



**Planning and Compulsory Purchase Act 2004 (as amended)**

**The Town and Country Planning (Local Planning) (England) Regulations 2012  
(as amended)**

**RESPONSE TO THE SUMMARY OF MAIN ISSUES RECEIVED DURING THE  
CONSULTATION ON THE MAIN MODIFICATIONS TO THE SITE ALLOCATIONS  
DEVELOPMENT PLAN DOCUMENT**

February 2021



# Section 1: Summary of main issues raised and Council's response

## Introduction

The preparation of the Site Allocations Development Plan Document (DPD) has evolved over time with public consultation embedded as an essential part of the process. The main modifications to the Site Allocations DPD was published for consultation between 18 September 2020 and 14 December 2020. The proposed main modifications are those changes which the Inspector considers to be necessary to ensure the soundness of the DPD. However, the Inspector has made it clear that this is without prejudice to his final conclusions on the DPD which will be made after having regard to the consultation responses on the main modifications and all other evidence. This document is the Council's response to the summary of the main issues raised during the consultation on the main modifications. It is submitted to the Inspector to consider.

The Inspector has stressed in his covering letter to the consultation on the main modifications that representations should be focused on the material presented for consultation and not about other aspects of the DPD. In this regard, it is not intended to repeat information that has already been submitted to the Examination or discussed at the Examination Hearings. This response should be read in conjunction with the other Examination Documents submitted by the Council. The Examination Documents can be accessed by this link: [www.woking2027.info/allocations/sadpdexam](http://www.woking2027.info/allocations/sadpdexam).

The Inspector has asked the Council for a summary of the main issues raised and a brief response to those main issues. This document provides a response to the request. The Council's response is in two parts:

- Part 1 is a summary of the main strategic or broad issues raised together with the Council's brief response; and
- Part 2 is a summary of further detailed matters raised together with the Council's brief response.

There are a few unavoidable potential overlaps between the two parts that should be noted.

The Council published a Consultation Plan setting out how it would engage with the community during the consultation on the main modifications. The Council is satisfied that everything it set out to do in the Consultation Plan had been met. For example, direct letters were sent to over 6,000 individuals and organisations on the consultation database. A Press Release and a Public Notice were published in the local newspapers. A series of Zoom sessions were organised for virtual discussions with the community. Posters were placed at key locations across the Borough, including train stations and Borough Notice Boards. The Council offered to provide paper copies of the consultation documents to anyone who could not access the internet. The Council is satisfied that the provisions of the Consultation Plan have been met, and anyone who had reasonably wished to be consulted had the opportunity to give their views.

A total of 448 individuals and organisations made representations to the consultation (which can be accessed at: [www.woking2027.info/comment](http://www.woking2027.info/comment)). In addition, a petition signed by 2,739 individuals from residents of Byfleet and West Byfleet was submitted. The petition called for the 'withdrawal of modified Site Allocations Development Plan Document and resubmission of

a new plan'. The representations raised a wide range of detailed and strategic matters. The issues that received most comments relate to:

- No exceptional circumstances justification exist for the release of Green Belt land to meet the development needs of the Core Strategy, including the need for Travellers accommodation. A disproportionate amount of Green Belt land is taken from West Byfleet and Byfleet to meet the housing needs of the Borough;
- Land should not be released from Green Belt between 2022 and 2027, without an assessment of housing need to justify any such release;
- The indicative yields and proposed uses for the allocated sites are too prescriptive, taking into account the amended Use Classes Order;
- The Site Allocations DPD should allocate land for a quantum of housing other than the Core Strategy requirements (i.e. ONS household projections, current standard methodology);
- The North Field of GB7 of the Site Allocations DPD should not be developed. It should be protected from development to provide a crucial visual gap separating Mayford and Woking. It is suggested that it should remain in the Green Belt and/or be allocated as Open Space/Local Green Space. If necessary, the development of the safeguarded site GB8 should be brought forward to 2022 – 2027 to compensate for the North Field of GB7 not being developed;
- There is inadequate infrastructure to mitigate the impacts of development, in particular, the impacts of developing site GB7 on A320, GB9 on education, healthcare, and transport and flood risk in West Byfleet/Byfleet, which are being disproportionately impacted by Green Belt release. Although the commitment to carry out an infrastructure study is positive, it does not clarify who is going to deliver the required infrastructure;
- The impacts of the COVID-19 pandemic on housing need, the availability of brownfield land and open space need to be considered;
- For the Sustainability Appraisal and Habitats Regulations Assessment, agreed and proposed development should be assessed cumulatively, rather than individually;
- The same factors that applied in the Aireborough Neighbourhood Development Forum v Leeds City Council High Court judgement apply to Woking's Site Allocations DPD.

The above list does not cover every issue raised by the representations, is not in any priority order and does not imply that the issues are more important than any other issue raised. They are highlighted because of the relatively high number of individuals who raised the issues. The Inspector will give due consideration to all the issues raised by the representations. The Council's response to the main issues identified above are broadly addressed in the following pages.

Based on the analysis of the representations and updates on the status of the allocated sites, the Council has proposed some modifications for the Inspector to consider. This is published separately as further modifications to the Site Allocations DPD. The schedule of proposed modifications is published on the Council's website at the Examination webpage. Overall, subject to the proposed modifications that the Council would like the Inspector to consider, the Council is satisfied that the Inspector's main modifications are well reasoned, justified and are acceptable.

## **1.0 The Petition**

- 1.1 The petition called for 'withdrawal of modified Site Allocations Development Plan Document and resubmission of a new plan'. The petition was submitted to the Council for consideration. The Council has already considered the petition and resolved not to withdraw the Site Allocations Development DPD. The petition was also submitted as a representation to the consultation on the main modifications to the Site Allocations DPD, and as such, it has been submitted to the Inspector for his own consideration regardless of whether the Council has considered it or not.
- 1.2 There is no justification for the withdrawal of the Site Allocations DPD. Doing so will lead to unnecessary delay with significant implications. It could potentially lead to speculative development and planning by appeal with outcomes that the Council and indeed the petition are seeking to avoid, such as unplanned development in the Green Belt. One of the key defences for protecting the Green Belt is to be able to demonstrate that the Council has identified sufficient land to deliver its development requirements in accordance with the Core Strategy.
- 1.3 The Council has provided evidence to demonstrate that very special circumstances justification exists to release Green Belt land to meet housing need between 2022 and 2027. This has been examined by the Inspector of the Secretary of State and agreed as part of the Examination of the Core Strategy. There is no new evidence that is significant enough to cause the Council to change the policy requirement to release Green Belt land. In accordance with the Core Strategy, the Council has also carried out a Green Belt boundary review to make sure that the specific sites that are proposed to be released from the Green Belt are those that will not undermine its overall purpose and integrity. The allocated sites are also justified. Whilst local residents' concern about the release of Green Belt land are noted, the allocated/safeguarded sites are the most sustainable when compared against all other alternative Green Belt sites. The preparation of the Site Allocations DPD should proceed expeditiously towards its adoption. A further delay will be unhelpful.

## **2.0 Justification for the release of Green Belt land**

- 2.1 The Council has provided information to the Examination to demonstrate that an exceptional circumstance justification exist for the release of Green Belt land to meet housing need between 2022 and 2027, including the release of Green Belt land to meet the accommodation needs of Travellers. This includes both the quantum of housing and the nature and type of housing need. Specific reference is made to the Council's statement in response to the Inspector Matters, Issues and Questions (WBC/SA/033). This document is on the website as part of the Examination documents and can be accessed by: [www.woking2027.info/allocations/sadpdexam/wbchearingstatements15112019](http://www.woking2027.info/allocations/sadpdexam/wbchearingstatements15112019). This matter is also addressed in the Council's Issues and Matters Topic Paper (WCB/SA/016) that was submitted to the Inspector as an Examination Document to the Site Allocations DPD Examination. This is also on the website and can accessed by: [www.woking2027.info/allocations/responsereg18/issuesmatters.pdf](http://www.woking2027.info/allocations/responsereg18/issuesmatters.pdf). The matter was comprehensively debated at the Site Allocations DPD Examination Hearings. Given the housing requirement of the Core Strategy, the scale of the housing need and the supply of housing land, the Council believes that an exceptional circumstances justification continue to exist for the release of Green Belt land.
- 2.2 The Inspector has stressed in his covering letter to the consultation on the main modifications to the Site Allocations DPD that representations should focus on the material presented for consultation and not about other aspects of the plan or omission

sites. The consultation was not an opportunity to raise other matters which either were or could have been part of the earlier representations or the Examination Hearings of the DPD. There was also no need to repeat representations that have been submitted before, which have been submitted to the Inspector. In this regard, it is not intended to rehearse everything that has already been covered in the above documents. This response should be read in conjunction with the Examination Documents provided by the Council. Representations have been received promoting alternative Green Belt sites. The Inspector is not inviting omission sites, in particular, omission sites that had been debated at the Examination Hearings. Some representations are promoting alternative Green Belt sites such as Green Belt sites in Saunders Lane. This response is not intending to discuss the merits of those sites. The Council has already decided that exceptional circumstances justification does not exist to release those sites from the Green Belt.

- 2.3 Paragraph 136 of the NPPF emphasises that 'once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so that they can endure beyond the plan period. Where a need for changes to the Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans'. The Core Strategy provides the strategic policy context for the preparation of the Site Allocations DPD. In accordance with the NPPF, the Core Strategy already establishes the exceptional circumstances justification for the release of Green Belt land to meet housing need between 2022 and 2027. This has been supported by the Secretary of State in finding the Core Strategy sound. Policies CS1, CS6 and CS10 of the Core Strategy provides justification that exceptional circumstances exist to release Green Belt land. The evidence that was used to inform the Core Strategy, such as the Strategic Housing Market Assessment (Housing Need Assessment) and Strategic Housing Land Availability Assessment, has been reviewed, and the conclusions do not provide any new evidence that is significant enough to cause the Council to depart from the approach adopted in the Site Allocations DPD.
- 2.4 The Council has reviewed the planning status of housing and employment sites since the Examination Hearings. This has been published as a separate document. The housing need for the Borough has remained the same since the Examinations Hearings. The Government has recently published its indicative housing need for districts and boroughs across the country. It requires the Council to make provision for 431 dwelling per year. Given the scale of the housing need and the available evidence of housing land supply, it is highly likely that the Site Allocations DPD will be found unsound if it failed to allocate sufficient land to enable the requirements of the Core Strategy to be delivered, including allocating Green Belt land to enable the delivery of housing between 2022 and 2027. It should be noted that there have been representations made to the Examination requesting the Council allocates more Green Belt land to meet its housing need and the need for Affordable Housing.
- 2.5 Against the housing need of 431 dwellings per year, there is an unmet need of about 139 dwellings per year arising from Woking that has to be met. Under the Duty to Cooperate, this is presently being met by the Waverley and Guildford local plans. For example, the Secretary of State has asked Waverley Borough Council to make provision in its local plan to meet 83 dwellings per year of Woking's unmet need. The rest of the unmet need is being met in Guildford Borough. Against this backdrop, it will be indefensible to plan to deliver less than 292 dwellings per year.

- 2.6 The Council understands the concerns raised by local residents. It is in this regard that it has made sure that the DPD is informed by a number of evidence base studies to make sure the release of Green Belt land would not undermine the overall integrity and purposes of the Green Belt. The Council has assessed the capacity of the urban area to accommodate the projected future housing need. It has also made sure that the availability of suitable brownfield sites are first developed before Green Belt land. The evidence continues to demonstrate that there are insufficient brownfield sites with the likely prospect of coming forward during the plan period to enable the comprehensive delivery of the Core Strategy for the entire plan period.
- 2.7 It is important to remember the respective roles of the Council's development plan documents that have been approved by Council and set out in the Local Development Scheme (LDS). The LDS is on the website and can be accessed by: [www.woking2027.info/lDs](http://www.woking2027.info/lDs). The Site Allocations DPD has a distinct role to allocate land and cannot be used as a backdoor to review the policy requirements of the Core Strategy. Paragraph 20 of the NPPF requires strategic policies to set the overall strategy for the pattern, scale and quality of development. Paragraph 136 of the NPPF also requires strategic policies to establish the need for any changes to Green Belt boundaries. The respective roles of the Site Allocations DPD and the Core Strategy should not be conflated.
- 2.8 Many residents from Byfleet and West Byfleet have raised concern about the release of Green Belt land for development in their area, in particular, what they believe to be the disproportionate amount of Green Belt land being proposed to be released for allocation and safeguarding in the area. They have also raised concern about the allocation and overconcentration of Traveller pitches in the area. Whilst the Council understands the concerns, it is not possible to distribute the development evenly due the uneven distribution of constraints in the borough and the overriding need to make sure that development is located in the most sustainable locations of the borough when compared against all other reasonable alternatives. The Council has carried out evidence base studies such as the Green Belt boundary review and Transport Assessment to demonstrate that GB9, GB9A, GB4 and GB5 are in most sustainable locations and can be released from the Green Belt to meet future housing need. Based on the evidence, the Council is satisfied that the development of the sites will not undermine the overall purpose and integrity of the Green Belt.
- 2.9 The Council has a responsibility to make provision to meet the accommodation needs of all sections of the community. In accordance with Policy CS14 of the Core Strategy and the Green Belt boundary review, the Council has applied a sequential approach to identifying land for Traveller pitches. Land at West Hall, land at Stable Yard, land south of Gabriel Cottage and land at Brookwood Lye have been identified to make a contribution towards meeting the need for Travellers accommodation.

### **3.0 The scale of housing need**

- 3.1 The NPPF provides the following guidance in determining the minimum number of homes needed in the borough. It states 'strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. 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'. The Government has published the housing need for districts and boroughs across

the country using the standard method. The housing need for Woking is calculated to be 431 dwellings per year. The Council does not believe that an exceptional circumstances justification exist for an alternative approach to the standard method for calculating housing need. The Strategic Housing Market Assessment (SHMA) which the Council undertook in 2015 is the local evidence of housing need. The SHMA demonstrates that there is a housing need for 517 dwellings per year. The housing requirement figure of at least 292 dwellings per year is below both the standard method figure of 431 dwellings per year and the local housing need figure of 517 dwellings per year. It is unreasonable to expect that the outcome of an alternative approach to calculating the housing need will be less than 292 dwellings per year

- 3.2 The Core Strategy sets a housing requirement of at least 292 dwellings per year. This has been debated at the Core Strategy Examination and agreed by the Secretary of State as the number of dwellings that the Council has to provide on average each year. The housing requirement takes into account the environmental and infrastructure constraints of the borough. The Core Strategy is up to date. It was reviewed in October 2018. It is recommended that the housing requirement of the Core Strategy of at least 292 dwellings per year should continue to be the basis for planned growth in the Borough.
- 3.3 Claims have been made for the Council to use the up to date 2016 or the 2018 household projections instead of the 2014 household projections to calculate the housing need using the standard method. This matter has already been comprehensively addressed at the Examination Hearings, and the Council has published a Topic Paper about it on the website as an Examination Document. This can be accessed by this link: [www.woking2027.info/allocations/sadpdexam/mmconsultation/mmtopicpaper.pdf](http://www.woking2027.info/allocations/sadpdexam/mmconsultation/mmtopicpaper.pdf). As per the Planning Practice Guidance the demographic baseline is to use the 2014 based household projections (reference ID: 2a-004-20190220). The Government requires the 2014 based projections to be used to provide stability for planning authorities and communities, ensure that historic under delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. It later adds that any method which relies on using the 2016 based household projections will not be considered to be following the standard method as it is not considered that these projections provide an appropriate basis for use in the standard method (Reference ID: 2a-015-20190220).
- 3.4 While the PPG makes no mention of the 2018 based household projections, the Government has made its intentions clear in its response to the consultation on the 'changes to the planning system' by confirming the continuing use of the 2014 base projections. Subsequently, the Government has published the indicative housing need for the Borough using the standard method. This is set at 431 dwellings per year. Based on the above, the Council is satisfied that exceptional circumstances justification does not exist that is meaningful enough to adopt an alternative approach to calculating the housing need.
- 3.5 Evidence of housing need, housing completions to date and future supply of housing land continue to provide justification for the at least 292 housing requirement as basis for future planned growth. Since the adoption of the Core Strategy on October 2012, average number of housing completions as at March 2020 is 293 dwellings per year.

Analysis of how this is derived is set out in the Annual Monitoring Report. Representations have been received about the scale of extant planning permissions that could be delivered to meet the housing requirement until 2027 without the need to release Green Belt land. Not all planning permissions are implemented and/or implemented within reasonable time period. Trends since 2012 demonstrate the need for a buffer of housing land supply to improve the prospect of achieving the planned growth. For example, in 2019/2020 housing completions was 303 dwellings. During the same period permitted dwellings was 874 dwellings. In 2018/2019 completions was 231 whilst permitted dwellings was 639 and finally in 2017/18 completions was 345 dwellings and permitted dwellings was 777 dwellings. The Site Allocations DPD builds in sufficient cushion to enable the housing requirement to be met and to cater for the risk of non-implementation of some sites. It is important to note that where relevant, sites that have the benefit of planning permission are allocated in the Site Allocations DPD.

- 3.6 Representations have been received requesting the Council to take into account the High Court judgment between Aireborough Neighbourhood Development Forum and Leeds City Council. The Council has published a Topic Paper to comprehensively address this matter. This can be accessed by: [www.woking2027.info/allocations/sadpdexam/mmconsultation/mmtopicpaper.pdf](http://www.woking2027.info/allocations/sadpdexam/mmconsultation/mmtopicpaper.pdf). In summary, the Council believes that the judgment does not in any way undermine the legitimacy of seeking to deliver the 292 housing requirement or the release of Green Belt land. The spatial strategy and course of action taken in the Site Allocations DPD is the most sustainable when compared against other reasonable alternatives. The Green Belt sites allocated and safeguarded in the Site Allocations DPD have been justified with reasons at each stage of the DPD preparation process and should therefore be fully supported (subject of course to the Inspector's Final report). Above all, the Council believes that the Woking Core Strategy is up to date with no ambiguity about its housing requirement figure of 292 dwellings per year and the scale and nature of housing need.

#### **4.0 Provision of infrastructure to support the proposed development**

- 4.1 A number of local residents, in particular, residents from Byfleet and West Byfleet have expressed concern about the lack of proper assessment and provision of infrastructure to support the development of the proposed sites allocated in the DPD. This includes transport, education, health and green infrastructure.
- 4.2 The need to provide infrastructure to support proposals in the Site Allocations DPD has been comprehensively addressed in the Council's Issues and Matters Topic Paper in response to the Regulation 19 consultation. This can be accessed by: [www.woking2027.info/allocations/sadpdsub/regnineteentopicpaper.pdf](http://www.woking2027.info/allocations/sadpdsub/regnineteentopicpaper.pdf). This matter was also well debated at the Site Allocations DPD Examination Hearings, which the Council also published a statement in response to the Inspector's Matters, Issues and Questions. This can be accessed by: [www.woking2027.info/allocations/sadpdexam/wbchearingstatements15112019.pdf](http://www.woking2027.info/allocations/sadpdexam/wbchearingstatements15112019.pdf). The Council has been concerned to make sure that the necessary infrastructure that is needed to support the delivery of the Core Strategy and the Site Allocations DPD is fully assessed and measures of mitigation identified where justified by evidence. In accordance with paragraph 20 of the NPPF, the Council has worked with infrastructure providers to assess the quality and capacity of existing infrastructure and its ability to meet demand arising from the delivery of the Core Strategy and the Site Allocations DPD. An updated Infrastructure Delivery Plan (IDP) has been published in 2018 setting out the nature, type and scale of infrastructure that would be needed, who would provide it and where, at what cost and to what timescales. The IDP can be accessed by this link: [www.woking2027.info/test/ldfresearch/infrastructure](http://www.woking2027.info/test/ldfresearch/infrastructure). The IDP is a living document and is presently being reviewed to bring it up to date in accordance with the Council's



commitment to review it regularly. The review of the IDP is no reason to delay the next steps of the DPD process.

- 4.3 The Site Allocations DPD allocates land for infrastructure necessary to support the growth envisaged in the Core Strategy, including for SANG (GB12-GB16), transport (UA7, GB6, UA28, UA32), education (GB7), community facilities (UA15, UA25, UA31, UA42, UA43, UA44, GB3) supported accommodation (GB11), energy (UA14) and open space/recreational space (UA25, UA32, GB3, GB7, GB17, GB18). A number of key requirements to make the development of the sites in the Site Allocations DPD acceptable also requests the provision of additional site-specific infrastructure – such as sustainable drainage systems or green space – to support development; and also secure CIL contributions to fund infrastructure projects. These infrastructure projects will be secured and delivered as development proposals come forward.
- 4.4 The Council has worked closely with both Affinity Water and Thames Water to identify any deficiencies in infrastructure as a result of the likely scale and pattern of development foreseen in the Site Allocations DPD. The IDP details Affinity Water's response to consultation on the DPD - they conclude that no strategic network updates are foreseen to be required, but local network reinforcements may be needed in a few key areas. Paragraphs 13.91-13.109 of the IDP detail sites identified by Thames Water as likely to have insufficient wastewater infrastructure; and key requirements have therefore been included in relevant Site Allocations DPD policies to ensure applicants consult Thames Water regarding the impact of the development on wastewater infrastructure.
- 4.5 Education and health infrastructure needs are assessed in detail in sections 7, 8, 9, and 10 of the IDP. This issue is addressed in detail in the Council's Issues and Matters Topic Paper, which is an Examination Document on the website. The projected need for a secondary school has been met at land at Egley Road. The school is now operational. The need for primary education will mainly be met through existing provision. The Council continue to work with health providers to help improve the wellbeing of local residents. The provision of health infrastructure has historically reacted to demand. The health providers are satisfied that the impacts of the projected housing growth can be met.
- 4.6 Culture and tourism development is defined in the NPPF as including theatres, museums, galleries and concert halls, hotels and conference facilities. Specific site allocations identified to meet need for cultural infrastructure include UA15 (Big Apple), UA25 (Sheerwater), UA42 (Land at Station Approach), UA44 (Football Stadium); GB3: Brookwood Cemetery - including visitor facilities and museum and display space; GB17: Woking Palace – improved accessibility to learn about this Scheduled Ancient Monument.
- 4.7 The Council is satisfied that the necessary infrastructure to support the proposed development in the Site Allocations DPD has been comprehensively assessed and measures of mitigation identified where relevant. The Council will work with providers to enable the delivery of the infrastructure.

## **5.0 Land to the north of GB7**

- 5.1 The Council has been clear about its objective to maintain a visual gap between Mayford and the rest of the urban area, and has made this case to the Inspector with the proposal to set aside land to the north of GB7 where built development will be excluded. Whilst the Inspector agreed with the overall objective, he does not believe that it should be achieved by such a restrictive policy approach of excluding development on the part of

the site identified as visual separation. The Inspector considers such a restrictive approach unjustified. As a main modification, he has suggested that the objective could reasonably be achieved by effective design and landscaping. The extent of the visual gap would be decided through the development management process. The proposed main modifications delegate the decision on the extent of what is an acceptable visual gap to the local planning authority as decision maker on planning applications. Whilst the Council would have preferred to maintain the proposed visual gap through a policy designation, the Inspector's modification is clear, well-reasoned and defensible. There is no further evidence that the Council could provide at this stage that has not already been submitted to the Inspector on this matter. The Council would not argue that it is incapable of making reasonable development management decisions that will enable this objective to be achieved. The Council has well experienced Officers who will be capable of applying the key requirements of the policy to make sure that the objective of maintaining a visual gap is achieved.

- 5.2 The site is not designated as an absolute environmental constraint because of its biodiversity value. The Green Belt boundary review has concluded that the site can be developed without damaging the overall purpose and integrity of the Green Belt and the Escarpments. Whilst it is critical that a visual gap is maintained between Mayford and the rest of the urban area, the Inspector's suggested means to achieve that through landscaping and good design is defensible, and should be accepted.
- 5.3 In accordance with the Planning Act, the Council has asked the Inspector to propose modifications to the DPD that he considers will make the DPD sound and legally compliant. The proposed main modifications are therefore in accordance with Government legislation and not against the democratic wishes of the Council.

## **6.0 Implications of the COVID 19 pandemic**

- 6.1 A number of issues have been raised regarding the implications of the pandemic on the need for housing and the supply of housing land. There are representations suggesting that given that a lot of people would be working from home, there could be surplus office floorspace that could be redeveloped for housing. The Council is of the view that whilst people may choose to work from home, those who work in the office will require more floorspace to work due to social distancing. Others have argued that the pandemic has taught us that we need homes with gardens rather than flatted accommodation, and more Green Belt land should be released for that. There are suggestions that development has to incorporate on-site green infrastructure and/or be linked to offsite green infrastructure. There are claims relating the uncertainty about retail floorspace due to growth in online retailing. Whilst there could potentially be an element of truth or otherwise in all of these claims, some of which are conflicting, it is too soon to forecast or make projections on future need and demand based on them. The Council will carefully monitor local economic activity. The Core Strategy has inbuilt mechanism for monitoring and review to take into account future trends and respond accordingly.

## **7.0 Anticipated capacity of and uses on allocated sites**

- 7.1 Some representations have suggested that the proposed yields and uses for the allocated sites are too prescriptive. Others have argued that the anticipated capacities should be increased to reflect developers' aspirations for the sites. The Site Allocations DPD is clear to emphasise that the anticipated capacities are indicative, and that actual densities will be decided at the planning application stage when specific schemes come forward for development. The capacities are calculated using the densities in the Core Strategy (Policy CS10). Policy CS10 of the Core Strategy also emphasises that the anticipated densities are indicative and not intended to be prescriptive. It is important

that the application of the methodology for calculating the capacities is consistent across board. In this regard, the anticipated capacities should be retained as specified in the DPD.

- 7.2 The Site Allocations DPD has a clear purpose to allocate specific sites to enable the delivery of the requirements of the Core Strategy. The flexibility requested regarding the flexibility of uses on the sites will undermine this objective. The uses should be retained as specified.

## **8.0 Housing Infrastructure Fund (HIF)**

- 8.1 The Council has been awarded £95M to replace the Victoria Arch and improve the transport network within the vicinity of the Arch. This will unlock an additional 3,304 dwellings on specific sites within the Town Centre. The 3,304 dwellings is a separate contractual requirement on top of the provision to be made on the back of the Core Strategy requirement and would be counted and monitored as such. The Core Strategy requirement should not be conflated with the HIF requirement.

## **9.0 Sustainability Appraisal Report (SA) and Habitats Regulations Assessment (HRA)**

- 9.1 A request has been made for the SA and the HRA to assess the cumulative impacts of the development of the allocated sites. For information and clarification, the SA and the HRA both assess the cumulative impacts of developing the sites in the DPD.

## Section 2: Summary of further issues raised and Council's response

Site allocation and/or main modification reference	Summary of issue raised	Proposed action for consideration by Inspector
MM4	<p>The link does not obviously direct the reader to the SANG table.</p> <p>The wording should be accompanied by a map of potential SANG sites which the Council could buy.</p>	<p>A specific page will be created to direct readers to the SANG Table. The link will be amended.</p> <p>It will be unhelpful and unreasonable to expect the DPD to speculate with confidence SANG land that the Council may wish to buy to meet future development needs beyond the plan period. The Site Allocations DPD identifies sufficient SANG land to enable the delivery of the allocated sites over the plan period. The amount of SANG land that will be needed for the next plan period will be assessed and provided as part of the review of the Core Strategy/Site Allocations DPD..</p>
MM5	<p>The use of the phrase 'will be advised' and 'encouraged' should be strengthened to 'must', otherwise developers can ignore the design process. Developers should be asked to make use of low carbon steel and concrete.</p>	<p>The wording of the text is appropriate and the choice of the specific words are appropriate for their context.</p> <p>The choice of materials for the construction of development is a matter of detail that could appropriately be agreed at the planning application stage rather than at this plan making stage.</p>
<p>UA2: Trizancia House and Woodstead House UA3: Chester House</p> <p>MM10, MM11, MM12, MM13, MM14, MM15, MM16, MM17</p>	<p>MMs affecting UA2 and UA3 are too prescriptive and do not sufficiently reflect the up-to-date position on the ground. Given that adjacent office developments and the existing use of Chester House as offices, the natural use of the site is to retain it as entirely offices. Office and employment sites in the Town Centre are in short supply as a number of these buildings have been demolished or have been converted to residential uses a result of permitted development. Therefore, whilst the Council has a healthy housing land supply position, consequently there is an extreme lack of employment sites in the Town Centre.</p> <p>The residential element in UA2 should be deleted to ensure the plan is up-to-date and relevant. Alternatively, the policy should be revised to refer to main town centre uses with no prescriptive breakdown given. The surrounding</p>	<p>The Site is allocated for mix use development to contribute towards the delivery of the Core Strategy. The proposed uses are justified by evidence of need. If a planning application comes forward in the future and circumstances have changed at the time, the Core Strategy allows scope for a case to be made for an alternative use. This will be considered on its own merits by the Council.</p>

	<p>context is largely offices and residential uses would not be compatible with these.</p> <p>Regarding UA3, there is no reason for a prescriptive policy requirement of 14 residential units and 1,000 sqm of office space. This is not justified in terms of evidence and should be made more flexible and refer to office and other town centre uses.</p>	
<p>MM12, MM16, MM80, MM104, MM105, MM110, MM118, MM119, MM177, MM188, MM205, MM240, MM253,</p>	<p>The proposed modifications do not go far enough in respect of allocated sites adjacent to or in close proximity (5km) of the Basingstoke Canal. Concerns raised about the heritage, conservation and SSSI designation of the canal corridor. The increase in people using the canal towpath as a result of the allocations will need to be mitigated by financial contributions which are not necessarily covered by CIL.</p>	<p>CIL is a non-negotiable levy that will be charged on all relevant development. The choice of projects that the CIL money will be used on is a matter for the Council to decide. The Council publishes by 31 December of every year an Infrastructure Funding Statement setting out the priority list of schemes it wishes to use its CIL money on for the coming year. If a development proposal can be justified to have a direct impact on the Canal/Towpath, developer contributions could be sought via S106 Agreement to mitigate the adverse impacts.</p>
<p>UA6 2-24 Commercial Way and 13-28 High Street, Woking, GU21 6BW</p> <p>MM26, MM27, MM28, MM29</p>	<p>MM26 (and footnote 4 in MM28 and MM29) assumes just 50 new dwellings and associated commercial development. It may be prudent to reference this higher density of development and anticipated site capacity.</p> <p>In commercial terms, although the policy refers to retail and office uses, it should instead now reflect the new Class E flexible commercial use, appropriate to the town centre.</p> <p>MM27 provides for a comprehensive residential led, mixed use redevelopment of the site and is supported. The modification should reference the emerging context, which is of a wholly different scale to the existing context. It should refer to the immediate context including the Victoria Square Development and adjacent public space, and other development within the town centre allocated sites.</p> <p>The policy should allow for consideration of the degree to which the proposals conserve or enhance the character and appearance of heritage assets and/or deliver other benefits as part of the overall planning balance.</p>	<p>The site does not yet have the benefit of a planning permission, and the future aspirations for the site alone cannot be used as evidence to define policy, in particular, policy on the scale of development on the site. A consistent methodology has been applied to define the anticipated capacities for the sites. The DPD emphasises that the anticipated capacities for the allocated sites are indicative and not intended to be prescriptive. The suggested change is not justified.</p> <p>The propose uses are appropriate for the site and has the intended purpose to make a contribution to the comprehensive delivery of the Core Strategy. They are justified by evidence of need.</p> <p>The character and context for the vicinity of the site is wider than the Victoria Square development. It is therefore not necessary to single out Victoria Square and make reference to it in the DPD.</p>

	<p>Although MM27 also refers to the need to retain any trees of demonstrable amenity value, there are no trees within the site and this should perhaps be amended.</p> <p>MM27 refers to the need to avoid any impact, directly or indirectly, on the minerals function and operational requirements of the Downside Goods Yard rail aggregates depot. The site is some distance from the depot on the opposite side of the railway line and would have no direct or indirect impact on the depot, hence this requirement is not relevant and should perhaps be deleted.</p> <p>The new class E replaces class B1 and a range of active frontage uses including A1 retail and other town centre uses, hence, the policy should perhaps instead refer to replacement of class E space as far as possible, consistent with the needs of the Borough.</p> <p>Other representors support key requirements xix and xx and paragraph 5 of the supporting text as appropriately safeguarding the goods yard.</p>	<p>Reference to retain trees should be deleted given there are no longer trees on the site.</p> <p>The site falls within the consultation zone of the safeguarded downside goods rail aggregates depot as detailed in the Surrey Minerals Plan Policy MC6. The key requirement is therefore necessary.</p>
<p>UA7: Woking Railway Station bus/rail interchange</p> <p>MM31, MM32, MM33</p>	<p>Day Group support key requirement viii as appropriately safeguarding the goods yard. However they object to paragraph 8 as failing to safeguard the goods yard or respect the agent of change principle, and being inconsistent with previous statements by the Council (including the July 2019 proposed changes), and they request amended wording.</p> <p>Other representors support monitoring the delivery of specific projects such as the transport interchange hub and the Woking Flyover in accordance with the relevant project plans is supported. Support the improved focus on sustainability principles underpinning these transport improvement schemes.</p>	<p>The site falls within the consultation zone of the safeguarded downside goods rail aggregates depot as detailed in the Surrey Minerals Plan Policy MC6. Paragraphs 7 of MM56 and 4 of MM60 appropriately require applicants to consult the Minerals Planning Authority in accordance with Policy MC6 of the Minerals Local Plan. The paragraphs are appropriately worded to accord with the development plan.</p>
<p>UA10: MVA and Select House, Victoria Way</p> <p>MM43, MM44</p>	<p>The site is not within the 200m consultation zone for Downside Goods Yard.</p>	<p>The site does not fall within the consultation zone of the safeguarded downside goods rail aggregates depot as detailed in the Surrey Minerals Plan Policy MC6. Paragraph 6 of UA10 should be modified accordingly.</p>
<p>UA11: 1-7 Victoria Way and 1-29 Goldsworth Road</p> <p>MM46, MM47, MM48</p>	<p>Day Group support key requirement xvii as appropriately safeguarding the goods yard. However they object to paragraph 7 as failing to safeguard the goods yard or respect the agent of change principle, and being inconsistent with previous statements by the Council (including the July 2019 proposed changes), and they request amended wording.</p>	<p>The site falls within the consultation zone of the safeguarded downside goods rail aggregates depot as detailed in the Surrey Minerals Plan Policy MC6. Paragraph 7 appropriately require applicants to consult the Minerals Planning Authority in accordance with Policy MC6 of the Minerals Local Plan. The paragraph is appropriately worded.</p>

<p>UA12: Synergy House, 8 Church Street West</p> <p>MM50, MM51, MM52, MM53</p>	<p>Lack of flexibility in the anticipated site yield and proposed use class. It is too prescriptive given the introduction of new use class regulations.</p> <p>In PLAN/2020/0568, the site is proposed for a homeless shelter to provide space used by the York Road Project. UA12 should allow for this sui generis use, as supported by CS13.</p>	<p>A consistent methodology has been applied to define the anticipated capacities for the site. The DPD is clear to emphasise that the anticipated capacities for the allocated sites are indicative and not intended to be prescriptive. The suggested change is not justified.</p> <p>The proposed uses are appropriate for the site and has the intended purpose to make a contribution to the comprehensive delivery of the Core Strategy.</p>
<p>UA13: 30-32 Goldsworth Road, Woking Railway and Athletics Club</p> <p>MM54-MM57</p>	<p>Objection to inflexibility of anticipated uses and yields – it is too prescriptive given the change in circumstances and introduction of new use class regulations.</p> <p>The key requirement regarding impact on the Day Group site is unsound and should be modified to define the acceptable impact.</p>	<p>A consistent methodology has been applied to define the anticipated capacities for the site. The DPD is clear to emphasise that the anticipated capacities for the allocated sites are indicative and not intended to be prescriptive. The suggested change is not justified.</p> <p>The proposed uses are appropriate for the site and has the intended purpose to make a contribution to the comprehensive delivery of the Core Strategy.</p> <p>The site falls within the consultation zone of the safeguarded downside goods rail aggregates depot as detailed in the Surrey Minerals Plan Policy MC6. The requirement is therefore necessary.</p>
<p>UA13: 30-32 Goldsworth Road, Woking Railway and Athletics Club</p> <p>MM55, MM56, MM59, MM60</p>	<p>Day Group support key requirements xix and xxi of MM55 and xxi of MM59 as appropriately safeguarding the goods yard. However they object to paragraphs 7 of MM56 and 4 of MM60 as failing to safeguard the goods yard or respect the agent of change principle, and being inconsistent with previous statements by the Council (including the July 2019 proposed changes), and they request amended wording.</p>	<p>The site falls within the consultation zone of the safeguarded downside goods rail aggregates depot as detailed in the Surrey Minerals Plan Policy MC6. Paragraphs 7 of MM56 and 4 of MM60 appropriately require applicants to consult the Minerals Planning Authority in accordance with Policy MC6 of the Minerals Local Plan. The paragraphs are appropriately worded.</p>
<p>UA15: The Big Apple American Amusements Ltd, H.G. Wells Conference Centre, the former Rat and Parrot PH, 48-58 Chertsey Road</p>	<p>Re-provision of a community facility at the site is acknowledged and supported, but highlights the approach agreed with WBC in the application process (PLAN/2019/1141) to scope the quantum of floorspace necessary, linked to functionality and user groups that the floorspace is designed to accommodate. Conferencing facilities have been re-provided at Victoria Square and the proposed MM is inconsistent with the Council's determination of the planning</p>	<p>The site does not have the benefit of planning approval. It is important that any planning application for the site is determined in accordance with the development plan for the area, including the emerging Site Allocations DPD. Any agreement reached during pre-application discussions is not sufficient on its own</p>

MM62, MM63, MM64

application. It is unnecessary, irrational and unviable to provide the same amount of community floorspace as the conference centre. The approach taken is not in the interests of sustainable development and would undermine delivery of this important town centre site.

The MMs introduce more restrictive policy wording with regard to the re-provision of equivalent floorspace for a range of replacement uses. This is cited to link to CS19 but refers to uses not covered or protected by that policy. Policy CS2 seeks to prevent the loss of existing cultural and entertainment facilities in the town centre, but does allow for loss where there is no demand or demand can be met from an alternative provision in the town centre. The proposed MMs wording create new policy requirements not present in the Core Strategy which would require a new evidential basis. Therefore the MMs are not justified.

Supports the complete removal of reference to replacement uses in relation to the conference centre. If the Inspector would prefer to retain wording addressing this issue, the following options for MM63 ii are suggested:

- 'Accord with Core Strategy CS19: Social or community infrastructure' or
- 'Accord with Core Strategy Policy CS19: Social and community infrastructure – provide social and community uses on site and/or make a financial contribution towards the provision of community facilities unless the provisions of policy CS19 are otherwise met'

Remove the words 'Reprovision of community/cultural and entertainment floorspace' from the header of the site allocation at MM62 or amendment to:

- 'Social and Community Uses: Reprovision of social and community/cultural uses where required by Policy CS19'

If the Inspector wishes to refer to protection of cultural and entertainment uses, this should reference CS2 not CS19. However, does not consider it necessary to repeat requirements of Core Strategy policy in the Site Allocations DPD.

Concern about the indicative site capacity of 67 residential units. This is inconsistent with the Core Strategy's spatial vision; CS1's direction for most new development to be on PDL in the town, district and local centres; and with policy that supports high density developments and tall buildings within Woking Town Centre. It also does not reflect detailed discussion with officers during the pre-application process.

to define policy in the DPD. The need to re-provide the existing floorspace for community uses is justified. It is necessary to enable the existing and diverse operators which contribute to the town centres economy and supports its vitality to continue and are not left without a home.

The reference to Policy CS19 is appropriate in the context that it is used.

A consistent methodology has been applied to define the anticipated capacities for the site. The DPD is clear to emphasise that the anticipated capacities for the allocated sites are indicative and not intended to be prescriptive. The suggested change is not justified.



<p>UA28 [modified to UA27]: Monument Way West Industrial Estate</p> <p>MM116-118</p>	<p>Allocate the unused gasworks area of the site for community uses – provides a series of ideas ranging from green infrastructure opportunities, to performing space and play space – to help address issues in the area such as antisocial behaviour and crime.</p>	<p>The proposed uses are appropriate for the site and has the intended purpose to make a contribution to the comprehensive delivery of the Core Strategy. The DPD also makes sufficient provision to enable the delivery of community facilities, including green infrastructure.</p>
<p>UA32 [modified to UA31]: Car Park, Oriental Road</p> <p>MM136-140</p>	<p>The site is capable of delivering of at least 250 new homes as well as commensurate open space and pedestrian and other local connections. Support the development of the site for a high density town centre use. It is reasonable to assume a start on site in 2024/25, with the first completions occurring before 2026/27.</p> <p>While the precise boundary with development at UA7: Woking Railway Station (MM30/MM31) will need to be defined in the light of existing and proposed site infrastructure and the plans for the adjacent station, which may or may not reflect the boundary of the allocations, the notion in principle that there should be some re-provision of car parking that is related to the operation of the station is supported. However, concerned that this should not be expressly required to make full off-site provision of car parking to offset the loss of spaces as a result of the site's development. Whether the level of parking should reflect current or an alternative, potentially reduced, level of provision should be based on a detailed assessment of parking requirements in this location on a basis to be agreed with the Borough and County Councils. This and the form of parking including any decked proposals, should be the subject of discussion with the Council.</p> <p>It would be useful in Footnote 10 to note that any proposals would be subject to viability review in order to secure delivery of a viable development and determine the appropriate level of s106 and other obligations (aside from CIL liabilities).</p> <p>An objection was raised to the removal of clauses which respect immediately adjoining properties and those in surrounding streets, as it is difficult to ascertain anticipated heights. In particular, (iii) and (v) are scored through and not replaced by equally strong restrictions on height.</p>	<p>It is an objective of the Core Strategy to promote sustainable modes of travel such as rail travel. An adequate car/cycle parking facilitate to promote an effective interchange between modes is important to encourage modal shift to public transport in accordance with Policy CS18 of the Core Strategy. The re-provision of the existing car parking spaces is an important pre-requisite for the redevelopment of the site. This is more so necessary given plans to enhance facilities and connectivity to/from the station and the proposed significant improvements to the rail network such as the Woking Flyover.</p> <p>Key requirements (iii) and (v) are appropriately reworded to ensure that any development of the site are of good design, of appropriate height and respects the character of its vicinity.</p> <p>The Council would expect a policy compliant proposal to be delivered on the site. The Council also expects development to be supported by adequate infrastructure. However, the Core Strategy allows scope for an applicant to submit evidence of viability to justify why the Affordable Housing requirements of Policy CS12 and infrastructure requirements in accordance with Policy CS16 could not be met. The proposed changes are not necessary.</p>
<p>UA34 [modified to UA33]: Coal Yard/Aggregates Yard adjacent to the railway line,</p>	<p>The Minerals Planning Authority recognizes that changes have been made within SADPD policies to reflect MC6 and MC16 of Minerals Plan in respect of the safeguarded aggregates depot. MPA also acknowledges that there is now a requirement within the DPD for all development proposals within the</p>	<p>The policy already provides effective protection for the aggregates depot. The policy ensures that the Minerals Local Plan is taken into account through engagement with the Minerals Planning Authority. It also requires</p>

<p>Guildford Road/Bradfield Close</p> <p>MM146, MM148, MM149</p>	<p>aggregates yard consultation area to benefit from early engagement with the MPA. MPA reiterates comments made at Reg. 19 stage and seeks further reassurance that as the agent of change, the plan making authority will ensure that newly proposed development within the safeguarded area of the depot will not threaten the future operation of the existing depot. Wording is proposed for UA33 as below:</p> <p>‘The existing depot would need to be retained and its efficient future operation safeguarded, whilst ensuring access is maintained or improved. Surrey County Council (Minerals Planning Authority) would strongly resist any development that would be likely to prejudice the future efficient operation of the depot. The relocation of the depot to an equivalent alternative site on the rail network is not a realistic option.’</p> <p>Day Group supports changes to the boundary of the site and also key requirements v and vi as appropriately safeguarding the goods yard. However they object to key requirement iii, iv, x and xiv and paragraph 6 as failing to safeguard the goods yard or respect the agent of change principle, and being inconsistent with previous statements by the Council, and they request amended wording to bring the policy into line with the July 2019 proposed changes and the November 2019 WBC Hearing Statement.</p>	<p>the Minerals Planning Authority to be satisfied that future development will not prevent directly or indirectly the minerals function and operation of the site. This is sufficient to provide the assurance sought.</p> <p>Whilst the Policy does not seek to relocate the aggregate depot to an alternative location during the plan period, it will be unreasonable to expect the DPD to rule out the future use of the site beyond the plan period. That is beyond the scope of the DPD. The Council has not been provided with any evidence why an equivalent alternative site on the rail network will not be a realistic option.</p> <p>The site falls within the consultation zone of the safeguarded downside goods rail aggregates depot as detailed in the Surrey Minerals Plan Policy MC6. It is also adjacent to the aggregates depot. Paragraph 6 and key requirements iii, iv, x and xiv appropriately require applicants to consult the Minerals Planning Authority in accordance with Policy MC6 of the Minerals Local Plan. They also ensure that the design of development takes account of the operations on the depot and there is proper relationship between the adjoining uses. The paragraphs and key requirements are appropriately worded.</p>
<p>UA40 [modified to UA38]: Camphill Tip</p> <p>MM177, MM178, MM179</p>	<p>Designation too narrowly focuses on industrial uses – should consider alternative productive uses such as community energy generation (e.g. PV farm). Could be an opportunity to meet policy CS23 support for renewable energy projects.</p> <p>Due to existing constraints (land contamination, topography, constrained access for commercial vehicles, and improvement in infrastructure (e.g. wastewater) likely to make delivery unviable, and cause public outrage over the demolition of homes required) make proposed use unrealistic. Key requirements vi, vii and viii should be costed and an explanation provided of how they could be achieved. Would the landowner be required to fund decontamination?</p>	<p>The site has a realistic prospect of coming forward for the propose use and the development will complement the adjacent industrial use. The Council has not been provided any evidence of the locational advantage of using the site for renewable energy instead of the propose use. No evidence has been provided to assess the impacts. Policy CS23 of the Core Strategy offers an in-principle support for renewable energy and low carbon energy generation. However, for any scheme to be acceptable, applicants should provide sound evidence of the availability of the resource to be harnessed, including adequacy of transport networks where applicable and detailed studies to assess</p>

	<p>Development would do nothing to improve the vibrancy and the vitality of the adjacent Camphill Industrial Estate. Requirement for it to be complementary is not justified.</p> <p>Substantial levelling of the site would entail disturbance of historic mass waste, contrary to the requirement to minimize pollution of the Rive Ditch and Basingstoke Canal.</p> <p>Commercial development would compound congestion.</p> <p>Key requirement xiii would result in a 'shell construction'.</p> <p>Perhaps with modern technology an environmentally friendly and socially beneficial and positive utilization could be identified.</p>	<p>potential adverse impacts. The policy encourages renewable generation if it can be justified in its location. The site is suitable for industrial use and has been allocated with the purpose of contributing towards the economic strategy of the Core Strategy. The site specific issues raised by the representation such as contamination can be mitigated to enable development to come forward.</p>
<p>UA44 [modified to UA42]: Woking Football Club</p> <p>MM195-MM199</p>	<p>Text is ambiguous. It should specify which parts of the site are publicly owned and the appropriate affordable housing requirement.</p> <p>There is no explanation as to how the indicative yield of 93 dwellings was arrived at, and which area of the site would be allocated for residential development.</p> <p>There is no indication of densities and height.</p> <p>A masterplan should be developed for the site.</p> <p>Although the new additional text in relation to Travel Plans is welcome, concerns are raised about the removal of the reference to the adopted Car and Cycle Parking Standards.</p> <p>There is an imbalance in the provision of 3-bedroom homes, and over-provision of 1-bedroom homes. UA42 could contribute to restoring the desired balance, and therefore a policy supporting greater provision of larger properties should be included.</p> <p>Support for inclusion of anticipation yield at 93 dwellings.</p> <p>The developer does not object to the principle of development sought by UA44, but expresses three concerns. Firstly, it is unclear whether the football stadium is to be replaced, enhanced or retained. Secondly, as regards positive</p>	<p>The wording of the policy is appropriate, and the specific choice of words are appropriate for the context they are used. The policy is not seeking the relocation of the stadium to another location. It requires it to be enhanced at its existing location. Given the objective for an enhanced facility, it could be achieved through redevelopment at its existing location.</p> <p>Policy CS12 of the Core Strategy appropriately sets the Affordable Housing requirement for development and any scheme that comes forward would be expected to be policy compliant. There is no justification to set a distinct Affordable Housing target for the site.</p> <p>The introductory section of the Site Allocations DPD sets out how the indicative yields of the allocated sites are calculated.</p> <p>It will be unreasonable to expect a local plan such as a Site Allocations DPD to go into such detail to set heights for each or any site unless there is a clear justification to do so. There is nothing unique about the site to justify setting height for any development that would come forward. That will be unnecessarily prescriptive. This is a level of detail that can best be addressed at the development management stage.</p>

	<p>preparation, the site has capacity for significantly more than 93 dwellings. This does not seem to be supported by the evidence base. Thirdly, the overall basis and justification for the policy is questioned. Therefore two propositions are set out as below:</p> <p>a. Policy UA44 is modified to include an approximation of the potential housing delivery yield, based on site capacity and masterplanning evidence, which is approximately [100] dwellings on the basis that such development does not preclude any future enhancement to the football stadium in-situ, or a greater housing yield where justified via a robust consultation, design review and masterplanning process, in order to specifically enable the comprehensive redevelopment of the football club on the site (as linked to emerging policy GB7), or;</p> <p>b. Policy UA44 is deleted as there is no alternative justification for the redevelopment of the football stadium nor evidence to support it. Any future proposals are considered as windfall in the context of the Core Strategy.</p> <p>Proposition b. is suggested where the Inspector is not satisfied that neither sufficient reason nor evidence exists to justify any policy on the site. This may still enable sustainable development, guided by the Core Strategy.</p> <p>Another representation states that any development of the Woking Football Club should reflect the densities in CS10, consider noise and light pollution, excess traffic and local parking impacts for any non-football activities.</p>	<p>The indicative densities for the various part of the borough are set out in Policy CS10 of the Core Strategy. These have been used to inform the anticipated capacities for the allocated sites. The Policy is clear to emphasise that the densities are indicative. Actual densities will be agreed at the planning application stage. Similarly, it will be unreasonable to specify the types of homes to be built on the site (such as number of bedrooms). Policy CS11 sets out the types of housing needed in the area, and any development of the site will be required to take that into account. A masterplan is not a necessary pre-requisite for the development of the site. The Council will however not resist the preparation of a masterplan by an applicant to inform any planning application on the site.</p> <p>The policies of the Core Strategy and the Development Management Policies DPD will ensure that development impacts such as noise and light pollution are fully assessed and any adverse impacts appropriately mitigated.</p>
<p>Policy SA1: Overall policy framework for land released from the Green Belt for development</p> <p>MM200</p>	<p>Objection to timing of release being between 2022 and 2027 without an assessment of the need for release, given changing housing requirements over time. Original language should be reinstated. Removal of that assessment is an error of law.</p> <p>Does not reflect the Aireborough Neighbourhood Development Forum Judgment – there is not adequate justification for release of Green Belt land.</p> <p>As at March 2019: 2,365 dwellings have been completed during the plan period; there is extant planning permission for 2,037 dwellings; 1,094 dwellings are projected to be delivered in Woking Town Centre that are not reliant on HIF upgrades; according to the Five Year Housing Land Supply Position Statement, 268 dwellings are to be delivered on other sites across WB; and 336 dwellings to are likely to be delivered by windfall sites. This totals 6,100 relative to a</p>	<p>The main modifications to Policy SA1 better reflect the requirements of the Core Strategy (see Policies CS1, CS6 and CS10). Whilst the Council would have wished to put restrictions on the timing of the release of the allocated Green Belt sites for development, it is clear that such an approach would have gone beyond the letter of the above policies of the Core Strategy.</p> <p>The justification for the release of Green Belt land, the scale of housing need in the borough and the relevance of the case between Aireborough Neighbourhood Development Forum v Leeds City Council have been addressed separately in Section 1 above. The Council has published a Topic Paper to</p>

	<p>target of 4,964. This is an excess of 1,136 or 23% above the target. Adjusting for the different horizon of the Five Year Housing Land Supply Position Statement relative to the plan period gives a total of 6,201 dwellings: an excess of 1,237 or 25% above the target. Allowing a buffer for non-delivery gives an excess of 901 or 1,045 (between 18.2% and 21.1%). Consequently, there is no justification for Green Belt release.</p> <p>A variation of the above analysis concludes that there is a planned excess of 1,293 homes or 26% in housing delivery. Another concludes that there a planned excess of between 1,058 and 1,194 homes in housing delivery. A fourth states there is a potential excess of 2,236. It is also noted that there are plans to deliver 3,304 properties further to those in the DPD through the successful HIF bid.</p> <p>During the plan period, CS10 requires 170 additional homes in West Byfleet and 550 on Green Belt in the whole of the borough. Should GB9 be released during the plan period, West Byfleet will have contributed over 1,100 new dwellings including 823 on Green Belt. There are no current exceptional circumstances, and no longer housing need, that justifies the release of this Green Belt land. Does the Inspector consider that housing numbers additional to those agreed in 2012 (CS) and 2016 (GBBR) come within his terms of reference? Refer to <i>Cooper Estates Strategic Land Limited v Royal Tunbridge Wells Borough Council</i> [2017] EWHC 224 regarding the role of a Site Allocations plan.</p> <p>WBC does not publish documents that make it easy to establish dwellings completions by size and type. Without such data, and future projections, it is not possible to determine if any exceptional circumstances exist, or are likely to exist in the future, on the basis of housing size and type that may require Green Belt release.</p> <p>WBC has not published documents that make it sufficiently possible to determine if any exceptional circumstances exist, or are likely to exist in the future, on the basis of housing type mix that may require the release of Green Belt land. The Inspector should request an independent audit of housing numbers.</p> <p>There is an absence of data on dwellings with gardens. Therefore Green Belt release, including at GB9, to deliver such houses would not appear to be based</p>	<p>demonstrate why it has come to this conclusion. This can be accessed at the Examination webpage.</p> <p>The scale of the housing need, the housing requirement and the capacity of the urban area to accommodate the development requirements of the Core Strategy have been addressed in the main report.</p> <p>The Core Strategy covers the period 2010 to 2027. Development needs up to 2022 (12 years of the 17 years) is being met on previously development land in the main urban centres in line with the spatial strategy of the Core Strategy. There is no doubt that the Council has prioritised development on brownfield land over development on Green Belt site. Nevertheless, there would be the need to release Green Belt land to meet housing need and nature and type of housing between 2022 and 2027.</p> <p>The justification for the release of Green Belt land to meet the accommodation needs of Travellers is addressed in the main report.</p>
--	---	--

on quantitative data. The emphasis on homes with gardens in West Byfleet does not accord with need identified in the West Surrey SHMA, which makes only one reference to 'garden' (p.158) and emphasis demand for smaller and above all affordable dwellings.

A review of housing size delivery suggests that Woking is in general meeting the need for 4+ bedroom and 2 bedroom dwellings, vastly over-delivering 1 bedroom dwellings and that there is a shortfall of 3 bedroom dwellings. It is not possible to determine the mix of housing sizes that would be yielded by the SADPD sites. Therefore housing mix is not a valid factor in deciding whether GB9 should be released from the Green Belt.

The marked rise in vacant dwellings (78% increase from 2017 and 2019 according to UK government data) demonstrates that Woking Borough may be oversupplied with housing.

Why is Green Belt land being developed before all brownfield land, for instance Manor School in Byfleet, has been considered?

Strategic policies do not require re-testing unless there has been a significant change in circumstances affecting the requirement. This has occurred; options for brownfield land and available office spaces need to be assessed.

West Byfleet's Green Belt should be protected for future generations.

Keeping GB4, GB5 and GB9 in the Green Belt contributes to multiple national and international environmental policy commitments. The statement by Lord Goldsmith on Building Back a Green and Resilient Recovery highlights the importance on nature in light of the COVID-19 pandemic. These sites also serve important Green Belt purposes.

Release/safeguarding of Green Belt land at GB1, GB7 and GB8 is unsound and will cause adverse impacts such as congestion and urban sprawl.

The release of GB4, GB5 and GB9 will cause Weybridge and Woking to merge over the M25.

Reconsideration of Green Belt release is urged as the Government has changed its recommendations for building in the South East.

	<p>Concerns that objections to the removal of Green Belt land in Byfleet and West Byfleet on the basis of flood risk and infrastructure have been disregarded.</p> <p>This development contradicts the intent of the Environment Bill.</p> <p>SA1 – overall policy framework for release of Green Belt Has failed to consider land east of Martyrs Lane for Traveller pitches – whilst it was found unsuitable for major housing, it has not been assessed for Traveller accommodation.</p> <p>One representation supporting the clarity that the modified policy brings regarding release of land and timing of delivery for Traveller pitches.</p> <p>The TAA (2013) is not a robust assessment of need as required in the PPTS. It is also 7 years old; most LPAs choose to update such assessments far more regularly.</p> <p>The TAA (2013) states that “temporary planning permissions, once they expire, will represent a new need.” However, the needs of 9 temporary pitches which post-date the TAA have not been accounted for, despite the methodology insisting otherwise.</p> <p>There are clear and important reasons why the residents of Boyd’s Farm would not be able to occupy pitches at one of the other allocated sites. It is incumbent on the LPA and the Inspector to consider the Article 8 rights of the current occupants. If no allocation is made, the implication is that this family group will be forced to move elsewhere. If significant weight is given to this figure, then it is possible for an allocation to be made on a personal basis. A modification is proposed accordingly. An example of such an approach is from the Guildford Borough Plan (2019) (Four Acres Stable, Aldershot Road, Worplesdon).</p> <p>A representor considers that the overall amount of housing proposed to be delivered by the SADPD appears to be substantially reduced from the submission version of the Plan. Additional sites, such as Land north west of Saunders Lane and Land north east of Saunders Lane, should be added to meet the higher level of need established by the current standard methodology.</p> <p>Not meeting family housing needs as shown by AMR.</p>	
--	--	--

	<p>Need more Greenfield sites to deliver more affordable housing.</p> <p>No evidence demonstrating that the SADPD housing allocations are deliverable or developable, contrary to the requirements of NPPF.</p> <p>Given that the Council considers that the integrity of the Escarpment can be maintained at the adjacent GB7 through detailed design, it follows that a similar approach could be taken towards development at Land north east of Saunders Lane and Land north-west of Saunders Lane.</p> <p>Recommendation that text within MM200 is amended further as follows:  'Land at:</p> <ul style="list-style-type: none"> <li>• Land south of Parvis Road and High Road, Byfleet (Proposal Site GB4)</li> <li>• Land to the south of Rectory Lane, Byfleet (Proposal Site GB5)</li> <li>• Woking Garden Centre, Egley Road, Mayford (Proposal Site GB8)</li> </ul> <p>are identified as safeguarded land <b>which could</b> be released from the Green Belt for development (<b>following consideration of all Green Belt sites through a full Green Belt Review</b>) should a future update to the development plan find that the release of sites from the Green Belt is necessary. The sites will remain in the Green Belt until such release is justified...' [changes proposed by Martin Grant Homes in bold].</p> <p>SA scoring of the sites for Saunders Lane requires adequate evidence.</p>	
<p>SA1: Overall policy framework for land released from the Green Belt for development</p> <p>MM201</p>	<p>Requests WBC to publish their consultations with the Gypsy and Traveller communities to clarify how those impacted wish to be housed.</p> <p>At point 9, it is an 80 bed care home, not 8 bed care home. Questions what else is based on incorrect facts.</p> <p>Considers that SA1 is a decree rather than a policy.</p>	<p>The Council has published all representation received during the formal consultations of the DPD including Regulations 18 and 19 consultations.</p> <p>The reference to 8 bed instead of 80 bed is an editorial error that will be corrected.</p>
<p>GB4: Land to the south of Parvis Road and High Road, and GB5: Land to the south of Rectory Lane</p> <p>MM215, MM216, MM217, MM218, MM219, MM220</p>	<p>Any update to the Core Strategy should be accompanied by a further Green Belt review.</p> <p>There is no justification for Green Belt release.</p> <p>The plan needs to be reviewed in the context of changing evidence and policy relating to biodiversity. This includes the RSPB's State of Nature report (2019),</p>	<p>The Core Strategy has a period up to 2027. It was reviewed in 2018 and is up to date. The Council will determine the issues to be addressed at its review and the necessary evidence that will be needed to justify its policies. It will be unreasonable to speculate that at this stage.</p>



	<p>the WWF Living Planet Report and the government's Natural Capital Approach and Biodiversity and Ecosystem Guidance. This makes proposed Green Belt release unacceptable.</p> <p>As sites GB4 and GB5 are both crossed by overhead electricity transmission lines, National Grid wishes to be consulted on any Development Plan Document or site-specific proposals and has submitted guidance on development near National Grid assets and a map illustrating the location of the electricity lines within GB4 and GB5.</p> <p>Highways England requests to be consulted on GB4 due its proximity to the Strategic Road Network. Notes the 'noise fences, screen fences etc.' section of the Dft circular 02/2013 Annex A in relation to the site's boundary with the Strategic Road Network.</p>	<p>The Core Strategy provides the exceptional circumstances justification for the release of Green Belt land to meet housing need between 2022 and 2027. The Green Belt boundary review provides justification for the release of GB4 and GB5. The Study has demonstrated that they can be released for development without significantly undermining the overall purposes of the Green Belt. The DPD is justified to safeguard them to meet future development needs beyond this plan period subject to the restriction proposed in the main modifications. The above is address in detail separately in the main report (see main report)</p> <p>The site selection process for the DPD has ensured that sensitive environmental designations of wildlife significant are avoided for allocation. The key requirements and the Policies of the Core Strategy such as Policies CS7, CS8 and CS9 of the Core Strategy will ensure that harm is not caused to the biodiversity assets of the borough. Sites that were as deemed as absolute constraints were ruled out at an early stage of the site selection process. The Council had been concerned to make sure that environmental bodies such as Natural England, Surrey Wildlife Trust and Environment Agency were actively involved in the preparation of the DPD and their comments have been used to inform the DPD to date.</p> <p>The policy acknowledges the existing pylons on the site and the need for development to take that into account.</p> <p>Highways England is a key statutory consultee and the Council has and will continue to engage with them in the preparation and delivery of its plans including consulting them on relevant planning applications.</p>
<p>GB4: Land to the south of Parvis Road and High</p>	<p>As an update to the development plan has not commenced to consider exactly what future development needs will be between 2027 and 2040, and the</p>	<p>The policy guidance for safeguarding land to meet future development needs is established and</p>

<p>Road, GB5: Land to the south of Rectory Lane, and GB8: Woking Garden Centre</p> <p>MM215, 218 and 230</p>	<p>release of these sites is yet to be justified, it is misleading to state that these sites will meet long term needs during this defined period. Therefore text within MM215, MM218 and MM230 should be amended as below:</p> <p>‘safeguarded to <b>contribute to meeting</b> the long term development needs of the Borough <b>between 2027 and 2040</b>’</p>	<p>encouraged in the NPPF (see paragraph 139). The Council has decided that based on the available evidence GB4, GB5 and GB8 are sites that are justified to be safeguarded to meet future development beyond this plan period. The policy is therefore appropriately worded and consistent with NPPF. There is no intention of considering omission sites or to speculate on what they might be. At the review of the DPD, omission sites could be promoted for consideration and assessed on their merits. The suggested change is therefore unreasonable in this context.</p>
<p>GB7: Nursery Land adjacent to Egley Road</p> <p>MM225-MM229</p>	<p>A concept report has been submitted on how the visual separation be maintained through landscaping and design. Supportive of this part of modified policy. However, the anticipated yield should be more flexible to allow for efficient use of Green Belt land. It is unsound as proposed.</p>	<p>Whilst the concept report has been noted, by the requirements of the proposed main modification, this is a matter for the local planning authority to decide when a planning application comes forward.</p> <p>The anticipated capacity for the site has been calculated using the consistent approach applied throughout the DPD. It is based on geographical size of the allocated site, the anticipated density for development of Green Belt sites as set out in Policy CS10 of the Core Strategy and the character of the area. The approach for calculating the capacities of the allocated sites is explained in the introductory section of the DPD.</p>
<p>GB7: Nursery Land adjacent to Egley Road</p> <p>MM225-MM229</p>	<p>The northern field of GB7 is necessary to ensure the separation of Mayford and Woking. Its development would lead to Mayford becoming an urban extension of Woking, and set a precedent leading to the merging of Woking and Guildford. Such separation is consistent with Policy CS1, and cannot be maintained without Green Belt protection. It appears to be agreed that such separation is a sound principle under CS6 and CS10. Removing separation would be inconsistent with CS24. Separation between Woking and Mayford could not be maintained by landscaped development.</p> <p>The proposed wording – “required to take into account the desirability of maintaining a sense of visual separation” – is too opaque to provide any certainty of an effective visual gap.</p>	<p>This matter has been addressed separately in the main report – Section 1 above.</p>

	<p>The Green Belt Boundary Review stated that development should be to the south of the site and the north of the site should be safeguarded to protect the integrity of Mayford and Woking.</p> <p>The release of the northern field is not necessary given the substantial amount of housing construction that is ongoing in the borough.</p> <p>There is significant brownfield land available which should be considered first.</p> <p>Woking has taken an 'upwards not outwards approach' so how can the release of greenfield land be justified?</p> <p>The Green Belt land to the north of the site serves the purposes of the Green Belt effectively, and is not suitable for release. It is also a wildlife sanctuary and corridor, and an important area of rising land.</p> <p>The escarpment map is erroneous and therefore no protection is afforded by local policy to the significant area of rising land at the site.</p> <p>Such spaces have a special role during the COVID-19 pandemic, contributing to physical and mental health. These should be protected. Questions whether development is financially prudent given the recent impact of the COVID-19 pandemic.</p> <p>Development of the northern part of GB7 is inconsistent with the planning of the school, which located its open spaces in the northern part of the site to blend in with the field.</p> <p>The modified policy goes against a democratic decision made by the Council.</p> <p>Access to residential development would most likely be from Hillside, compounding the risks of the staggered junction with Almond Avenue.</p> <p>Development would worsen congestion and increase the risks of accidents, particularly given the schools along Egley Road.</p> <p>The area along Egley Road has already been over-developed, resulting in pollution (including light pollution), littering and traffic noise. Also concerns about noise pollution.</p>	
--	--	--

	<p>Development would place a burden on infrastructure, including Barnsbury Primary School.</p> <p>CS6 identifies Mayford Village as an infill-only settlement. Development of this land cannot be considered infill development.</p> <p>The site is an SNCI.</p> <p>Southern part of the site only should be allocated for development.</p> <p>The land previously shaded should remain as Green Belt to preserve the character, wildlife, and identify of the village of Mayford as a separate settlement, and to make the plan sound.</p> <p>Retaining the northern field of GB7 in the Green Belt would allow for limited affordable housing for local community needs. Therefore designating it as Green Belt would still allow for it to contribute to development, but in a more defined way than suggested in the schedule.</p> <p>The Green Belt land to the north of the site could accommodate environmental improvements to contribute to biodiversity net gain (as per the Environment Bill).</p> <p>The Green Belt boundary in Mayford is already irregular and can't see how reformed boundary of northern part of GB7 would be any different.</p> <p>Northern part of site should be preserved for wildlife and/or recreation and/or woodland planting – benefit of local residents.</p> <p>Northern part of the site could be a wildflower meadow, memorial garden or woodland with a small car park.</p> <p>One representation suggests that half of the northern field at GB7 could be a bird sanctuary and the other half excavated for a recreational fishing lake.</p> <p>Leave GB7 as Green Belt Land // Local Green Space / Open Space not to be developed in accordance with CS16.</p>	
--	--	--

	<p>Instead of allocating GB7 for development, plan more trees and create a wetland/pond area to aid carbon reduction and encourage biodiversity.</p> <p>The term ‘safeguarded for development’ is misleading as development here would be harmful.</p> <p>Education Authority notes modifications to GB7 to reflect the progress made with the delivery of the school at Egley Road.</p>	
<p>GB8: Woking Garden Centre, Egley Road</p> <p>MM200, MM227, MM230, MM232</p>	<p>Site should be brought forward into this plan period to compensate the development requirement should the northern field of GB7 remain in the Green Belt as Allocated Open Space in accordance with CS16.</p> <p>Safeguarded site GB8 should be developed instead of GB7.</p> <p>If the North Field of GB7 has to be released from the Green Belt and safeguarded for development, this should be done in 2027 or 2040 so that the Council, Councillors and residents – who recognize the site’s importance – can appropriately assess the situation to agree a sounder way forward.</p> <p>GB8 landowner supports the rewording of Policy SA1 in MM200 in respect of the Woking Garden Centre site (GB8). Agrees that the site is suitable for removal from the Green Belt and has alternative development potential.</p> <p>GB8 landowner supports the direction of travel proposed by the Main Modifications to emerging policy GB8. Understands that a mix of uses and development capacity would be agreed as part of a future Local Plan Review, although notes that residential, retail and community uses have been identified previously.</p> <p>GB8 landowner supports the intention for the site to be considered for further development during the Local Plan Review process. However, questions whether policy should allow for earlier development in the event it is proven necessary. GB8 landowner queries whether GB8 may be preferable to GB7 due to its location and brownfield nature.</p> <p>GB8 landowner wishes to be kept up to date with the Local Plan Review process to ensure the site is appropriately considered. It is noted that the</p>	<p>Special circumstances justification exist for the release of both GB7 and GB8 to meet development requirements of the Core Strategy. Bringing forward GB8 will not justify allocating GB7 for open space or retain it in the Green Belt in this regard. All the evidence demonstrates that GB7 can come forward to meet development needs between 2022 and 2027. To put restrictions as suggested will not be defensible. This is not in any way a reason to underplay the significance of maintaining a visual gap between Mayford and the rest of the urban area. It will be important for the Council as decision taker to make sure that the objective of maintaining the visual gap is achieved.</p> <p>The DPD identifies sufficient land to meet the requirements of the Core Strategy. The spatial strategy of the Core Strategy directs most new development to previously developed land in the main centres. The timing of the safeguarded sites is justified.</p> <p>The matter has also been address separately in the main report. – see Section 1 above.</p>

	current lease on the Garden Centre expires in 2040 but could be subject to earlier surrender by negotiation.	
GB9: Land adjacent to Hook Hill Lane, Hook Heath, Woking  MM233	Supports the retention of Regulation 19 sites GB9 in the Green Belt and the deletion of this policy from the DPD. The green infrastructure it was to have provided in support of the former Saunders Lane Green Belt sites is now not needed.	Support noted.
GB4, GB5, GB10 [modified to GB9 and GB9A]: Land surrounding West Hall, Parvis Road  MM215 - MM242	<p>A Motion was passed at the 4<sup>th</sup> December 2020 Council meeting requiring WBC and SCC to undertake a full study on how the impacts of GB4, GB5 and GB9 could be mitigated. This should be written into SADPD policies to ensure that no planning application can be brought forward until the study has been completed and Councillors are satisfied that infrastructure will be in place when homes are built.</p> <p>Paragraph 73 of the NPPF states that LPAs should identify and update annually a supply of deliverable sites. WBC targets are obsolete and have not been updated annually. The targets are much lower than the figures to which WBC are working.</p>	<p>At the meeting referred to, Council resolved not to withdraw the DPD. The DPD is informed by an Infrastructure Delivery Plan (IDP) that includes the assessment of development impacts of policies GB4, GB5 and GB9. Policy CS16 of the Core Strategy ensures that development is supported by the necessary infrastructure to address development impacts. The suggested change is not reasonable and unnecessary.</p> <p>This matter is addressed separately in the main report – see Section 1 above.</p>
GB10 [modified to GB9]: Land surrounding West Hall, Parvis Road  MM237 - 241	<p>Cumulative amount of development, with that at Broadoaks and Sheer House, is excessive. Taking into account planned delivery in Town Centre, extant planning permissions, windfall sites and using NPPF recommended buffers, the Council is on target to deliver in excess of Core Strategy targets – there is therefore no justification for release of this Green Belt land.</p> <p>There is no justification to release Green Belt land as only 2,599 dwellings are left to deliver to 2027. The Housing Land Supply Position Statement shows there is planning permission for a further 2,037 homes. This leaves only 562 units to be delivered over the remaining plan period. These figures are already out of date. In April 2020, WBC announced an investment grant for town centre infrastructure to support an estimated 4,500 homes in the town centre.</p> <p>There are no exceptional circumstances to remove land from Green Belt and plan is therefore unsound. Both HIF planned housing, and housing permitted to date in West Byfleet, means that 555+ homes at West Hall is not justified or needed.</p>	<p>Many of these issues are addressed in the main report – see Section 1 above. Some of the issues have been raised previously, and discussed at the Examination Hearings.</p>

	<p>Given WBC's visibility of an additional 6,537 homes, the residual target of 2,599 should be achievable without the need for further loss of Green Belt in West Byfleet and across the borough.</p> <p>If 555 homes are needed in the Green Belt, only 182 are outstanding for West Hall if you take Broadoaks and Egley Road allocated site yields into account.</p> <p>Queries why Green Belt is allocated for development when the Council has assessed 58 brownfield sites as suitable for residential development.</p> <p>Housing demand and need should be reassessed under new post-pandemic circumstances.</p> <p>The proportion of Green Belt land that is being released in West Byfleet relative to the rest of the Borough is inequitable. Disproportionate impact on the Green Belt of the Byfleets.</p> <p>Lack of infrastructure to support this growth (including schools, healthcare, pharmacies, post offices, sewerage, wastewater, parking, transport, including additional train services and parking at West Byfleet Station, police, fire services and open space). Although the commitment to carry out an infrastructure study is positive, it does not satisfy the soundness requirements for West Hall, namely "that it is clear who is going to deliver the required infrastructure and the timing of the provision complements the timescale of the policies."</p> <p>Severe traffic implications have not been sufficiently assessed or mitigated for. Traffic implications will be worsened given the post-COVID-19 switch from long-distance rail to short-distance car travel. Traffic implications will be worsened by the remodeling of the network to the M25.</p> <p>Modified key requirement regarding Transport Assessment insufficient – also needs to address provision of basic transport infrastructure to improve existing situation.</p> <p>Accessibility to Byfleet centre should also be improved, which can provide amenities and services to support growth. Key requirement focuses only on access to West Byfleet District Centre.</p>	
--	---	--

The key requirement for access from West Hall through Broadoaks to West Byfleet is undeliverable. The Broadoaks development is underway and cannot be retrofitted to enable this. There is no evidence to justify this more stringent requirement and no discussions have been had with the Broadoaks landowner. Additionally, such a requirement is environmentally unsustainable as the access route would have to pass through sensitive woodland. An alternative, deliverable proposal for pedestrian and cyclist access to West Byfleet needs to be sought in order for the plan to be found sound. Questions whether improved accessibility through Broadoaks has been discussed with Octagon and whether discussions have been undertaken with bus providers.

Objects to the key requirement that a road could run “subsequently through Green Belt land”; this is unclear and unsound.

The unnamed access road to the West Hall care home should be adopted, named and maintained by WBC.

Noise, light and air pollution impacts have not been sufficiently addressed. Concerns about the proximity of the M25 and its impact on future residents.

West Byfleet Infant School raises concerns about its capacity to accommodate additional pupils, and about road safety. West Byfleet Junior School raises concerns about its capacity to accommodate additional pupils. Further expansion would require extensive investment.

Local shops will struggle to meet demand.

Concerns about lack of plans for recreation, library and other community services in the new Parvis Road developments.

Concerns about the impact on West Byfleet’s character.

Concerns about loss of open space.

Concerns that the separation between Byfleet and West Byfleet would be lost.

The release of GB9 would cause a net loss of biodiversity in West Byfleet, contrary to the NPPF.



	<p>Concerns about environmental impacts, including the impact on wildlife habitats, and the fact that the site is adjacent to protected ancient woodland.</p> <p>Queries the meaning of “contribute to Strategic Access Management and Monitoring to mitigate the impact...”</p> <p>Green spaces are even more critical for people in context of pandemic, particularly for mental wellbeing.</p> <p>Land is prone to flooding; development would place new and existing properties at significant additional risk. Lack of assessment given to climate change.</p> <p>Lack of affordable housing brought forward.</p> <p>Increased density increases the risk of COVID-19 spreading.</p> <p>Thousands of people have signed a petition against this development.</p> <p>The allocation is contrary to the West Byfleet Neighbourhood Development Plan and therefore undemocratic and contrary to planning law. The proposal is contrary to the wishes of West Byfleet residents, as per the West Byfleet Neighbourhood Plan.</p> <p>Loss of Green Belt is not in accordance with Policy DM1.</p> <p>Proposed development would be unviable and therefore undeliverable.</p> <p>Key requirements that state ‘development will be required to’ are unsound as no person or body is allocated responsibility. These will remain unfulfilled and unenforceable.</p> <p>The site is allocated as a concrete aggregates safeguarding site to 2026; this would cause confusion and render the site less attractive for residential development.</p> <p>Paragraph 3 states that GB9 was selected due limited options for “sustainable urban extensions”; what does this mean? There are many options in the urban areas of the borough for increased density. No such scarcity was discussed at</p>	
--	--	--

	<p>the examination. Disagreement that there is a limited supply of suitable urban extensions – should consider brownfield land such as Waitrose site, Brantwood Estate, War Memorial area Byfleet, Royston Road retail park rather than release Green Belt.</p> <p>Consultation set out in paragraph 5 of the Reasoned Justification should be done before the DPD is signed off.</p> <p>Welcomes Reasoned Justification paragraphs 5 (b) and (d) as hydrology issues are a major concern on this site.</p> <p>Considers it unlikely and unrealistic that the scale of development put forward will be sensitively designed to preserve as much of the landscape setting as possible and to create a strong landscape edge to the settlement.</p> <p>Another representor considers MM200 and MM241 to be sound and legally compliant. Considers it critical to begin early engagement with Council officers, statutory consultees and the public to ensure that new Traveller pitches and homes are delivered by 2022/23 and 2026/27 respectively. Consultation should begin now to enable submission of an application by as early as summer 2021.</p>	
<p>GB10 [modified to GB9A]: 15 Traveller pitches at land surrounding West Hall</p> <p>MM238-9</p>	<p>Whilst multicultural diversity is welcome, the proposed site is too big.</p> <p>This is an inappropriate location to accommodate the Traveller pitches because of the ecological sensitivity of the site and the lack of direct access to the A245. A preferable location would be to the north east of West Hall itself (as per the Tyler Grange report)</p> <p>The release of GB9A is inextricably linked to the release of GB9. Given that exceptional circumstances for the release of GB9 do not exist, an alternative site or sites should be identified to meet need.</p> <p>A sequential approach to allocated Travellers' accommodation has not been taken; a lack of deliverable sites in the urban area has not been demonstrated.</p> <p>Considers that pitches should be made permanent first, and those sites extended before such a large site is created.</p> <p>Considers that proposal lacks detail, and it would be sensible to start with a smaller site of 5 pitches and then increase it if needed.</p>	<p>As per CS14, a sequential approach has been taken to identify suitable sites for Gypsy and Traveller accommodation. The site that are allocated are the most sustainable when compared against other alternatives. By applying the sequential approach recommended in the Green Belt Boundary Review, granting full planning permission for existing sites with temporary permission is sequentially preferable to the allocation of new sites. Stable Yard, Guildford Road and land south of Gabriel Cottage, Blanchards Hill has been allocated in this regard. It is stressed that the ultimate goal is to allocate land at sustainable locations.</p> <p>Site GB9A is capable of accommodating 15 pitches with associated community facilities to meet</p>

	<p>The site is unsuitable for 15 Travellers' pitches; it does not have safe access, parking provision of turning areas; it does not provide adequate amenity; it does not have an acceptable impact on the visual amenity and character of the area; it does not have adequate infrastructure and on-site utilities; it does not have reasonable access to schools and other local facilities.</p> <p>The allocation risks isolating the Traveller community, and not contributing to positive integration between the Traveller and settled community.</p> <p>The inclusion of Traveller pitch is a contravention of government policy on Traveller sites (Policy E) - no justification to remove GB9A from the Green Belt. The TAA acknowledges difficulties in forecasting demand. However the Site Allocations DPD does not account for potential migration (up to 2040) in its needs assessment; the 19 pitches omit a potential 9 vacancies, giving only a net of 10.</p> <p>One representation stresses the need to begin planning application process earlier in order to deliver development by anticipated delivery dates, particularly if Traveller sites are to be delivered by 2023.</p> <p>The DPD is unsound as it does not comply with paragraph 127 of NPPF. The policy does not have due regard to the safety and wellbeing of neighbouring residents of the care home. It needs to be amended to ensure a secure boundary is included in any development to the eastern edge to prevent trespassing. The proposed Traveller site should be moved further south within the wider site so it is further from the entrance to West Hall. Residents should be discouraged from accessing the facility accidentally or deliberately – dwellings should be at least 800m walking distance from the entrance.</p>	<p>acceptable standards. 15 pitches is also a reasonable number of pitches on a site for management purposes. Detailed design and layout are matters to be addressed at the development manage stage. Development impacts on any proposal to develop the pitches will be fully assessed and appropriate measures of mitigation introduced to address any adverse impacts.</p> <p>The location of GB9A offers opportunity for effective screening, and a good connection with respect to layout with the rest of the proposed residential use on the site.</p>
<p>GB10 [modified to GB9 and GB9A]: Land surrounding West Hall</p> <p>MM241 and MM242</p>	<p>Concerned that the potential monitoring outcomes for GB9 and GB9A include Compulsory Purchase Order. This raises questions about the deliverability of the allocations.</p> <p>Supportive of the monitoring outcomes including "review the allocation"; this will allow residents to lobby.</p> <p>MM241 may be wrongly written as it refers to both GB9 and GB9A.</p>	<p>It is not expected that there would be a need to compulsory purchase GB9 or GB9A or any part of it. The landowner has provide evidence that the site is available for the proposed uses.</p>
<p>GB11 [modified to GB10]: Broadoaks, Parvis Road</p>	<p>Good use of a brownfield site, but places pressure on surrounding infrastructure.</p>	<p>The overall spatial strategy seeks to focus most new development on previously developed land in the main</p>

MM245		centres where there is relative access to key services and facilities. The DPD accords with this strategy. This matter is addressed in detail in Section 1 above.
MM248	MM248 is written as though planning permission has not been granted at Broadoaks. Why can't the Council state which SANG will offset this site?	A SANG table has been produced and published as an Examination Document assigning each proposal site to a SANG. Once a development has been approved, CIL contributions are collected towards SANG provision. This part of the process is conducted separately and is outside the scope of the DPD.
GB12: Byfleet SANG MM251	A tighter requirement should be placed on the Council to ensure GB12 – Byfleet SANG, becomes a SANG before any construction begins on GB9 or GB9A. The new wording introduced in MM251 does not achieve this and would allow SANGs to be created elsewhere in the Borough, not benefitting the communities most affected by the loss of GB9, GB9A and GB10.	The proposed change is not reasonable. SANGs provide alternative natural greenspace to avoid impacts on SPA, not to offset loss of non-designated green space. The Council has made sure that sufficient SANG land has been identified to meet development needs over the plan period.
GB17: Woking Palace, Carters Lane MM267	Environment Agency has requested insertion of specific wording in reasoned justification.  The decision to exclude all of Burhill Development Limited's open land from GB17 is welcomed. However, MM267 is incorrect as Woking Borough Council does not own Carters Lane or the access to Woking Palace. Under MM265, the extent of GB17 should be revised to highlight only the land owned by Woking Borough Council.	The policy only mandates the preparation of a development brief for the site to inform future policy for the site. These matters will certainly be addressed as part of the development brief which the Environment Agency will be involved.  The track that provides access to the heritage asset is leased to the Council by Burhill Development Limited. The Map will be amended to clarify that.
<b>Issues raised regarding Proposed Proposals Map Modifications</b>		
PMM4	Day Group supports the proposed new boundary for site UA33.	Support noted.
PMM12	PMM12 is inconsistent with MM239; the former states the Traveller site is 1.72ha and the latter states that it is 1.1ha.  The proposed location of the Traveller pitches is not the most appropriate location; in accordance with national policy, it should be easily accessible from the road network. It may also be detrimental to sensitive woodland, protected by site-specific policy.  Concerns are raised about the scale of the site, which is the maximum to allow for effective management.	The total area of the site is 1.72ha. MM239 will be modified to correct the editorial error.  The location of the site is suitable for the use and will ensure effective screening.

	The alternative location put forward in a report by Tyler Grange during the Regulation 19 is supported. This is to the north east of West Hall itself.	
PMM15	<p>Byfleet United Charities, the owners of GB18 (to become GB11), support the removal of the site from the Green Belt. However, they consider that legend description in Appendix H as 'Urban Space to Serve School' is too limited as the land was given to BUS for use by the local community.</p> <p>Proposes that legend description on the Proposals Map should be changed to 'Urban Open Space to Serve the Local Community'</p>	<p>Support is noted.</p> <p>It is proposed to change the legend of the Proposals Map to ensure consistency with the text of the policy.</p>
<b>Issues raised regarding the DPD in general</b>		
Whole DPD	<p>Petition to withdraw the modified DPD in its entirety, taking into account latest housing figures and availability of brownfield land/alternative sites. Concerns that resident opinion expressed through the petition has been dismissed.</p> <p>Concerned that local residents in West Byfleet are being ignored, despite having following procedural requirements and responded with factual accuracy.</p> <p>Request Inspector to explain why the Hearings were not webcast or any public record made.</p> <p>The DPD ignores proposed national planning legislation, and policy guidance. Guidance in the NPPF, section 13 is ignored.</p> <p>The plan contravenes Government tree planting policies.</p> <p>ONS household projection figures are lower than those used by the Council.</p> <p>It is reported that the formula used to calculate housing targets will be rebalanced to focus on building in urban areas and move the focus away from the south.</p> <p>Inadequate reasons have been given for the exclusion of Green Belt land at Martyrs Lane from the DPD.</p> <p>Considerations should be given to representations previously submitted in relation to Woodham Court Sports Club, Martyrs Lane, Woking, GU21 5NJ.</p>	<p>Many of these matters have been addressed separately in detail in the main report (Section 1 above), and it is not intended to repeat that. Any further comments should therefore be read in conjunction with the main report.</p> <p>The Council values the views of local residents and has always taken them into account throughout the evolution of the DPD. For example, the Council has published representations received, has responded to all of them and provided justification on why or not they have been used to inform subsequent stages of the DPD.</p> <p>The Council is satisfied that the DPD has been prepared in accordance with the legal and procedural requirements. The Council has published a self-assessment of how these have been met. The self-assessment is an Examination document that can be accessed via the Examination webpage.</p> <p>The Council has carried out studies to determine the suitability of the land east of Martyrs Lane to meet future housing need. This includes the Landscape Assessment and Green Belt review of land east of Martyrs Lane by Hankinson Duckett Associates (2016)</p>

	<p>The SADPD does not allocate a sufficient mix of sites in the borough insofar as GB4, GB5 and GB9 are similar, large tracts of land.</p> <p>Concerns that the modified DPD doesn't recognize recent increases in planned and actual housing numbers, doesn't consider brownfield/alternative sites, ignores national planning legislation and overrides residents' concerns. A new plan should be submitted based on current information, proposed legislation and residents' needs.</p> <p>There should be an independent review of WBC's housing figures, the housing requirement, and whether Green Belt land is needed.</p> <p>The DPD has been modified to such an extent it should be considered an entirely new document.</p> <p>Need to collect more evidence on the impact of the COVID-19 pandemic - new need for green space for well-being; lack of commuters demanding new homes; demand for homes further afield; assessment of new working patterns. There is net-migration out of the south east, commuting into London is decreasing and office blocks in London may become vacant and being redeveloped for residential use. Queries whether in the context of the COVID-19 pandemic, the Council's interpretation of NPPF paragraph 60 continues to be reasonable (in particular, the wording which states: '...unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends.'</p> <p>Mole Valley District Council does not believe that the consultation has any Duty to Cooperate implications for MVDC.</p> <p>Waverley Borough Council has no further comment to make on the Plan beyond its previous submissions.</p> <p>Highways England looks to WBC to promote policies that support alternatives to the car and the operation of a safe and reliable network. Highways England would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth within Woking Borough without careful consideration of mitigation measures. A Local Plan should ensure development cannot progress without appropriate infrastructure in place.</p>	<p>and the Green Belt boundary review sensitivity test – addendum report to Strategic Transport Assessment – land east of Martyrs Lane. (2016). The Council has also carried out a consultation of the suitability of allocating the land east of Martyrs Lane to meet future development needs. Based on the available evidence, the Council has decided that the development of the site east of Martyrs Lane will significantly undermine the purposes and integrity of the Green Belt compared to the sites that are allocated/safeguarded in the DPD.</p> <p>The housing requirements of the Core Strategy had been independently examined by an Inspector of the Secretary of State and found to be acceptable.</p> <p>The Government requires housing need to be determined using a standard national method. By the calculation, the housing need for Woking is 431 dwellings per year. Given that the Core Strategy makes provision for the delivery of 292 dwellings per year, there is significant unmet need arising from Woking that is presently being met by the Waverley and Guildford Local Plans.</p> <p>The Transport Assessment takes into account background traffic and traffic generation from all proposals including employment proposals. The calculation of housing need takes into account an uplift associated with employment growth. The evidence that informs the nature and type of infrastructure that will be needed to support the projected housing growth is wide ranging and comprehensive.</p> <p>SANG is classified as infrastructure and developer contributions for its provision is sought under CIL. The CIL is secured to enable the delivery of infrastructure, but a percentage of the money received is ring-fenced for the provision and maintenance of SANGs. It is not necessary to single out one type of infrastructure such</p>
--	--	--

	<p>It is unclear what assessment has been done to demonstrate the additional level of employment growth that can be accommodated in transport terms within Woking Borough. This could influence the Council's IDP; if any infrastructure identified herein relates directly or indirectly to the SRN, early dialogue with Highways England is recommended.</p> <p>Education Authority notes that any additional education need within the borough is intended to be met through expansion of existing premises as required. The Council's School Commissioning Managers will continue to work closely with Woking Borough Council through the established school place forecasting process and IDP review.</p> <p>Natural England has no further comments to make on the Site Allocations DPD. This does not affect the soundness of the Local Plan, but recommends that site visits to new SANGs and SANG extensions are scheduled as soon as possible.</p> <p>Natural England recommends that under the key requirements for each allocation, SANG contributions should be mentioned, unless a bespoke SANG is to be provided which should be mentioned.</p> <p>The plan conflicts with WBC's declaration of a climate emergency and the Planet Woking initiative. The Woking 2050 document has still not been updated to reflect the national target of net zero greenhouse gas emissions by 2050, as per the Climate Change Act 2008 2050 Target Amendment Order 2019. Therefore the SADPD is still not legally compliant, and the Main Modifications do not rectify this.</p> <p>The production of the SADPD has been slow, excessively complex, adversarial and undemocratic. Given the urgency of the climate emergency we cannot afford to produce plans this slowly.</p> <p>The plan would damage Woking's townscape; concerns are raised about the impact of high-rise buildings on the skyline.</p> <p>It is difficult to ascertain the proposed height of all the developments in the DPD's plans; these should be made clearer.</p>	<p>as SANG in the policy. The importance of the need to provide SANGs to support development is adequately covered by Policy CS8 of the Core Strategy.</p> <p>The Council has published a Sustainability Appraisal Report (SA) and Habitats Regulations Assessment (HRA) of the DPD. Addendum and revised versions of the studies have been published to reflect the main modifications to the DPD. The effects of the development of the individual allocated sites of the DPD and their cumulative effects have been appraised in Sustainability Appraisal and Habitats Regulations Assessment. The SA and the HRA have both concluded that the potential effects can be appropriately mitigated. The DPD includes key requirements that are specifically intended to address the outcomes of the SA and the HRA. Overall, it is not expected that the delivery of the DPD or the Core Strategy will have significant adverse on climate change objectives. They will rather make a positive contribution towards sustainable development.</p> <p>The height of development is a matter that can best be addressed through the development management process. It is too detailed to be prescribed in a local plan.</p> <p>The preparation of a local plan has to follow due process in accordance with legislation and national planning policy. Whilst the Council has been determined to prepare the DPD expeditiously, it will always explore ways to improve upon its efficient preparation.</p> <p>The use of electric buses is outside the scope of the DPD. The Council will however explore the suggestion as it develops its strategy for climate change emergency, and work with providers to achieve that goal. The Council is already leading on expanding</p>
--	--	---

	<p>Monitoring tables are useful but it is difficult to monitor the number of new dwellings, the proportion of affordable housing, housing size and type, and net floorspace for retail, community and office use. Annual cumulative status and projected performance against these targets should be clearly document in one place.</p> <p>Data from SCC's map of footpaths should be added to the proposals map, and rated by length and interest.</p> <p>Woking should consider becoming an electric-bus only town. This should include buses for inter-town locations, locations within Woking and between at least one or more 'out of town' park and ride sites. Similar buses should be considered for travel to Heathrow and possibly Gatwick airports.</p> <p>Green Belt land should be freely accessible to local residents and maintained to an acceptable visual standard.</p> <p>The SADPD does not reflect actual development proposals (example of UA18: Concorde House is given).</p> <p>Developer perspectives need to be considered.</p> <p>Consultation – Posters directed people to a website, this is not appropriate for non-internet users. Small virtual meetings were an inadequate substitute for the large public meetings normally held. Some consultation text was confusing. Public comments should have been published during the course of the consultation.</p>	<p>electric charging points to facilitate the use of electric vehicles.</p> <p>The Council published a Consultation Plan to set out how the community will be engaged/informed during the consultation on the main modifications to the DPD. There were a variety of events to help reach as many people as possible, including new paper adverts, posters at key locations and Zoom sessions with residents. For people without access to computers, the Council committed to provide paper copies of documents on request. The Council did everything possible to make sure that no one was disadvantaged to express their views during the consultation period.</p> <p>The Council has published a self-assessment as an Examination Document to demonstrate that it had met the requirements of the duty to cooperate. All the relevant key stakeholders have been constructively engaged throughout the preparation of the DPD.</p>
<b>Comments raised relating to other supporting documents</b>		
<p>Sustainability Appraisal and Habitat Regulations Assessment</p>	<p>The Sustainability Appraisal has not been carried out in accordance with the NPPF. In particular, biodiversity and improving conditions for people are inadequately addressed.</p> <p>The SA and HRA fail to take into account the cumulative effects of housing planned for the Byfleets (GB9, GB10, UA42).</p>	<p>The Council has published a Sustainability Appraisal Report and a Habitats Regulations Assessment. The Sustainability Appraisal Report has been prepared in accordance with all the necessary requirements of the SEA Directives and national guidance. How it does so is set out in Table 1 of the SA Report. The HRA has also been prepared in accordance with the relevant requirements. The Council has provided evidence including a self-assessment to the Examination to</p>



	<p>For the SA and HRA, agreed and proposed development should be assessed cumulatively rather than individually. Assessment should reflect the updated ONS projections and NPPF calculations on perceived housing requirement.</p> <p>Land at West Hall has been incorrectly screened out from AA and incorrectly appraised for sustainability.</p> <p>GB9 has never been screened under the Habitat Regulations. The screening only took place on Green Belt sites that were earmarked as part of CS6. At the time, this was just Broadoaks. The plan is therefore unsound.</p>	<p>demonstrate how the DPD has been prepared in accordance with legal and procedural requirements. The legal and procedural requirements include the preparation of the SA Report and the HRA. The SA Report and the HRA took into account cumulative effects of development of the individual sites.</p>
<p>Topic Paper</p>	<p>An independent barrister should have carried out a review of the judgment.</p> <p>The High Court rulings also apply to Woking's approach – no account has been taken of surplus development delivered to date (2,365 delivered); nor of the future surplus development (2,037 extant planning permissions); nor of future planned development (13 additional sites from HiF bid for 4,500 dwellings); nor of windfall sites (336 dwellings); therefore no adequate reasons for release of Green Belt land in Woking.</p> <p>In Aireborough Neighbourhood Forum v Leeds City Council, the High Court found that a fall of more than 25% in the housing requirement would rationally be considered a fundamental change requiring reconsideration, and that in determining exceptional circumstances, it was important to accurately calculate housing supply and how it changed during the progress of the draft plan.</p> <p>Factors material to the Aireborough Neighbourhood Forum v Leeds City Council decision are material to the SADPD: namely the failure to take into account surplus development and the failure to give adequate reasons as to the need for Green Belt release.</p> <p>The West Byfleet Neighbourhood Forum has been liaising with the Aireborough Neighbourhood Forum and both have concluded that the case is equally applicable to Woking and GB9.</p> <p>Aireborough won the case because Leeds City Council had not completed their housing assessment and could not justify exceptional circumstances. Woking are planning to assess the sustainability of GB9 as per the December 3<sup>rd</sup> Council meeting. Therefore GB9 should not be included until this is complete. Further, as per the last AMR, there is surplus housing stock and therefore</p>	<p>The Council has qualified Officers with long experience of dealing with case laws. They are capable of providing guidance and advice on the merits of this case and how it relates to the DPD. In any case, an opportunity has been provided for anyone who holds a different view to the conclusions of the Council to submit their case for the Inspector to consider. It is therefore not necessary to engage an independent barrister to do so. To instruct an Independent Barrister to analyse the case will be an unnecessary waste of public funds. The Inspector will determine whether the Council's response and analysis is well reasoned.</p> <p>Further comments are provided in Section 1 above.</p>

exceptional circumstances do not exist. A legal case brought against the Council is equally likely to prevail, and will occur unless GB9 is removed.

The fall in the ONS household projections for Leeds in the Aireborough case was approximately matched by a similar fall in the housing requirement for the area. By contrast, the fall in the housing requirement for Woking in the same period was much less than the fall in ONS household projections (21 percent as opposed to 43 percent). If the percentage by which the ONS figures declined was applied directly to the housing requirement, the latter would be 294 dwellings per annum.

The government is now reviewing its housing target algorithm, with a press report suggesting the system should be made fairer after targets in Surrey were increased.

The 2018 ONS Household Projections for England indicate a substantially lower increase in households for Woking of 441 between 2018 and 2028, a fall in housing demand in excess of 80% which reinforces the absence of exceptional circumstances.

The housing forecasts for years 10-15 in SHLAAs in Woking, used to justify Green Belt loss have always been highly pessimistic, and have fluctuated strongly. Table of figures provided. These forecasts of limited worth and do not prove the existence of exceptional circumstances for Green Belt loss.

Analysis of housing completions show they have been significantly underestimated, with a provision of 6,000 dwellings. This is much more than enough to meet both the target of 4,960 and any buffer for under-delivery, negating any need for Green Belt removal.

There will almost certainly be direct consequences for Woking and SE England from the COVID-19 pandemic. Many people have found that they prefer to work from home, for example in the countryside of the South East, rather than commute, and this will continue after the pandemic, though Covid is also likely to persist and the home working trend therefore accelerate. This factor will accelerate the pre-existing trend of conversion of shop and office sites into residential, for example around the Victoria Arch (HIF) scheme, Sheer House and Emerald House. Lack of brownfield sites is no longer a limit to achieving housing targets.

One representor maintains that given the position regarding housing need (discussed further below), and the comments by the Core Strategy Inspector, which have been accepted by the Council, a clear case justifying exceptional circumstances has been fully evidenced and justified to warrant the review and alteration of Green Belt boundaries, in accordance with the requirements of paragraph 136 of the National Planning Policy Framework (NPPF).

As per previous submissions, it is however critical that any alteration to the Green Belt boundaries is based upon a Green Belt review that is 1) up to date, referring to up to date policy and informed by any up to date guidance, 2) underpinned by a correct application of the relevant Green Belt purposes and requirements of the NPPF and 3) it is demonstrated that this evidence has informed the alteration of the Green Belt boundaries, to ensure the soundness of the approach taken and SADPD.

Given the clear changes to housing requirement figures in both Woking and additionally Guildford and Waverley, plus updates/changes to legislation, Woking must commit to a full review involving public consultation in advance of 2023 in order to accord with the current requirements of the NPPF. This approach would provide a robust basis for any future plan.

The land use and potential yields of the three safeguarded sites have now been removed. In addition to the reasons previously set out, the current changes further highlight that whilst sites already identified could continue to be safeguarded, further assessment and full consideration of additional sites should be undertaken to ensure the approach is robust and based on up to date evidence.

Whilst there is clear justification for the release of Green Belt land, up to date evidence must clearly support the approach to those sites that are released. Additionally, consideration of actual housing need (rather than constrained housing requirement figures) should inform the SADPD. This would result in an even stronger case for exceptional circumstances to be demonstrated. By appropriately considering the current up to date housing figures informed by the standard methodology, and ensuring future housing delivery is not further constrained by using out of date evidence, matters raised in the High Court Judgement associated with the release of Green Belt land and how that is related to housing need are appropriately evidenced and justified.

