector, or by the Council, related to the SA Report or methodology – the Inspector was satisfied that the SA had been carried out adequately (Inspector's Report, July 2016). The final SA Report can be found with the adopted documents at www.woking2027.info/management.

- 2.26. The Council were of the view that the modifications did not require an update to the Sustainability Appraisal because they did not significantly affect the substance of the Development Management policies. The Inspector confirmed this position in a note to the Council, stating "I am content that the proposed main modifications do not require an update to the sustainability appraisal. Whilst they would moderately enhance the impact and predicted effects of the relevant policies as contained in the assessment they would not introduce any substantive new options which would require a re-appraisal". The note is available on the Council's website at www.woking2027.info/management/dmpex, document Ref ID/DMP/007.

Summary

- 2.27. The Inspector and Council are satisfied that the Sustainability Appraisal achieves its central goal of striking a good balance between the environmental, economic, and social implications of the Development Management policies. The SA process was carried out as an integral part of the DPD preparation, and provided an independent review of emerging policy content to ensure that environmental, economic and social implications were addressed effectively. Where the SA identified instances where policies could potentially have a negative impact on sustainability factors mitigation measures were built into the policy to reduce or overcome the impact. For example, the DPD seeks developer contributions towards the provision of Suitable Alternative Natural Greenspace (SANGs) to avoid harm to the Special Protection Areas (Policy DM1 Green Infrastructure Opportunities). The SA also assessed the cumulative impacts of each of the policies against the SA Objectives, as collectively they could add up to more significant effects (positive or negative) – the results are in Table 6 of the SA Report. Overall it was found that the Development Management policies would have neutral or positive cumulative impacts. Where the policies were found to have short to medium term negative impacts, appropriate mitigation measures were incorporated into the policies to ensure that the effects would be neutral in the medium to longer term when the mitigation measures were introduced.
- 2.28. The outcome of the SA demonstrated that overall, the Development Management policies when implemented would make a meaningful and long term positive contribution to achieving sustainable development in the Borough.

3. How results of public consultation on the DPD and Sustainability Appraisal have been taken into account

- 3.1. As described in Section 2 above, consultation was undertaken on the SA at a number of stages. In accordance with the SEA Regulations, the DPD and its supporting documents, including the SA, were made available for consultation throughout the plan preparation process. The Development Management Policies DPD Consultation

Statement (February 2016) sets out each stage in detail, and can be found at www.woking2027.info/management/dmdpdsub/dmdpdcs.pdf.

- 3.2. At each stage consultation was used to inform the following stages of the DPD and SA:

Table 2: SA Iterations

DPD Preparation Stage		SA Stage at which Consultation Responses taken into Account	SA Dated
Pre-production		Scoping Report of Core Strategy	2010
		Draft SA Scoping Report for DPD	December 2013
		Final SA Scoping Report	February 2014
Production	Initial Draft DPD (Regulation 18)	Draft SA Report	February 2015
	Proposed Submission DPD (Regulation 19)	SA Report Proposed Submission	October 2015
	Submission DPD (Regulation 22)	SA Report Submission	March 2016
Examination (Regulation 24)		SA Report with any modifications	March 2016
Adoption (Regulation 26)		Final SA Report	March 2016

- 3.3. In May 2011 the Council wrote to key stakeholders to make any representations on the Core Strategy Scoping Report (2010), in particular to assess whether it was still relevant to be used to appraise the Development Management Policies DPD. Although comments received were supportive, a number of changes had occurred in the succeeding years, including changes to national planning policy and legislation. An updated Scoping Report was drafted specifically for the DPD to reflect these changes. A second round of consultation on the report took place in January and February 2014 with the main Consultation Bodies, and other key stakeholders. Several useful comments were received enabling the Council to amend the baseline data, plans, policies and programmes, and SA Objectives, and thus bring the SA Framework against which the DPD would be assessed up to date. For example, consultees provided new information regarding water quality, waste management, flood risk, and biodiversity priority species and habitats. The full list of consultees, their responses, and the way in which they were addressed in the final Scoping Report, are set out in detail in Appendix 5 of the Scoping Report, found at www.woking2027.info/management/dmdpd/management. The Scoping exercise, and the consultation responses that informed the final Scoping Report, formed a critical part of the Sustainability Appraisal process in identifying key sustainability issues (including environmental considerations) that the DPD should seek to address, and the core SA Framework against which the DPD would be assessed.
- 3.4. The second formal consultation stage for the Sustainability Appraisal should then be the publication of the Sustainability Appraisal Report² to accompany the Submission DPD. However, in the interests of producing a robust and informative SA Report, the draft SA Report was made available alongside the draft Development Management Policies DPD during the Regulation 18³ consultation period between 19 February 2015 and 3 April 2015. Around 3700 consultees in the Council's Local Development Framework Database were contacted.
- 3.5. Paragraphs 2.20-2.23 set out how the consultation responses informed the drafting of the Sustainability Appraisal, and subsequently taken into account in the draft DPD.

² Regulation 12 of the SEA Regulations

³ Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012

In total, twelve individuals or groups responded, including statutory bodies and local groups, resulting in 104 representations. Representations covered a range of issues, and are summarised with the Council's response and recommendations in Appendix 10 of the Consultation Statement, at www.woking2027.info/management/dmdpds/dmdpdcgs.pdf. The final column of this table sets out the planning officer's recommendations, including proposed modifications to the DPD and the SA Report.

- 3.6. The Council prepared the proposed Submission DPD and its accompanying Sustainability Appraisal taking consultation responses into account. These documents were published for Regulation 19⁴ consultation on 26 October 2015 until 7 December 2015. A total of 29 responses were received during the period, resulting in 97 representations. Again, representations covered a range of issues and are summarised with the Council's response and recommendations in Appendix 17. Only one representation related to the Sustainability Appraisal, providing up to date water quality information. A Schedule of Proposed Modifications (February 2016) was produced addressing the comments received for the Inspector to consider has part of the Independent Examination of the DPD, and is available in Appendix 18 of the Consultation Statement. The appendices can be found at www.woking2027.info/management/dmdpds/dmdpdcgs.pdf.
- 3.7. An Independent Examination took place with a Public Hearing held on 10 May 2016 at the Civic Offices. The Council compiled a Schedule of Main Modifications (May 2016), that were considered necessary for soundness and related to matters that were discussed at the Examination hearing. The Council also published a Schedule of Further Proposed Modifications (May 2016) outlining minor modifications which would not affect the substance or soundness of the DPD, but would enhance its quality. These documents were published for public consultation between 17 May and 29 June 2016, and 8 representations were received. The Inspector took these consultation responses into account in coming to his conclusions. On 1 August 2016 the Council received the Inspector's Report on the Examination, concluding that with the recommended main modifications set out in the Annex to the report the Development Management Policies DPD was sound.
- 3.8. Several modifications were subsequently made which would enhance positive environmental impacts of the DPD, and reduce or neutralise negative impacts of the DPD, including:
- ensuring proposed development incorporates sustainable urban drainage;
 - avoiding inappropriate development in the Green Belt;
 - ensuring applications are supported by a site specific flood risk assessment in certain circumstances;
 - that the provision of Suitable Alternative Natural Greenspace will not compromise the biodiversity value of Sites of Nature Conservation Interests;
 - that the aims of the Water Framework Directive should be taken into account in planning decisions affecting water quality and management;
 - that planning applications are accompanied by a Green Infrastructure Strategy where necessary, and opportunities are taken to connect to the Green Infrastructure Network;
 - that lighting schemes minimise pollution to prevent adverse impacts on nocturnal animals such as bats and water species.
- Modifications also led to improved social and economic impacts, all of which can be found in the Schedules available on the DPD website at

⁴ Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2012

www.woking2027.info/management. The Inspector was content that the main modifications did not require an update to the Sustainability Appraisal as they would not introduce any substantive new options which would require a re-appraisal (Inspector's Post Hearing Note, May 2016).

- 3.9. The DPD was adopted upon approval from the full Council on 20 October 2016. The Council have ensured that community involvement has been integral to each stage of the preparation of both the Sustainability Appraisal and the DPD, and has taken into account representations received at all the key stages. The consultations have been carried out in accordance with the Council's Statement of Community Involvement and all statutory requirements. The Council is satisfied that overall, the outcome of the consultations has enhanced the quality of the DPD and enabled it to effectively address sustainability objectives, including environmental considerations.

4. The reasons for choosing the Development Plan Document in light of other reasonable alternatives

- 4.1. The DPD provides detailed policies to manage individual development proposals in a way that meets local needs, both economic and social, while protecting the environment. As outlined in paragraphs 2.13-2.18, the Council chose to cross-reference to the Sustainability Appraisal of options for the Core Strategy rather than repeat it. These policies were considered the most sustainable when measured against the other alternative options considered. The options that were appraised included the scale, type, mix and broad locations for development, including housing, provision of green infrastructure to service development, protection of biodiversity, economic development, use of sustainable transport modes, use of previously developed land, sustainable development and options for development in the Green Belt. The challenges facing the Borough continue to be as relevant today as they were in 2009 – there is no new evidence to suggest that further strategic policies are needed to address new challenges that could be considered in the DPD.
- 4.2. The Council was therefore satisfied that the options that were tested to support the Core Strategy remain relevant for the DPD, and that the policies of the DPD had a clear relationship with the Core Strategy options. For example, the DPD policies help provide green infrastructure, manage air and water quality, bring forward some types of housing in a sustainable manner and promoting the use of previously developed land. Since the purpose of the DPD was to develop detailed policies to help deliver the strategic policies of the Core Strategy, any further assessment of options would potentially and mainly be an assessment to determine whether or not the policies were needed with potential yes or no answers. The Council had engaged in a long process, including during the Core Strategy Examination to decide policy areas where the DPD would be helpful (see Appendix 6 of the Core Strategy).
- 4.3. In addition, following the Examination the Inspector concluded that with the recommended Main Modifications, the DPD satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the NPPF. These tests include the test that the document must be the most appropriate strategy when considered against the reasonable alternatives.

5. Monitoring Measures

- 5.1. The Council will monitor the effectiveness of the DPD in delivering its objectives by assessing its performance against a series of indicators. As the Development Management policies support the Core Strategy objectives, they will be monitored

using the same indicators within the Performance Framework in Appendix 5 of the Core Strategy. There are, however, a few detailed indicators that will be needed to monitor the bespoke requirements of the Development Management policies, and these are set out in a Monitoring Framework at Appendix 3 of the Development Management Policies DPD. As with the Core Strategy, the Development Management policies will be monitored through the Council's annual Authority's Monitoring Report (AMR). The AMR is a statutory requirement of the Planning and Compulsory Act 2004 (as amended) and is published by the Council, including on its website, on an annual basis.

- 5.2. The outcomes of the annual monitoring will inform any future review of the DPD and any necessary action that might be needed to address any emerging concerns. Consideration will also be given to review the DPD either in whole or in part every five years to take into account any new evidence including evidence on how the Core Strategy is performing.

6. Habitats Regulation Assessment

- 6.1. The DPD also required a Habitats Regulation Assessment, as set out in the Conservation of Habitats and Species Regulations 2010 (as amended), as it might have had significant effects on European habitats or species located in the borough and neighbouring boroughs.
- 6.2. The Council is required under the European Union Directive on the protection of wild birds (the Birds Directive) to protect and manage wild birds species and their habitats in the area. The Thames Basin Heaths Special Protection Area (SPA) has been designated as Special Protection Areas because it contains important populations of nightjar, woodlark and Dartford warbler that are considered by the Directive to be rare or vulnerable. A number of the SPAs are within Woking Borough. The Borough also contains the Thursley, Ash, Pirbright and Chobham Special Area of Conservation that is a habitat of European significance.
- 6.3. The Directive requires the Council to undertake a Habitats Regulation Assessment Screening (HRA) of the impacts of the DPD on the protected species and habitats to determine whether an Appropriate Assessment will be required. An HRA Screening was therefore carried out and its report (January 2015) was published to supplement the SA process. The DPD policies were screened out as having no likelihood of leading to significant adverse effects on European sites either alone or in combination with other plans or projects. There was therefore no need to conduct an Appropriate Assessment.

7. Conclusion

- 7.1. This Adoption Statement has been produced in accordance with the legal requirements set out in paragraph 1.2. The Statement sets out how both Sustainability Appraisal and Habitats Regulation Assessment have played an integral part in the preparation of the Development Management Policies DPD to ensure the DPD makes a meaningful and long-term positive contribution to achieving sustainable development in Woking Borough.