



Woking Borough Council

**Examination of the Site Allocations Development
Plan Document (DPD)**

**Hearing Statements Matters 1-6
In Response to Inspector's Matters, Issues and Questions**

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**Produced by the Planning Policy Team
For further information please contact:
Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square, Woking,
Surrey, GU21 6YL.
Tel: 01483 743871
Email: planning.policy@woking.gov.uk**

Abbreviations

AMR - Annual Monitoring Report
CIL - Community Infrastructure Levy
CS - Core Strategy
DCO – Development Consent Order
DM – Development Management
DMPDPD – Development Management Policies Development Plan Document
DPD - Development Plan Document
DtC – Duty to Cooperate
EA – Environment Agency
ELR - Employment Land Review
GB – Green Belt
GBBR – Woking Green Belt Review
GCN – Great Crested Newt
GI – Green Infrastructure
HIF – Housing Infrastructure Fund
HRA - Habitats Regulations Assessment
ID – Inspector Document
IDP - Infrastructure Delivery Plan
JSPB – Joint Strategic Partnership Board
LDD - Local Development Document
LDF - Local Development Framework
LDS - Local Development Scheme
LPA – Local Planning Authority
LRN – Local Road Network
MIQs – Matters, Issues and Questions
NPPF - National Planning Policy Framework (or ‘The Framework’)
NWSID – Natural Woking Supporting Information Document
PiP – Permission in Principle
PPG - Planning Practice Guidance
PPTS – Planning Policy for Traveller Sites
RSS - Regional Spatial Strategy
SA - Sustainability Appraisal
SADPD – Site Allocations Development Plan Document
SAMM - Strategic Access Management and Monitoring
SANG - Suitable Alternative Natural Greenspace
SHLAA - Strategic Housing Land Availability Assessment
SHMA - Strategic Housing Market Assessment
SCC - Surrey County Council
SCI - Statement of Community Involvement
SEA – Strategic Environmental Assessment
SEP - South East Plan
SFRA - Strategic Flood Risk Assessment
SoCG – Statement of Common Ground
SPA - Special Protection Area
SPD – Supplementary Planning Document
SuDS – Sustainable Drainage Systems
S106 - Section 106 Legal Agreement
TAA – Traveller Accommodation Assessment
TBH - Thames Basin Heaths
TBHSPA – Thames Basin Heaths Special Protection Area
TCPA – Town and Country Planning Act (1990)
WBC -Woking Borough Council

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Introduction

The Inspector's Guidance Note (ID/5) accompanying the publication of the Matters, Issues and Questions (MIQs) (ID/4) sets out how the Council should produce a hearing statement for each of the Main Matters listed in the MIQs¹. As explained in the Guidance Note, the MIQs form the basis for the programme and discussion at the hearing sessions. The following document therefore contains Woking Borough Council's response to each of the Main Matters raised by the Inspector.

The statements rely on cross-referencing to existing documents as far as possible so as to avoid unnecessary duplication. Where evidence base or other documents are quoted, these have been given Examination reference numbers and either feature on the main Examination website here: www.woking2027.info/allocations/sadpdexam; or on the 'List of Examination Core Documents', available here: www.woking2027.info/allocations/sadpdexam/reflist. Some of the documents are readily and publicly available material such as legislation, the National Planning Policy Framework (the Framework) or Planning Practice Guidance (PPG) and links to these documents are also included where relevant.

References to site allocation policies are those of the [Regulation 19 consultation version](#) of the DPD.

This document is structured as follows:

- Statement of the matter and issue;
- The Council's response to the key issue and any subsidiary issue(s);
- Any modifications proposed as a result – which will appear in an updated Schedule of Proposed Modifications.

In summary, this document sets out why the Council considers the Site Allocations DPD (SADPD) to be sound in relation to the questions raised by the Inspector. Any proposed changes put forward in the following hearing statements will be collated with those from the Statements of Common Ground and included on an updated Schedule of Proposed Modifications to provide one central reference document for suggested changes.

The Programme Officer has produced a Provisional Hearings Programme (ID/6). The Programme should be read alongside the MIQs document and the related Guidance Note which it accompanies.

¹ These and all other documents referenced can be accessed on the Site Allocations DPD Examinations website: <https://www.woking2027.info/allocations/sadpdexam>

Hearing Statement 1 in Response to Matter 1

Matter 1: Is the SADPD legally compliant, have the relevant procedural requirements been met, and has the Duty to Co-operate (DtC) been discharged?

Issue (i) Has the DtC been discharged?

Question 1: Has the Council engaged constructively and on an ongoing basis with all relevant organisations on any strategic matters in accordance with the DtC?

- i.1.1 Yes. The Council has published a Duty to Co-operate Statement² to demonstrate how this has been achieved. The Statement contains Statements of Common Ground and Memorandum of Understanding with neighbouring authorities and how the statutory consultees such as Highways England, the Environment Agency, Natural England and Historic England have been engaged throughout the preparation of the SADPD. The Council has also published a self-assessment of tests of soundness and self-assessment of legal and procedural requirements³ to demonstrate how the requirements of the Duty to Co-operate have been discharged. The Consultation Statement⁴ also sets out the means by which these prescribed bodies have been engaged in preparing the SADPD. The Council is an active participant of well-established partnerships such as the Thames Basin Heaths (TBH) Joint Strategic Partnership Board and Surrey Planning Officers Association to enable it to respond in future to any further potential issues that may arise. Section 5 of the Duty to Co-operate Statement outlines how there will be on-going cooperation to deal with matters that may arise.
- i.1.2 Natural England, Environment Agency and Heritage England have all provided statements⁵ to demonstrate their satisfaction with the SADPD subject to their representations being addressed. The Council has addressed their representations.

Question 2: How does the SADPD address any cross-boundary issues that have emerged as a result of engagement with prescribed bodies?

- i.2.1 The Council has published a Duty to Co-operate Statement⁶ to demonstrate how the SADPD has addressed cross boundary issues that have emerged as a result of engagement with the prescribed bodies. The extent to which this is achieved is set out in Table 1 pages 17 – 24 of the Duty to Co-operate Statement. For example, the SADPD safeguards land to enable Network Rail to deliver significant rail improvements such as its proposed Woking Flyover. The SADPD also allocates sufficient SANG land to help avoid harm to the TBH Special Protection Areas, and has key requirements to minimise the risk of flooding. Pages 25 to 27 of the Duty to Co-operate Statement set out the key outcomes of the cooperation. The Council is satisfied that the SADPD has been prepared as an iterative process that takes full account of issues raised by the prescribed bodies.

² Document reference: WBC/SA/009

³ Document reference: WBC/SA/013

⁴ Document reference: WBC/SA/008

⁵ Document references: WBC/SA/031, WBC/SA/032, WBC/SA/030

⁶ Document reference: WBC/SA/009

Issue (ii) does the Sustainability Appraisal (SA) comply with the requirements of the Strategic Environmental Assessment Directive (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)?

Question 1: Has the SA process complied with the requirements of the SEA Directive and the SEA Regulations?

ii.1.1 Yes. Section 2 of the Sustainability Appraisal (SA) Report⁷ demonstrates in Table 1 how the appraisal has satisfied the specific requirements of the SEA Directive and SEA Regulations (which reflects the requirements checklist provided in the PPG⁸). Section 3 of the report details each stage of the SA process (summarised in Figure 2⁹), and how the requirements of the SEA Regulations have been incorporated. This has ensured that the potential environmental effects have been given full consideration alongside social and economic issues.

Question 2: Is the approach to SA compliant with the advice set out in the PPG¹⁰ and based on an appropriate methodology?

ii.2.1 Yes. The PPG provides advice on key stages of the SA process, summarised in the flowchart provided⁹. Section 3 of the SA Report details how each of these key stages was followed during the plan-making process, from scoping stage (stage A), to developing and refining alternatives and assessing effects (stage B), to preparing the SA Report (stage C) and finally on various consultation procedures (stages A-D).

ii.2.2 Section 11 of the report describes the SA methodology. PPG on the assessment of alternatives¹¹ was taken into account when devising the methodology, acknowledging that the overall spatial strategy for the distribution of development across the borough, and objectives to deliver this vision, were already prescribed by the Core Strategy¹² which itself was subject to a comprehensive Sustainability Appraisal¹³ (as explained in paragraphs 12.2, 13.1, and 15.1-15.8 of the report). The PPG explains that "reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan". For the SADPD, the SA therefore focussed on the appraisal of reasonable alternative potential sites for development, as explained in paragraph 15.6-15.8 of the report. The Council is confident that this methodology is appropriate, and proportionate given the non-strategic nature of the DPD - in line with advice in the PPG which stresses that the SA should only focus on what is needed to assess the likely significant effects of the plan, appropriate for the content and level of detail in the plan¹⁴.

Question 3: Has the SA process been genuinely iterative and carried out in step with the stages of plan preparation?

ii.3.1 Yes. Paragraph 3.17 of the SA Report¹⁵ outlines how developing options for the DPD has been an iterative process. Early drafts of the DPD incorporated mitigation/optimising measures identified

⁷ Document reference: WBC/SA/005

⁸ Paragraph: 004 Reference ID: 11-004-20150209, available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/580073/Strategic_Environmental_Assessment_Regulations_requirements_checklist.pdf

⁹ The flowchart is available via the Planning Practice Guidance at Paragraph: 013 Reference ID: 11-013-20140306 here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/580027/sea1_013.pdf

¹⁰ Strategic environmental assessment and sustainability appraisal published 9 February 2015

¹¹ Paragraph: 018 reference ID: 11-018-20140306

¹² Document reference: WBC/SA/E017

¹³ Document reference: WBC/SA/E017C

¹⁴ Paragraph: 009 reference ID: 11-009-20140306

¹⁵ Document reference: WBC/SA/005

throughout the appraisal process into SADPD policies to avoid adverse/enhance positive impacts associated with allocating the sites (see paragraphs 15.9-15.10 of the report); and in later stages of the appraisal process, feedback from consultation with the public and a range of stakeholders led to different/new recommendations for allocation or rejection of sites; or new mitigation/optimising measures being incorporated into policies as they evolved. Paragraphs 15.11-15.17 of the SA report describe in detail how newly emerging evidence - including that from representations made during consultation at various stages of plan preparation - influenced the refinement of options. For example, where new, 'reasonable' sites were proposed either as a result of consultation or from updates to the evidence base such as the SHLAA, they were appraised accordingly, and recommended for either inclusion or rejection in the DPD. Acting on feedback from consultation responses, some sites were re-appraised and subsequently removed from the SADPD where it was considered that significant adverse impacts could not be avoided – see paragraph 15.16 for details.

- ii.3.2 Paragraphs 15.17-15.31 of the report describe how the appraisal process informed the selection of preferred sites to be released from the Green Belt, in conjunction with other evidence such as the Green Belt boundary review (GBBR)¹⁶. In particular, the scores against SA Objective 10 were closely scrutinised by the Council and helped identify any adverse impacts on the borough's natural, historic and cultural assets and landscape, including Green Belt (GB) land, and led to mitigation measures being included in key requirements such as inclusion of significant elements of green infrastructure (GI). Paragraphs 15.32-15.33 describe how the SA informed the selection of preferred sites in the urban area.
- ii.3.3 The SA has thus been prepared as an integral part of the SADPD preparation process and its outcome has genuinely helped define and refine the sites selected for allocation and safeguarding, and the key requirements of SADPD policies.

Question 4: Are the alternatives considered by the SA sufficiently distinct to highlight the different sustainability implications of each?

- ii.4.1 The overall purpose of the SADPD is to allocate specific sites to facilitate the delivery of the development proposals of the Core Strategy. The SHLAA¹⁷ and Employment Land Review and Topic Paper¹⁸ provided the starting point for the selection of sites for appraisal, which would constitute 'reasonable alternatives'. Despite these sites being predominantly situated in the urban area – in accordance with the spatial vision of the Core Strategy – their appraisal against the SA Framework gave rise to distinct economic, social and environmental effects. This was also true of the sites within the Green Belt. For example, the allocation of a site for development which had scope to deliver a large number of affordable homes resulted in very positive effects against SA Objective 1; development in a location lacking suitable access to community facilities would score negatively against SA Objective 5; development of a site with scope to harm a heritage asset or its setting would score negatively against SA Objective 10. Sites were in various locations and settings throughout the borough and were therefore subject to various site-specific constraints and opportunities, which subsequently gave rise to a wide range of sustainability effects. The appraisal tables clearly highlighted the social, environmental and economic impacts and issues for each site; and how these could be addressed by optimising or mitigating measures incorporated into SADPD policies to ensure the proposals in the plan were appropriate and would contribute to the achievement of sustainable development in the borough.

¹⁶ Document reference: WBC/SA/E018

¹⁷ Document reference: WBC/SA/E020-E021D

¹⁸ Document reference: WBC/SA/E025-E026B

Issue (iii) Is the SADPD supported by a robust approach to Habitats Regulation Assessment (HRA)?

Question 1: Is the HRA adequate and how has the SADPD taken account of its findings?

- iii.1.1 The HRA is considered to be adequate in that its scope and contents are proportionate and sufficient to satisfy the competent authority that the SADPD – through its policies and allocations - will not adversely affect the integrity of relevant European protected habitats, either individually or in combination with other plans or projects. It has been produced, with the input of Natural England, to a high standard by a reputable consultant, and meets legislative requirements¹⁹. Several relevant 'pathways of impact' were assessed, including recreational disturbance, reductions in air quality and trans-boundary/cumulative effects.
- iii.1.2 The HRA concludes in Section 6 that no adverse effects on integrity would occur on the Thames Basin Heaths SPA or other European sites under consideration, but makes several recommendations. The Council has addressed these recommendations during the plan-making process as follows:
- The Council has ensured that there is sufficient Suitable Alternative Natural Greenspace (SANG) provision to serve growth. A table²⁰ has been produced assigning each proposal site (where residential uses are proposed) to a SANG, demonstrating there is sufficient existing and proposed SANG infrastructure to avoid adverse effects caused by recreational disturbance over the plan period. The SADPD identifies sufficient SANG land to meet the shortfall in provision up to 2027. In addition to the overarching Core Strategy policy CS8: *Thames Basin Heaths Special Protection Areas*, a key requirement has been included in relevant SADPD policies requiring both Community Infrastructure Levy (CIL) contributions towards SANG provision, and Strategic Access Management and Monitoring (SAMM) contributions.
 - Policy GB6 (Six Crossroads roundabout) includes a key requirement that a project-specific HRA be carried out, and that Natural England be consulted on the construction of the scheme to conserve the integrity of the European site.
 - The Core Strategy sets out how the Council offers in-principle support to work with its partners if any issues of cross-boundary significance emerge, including the need for the strategic protection of the SPA to conserve its integrity²¹. The Council is a member of the TBH Joint Strategic Partnership Board, and is committed to working with other Surrey local authorities and Natural England to strategically monitor and mitigate any adverse impacts on the SPA. The impact of developments on air quality is an issue which has been, and continues to be, a topic of discussion. Acting on advice from Natural England²², site-specific air quality assessments (which take account of in-combination effects) have been added as a key requirement to relevant SADPD policies where the scale of development has potential to cause traffic impacts to roads within 200m of European protected sites, and thus potentially lead to ecological impacts from emissions, in line with policy DM6 of the Development Management Policies DPD on Air and Water Quality²³. Where assessments identify the need for avoidance/mitigation measures, the Council will take appropriate measures to address that, including working with the TBH Board if the issues are of cross-boundary significance. Natural England's internal operational Guidance Note²⁴ would be referred to in such circumstances.

¹⁹ Set out in the [Habitats Directive 1992](#) and the [Conservation of Habitats & Species Regulations 2017](#)

²⁰ Document reference: WBC/SA/023A

²¹ Paragraph 2.40, p25 of Woking Core Strategy (Document Ref: WBC/SA/E017)

²² Regulation 19 Representation ID: 06392/2

²³ Modification Ref. 16 in the Schedule of Proposed Modifications, Document Ref. WBC/SA/002

²⁴ NEA002 Advising Competent Authorities on Road Traffic and HRA, June 20018, available here:

<http://publications.naturalengland.org.uk/publication/4720542048845824> and Document Ref: WBC/SA/E049

Question 2: Is the approach to HRA legally compliant having regard to the Court of Justice of the European Union's judgement on *People over Wind, Peter Sweetman v Coillte Teoranta* (Case C-323/17)?

iii.2.1 Yes. A new HRA report²⁵ was produced in June 2018 to reflect this judgement. As a result, measures intended to avoid or reduce the harmful effects of a proposed project on a European site, but which are not an integral part of the project or plan – such as those put forward in the Thames Basin Heaths SPA Avoidance Strategy - have not been taken into account at the 'screening' stage of HRA. Chapter 5 of the HRA report undertakes a full 'Appropriate Assessment' of potential effects of any site allocations screened in for further consideration from Chapter 4 (note that all of the residential site allocations were screened in, and therefore subject to appropriate assessment).

Issue (iv) has consultation on the SADPD been carried out in accordance with the Regulations and the Council's Statement of Community Involvement (SCI)?

Question 1: Has consultation on the SADPD been carried out in accordance with the Council's SCI?

iv.1.1 Yes. The Council has published a Consultations Statement²⁶ to demonstrate how the requirements of the SCI²⁷ have been achieved, in particular, during the Regulations 18 and 19 consultations. The Council has also published a Regulation 17 Statement, which also meets the requirements of Regulation 22²⁸ setting out individuals and organisations invited to make representations, a summary of the main issues raised in their representations and how they have been taken into account to improve the quality of the SADPD. The Council has submitted a Duty to Cooperate Statement²⁹ to provide details on how it has involved the relevant prescribed bodies in addressing strategic matters of cross boundary implications. The Council has submitted a self-assessment of the tests of soundness and self-assessment of legal and procedural requirements³⁰, which sets out how the consultation on the SADPD meets the provisions of the SCI.

Question 2: Have the publication, advertisement and availability of the SADPD followed the statutory procedures set out in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) England Regulations 2012?

iv.2.1 Yes, the Council had made sure that the publication, advertisement and availability of the SADPD followed procedures set out in the Planning and Compulsory Purchase Act 2004 (as amended)³¹ and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)³². The Council has published a Consultation Statement³³, a Duty to Cooperate Statement³⁴ and a self-assessment of the tests of soundness and self-assessment of legal and procedural requirements³⁵ to demonstrate how this has been achieved. The Consultation Statement includes details of deposit venues, the Statement of Representation procedure, Consultation Plan and events to promote the SADPD, extracts of advertisements, public notices, press releases, articles and photos of events.

²⁵Document reference: WBC/SA/006

²⁶ Document reference: WBC/SA/008

²⁷ Document reference: WBC/SA/012

²⁸ Document reference: WBC/SA/010

²⁹ Document reference: WBC/SA/009

³⁰ Document reference: WBC/SA/013

³¹ The Act is available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents>

³² The Regulations are available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made>

³³ Document reference: WBC/SA/008

³⁴ Document reference: WBC/SA/009

³⁵ Document reference: WBC/SA/013

Issue (v) To what extent has the production of the SADPD complied with the Council's published Local Development Scheme (LDS)?

Question 1: Is the scope of the SADPD as described in the LDS?

v.1.1 The Council has an up to date LDS (September 2018)³⁶. The LDS is clear about the role, coverage, status of the SADPD and its relationship to the Core Strategy. The purpose of the SADPD is set out in page 4 of the SADPD. It is clear that it is consistent with the scope as prescribed in the LDS. The Council is therefore satisfied that the scope of the SADPD is as prescribed in the LDS. The SADPD achieves its purpose by identifying sufficient land to enable the comprehensive delivery of the Core Strategy.

Question 2: Does the SADPD make explicit which, if any, of its policies are strategic³⁷?

v.2.1 The SADPD does not contain strategic policies as described in Section 3 of the NPPF. The Core Strategy³⁸ provides the strategic policy context for the preparation of the SADPD. Section 3 of the NPPF deals with plan-making. It draws a distinction between strategic policies and non-strategic policies. Paragraph 28 of the NPPF classifies a SADPD as non-strategic policies. The LDS³⁹ defines the role of the SADPD to identify sufficient employment and housing land and infrastructure to cover the period up to 2027, in accordance with requirements, vision and spatial strategy set out in the Core Strategy. The SADPD achieves its intended purpose.

Question 3: Do any strategic policies contained in the SADPD accord with the Framework⁴⁰ insofar as they "should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities"?

v.3.1 The SADPD does not contain strategic policies as highlighted in the Council's response above at paragraph v.2.1. In this regard, the provisions of paragraph 22 of the NPPF is not engaged in the same manner as it would apply to the preparation of a strategic policies plan. Given its stated purposes, it is necessary that the plan period for the SADPD is aligned to the plan period for the Core Strategy. Regardless of that, the SADPD builds in sufficient scope to respond to potential changes and opportunities during its plan period up to 2027, and safeguards land to meet future development needs beyond the current plan period.

Question 4: Has the timing of production of the SADPD followed the timetable set out in the LDS?

v.4.1 Yes, the timing of the production of the SADPD follows the timescales set out in the LDS. The Council has an up to date LDS⁴¹. Table 1 of the LDS sets out the timescales for the key milestones for the preparation of the SADPD. The timescales have broadly been followed to date. The Council has published a self-assessment of tests of soundness and self-assessment of legal and procedural requirements⁴² to demonstrate how this has been achieved.

³⁶ Document reference: WBC/SA/011

³⁷ Per paragraph 21 of the Framework; and having regard to the definition of 'Strategic Policies' given in the glossary of the Framework.

³⁸ Document reference: WBC/SA/E017

³⁹ Document reference: WBC/SA/011

⁴⁰ At paragraph 22

⁴¹ Document reference: WBC/SA/011

⁴² Document reference: WBC/SA/013

Issue (vi) To what extent does the SADPD contain policies designed to secure that the development and use of land in the Borough contribute to the mitigation of, and adaptation to, climate change?

Question 1: To what extent does the SADPD contain policies designed to secure that the development and use of land in the Borough contribute to the mitigation of, and adaptation to, climate change?

- vi.1.1 The Core Strategy⁴³ provides the strategic policy framework for the preparation of the SADPD. It contains robust policies covering a range of topics to make sure that development and use of land contributes to the mitigation of and adaptation to climate change. These include policies CS1 *A spatial strategy for Woking Borough* which directs most new development to previously developed land in the town, district and local centres; CS17 *Open space, green infrastructure, sport and recreation*; CS18 *Transport and accessibility*; CS21 *Design*; CS22 *Sustainable construction*, CS23 *Renewable and low carbon energy generation* and DM1 *Green infrastructure opportunities*.
- vi.1.2 The SADPD takes account of these policies and includes site-specific requirements that should be met to achieve satisfactory development of the site, such as: connection to the Town Centre district heat network/a feasibility study for the integration of renewable/low carbon energy infrastructure; retaining and enhancing green infrastructure to reduce vulnerability to climate impacts, including Sustainable Drainage Systems (SuDS); provision/improvement of sustainable modes of transport; and meeting relevant sustainable construction requirements.
- vi.1.3 The Council has produced a Sequential Test⁴⁴ to demonstrate how the SADPD has applied a sequential, risk based approach to the location of development, taking into account the current and future impacts of climate change, so as to avoid, where possible, flood risk to people and property. Where relevant, carrying out a flood risk assessment has been made a key requirement of some proposals, which should take into account the EA's latest guidance on climate change⁴⁵.
- vi.1.4 The Council is confident that the SADPD policy key requirements, combined with the requirements of planning policies in the wider Development Plan, will ensure development and use of land in the borough effectively responds to climate change impacts.

⁴³ Document reference: WBC/SA/E017

⁴⁴ Document reference: WBC/SA/E039

⁴⁵ This refers to the 'Flood risk assessments: climate change allowances' guidance which supports the NPPF, available at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#history>. The Statement of Common Ground with the EA (Document reference: WBC/SA/032) lists the sites where proposed modifications will incorporate this key requirement, and these are also now incorporated into the updated Schedule of Proposed Modifications (Document reference: WBC/SA/002)

Hearing Statement 2 in Response to Matter 2

Matter 2: Is the overall approach of the SADPD in general conformity with the Woking Core Strategy?

Issue (i) Are the requirements set out in the Woking Core Strategy (adopted October 2012) (the Core Strategy) justified, up-to-date and consistent with national policy?

Question 1: The Council has undertaken a review of the adopted Core Strategy. How have the Borough's Housing Delivery Test results and any evidenced changes to housing need since the adoption of the Core Strategy informed that review⁴⁶?

i.1.1 The review of the Core Strategy⁴⁷ was approved on 18 October 2018. The Council can confirm that the review took into account housing delivery against the Core Strategy's housing requirement, changes in housing need since the adoption of the Core Strategy, how the policies of the Core Strategy have been performing against its intended objectives, how the policies of the Core Strategy continue to be in general conformity with the NPPF, and how the policies are delivering on the key priorities of the Council. These are set out in distinct sections of the review to demonstrate in detail how these matters have been addressed. There is also a distinct section in the review that provides detailed analysis of why the Council should continue to enable the delivery of the Core Strategy housing requirement. It is important to note that based on the Government's published data, Woking Borough passed the Housing Delivery Test. Also, the objectively assessed housing need for the Housing Market Area has been fully met by the Woking, Guildford and Waverley Borough Local Plans.

Question 2: Did the Council's review of the Core Strategy pay due regard to the DtC⁴⁸?

i.2.1 The Council paid due regard to the DtC by giving due regard to the legal effect of Section 33A(3)(a) of the Planning and Compulsory Purchase Act 2004⁴⁹. Section 33A(3)(a) prescribes the activities which might be subject to the DtC. These activities are 'the preparation of development plan documents'. It is clear from the overall conclusion of the review that the Council did not propose to prepare a development plan document, so no DtC had arisen under Section 33A(3)(a). Furthermore Sections 33A(3)(d) or 33A(3)(e) can only impose a DtC on the Council if the Council had undertaken, or is undertaking a Section 33A(3)(a) activity. There was no such activity, and in this regard, neither of the Sections is engaged. It is highlighted that the review was undertaken in full compliance with the Guidance on Plan-making published in September 2018⁵⁰. The Council is aware that the Guidance has changed in part since this time.

⁴⁶ In accordance with the *Plan Making* PPG Paragraph: 065 Reference ID: 61-065-20190723, Revision date: 23 07 2019

⁴⁷ Document reference: WBC/SA/E017B

⁴⁸ In accordance with the *Plan Making* PPG Paragraph: 068 Reference ID: 61-068-20190723

⁴⁹ The Act is available at: <http://www.legislation.gov.uk/ukpga/2004/5/contents>

⁵⁰ Available within the PPG at: <https://www.gov.uk/guidance/plan-making>

Question 3: Did the review of the Core Strategy take into account plan-making activity in neighbouring authorities, such as whether those LPAs are unable to meet all of their identified housing needs?⁵¹

i.3.1 Yes, the Council took into account Plan-making activities of neighbouring authorities during the review of the Core Strategy. The section on 'evidence base studies' of the Review of the Core Strategy⁵² provides evidence that the plan making activities of Waverley and Guildford Borough Councils who are in the same Housing Market Area as Woking were considered. The Council has signed a Statement of Common Ground (18 May 2018) with Runnymede Borough Council to agree that Woking is unable to meet any part of Runnymede Borough's housing need. A copy of the SoCG is in Appendix 3c of Duty to Cooperate Statement⁵³. Elmbridge and Surrey Heath Borough Councils are at the very early stages of reviewing their local plans, and it is unknown whether they will or will not be able to meet their objectively assessed housing need. It is highlighted that Runnymede, Elmbridge and Surrey Heath Borough Councils are in different Housing Market Areas.

Issue (ii) To what extent would the allocations, taken together, meet the requirements set out in the Core Strategy?

Question 1: Has the viability of the SADPD been tested and evidenced in accordance with the advice contained in the PPG⁵⁴, and does the viability evidence take into account any policy requirements arising from the SADPD, such as the requirement to make use of the Government's optional technical standards?

ii.1.1 The PPG provides guidance on viability⁵⁵ and plan making⁵⁶. The PPG expects plans to set out the contribution expected from development, and the policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, including the implications of the Community Infrastructure Levy (CIL). The policies of the Core Strategy⁵⁷ were informed by a comprehensive viability assessment⁵⁸ that took into account policy requirements such as the need for development to meet lifetime homes standard, an Infrastructure Delivery Plan⁵⁹ and a Strategic Housing Market Assessment⁶⁰. It concluded that the affordable housing requirement could be met taking into account the other policy requirements of the Core Strategy.

ii.1.2 The Council has subsequently carried out a CIL Viability Study⁶¹ to take account of the implications of the CIL Charging Schedule⁶². The Council introduced CIL on 1 April 2015. The development scenarios used for the viability assessment are reasonably representative of residential and non-residential development types that are likely to come forward across the Borough. The Charging Schedule has been set to build in sufficient cushion to ensure positive viability for residential and retail

⁵¹ In accordance with the *Plan Making* PPG Paragraph: 065 Reference ID: 61-065-20190723 Revision date: 23 07 2019

⁵² Document reference: WBC/SA/E017B

⁵³ Document reference: WBC/SA/009

⁵⁴ *Viability* 1 September 2019

⁵⁵ The Planning Practice Guidance on Viability is available here: <https://www.gov.uk/guidance/viability>

⁵⁶ The Planning Practice Guidance on Plan-making is available here: <https://www.gov.uk/guidance/plan-making>

⁵⁷ Document reference: WBC/SA/E017

⁵⁸ Document reference: WBC/SA/E046

⁵⁹ Document reference: WBC/SA/E036H-I

⁶⁰ Document reference: WBC/SA/E022A

⁶¹ Document reference: WBC/SA/E036F

⁶² Document reference: WBC/SA/E036D

development and there is evidence in the study to suggest that residential development will continue to remain viable across the Borough. The Charging Schedule strikes an appropriate balance between the need for CIL to fund infrastructure provision and the impact of the imposition of the levy on the economic viability of development in the area.

- ii.1.3 The Council has published a property market update – house price trends (2014)⁶³. The study demonstrates that it is unlikely that there would be deterioration in viability outcomes relative to those set out in the CIL Viability Study. The Council is therefore satisfied that the approach to viability follows guidance in the PPG and takes into account the policy requirements of the Core Strategy including the need for development to meet lifetime homes standards.
- ii.1.4 Policies CS12 and CS16 allow scope for an applicant subject to a requirement for a financial viability appraisal to demonstrate that the contributions being sought from development will threaten the viability of the proposal.

Question 2: Is the spatial distribution of development allocations in the SADPD in general conformity with the Core Strategy?

- ii.2.1 Policy CS1: *A spatial strategy for Woking Borough* of the Core Strategy⁶⁴ sets out the overall spatial strategy for development across the Borough. It directs most new development to previously developed land in the main centres, which offers the best access to a range of services and facilities. It identifies the Town Centre as the primary focus for sustainable growth. The spatial strategy also identifies the Green Belt (GB) as broad location for future direction of growth to meet housing need between 2022 and 2027. Policy CS10: *Housing provision and distribution* of the Core Strategy defines the amount of housing to be delivered through the release of GB land as 550 homes. The SADPD follows this strategy by focussing most of the allocations in the Town centre. Development in the main centres are phased to come forward in advance of development on GB land. Policy SA1: *Overall policy framework for land released from the Green Belt for development* of the SADPD provides the necessary framework to make sure that GB land is not released for development prior to 2022. Approximately, about 70% - 75% of the housing on the allocated sites will be in the urban area.

Question 3: Policy CS13 of the Core Strategy anticipates that sites would be allocated in the SADPD to meet specialist housing needs: to what extent does the SADPD fulfil this policy requirement?

- ii.3.1 In accordance with policy CS13⁶⁵, the Strategic Housing Market Assessment (SHMA)⁶⁶ provides an assessment of the overall need for specialist accommodation. It estimates an indicative need for 918 specialist homes for older persons in Woking in the 2013-33 period, including 962 market units, and 44 affordable units (paragraph 9.36, table 69).
- ii.3.2 The SADPD fulfils the requirement of CS13 by allocating site GB11 to meet specialist housing needs. Policy CS13 also offers in-principle support for specialist housing if a need can be justified. Since monitoring began in 2012, the following number of units have been delivered or in the pipeline: 264 specialist C3 dwellings for the elderly permitted, and 186 care home bed spaces for the elderly permitted; 100 specialist C3 dwellings for the elderly completed, and 135 care home bed spaces for the elderly completed. Extant permissions include 75 specialist dwellings and 80 care home bed spaces at site allocation GB11; 117 affordable specialist units at site allocation UA25; 24 net additional care home bed spaces at Horsell Lodge, and 82 of the same at Britannia Wharf (although this site also has an alternative permission for standard housing). Delivery to date, and the continued application of policy CS13 into the future, reinforces the conclusion that the approach to the delivery of specialist accommodation is sound given the current development pipeline.

⁶³ Document reference: WBC/SA/E036G

⁶⁴ Document reference: WBC/SA/E017

⁶⁵ Document reference: Ibid.

⁶⁶ Document reference WBC/SA/E022

- ii.3.3 The section 'Specialist residential accommodation' on pages 18 and 19 of the SADPD sets out in more general terms the contribution that the allocated sites will make towards the requirement for specialist accommodation.

Question 4: Does the SADPD give due regard to the important contribution that small sites can make to meeting the housing requirement of an area⁶⁷?

- ii.4.1 Yes, the SADPD gives due regard to the important contribution that small sites can make to meeting the housing requirement for the area by allocating a significant number of small sites to meet development needs. Paragraph 68 of the NPPF defines small sites as sites no larger than one hectare. A significant number of the allocations in the SADPD are below this threshold. Examples include – Proposals UA1, UA2, UA3, UA4, and UA5.
- ii.4.2 It should be acknowledged that in urban areas where local authorities are seeking to maximise the efficient use of land, small sites could yield many units of housing due to high density development.

Question 5: Does the SADPD identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare⁶⁸? If not, can it be shown that there are strong reasons why this 10% target cannot be achieved?

- ii.5.1 Yes the SADPD identifies land to accommodate at least 10% of the housing requirement on sites no larger than one hectare. Most of the allocations in the SADPD are on sites no larger than one hectare and collectively they will deliver well over 10% of the housing requirements. Examples are: UA1, UA2, UA3, UA4, UA5, UA6, UA8, UA9 and UA11.

Question 6: Would the SADPD allocations deliver a sufficient mix of sites to meet assessed needs for the size, type and tenure of housing for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)⁶⁹?

- ii.6.1 Yes, the SADPD allocates land to deliver sufficient mix of homes to meet the needs of the community. The Council aims to plan to meet the housing needs of all members of the community (paragraph 2.15 of the Core Strategy⁷⁰). In this regard, Policy CS12: *Affordable Housing* of the Core Strategy sets an overall target of 35% of all new homes to be Affordable Housing. This is equivalent to 1,737 new homes between 2010 and 2027. Policy CS11: *Housing mix* ensures that development is of the right mix of sizes to meet the needs of the community. Policy CS13: *Older people and vulnerable groups* provides an in-principle support for development of specialist accommodation for older people and vulnerable groups in suitable locations. Policy CS14: *Gypsies, Traveller and Travelling Showpeople* makes provision to meet the accommodation needs of Travellers. The SADPD applies these policies and requires the provision of Affordable Housing on relevant sites allocated for housing. Examples include Proposals UA4, UA5, and UA8. The SADPD allocates sufficient land to meet the accommodation needs of Travellers. Examples include Proposals GB2 and GB10. The SADPD allocates land to meet the needs of older people, for example, Proposal GB11. The SADPD allocates a range of sites, such as those proposed to be released from Green Belt land, to meet the accommodation needs of families with children. A number of the Town Centre sites will be high density flatted development for rent. For example, the Council has entered into a development agreement with a developer to build flats to rent at Proposal UA6. The Victoria Square development will provide about 430 units for rent. Whilst specific sites have not been allocated for self-build homes in the SADPD, the Council is meeting its requirement through other mechanisms. Self-build homes continue to be built on the back of windfall sites and are being monitored by CIL exemption claims.

⁶⁷ Per paragraph 68 of the Framework

⁶⁸ Per paragraph 68 of the Framework

⁶⁹ Per paras 61 and 67 of the Framework

⁷⁰ Document reference: WBC/SA/E017

Question 7: Does the SADPD specify the mix of dwellings that specific sites will be expected to provide in line with paragraph 5.75 of the Core Strategy?

- ii.7.1 Yes. Where it is relevant to do so, the proposals of the SADPD specify the housing mix for the sites, in accordance with paragraph 5.75 of the Core Strategy⁷¹. Policy UA25 requires housing mix on this site to reflect the specific need for family (2+ bedroom) accommodation in the area. Policies UA26, UA30 and UA31 require affordable housing on the sites to reflect the specific need for the same type of accommodation. Policy UA29 requires development to be suitable for the same type of accommodation. These requirements are informed by policy CS5, whose area adjoins UA26 and covers all the rest.
- ii.7.2 With regard to the other sites, the starting point has been that it would be unnecessarily prescriptive at this stage to specify in detail the housing mix for these sites, because of the factors to be taken into account to do so at this strategic level of plan preparation. Policy CS11 sets out the strategic policy framework for determining the housing mix for each proposal. The policy allows flexibility for the actual mix to reflect a number of factors that are best to examine at the Development Management stage. Further reference to housing mix is made under the section 'Specialist residential accommodation' on pages 18 and 19 of the DPD. Appendix 14 of the 2014 Strategic Housing Land Availability Assessment (SHLAA)⁷² sets out the dwelling mix on exemplar schemes that have informed the SHLAA methodology and thereby most of the indicative dwelling numbers given for housing sites in the SADPD.

Question 8: Is there a demonstrable requirement for self-build and custom housing in the Borough⁷³ and is it clear which allocated sites, if any, are expected to meet this requirement?

- ii.8.1 WBC has a self-build register that demonstrates a need for self- and custom-build housing in Woking. However, need fluctuates according to a range of factors, such as people finding land elsewhere, people losing interest, and the prevailing economic circumstances at any given time. Given that is the case, it is always difficult to allocate a specific site to meet need at any given time. The government has established an approach to meeting the need that is based on 3-yearly calculations, which does not align with the plan-led system that runs for 15 years with a built-in mechanism for review every 5 years. As a consequence, the Council has adopted policy DM12⁷⁴ which offers in-principle support for self-build housing across the borough. In accordance with that policy the council has also published the Self Build and Custom Housebuilding Guidance Note⁷⁵ that signposts people on the register to sources of land to meet their need.
- ii.8.2 Since the introduction of the requirements, the Council has delivered planning permission for 40 self- or custom-built homes through this process. Based on this, the need for the standard 2016-2019 monitoring period has been met. The Council continues to explore the possibility of identifying service plots from land in its own ownership and will continue to monitor future delivery as required by the Regulations. If there is any significant shortfall, the Council will consider what appropriate measures might be needed to facilitate provision. The SADPD allocates land in the Borough's main centres where high density development is encouraged, to ensure the efficient use of land. Evidence so far demonstrates that self-build schemes in Woking are all on windfall sites. Consequently, it is not envisaged that the nature, densities and type of accommodation being promoted on previously developed sites in the SADPD will meet all the need expressed in the register.

⁷¹ Document reference: WBC/SA/E017

⁷² Document reference WBC/SA/E021

⁷³ Mentioned on page 19 of the SADPD

⁷⁴ Of the Development Management Policies DPD, Document reference: WBC/SA/027

⁷⁵ Document reference: WBC/SA/E047

Question 9: Is the requirement for care homes and extra care accommodation appropriately reflected in the SADPD?

- ii.9.1 The provision of specialist accommodation in general is covered under the reply to Matter 2, Issue (ii), Question 3. Care homes and extra care accommodation are sub-categories within the broader category of specialist accommodation; Policy CS13⁷⁶ does not commit to, or provide requirements for, the provision of either sub-category in particular, although the accompanying monitoring indicators do require them to be monitored, along with other types of specialist accommodation.
- ii.9.2 In accordance with Policy CS13, the Strategic Housing Market Assessment (SHMA)⁷⁷ provides an assessment of the overall need for specialist accommodation. In paragraphs 9.44-9.47 it also sets out the need for registered care housing in Woking for people aged 75 or over, estimating a need for 393 care home bed spaces for such people between 2013-2033, equivalent to amounting to 19.65 bed spaces per annum. No such bed spaces have been constructed in the period 2013-2019, so there is an unmet need of 117.9 bed spaces. As at 01.04.2019 there is extant permission for 186 net additional bed spaces (equivalent to 9.5 years supply), including 80 on the SADPD site allocation GB11, and 106 on windfall sites. All these permissions were granted in the last three years. While it is acknowledged that not all permissions will be implemented, the number of permissions that have been issued in the past three years provides assurance that market values are sufficient to ensure that schemes for this type of accommodation continue to come forward.
- ii.9.3 Regarding people with long-term health problems or disabilities (LTHPD), the SHMA focusses on those living in households. However, an estimate can be derived from the SHMA of 0.7% of Woking's population as having LTHPD and living in communal establishments (including care homes). The SHMA also notes that older people are more likely to have LTHPD (e.g. 77% of people aged 85 or over), so there will be a big overlap between the needs of this group and the need for care homes for the elderly, noted above. Since 2013, 24 additional bedrooms have been delivered in C2 facilities for people with long-term health problems and disabilities, including a palliative care hospice and a mental healthcare facility.
- ii.9.4 Need for extra care accommodation is not specified in the SHMA, but would come under the general assessment of need for specialist housing in paragraphs 9.32-9.43 of the SHMA. The meeting of this need is addressed under Matter 2, Issue (ii), Question 3.

Question 10: The Traveller Accommodation Assessment (TAA) pre-dates the publication of the Government's Planning Policy for Traveller Sites (PPTS). To what extent are the findings of the TAA consistent with the PPTS, particularly as the latter document introduced a new definition of the term "Traveller" for planning purposes?

- ii.10.1 The conclusions of the TAA have been reached by following a methodology that is in general accordance with the PPTS and, in particular, the stipulations of 'Policy A: Using evidence to plan positively and manage development.'⁷⁸ Woking has used Surrey's shared methodology for carrying out the TAA⁷⁹, clearly demonstrating inter-authority collaboration. Furthermore, the methodology gives due regard to early engagement and ongoing cooperation with the travelling community, particularly in drafting the questionnaire and methodology. The evidence base can be considered highly robust;

⁷⁶ Document reference: WBC/SA/E017

⁷⁷ Document reference WBC/SA/E022

⁷⁸ Planning Policy for Traveller Sites is publically available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

⁷⁹ Document reference: WBC/SA/E024A

as outlined in the TAA, 78% of the Traveller population in Woking Borough was interviewed during the survey, “[providing] confidence in the use of the survey data for future projections.”⁸⁰

- ii.10.2 It is recognised that the planning definition of “Gypsies and Travellers” has been amended by the PPTS. A Topic Paper has been prepared to address this matter in detail, establishing that while certain Gypsies, Travellers and Travelling Showpeople may no longer meet the relevant planning definitions, they remain a demographic whose needs must be accommodated in accordance with the relevant legislative context, which the SADPD seeks to meet.⁸¹

Question 11: The Employment Land Review material which supports the Core Strategy requirements was published in 2010. Consequently, are the policies of the SADPD flexible enough to accommodate needs not anticipated in the Core Strategy, allow for new and flexible working practices, and enable rapid response to changes in economic circumstances⁸²?

- ii.11.1 The Council has kept up to date with recent market trends and emerging needs through the publication of topic papers on employment and retail⁸³. These papers monitor delivery of the Core Strategy⁸⁴ development requirements, and demonstrate how the Council expects to meet remaining requirements. SADPD policies will be used alongside CS15: *Sustainable economic development*, which explicitly seeks to allow flexibility to cater to the changing needs of the economy by permitting ‘redevelopment of outmoded employment floorspace to cater for modern business needs’. CS15 also encourages workspace and ICT infrastructure as an integral part of residential development, to support home working.
- ii.11.2 For sites allocated for office use, the SADPD includes an indicative expected floorspace in the reasoned justification, to allow consideration alongside the policy’s key requirements. A detailed assessment of any site will be informed by evidence from applicants, the Council’s development monitoring and the topic papers on a case by case basis. With regard to retail, while eleven sites are allocated, the SADPD does not set expected quantities of retail floorspace. This is intended to allow the Council to take a flexible approach to delivery, informed by up to date evidence and development monitoring. The approach taken in the SADPD will enable the Council to fluidly respond to changing economic circumstances.

Question 12: Does the SADPD make sufficient provision of employment, retail and other commercial development of an appropriate range of types and scales?

- ii.12.1 Yes. The Employment and Retail Topic Papers⁸⁵ show there is adequate capacity to provide for the remaining employment and retail requirements. Increasing the density of development is key to this approach, linked to transport infrastructure improvements brought forward by the successful Housing Infrastructure Funding bid. In terms of other commercial uses, while the SADPD seeks to deliver the specific development requirements of the Core Strategy, it also allows flexibility for allocated sites to deliver a range of commercial uses which will be assessed on a case by case basis with regard to the Development Plan and up to date evidence.

⁸⁰ Document reference: WBC/SA/E024, p.12

⁸¹ The Topic Paper is available under document reference: WBC/SA/E024B

⁸² Per paragraph 81 (d) of the Framework

⁸³ The Employment Floorspace Topic Paper (2018), Document reference: WBC/SA/E025, and the Retail Topic Paper (2019), Document reference: WBC/SA/E048

⁸⁴ Document reference: WBC/SA/E017

⁸⁵ The Employment Floorspace Topic Paper (2018), Document reference: WBC/SA/E025, and the Retail Topic Paper (2019), Document reference: WBC/SA/048

Issue (iii) Does the SADPD's approach to flooding and water management accord with Policy CS9 of the Core Strategy and the Framework?

Question 1: Is the SADPD based on a sequential, risk-based approach to the location of development-taking into account the current and future impacts of climate change- so as to avoid, where possible, flood risk to people and property⁸⁶?

iii.1.1 The SADPD is informed by an up to date Flood Risk Assessment (2015)⁸⁷ that takes into account current and future impacts of climate change. Yes, The Council has published a Sequential Testing of Sites in the Site Allocations DPD (November 2018)⁸⁸ to demonstrate how a sequential test has been applied to determine the suitability of sites according to their susceptibility to flood risk. The Environment Agency has been actively involved in the preparation of the Sequential Test and is satisfied that the outcome is of high quality. The Sequential Test demonstrates that the Exception Test will not be required for any of the proposed sites in the SADPD where development is proposed. The Council has agreed a Statement of Common Ground with the Environment Agency⁸⁹, and subject to the proposed modifications being agreed by the Inspector, the Environment Agency is satisfied that the SADPD meets all necessary requirements. It is emphasised that the proposed changes set out in the Statement of Common Ground have all been approved by Council at its meeting on 25 July 2019.

Question 2: Do the submitted SADPD and the proposed modifications direct development away from areas at highest risk of flooding⁹⁰?

iii.2.1 Yes, the SADPD and the proposed modifications direct development away from areas at risk of flooding. The functional floodplain has been considered an absolute constraint, and sites within it had been ruled out as reasonable alternatives for consideration. The defined areas of the allocated sites where development will be required to be sited are all within Flood Zone 1 where development is encouraged (except Proposal UA25). A Sequential Testing of Sites in the SADPD⁹¹ has been published to demonstrate how this has been achieved. A Statement of Common Ground between Woking Borough Council and the Environment Agency⁹² has been agreed. It proposes modifications to key requirements of some sites for a sequential approach to be applied to the layout of development. Where relevant, key requirements of the allocated sites set out conditions for the need for detailed flood risk assessment to make sure that development addresses any site-specific issues relating to flood risk.

Question 3: Does the SADPD incorporate policies to ensure that developments are appropriately flood resistant and resilient?

iii.3.1 Policy CS9: *Flooding and water management* of the Core Strategy⁹³ provides a robust strategic policy framework for ensuring that developments are appropriately flood resistant and resilient. The SADPD includes key requirements to meet relevant sustainable drainage systems requirements, manage surface water runoff and enhance the provision of green infrastructure, all designed to make development flood resistant and resilient. Examples of sites where these measures have been proposed include UA20, UA24 and UA25. It should be noted that the key requirements are informed

⁸⁶ Per paragraph 157 of the Framework

⁸⁷ Document references: WBC/SA/E035, WBC/SA/E035A, WBC/SA/E035B

⁸⁸ Document reference: WBC/SA/E039

⁸⁹ Document reference: WBC/SA/032

⁹⁰ Per paragraph 155 of the Framework

⁹¹ Document reference: WBC/SA/E039

⁹² Document reference: WBC/SA/032

⁹³ Document reference: WBC/SA/E017

by the outcome of the Sustainability Appraisal⁹⁴, and flood risk assessment is required where relevant to inform site specific measures of mitigation that might be needed. A Sequential Approach is required to make sure that the layout of development on site takes account of the risk of flooding. This response should be read in conjunction with paragraphs iii.1.1 and iii.2.1 above. The Council is satisfied that the SADPD incorporates the necessary key requirements to make development flood resilient and resistant.

Issue (iv) Does the SADPD contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution⁹⁵?

Question 1: Do the SADPD and proposed modifications contain policies that would contribute to the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution?

- iv.1.1 The Council is satisfied that the SADPD and proposed modifications contain appropriate requirements to prevent development contributing to or being adversely affected by unacceptable levels of air pollution. Paragraph 8.4 of Section 8 of the Issues and Matters Topic Paper: Summary of Key Issues Submitted with Officers' Response⁹⁶ explains how policies CS18 *Transport and accessibility* of the Core Strategy⁹⁷ and DM5 *Environmental Pollution* and DM6 *Air and water quality* of the Development Management Policies DPD⁹⁸ are in place to address air pollution. The SADPD reflects these policies in specific key requirements to reinforce measures which need to be taken, for example: proposal UA4 states "Due to the proximity of the road and railway line, the development would need to consider the impacts on noise and air quality and ensure mitigation measures are implemented to protect residential amenity."⁹⁹
- iv.1.2 The Schedule of Proposed Modifications has introduced additions to strengthen these requirements, for example, modification 16 adds the following requirement to a number of sites; "Detailed Air Quality Assessment to determine potential impact of development on European protected sites through deteriorating air quality, taking account of in combination effects".¹⁰⁰

Issue (v) is the SADPD based on a robust assessment of required supporting infrastructure?

Question 1: Is the SADPD based on a robust assessment of the required supporting infrastructure?

- v.1.1 Yes. The Council has followed the requirements set out in paragraph 20 of the NPPF and worked with infrastructure providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand arising from delivery of the Core Strategy¹⁰¹, and the SADPD. The anticipated infrastructure requirements needed to support development foreseen by the Core Strategy and SADPD is identified in the Infrastructure Delivery Plan (IDP), and supporting Schedule of Infrastructure Delivery Requirements (Appendix 1 of the IDP)¹⁰². These documents also identify who is responsible for providing the necessary infrastructure and when it is likely to be delivered. The IDP

⁹⁴ Document references: WBC/SA/005, WBC/SA/005A, WBC/SA/005B, WBC/SA/005C

⁹⁵ Per paragraph 170 (e) of the Framework

⁹⁶ Document reference: WBC/SA/003

⁹⁷ Document reference: WBC/SA/E017

⁹⁸ Document reference: WBC/SA/027

⁹⁹ Document reference: WBC/SA/002A, p.44, p.49, and p.53

¹⁰⁰ Document reference: WBC/SA/002, p.6

¹⁰¹ Document reference: WBC/SA/E017

¹⁰² Document references: WBC/SA/E036, WBC/SA/E036A

was updated during 2017-18 to reflect progress in infrastructure delivery since its initial publication in 2011, and to support the SADPD by assessing any infrastructure needs associated with the proposed spatial distribution of development at specific, allocated sites. This was an iterative process, whereby the revised IDP was informed by proposals in the emerging SADPD, which in turn informed subsequent drafts of the DPD. During the process, the Council worked closely with a range of stakeholders and agencies to fine-tune the IDP and help identify means of delivery – see paragraph 3.5 of the IDP (p33). The proposed allocations were shared with infrastructure providers, whose subsequent recommendations were fed into the IDP. The Council's approach is described in extensive detail in the Issues and Matters Topic Paper: Summary of Key Issues Submitted with Officers' Response¹⁰³, within Section 6; and within the table in Section 1: Self-assessment of Tests of Soundness¹⁰⁴.

Question 2: Does the SADPD make sufficient provision for infrastructure including water supply, waste water, health, education and cultural infrastructure?

- v.2.1 Yes. The SADPD, drawing on up-to-date information from the IDP and other evidence¹⁰⁵, 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 within SADPD policies also stipulate 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.
- v.2.2 In terms of water infrastructure, Officers have 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 SADPD. Paragraphs 13.72-13.90 of the IDP detail Affinity Water's response - they conclude that no strategic network updates are foreseen to be required, but local network reinforcements may be needed in a few key areas as listed in paragraph 13.85. 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 SADPD policies to ensure applicants consult Thames Water regarding the impact of the development on wastewater infrastructure. Refer to modification reference no.22 in the Schedule of Proposed Modifications¹⁰⁶. Officers continue to work with both Affinity and Thames Water sharing GIS data and housing trajectories to inform both their future plans, and future updates to the Council's IDP.
- v.2.3 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 section 6 of the Issues and Matters Topic Paper: Summary of Key Issues Submitted with Officers' Response¹⁰⁷. See paragraph 6.9 regarding education, and 6.12 regarding health infrastructure. Note that the key requirements of SADPD policies include, where relevant, a contribution via CIL to meet future education infrastructure demands of additional housing. A secondary school has been built at proposal GB7 to meet need over the plan period.
- v.2.4 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:

¹⁰³ Document reference: WBC/SA/003

¹⁰⁴ Document reference: WBC/SA/013

¹⁰⁵ A full list is provided in Appendix 1 of the SADPD. Of particular relevance to infrastructure assessment is the package of transport assessments including on the Town Centre, A320 and A245 (Refs: WBC/SA/E027-E034), the Surrey Infrastructure Study (2016) (Ref: WBC/SA/E054), the Surrey County Council School Organisation Plan (Ref: WBC/SA/E053), social and community infrastructure studies, flooding and water management studies, and open space, green infrastructure, sport and recreation studies.

¹⁰⁶ Document reference: [WBC/SA/002](#)

¹⁰⁷ Document reference: [WBC/SA/003](#)

- 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.

v.2.5 Together with schemes that could come forward through the Development Management process on unallocated sites, the Council is satisfied that the SPD makes sufficient provision for infrastructure to support development.

Issue (vi) is the SADPD supported by adequate consideration of transport issues?

Question 1: Does the SADPD ensure that significant development will be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a general choice of transport modes¹⁰⁸?

vi.1.1 Yes. Policy CS1 of the Core Strategy sets out the spatial strategy for development across the Borough. It directs most new development to the main centres which have access to key services and facilities¹⁰⁹. The SADPD has been prepared in this context. Of the 53 sites allocated for residential, retail, office, leisure, community, industrial and warehousing uses, 31 are either partly or wholly within a town, district or local centre (equivalent to 58%). These locations have the best access to key services and facilities, thereby reducing the need to travel, and have the best access to public transport, thereby ensuring a wide choice of transport modes where travel is necessary. Where appropriate, key requirements have been included to ensure development locations are made maximally sustainable. Additionally, the provision of a transport interchange hub at UA7 will improve the sustainability of Woking Town Centre, which is already a highly sustainable location where a number of allocations are proposed.

Question 2: Has the SADPD been prepared with the active involvement of the local highways authorities, other transport infrastructure providers and operators and neighbouring councils so that strategies and investments for supporting sustainable transport and development patterns are aligned¹¹⁰?

vi.2.1 Yes. Surrey County Council (SCC), the local transportation authority, has been involved throughout the preparation of the SADPD, carrying out a range of supporting studies¹¹¹. Consequently SCC's 'Woking Forward Programme'¹¹², which sets out desired transport schemes for Woking Borough, is well-aligned with the pattern of development which the SADPD will deliver.

vi.2.2 Woking Borough Council has also worked to ensure alignment between the SADPD and Network Rail's 'Route Strategic Plan: Wessex Route 2019 to 2027'. The latter includes a commitment to work with SCC to "strengthen and widen Victoria [Arch] railway bridge" and an intention to "develop and seek funding for the Woking flyover enhancement scheme to release more peak time train paths on the main line."¹¹³ Both of these schemes will support the town centre allocations proposed in the SADPD, and enhance sustainable travel in the Borough.

¹⁰⁸ Per paragraph 103 of the Framework

¹⁰⁹ Document reference: WBC/SA/E017, p.29

¹¹⁰ Per paragraph 104(b) of the Framework

¹¹¹ Document references: WBC/SA/E027; WBC/SA/E028; WBC/SA/E029; WBC/SA/E030; WBC/SA/E031; WBC/SA/E031A; WBC/SA/E033; WBC/SA/E033A; WBC/SA/E033B; and WBC/SA/E034

¹¹² Document reference: WBC/SA/E036B

¹¹³ Document reference: WBC/SA/E036C, p.9 and 33

- vi.2.3 It is also noted that Highways England has included the proposed mitigation at the A245/Seven Hills Road junction – a scheme identified by the 'Potential Mitigation Study for the A245'¹¹⁴ - into its proposals for the M25 J10/A3 scheme.¹¹⁵
- vi.2.4 The Council has also worked with neighbouring authorities, for instance collaborating with Surrey Heath Borough Council and Runnymede Borough Council to commission the 'A320 Corridor Study'.¹¹⁶ The intention of this study was to understand the cumulative impact of planned development on this route and to develop a suite of mitigation measures. A Housing Infrastructure Fund (HIF) bid has been submitted by Runnymede Borough Council for the implementation of some of these measures.
- vi.2.5 The Council has also worked with a range of relevant organisations with transport functions during the preparation of the IDP.¹¹⁷

Question 3: How has the SADPD taken into account the effects of allocations on the transport network?

- vi.3.1 The Council has taken account of the effects of allocations on the transport network at various stages in the preparation of the SADPD. It should first be noted that the SADPD is a delivery mechanism for the Core Strategy, which was supported by the '2026 Transport Assessment Report'¹¹⁸ and the 'Cumulative Assessment of Future Development Impacts on the Highway Network'.¹¹⁹ To support the GBBR, a Green Belt Boundary Review Sensitivity Test was undertaken to understand the transport impacts of prospective housing allocations in various Green Belt locations. This included an addendum to assess the potential impact of residential development at Land to the East of Martyr's Lane.¹²⁰ A 'Woking Town Centre Modelling Assessment'¹²¹ was also undertaken, and two further studies were conducted: the 'Potential Mitigation Study for the A245' and the 'A320 Corridor Study: Feasibility Study Final Report'¹²² to identify impacts of development and potential mitigation at these locations.
- vi.3.2 The mitigation measures which have been identified through these studies are enumerated in response vi.6.1 below.

Question 4: How have the transport effects of the allocations in Byfleet and West Byfleet been taken into account?

- vi.4.1 As outlined in response vi.3.1-3.2 above, a number of transport studies have been undertaken during the preparation of the SADPD. Of particular relevance to the allocations at Byfleet and West Byfleet are the 'Green Belt Boundary Review Sensitivity Test' and the 'Potential Mitigation Study for the A245'.¹²³ The former tested the traffic impacts of three development scenarios, including Scenario E (Green Belt development at Byfleet and Pyrford) and Scenario F (Green Belt development at West Byfleet) to help inform the preparation of the SADPD. One of the findings of this study was that for these two scenarios, some of the greatest impacts would be likely to occur at the A245 Parvis/Old Woking Road.¹²⁴ Detailed analysis of the impact of proposed development along this corridor was

¹¹⁴ Document reference: WBC/SA/E028

¹¹⁵ Document reference: WBC/SA/E026

¹¹⁶ Document reference: WBC/SA/E027

¹¹⁷ Document reference: WBC/SA/E036, p.33 lists transport infrastructure providers and p.42-68 cover Transport and Accessibility infrastructure

¹¹⁸ Document reference: WBC/SA/E034

¹¹⁹ Document references: WBC/SA/E033; WBC/SA/E033A; and WBC/SA/E033B

¹²⁰ Document references: WBC/SA/E031 and WBC/SA/E031A

¹²¹ Document reference: WBC/SA/E029

¹²² Document references: WBC/SA/E028 and WBC/SA/E027

¹²³ Document references: WBC/SA/E031 and WBC/SA/E028

¹²⁴ Document reference: WBC/SA/E031, p.46

undertaken through the 'Potential Mitigation study for the A245'. This resulted in four mitigation proposals, at Chertsey Road roundabout, Brooklands Road roundabout, A245 junction with B365 Seven Hills Road and A245 junction with Camphill Road.¹²⁵ Of these, the main proposals are the A245 junctions with Camphill Road and Seven Hills Road. The latter has been incorporated by Highways England into their proposals for the M25 J10/A3 scheme. This scheme has been accepted by the Planning Inspectorate for formal examination and is subject to a Development Consent Order (DCO). This process is expected to commence late autumn 2019, with representations needing to have been submitted by 6th September.

vi.4.2 Beyond road infrastructure improvements, due consideration has been given to influencing modal shifts. Key requirements have been included in relevant allocations in this regard, for instance UA42 includes a requirement for “a Travel Plan to minimise car use of prospective occupants of the development” and GB10 includes a requirement for the preparation of a Transport Assessment which should address pedestrian and cycle infrastructure, and bus stop provision.¹²⁶ More broadly, the Council’s Regulation 123 list includes “A245 cycle and pedestrian improvements”¹²⁷ as a transport scheme.

Question 5: Have the effects of developments in neighbouring boroughs on the transport infrastructure of the Borough been taken into account?

vi.5.1 A key document in this regard is the 'Cumulative Assessment of Future Development Impacts on the Highway Network' which supported the Core Strategy, for which the SADPD is a delivery mechanism. Among the study’s aims was to “evaluate the highway capacity impacts of the cumulative county-wide strategic development within Surrey and large developments external to Surrey.”¹²⁸ It concluded that “levels of congestion and flow increase on the majority of LRN [Local Road Network] links in the County in the 2026 Do-Something, with localised areas experiencing increases in traffic impact. However, the overall impact of these increases is relatively insignificant.”¹²⁹

vi.5.2 Growth in other boroughs has also been taken account in subsequent transport studies. As set out in the Green Belt Boundary Review Sensitivity Test, Scenario B – which informed the other three scenarios which were tested (Scenarios D, E, and F) – includes “all commercial and residential developments outside the borough of Woking to the forecast year of 2026.”¹³⁰ Similarly, insofar as it drew on Scenario F, the Potential Mitigation Study for the A245 also took into account this information about development in other boroughs.¹³¹ Table 1 of the A320 Corridor Study details the significant developments in Runnymede, Surrey Heath and Woking Boroughs which were included in the transport modelling for this study.¹³²

Question 6: What measures are in place to mitigate the transport effects of the SADPD and is it clear how actions will be phased to secure appropriate mitigation- is there a reasonable prospect that mitigation measures would be delivered in the planned timescales?

vi.6.1 The timeframes for many of the mitigation measures required to support the SADPD are set out in the Infrastructure Delivery Schedule.¹³³

¹²⁵ Document reference: WBC/SA/E028, p.14
¹²⁶ Document reference: WBC/SA/002A, p.224 and p.284-285
¹²⁷ Document reference: WBC/SA/E036E, p.1
¹²⁸ Document reference: WBC/SA/E033, p.4
¹²⁹ Document reference: WBC/SA/EO33A, p.73-74
¹³⁰ Document reference: WBC/SA/E031, p.13
¹³¹ Document reference: WBC/SA/E028, p.6
¹³² Document reference: WBC/SA/E027, p.13
¹³³ Document reference: WBC/SA/E036A

- vi.6.2 At Woking station, the improved public transport interchange is scheduled for delivery within 0-5 years, and the proposed rail flyover is scheduled for between 2017 and 2027.¹³⁴ The latter is included, subject to funding, in Network Rail's 'Route Strategic Plan: Wessex Route' as per the response in vi.2.2.
- vi.6.3 The A320 Corridor Study¹³⁵ proposes a number of mitigation measures for this route. An important scheme along this corridor is put forward by Policy GB6 which allocates the Six Crossroads roundabout for essential infrastructure within the plan period.¹³⁶ This is listed on the Council's Regulation 123 List as a project that will be funded by CIL from 2019 onwards.¹³⁷ As noted in response vi.2.4, a HIF bid has been submitted by Runnymede to fund further improvements along this corridor. Furthermore, Woking Borough Council has scheduled improvements between Victoria Arch and Constitution Hill for within the plan period¹³⁸, and has been awarded £95 million through the HIF to widen the arch itself. This is scheduled for completion by the end of 2024.
- vi.6.4 Corridor mitigation measures at three points along the A245, which have been informed by the 'Potential Mitigation Study for the A245'¹³⁹, are timetabled in the Infrastructure Delivery Schedule during the 0-5 year period.¹⁴⁰ As set out in the Response to the Inspector's Preliminary Matters, the DCO process for the M25 J10/A3 scheme, which includes the proposed mitigation at the A245/Seven Hills Road junction and submitted by Highways England is expected to commence in late autumn 2019.¹⁴¹
- vi.6.5 In this regard, along three main transport corridors in the borough – the South Western main line rail route, the A320 and the A245 corridors – there are clear timeframes for the implementation of appropriate mitigation measures. The level of alignment that Woking has achieved with other stakeholders strategies, as well as the funding already awarded through the HIF bid, provides a reasonable prospect that they will be delivered in a timely manner.
- vi.6.6 Other site specific measures to be determined during the Development Management process will be secured for delivery by S106 to support the development.

¹³⁴ Document reference: WBC/SA/E036A, p.2 and p.4

¹³⁵ Document reference: WBC/SA/E027

¹³⁶ Document reference: WBC/SA/002A, p.265

¹³⁷ Document reference: WBC/SA/E036E p.2

¹³⁸ Document reference: WBC/SA/E036A, p.2

¹³⁹ Document reference: WBC/SA/E028

¹⁴⁰ Document reference: WBC/SA/E036A, p.2

¹⁴¹ Document reference: WBC/SA/026

Hearing Statement 3 in Response to Matter 3

Matter 3: Is the SADPD's approach to allocations and safeguarded land in the Green Belt (GB) justified and consistent with national policy?

Issue (i) Does the Woking Green Belt Review¹⁴² provide a robust evidence base to support the policies and allocations of the SADPD?

Question 1: Does the Green Belt Review's focus on land 'parcels' provide a sufficiently fine-grained assessment of the GB?

i.1.1 The Green Belt boundary review (GBBR)¹⁴³ does not entirely focus on land parcels. It follows a robust methodology that had been subjected to extensive stakeholder consultation. The GBBR has been carried out in stages, and does not only focus on land parcels. It also considers sites within the land parcels. This approach is emphasised in the Woking Green Belt Review – Method Statement¹⁴⁴. This is highlighted again throughout the Woking Green Belt Review – Final Report¹⁴⁵. In fact, none of the sites recommended to be released from the Green Belt is a 'parcel' in its own right as defined in the study. The allocations are sites within parcels. References to this in the GBBR include page v under 'Approach', page vi under 'stage 3' and page 63.

Question 2: Does the methodology of the Green Belt Review place appropriate emphasis on the permanence and purposes of the GB?

i.2.1 Yes. The GBBR¹⁴⁶ gives sufficient attention and appropriate emphasis on the enduring permanence of the Green Belt boundary. Page v of the Woking Green Belt review – Final Report¹⁴⁷ sets out the purpose of the study. The need to ensure the enduring permanence of the Green Belt boundary is highlighted. It identifies land to meet development needs well beyond the plan period. The study recommends the redrawing of the Green Belt boundary to enable this objective to be achieved. In accordance with this objective and paragraph 139 of the NPPF, the SADPD safeguards Proposals GB4 and GB5 with the stated objective of ensuring the enduring permanence of the Green Belt boundary. The GBBR devotes significant attention to assessing land parcels against the purposes of the Green Belt. Of course, the outcome of this assessment of sites against the purposes of the Green Belt had to be balanced with the other assessments regarding sustainability and landscape sensitivity and capacity for change. The proposals strike an appropriate and delicate balance between these mutually supplementary objectives.

Question 3: Does the Green Belt Review pay appropriate regard to the GB's purpose of preserving the setting and special character of historic towns¹⁴⁸?

¹⁴² Document reference: WBC/SA/E018

¹⁴³ Ibid.

¹⁴⁴ Document reference: WBC/SA/E018N

¹⁴⁵ Document reference: WBC/SA/E018

¹⁴⁶ Ibid.

¹⁴⁷ Ibid.

¹⁴⁸ See paragraph 134(d) of the Framework

- i.3.1 Woking Borough comprises distinct character areas with some rich history dating back many years. This is valued, and there are robust policies in the in the Core Strategy¹⁴⁹ such as Policy CS20: *Heritage and conservation*, CS21: *Design* and CS24: *Woking's landscape and townscape* and CS6: *Green Belt* to preserve the heritage of the area. The Council has also carried out a Character Study¹⁵⁰ to help understand the character and intrinsic qualities of the distinct areas of the Borough. However, Woking is not a Historic Town, and as such the GBBR gives it appropriate regard. The review recognised the need to protect the character of Mayford as a distinct village and recommended a separation gap between the village and the rest of the urban area.

Question 4: Does the Green Belt Review's objective of identifying suitable, deliverable sites for 550 homes over the plan period provide an appropriate basis for assessment?

- i.4.1 Yes. The objective to identify land in the Green Belt to enable the delivery of 550 homes is a clear policy requirement. This has been examined at a local plan Examination and approved by the Secretary of State as an appropriate basis for meeting the Core Strategy's housing requirement over the plan period. Policy CS1: *A spatial strategy for Woking*¹⁵¹ provides the justification for using the GBBR to identify Green Belt land to meet housing need between 2022 and 2027. This is reiterated in Policy CS6: *Green Belt*. Policy CS10 specifies that Green Belt land will be identified to enable the delivery of 550 new homes. Section 19 of the Planning and Compulsory Purchase Act¹⁵² requires the preparation of the SADPD to take account of the requirements of the Core Strategy. Given its overall purpose, the SADPD will not be performing its role if it failed to identify land to deliver 550 homes. However, the 550 homes was not the only focus of the GBBR; it also looked beyond the plan period and recommended that land be safeguarded beyond this plan period to meet future development needs up to 2040. The purpose of the GBBR is set out in page v of the Green Belt Review - Final Report¹⁵³. Attention is drawn to paragraph 3.5.22 of the report: 'we do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategy development'. In this regard, the review had gone as far as it could to identify land for future development needs.

Issue (ii) Do the SADPD's GB allocations and policies accord with national policies and guidance, and do exceptional circumstances exist sufficient to justify the alteration of the GB's boundaries?

Question 1: To what extent can it be demonstrated that exceptional circumstances exist sufficient to alter GB boundaries as proposed?

- ii.1.1 Paragraph 136 of the NPPF emphasises that 'once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries'. Accordingly, the special circumstances justification for the release of Green Belt land to meet housing need between 2022 and 2027 has been established by the Core Strategy and supported by the Secretary of State. Policies CS1, CS6 and CS10 of the Core Strategy provide policy justification that exceptional circumstances exist to release Green Belt land. The Council's priority has always been to focus most new development in the main centres. However, the 2011 SHLAA that informed the Core Strategy demonstrated that sufficient land could not be found in the urban area to meet the housing

¹⁴⁹ Document reference: WBC/SA/E017

¹⁵⁰ Document reference: WBC/SA/E052

¹⁵¹ Document reference: WBC/SA/E017

¹⁵² The Act is available here: <https://www.legislation.gov.uk/ukpga/2004/5/contents>

¹⁵³ Document reference: WBC/SA/E018

requirement over the entire plan period. The review of the evidence, in particular, the 2018 SHLAA¹⁵⁴ continues to demonstrate the need for Green Belt land to meet housing need between 2022 and 2027. In accordance with the Core Strategy¹⁵⁵, the Council has also carried out a Green Belt Boundary Review¹⁵⁶ to ensure that any land that is released from the Green Belt does not undermine its overall purpose and integrity and is appropriately justified. Development in the town centre is of high density, including tall buildings. The Council has explored all possibilities before considering releasing Green Belt land.

Question 2: Have reasonable alternatives to the release of GB sites been adequately explored, and have all reasonable options for meeting the Core Strategy's requirements been fully examined¹⁵⁷?

ii.2.1 Yes, the Council has explored reasonable alternatives to the release of Green Belt land. The Council has carried out a SHLAA¹⁵⁸ to assess the capacity of the urban area to meet the housing requirement. The Council has carried out an Employment Land Review and employment topic papers¹⁵⁹ to assess employment land that could be developed for alternative uses such as housing. In most cases, the SADPD promotes mixed-use development on previous employment sites to maximise their efficient use. The Core Strategy¹⁶⁰ sets out high indicative densities to maximise the use of land, including tall buildings in the town centre where justified. Policy CS10 sets out the indicative densities. It is important to highlight that the housing requirement of 292 dwellings per year is set against the backdrop of objectively assessed housing need of 409 dwellings per year. Because of the constraints of the area, Waverley and Guildford Borough Local Plans have committed to meet the unmet housing need arising from Woking Borough. It would therefore be unreasonable if sufficient land is not identified to meet the development requirements of the Core Strategy.

Question 3: Has the spatial distribution of the SADPD's GB allocations and safeguarded sites taken into account the need to promote sustainable patterns of development¹⁶¹?

ii.3.1 Yes. The spatial distribution of Green Belt sites takes into account the need to promote sustainable patterns of development. Proposal GB10 (West Hall) is the largest of the allocated GB sites by capacity of dwellings. Paragraph 6.2.6 of the Woking Green Belt Review – Final report advises that 'if the Council wishes to give priority to the most sustainable location for new development, then GB10 would seem to be the most appropriate¹⁶². The location of Proposals GB10 and GB11 offers opportunities for introducing sustainable modes of travel given their close proximity to the railway station and the district centre. The transport assessments undertaken to support the SADPD¹⁶³ provide further evidence.

Question 4: Does the SADPD demonstrate that GB boundaries will not need to be altered at the end of the plan period and define boundaries clearly using physical features that are readily recognisable and likely to be permanent¹⁶⁴?

ii.4.1 Paragraph 139 (c) of the NPPF expects that when defining Green Belt boundaries, plans should where necessary identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The purpose of the

¹⁵⁴ Document reference: WBC/SA/E020

¹⁵⁵ Document reference: WBC/SA/E017

¹⁵⁶ Document reference: WBC/SA/E018

¹⁵⁷ In line with paragraphs 35, 136 and 137 of the Framework

¹⁵⁸ Document reference: WBC/SA/E020

¹⁵⁹ Document references WBC/SA/E025-E026B

¹⁶⁰ Document reference: WBC/SA/E017

¹⁶¹ Per paragraph 138 of the Framework

¹⁶² Document reference: WBC/SA/E018

¹⁶³ Document references WBC/SA/E031, WBC/SA/E031A and WBC/SA/E028

¹⁶⁴ Per paragraph 139 (e) and (f) of the Framework

SADPD is set out on p4 of the SADPD, and it emphasises that the SADPD will safeguard land to ensure the enduring permanence of the Green Belt boundary. Accordingly, Proposals GB4, GB5 and GB8 of the SADPD have been identified for this objective. It is also worth noting that paragraph 3.5.21 of the Woking Green Belt Review¹⁶⁵ stresses the following: ‘we do not consider any other parcels to be suitable for removal from the Green Belt to accommodate new strategic development’.

- ii.4.2 The Council has published a Proposals Map¹⁶⁶ to demonstrate where the Green Belt boundary is drawn. It shows that the SADPD defines GB boundaries clearly using physical features that are readily recognisable and likely to be permanent.

Question 5: Would the SADPD be consistent with the GB’s purpose¹⁶⁷ of assisting in urban regeneration, by encouraging the recycling of derelict and other urban land?

- ii.5.1 Yes, the SADPD is consistent with the GB’s purpose of assisting in urban regeneration because as a priority, it directs most new development to previously developed land in the main centres, in particular, the town centre. Green Belt land will only be considered for development in the later part of the plan period between 2022 and 2027. Policy SA1: *Overall policy framework for land released from the Green Belt for development* of the SADPD stresses that the timing for the release of GB land during this period will be informed by a full assessment of the overall housing provision since 2010 and land will only be released if there is evidence of sufficient under provision against the housing requirement and there is no indication that the shortfall could be met by development on previously developed land in the urban area. The Policy promotes the ‘previously developed land first’ approach of the spatial strategy set out in the Core Strategy.¹⁶⁸

Question 6: Is GB release appropriately phased to assist urban regeneration, and to ensure that as much use as possible is made of suitable brownfield sites and under-utilised land¹⁶⁹?

- ii.6.1 Yes, as set out in paragraph ii.5.1 above, the release of Green Belt land is appropriately phased through the application of Policy SA1 of the SADPD to make as much use as possible of previously developed and underutilised land.

Question 7: Do the allocations contain appropriate provisions to mitigate adverse effects to landscape character where this has been highlighted as an issue in the Green Belt Review?

- ii.7.1 Yes, the allocations contain appropriate provisions to mitigate adverse effects to landscape character where this has been raised in the Green Belt Review (GBBR)¹⁷⁰. For example, the GBBR recommends that land at West Hall (GB10) should be released for development; but due to its landscape sensitivity, development should include significant elements of Green Infrastructure. The allocation covers a total area of about 29.33ha, however, the Proposal has a key requirement to make sure that a net developable area of only about 14.8ha is developed for residential development to enable significant amounts of green infrastructure and appropriate landscaping to be introduced. Large areas of woodland and parkland are to be retained on the site, and about 4.7ha of public open space and green infrastructure will form an integral part of the development. A landscape assessment will be carried out to inform a planning application. Proposal GB7 also sets aside undeveloped land to the north of the site to provide a visual gap between Mayford and the rest of the urban area. These are examples to demonstrate how the SADPD is concerned to make sure that the landscape implications for developing the sites are carefully taken into account.

¹⁶⁵ Document reference: WBC/SA/E018

¹⁶⁶ Document references: WBC/SA/001A, WBC/SA/001B

¹⁶⁷ Set out in paragraph 134 (e) of the Framework

¹⁶⁸ Document reference: WBC/SA/E017

¹⁶⁹ Per paragraph 137(a) of the Framework

¹⁷⁰ Document reference: WBC/SA/E018

Question 8: Does the SADPD set out ways in which the impact of removing land from the GB can be offset through compensatory improvements to the environmental quality and accessibility of the remaining GB land, and how such improvements could be secured¹⁷¹?

ii.8.1 Yes. The SADPD allocates SANG land such as GB12, GB13 and GB14, to offer enhanced accessibility to the remaining Green Belt for its beneficial recreational use. For example, the Heather Farm SANG is one of the most popular countryside destinations for recreation in the Borough. The SANGs will be secured in perpetuity through contract or Planning Obligations. Proposal GB17 has the potential to be a popular destination for its heritage and landscape value. Proposal GB9 has been safeguarded to provide green infrastructure. The Council is satisfied that this requirement has been met. There are other Council initiatives such as the Great Crested Newt project¹⁷² at the Proposed Westfield Common SANG (GB14) to enhance the environmental quality of the Green Belt.

Question 9: The key role that Woking's GB plays in providing recreational opportunity is identified in the Sustainability Appraisal Report¹⁷³. Consequently, to what extent do the SADPD's GB proposals accord with the Framework insofar as it states that planning policies should enable and support healthy lifestyles, especially where this would address identified local health and well-being needs, for example through the provision of safe and accessible green infrastructure¹⁷⁴?

ii.9.1 The SADPD accords with the NPPF in enabling and supporting healthy lifestyles, especially where these would address identified local health and wellbeing needs. The SADPD allocates sufficient SANG land within the GB for recreational use such as walking and running. SANGs such as Heather Farm have proven to be popular countryside recreational destinations for many local residents. Examples of SANG proposals include GB12-GB16 inclusive. Proposal GB17 seeks to create accessible green space within the GB through the creation of Heritage Parkland/Country Parkland.

ii.9.2 Furthermore, whilst proposal GB9 seeks to release land from the GB to ensure a strong, defensible GB boundary, its safeguarded use is to meet long-term Green Infrastructure needs, potentially making the land more safe and accessible for recreational opportunities (details to be established as part of the review of the Core Strategy and/or SADPD).

ii.9.3 Additionally, where land is released from the GB for development, key requirements are included in allocations to ensure significant green infrastructure is incorporated in proposals in accordance with Core Strategy¹⁷⁵ Policy CS17 *Open space, green infrastructure, sport and recreation*. Examples include Proposals GB3, GB7, GB9, GB10, and GB11.

Issue (iii) Are the GB housing allocations deliverable or developable?

Question 1: Are the policy requirements related to the GB allocations informed by evidence of affordable housing need, infrastructure requirements, the inclusion of local and national standards and a proportionate assessment of viability?

¹⁷¹ Per paragraph 138 of the Framework and *Green Belt* PPG 22 July 2019

¹⁷² Further details on this project are available here: <https://www.woking.gov.uk/nature-and-sustainability/conservation-projects/great-crested-newts>

¹⁷³ Document reference WBC/SA/005 at paragraph 7.12

¹⁷⁴ At paragraph 91(c)

¹⁷⁵ Document reference: WBC/SA/E017

- iii.1.1 The proportions of affordable housing required on the Green Belt housing allocation sites have been determined by the standard proportions for each type of site required by policy CS12 of the Core Strategy.¹⁷⁶ The affordable housing requirements of the Core Strategy were informed by the 2009 SHMA¹⁷⁷. The SHMA was reviewed in 2015¹⁷⁸ and the conclusions continue to justify the Core Strategy requirements. The SHMA demonstrates a significant unmet need for affordable housing, in particular affordable family homes. The allocations in the SADPD will help contribute to meeting this need. This demonstrates the importance of affordable housing on former Green Belt sites to meeting affordable housing need.
- iii.1.2 The SADPD is supported by a comprehensive Infrastructure Delivery Plan (IDP)¹⁷⁹. The IDP sets out the nature and type of infrastructure that will be needed to support the delivery of the SADPD, how and when that will be provided and at what cost. The extent to which the SADPD is based on a robust assessment of the required supporting infrastructure is also addressed in the Council's response to Matter 2- Issue (v).
- iii.1.3 The Green Belt housing allocation sites all require contribution to CIL. CIL receipts will be used to fund the identified infrastructure. Specific on and off site highways works required by the policies have been informed by policies CS18 and CS21. Green infrastructure requirements contained in the policies are informed by the Green Belt Boundary Review¹⁸⁰, Policy CS17 and the Natural Working Biodiversity and Green Infrastructure Strategy¹⁸¹.
- iii.1.4 The policy requirements are supported by comprehensive and proportionate viability assessments. More details on this are given under the response to Matter 5, Issue (ii), Question 11.

Question 2: To what extent would housing allocations in the GB anticipated to come forward in the next 5 years be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years?

- iii.2.1 Site GB11 has full planning permission and development has commenced on the site. Policy SA1 states that 'if a case can be justified, the development of the site can come forward from the adoption of the Site Allocations DPD'. The Council realistically expects the completion of the development within the next five years.

Question 3: For GB allocations scheduled later in the plan period, are these in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged?

- iii.3.1 The Green Belt allocations are informed by evidence including the GBBR¹⁸². The review considered availability of land, suitability for development, sustainability and viability. It recommended various options for development. It recommended that if the Council is to prioritise sustainability, then West Hall (GB10) would be the most sustainable site to deliver the Core Strategy from 2022-2027. It concluded that the site has the realistic prospect of coming forward between 2022-2027. The landowner has been actively promoting the site and has an indicative scheme to enable the

¹⁷⁶ Document reference: WBC/SA/E017

¹⁷⁷ Document reference: WBC/SA/EO22A

¹⁷⁸ Document reference: WBC/SA/E022

¹⁷⁹ Document reference: WBC/SA/E036

¹⁸⁰ Document reference: WBC/SA/E018

¹⁸¹ Document reference: WBC/SA/024

¹⁸² Document reference WBC/SA/E018

development of the site. The landowner has also confirmed developer interest in bringing forward the site.

- iii.3.2 The suitability of GB1 and GB2 for development is evidenced in the GBBR. Thameswey Limited (a WBC owned company) has significant interest and ownership of the sites and has a concept/indicative scheme to bring forward their development between 2022 and 2027. Planning applications¹⁸³ have been submitted for the development of the sites. While the existing applications may or may not be granted planning permission, it is considered that, given that their biggest landowner is actively seeking to develop, it is reasonable to expect that the sites will become available and could be viably developed if and when the criteria in Policy SA1 are met.
- iii.3.3 GB7 is actively being promoted by the owner and its suitability and availability is evidenced in the GBBR. Part of the site is already developed for the secondary school, which is part of the proposed uses on the site.
- iii.3.4 Overall, there is sufficient evidence to demonstrate that the GB sites are a suitable location for development, can be achievable with a realistic prospect that housing will be delivered on the site within 5-7 years.

Question 4: Policy GB10 of the SADPD relates to a site that is within a Mineral Safeguarding Area¹⁸⁴. The reasoned justification to Policy GB10 indicates that borehole testing of the site would be necessary, which may then lead to the full investigation of whether any reserves could be worked prior to any development that could sterilise those reserves. How have the implications of this informed the phasing and delivery assumptions of GB10?

- iii.4.1 The Council and the landowner are acutely aware that GB10 is within a Mineral Safeguarding Area. The landowner has already undertaken borehole testing of the site to demonstrate that there is no commercial viability for mineral extraction on site. Surrey County Council (SCC) is not objectionable to the conclusions of this work and is satisfied that the designation of the site as a Mineral Safeguarded Area should not be absolute constraint to residential development of the site, and any site specific matters, if there were to be, could be satisfactorily addressed at the planning application stage. In this regard, it is not envisaged that this will be a constraint in bringing forward the site for development or phasing the delivery of the site. Confirmation of this work and SCC's response to the works can be provided on request.
- iii.4.2 SCC is the Minerals Planning Authority for the area. The Council has worked in partnership with SCC at all stages of the SADPD process. They have not raised any objection to the allocation on the basis of its location within the Minerals Safeguarding Area.

Question 5: How has the 14.8ha figure for residential development on the GB10 site been arrived at, and does the figure include the proposed traveller pitch provision?

- iii.5.1 The 14.8ha figure is derived from the recommendations of the Woking Green Belt Review (GBBR)¹⁸⁵. This is evidenced in Table 4.3 on page 70 of the GBBR. Restricting the developable area to this figure is necessary to ensure that sufficient green infrastructure is integrated into the development to overcome the landscape implications for developing the site. The figure includes the proposed Traveller pitches.

¹⁸³ Application references: PLAN/2017/1306 and PLAN/2017/1307

¹⁸⁴ Per Policy MC6 of the Surrey Minerals Plan Core Strategy 2011

¹⁸⁵ Document reference: WBC/SA/E018

Question 6: Is the boundary of the ‘area of local separation’ within GB7 justified, and would the related restriction on “built development” within it act as a constraint on the wider deliverability of the site (i.e through prevention of flood mitigation measures etc)? Should the GB designation remain in place for the area of local separation?

- iii.6.1 Paragraph 4.3.14 of the GBBR¹⁸⁶ provides the evidence for the need and justification for the gap between Mayford and the rest of the urban area. There is a risk that the gap between Mayford and the rest of Woking would be compromised without the proposed visual separation. The GBBR expected the built development to be focused at the north of the site, leaving a wide landscape verge along Egley Road, and retaining open fields to the south. The secondary school which is part of the proposed uses on the site has now been built, resulting in buildings to the south of the playing fields. Given the orientation of the school it is logical for the housing development to be located to the south leaving the north of the site to maintain the integrity of the gap between Mayford and Woking and the separate identities of these distinct settlements within the Borough.
- iii.6.2 The school provides a clear dividing line between the proposed visual separation to the north of the site and where the housing development is to be located at south. It is not envisaged that the restriction on built development within the area of visual separation would act as a constraint on the wider deliverability of the site. The land to the south is capable of a standalone development.
- iii.6.3 The area of visual separation should not remain within the Green Belt. This is necessary to ensure a defensible boundary that will endure permanently beyond the plan period in accordance with paragraph 139(f) of the NPPF¹⁸⁷.

Issue (iv) Are the SADP’s policies relating to Traveller Sites consistent with the Core Strategy, national policies and guidance?

Question 1: Has the allocation of sites for Traveller accommodation and transit pitch provision followed the sequential approach set out within Policy CS14 of the Core Strategy?

- iv.1.1 Yes. As the Council could not identify deliverable or developable sites within the Urban Area, sites were identified in the Green Belt. In accordance with CS14, sites to be released from the Green Belt have been informed by the hierarchy set out in the GBBR¹⁸⁸: the Council has first sought to make temporary permissions permanent, then to intensify existing sites, before allocating new sites. At each stage, where a choice of sites has been identified, “priority [has been] given to sites on the edge of the urban area that benefit from good access to jobs, shops and other infrastructure and services” as per Core Strategy Policy CS14¹⁸⁹.

Question 2: What evidence is there to support the statement in the Council’s *Regulation 19 Consultation Issues and Matters Topic Paper*¹⁹⁰ that use of sites in the urban area to meet the needs of Travellers is unlikely to be viable?

- iv.2.1 Monitoring data strongly indicates that there is lack of viable urban area sites to meet Travellers’ needs. Between 2014/15 and 2018/19, all applications for Travellers’ sites were in the Green Belt rather than the Urban Area. Given the strong protection afforded to the Green Belt, the logical conclusion is that the market is resorting to these locations as it cannot identify viable sites in the

¹⁸⁶ Ibid.

¹⁸⁷ See p41 of the [NPPF](#)

¹⁸⁸ Document reference: WBC/SA/E018, p.ix

¹⁸⁹ Document reference: WBC/SA/E017, p78

¹⁹⁰ Document reference: WBC/SA/003, para 3.6

Urban Area. Such a dynamic cannot be due to an absolute lack of land in the Urban Area as monitoring data indicates a steady supply of permissions in these locations for accommodation to serve the needs of the settled community. That no suitable Urban Area Gypsy and Traveller sites were submitted to the SHLAA 2017¹⁹¹ supports this argument. This is likely the result of the high values commanded by accommodation for the settled community (average house price in Woking Borough in 2017/18: £406,650¹⁹²) and the low densities of traveller sites.

Question 3: The TAA did not identify a need for transit sites¹⁹³, consequently, do exceptional circumstances exist to release GB land for this purpose?

iv.3.1 Although the TAA did not identify a need for transit sites, it notes that “the provision of a transit site often enables a Council to effectively manage illegal encampment...it also provides certainty to Travellers to be able to carry out their activities legally without the threat of eviction”¹⁹⁴. Given the high incidence of unauthorised encampments in the borough – 25 between 2014/15 and 2018-19 – exceptional circumstances exist for the release of Green Belt land for a transit site. This is supported by aim (f) of the PPTS¹⁹⁵.

iv.3.2 Furthermore, the transit site is part of a larger allocation for the provision of pitches to meet Travellers’ accommodation needs and it would therefore not make a material difference to the openness of the Green Belt if it wasn’t provided. The Council is satisfied that its provision is an integral part of the allocation that will not undermine the purposes of the Green Belt.

Question 4: What factors have been taken into account to inform the SADPD’s spatial distribution of Traveller sites?

iv.4.1 As set out in the response to Question 1, the Council has taken a sequential approach to allocating Traveller sites. The key evidence base documents informing the application of this approach are the SHLAA¹⁹⁶ – which is one of the primary sources of sites for the SADPD - and the GBBR¹⁹⁷. Where a site is being intensified or a new site is being allocated, an evaluation has been undertaken through the Sustainability Appraisal¹⁹⁸, including consideration of access to local services and facilities. More broadly, the Council has ensured that its allocations will comply with the relevant provisions of the PPTS, in particular 4(j), 10(d), 10(e), and 13.

Question 5: Three sites are identified in Policy SA1 to which “permission in principle” (PiP) would be granted. What is the current planning status of those sites?

iv.5.1 Although Policy SA1 refers to “permission in principle”¹⁹⁹ being granted to three currently temporary Traveller sites, the term is not used to refer to the form of permission defined in the Town and Country Planning Act (TCPA) Paragraph 58(a)²⁰⁰. Rather, it is establishing that planning permission for permanent use would be acceptable in principle should such an application be made through the Development Management process.

¹⁹¹ Document reference: WBC/SA/E020-E020D

¹⁹² According to the Annual Monitoring Report (AMR), Document reference: WBC/SA/E045, p24

¹⁹³ Document reference WBC/SA/E024, paragraph 21.2

¹⁹⁴ Document reference: WBC/SA/E024, p24

¹⁹⁵ The PPTS is available here: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

¹⁹⁶ Document reference: WBC/SA/E020-E020D

¹⁹⁷ Document reference: WBC/SA/E018-E018M

¹⁹⁸ Document reference: WBC/SA/005B

¹⁹⁹ Document reference: WBC/SA/002A, p238

²⁰⁰ The Town and Country Planning Act 1990 is available at: <https://www.legislation.gov.uk/ukpga/1990/8/contents>

- iv.5.2 The four pitches at Land to the South of Murrays Lane have now been made permanent through a Section 73 application (PLAN/2018/1072) determined in May 2019.
- iv.5.3 The two pitches at Stable Yard, Guildford Road were initially issued temporary permission under PLAN/2013/0828. A second temporary permission was issued, under PLAN/2018/0804, expiring on October 2021.
- iv.5.4 As of 9 November 2019, the temporary permission pursuant to PLAN/2015/0821 for the one pitch at Land South of Gabriel Cottage will have expired. There is a pending Section 73 application (PLAN/2019/0035) to make the permission permanent.

Question 6: Mindful of the PPG²⁰¹ is it anticipated that PiP would be granted through entering the sites on Part 2 of the Council's brownfield land register?

- iv.6.1 As outlined in Paragraph iv.5.1, the reference to "permission in principle" in relation to the three Traveller sites does not refer to the term as defined in the TCPA Paragraph 58(a). Therefore, Policy SA1 does not explicitly seek to enter the site on part 2 of the Council's Brownfield Land Register.
- iv.6.2 However, it is recognised that Section 5(4) of the Brownfield Land Register Regulations (2017)²⁰² places a duty on LPAs to enter land allocated for residential development in Part 2 of the Register. In this regard, subject to the full provisions of the Regulations, there may be a requirement for these sites to be entered in Part 2 of the Register after the adoption of the SADPD.

Question 7: Would the use of PiP in relation to Traveller Sites be consistent with the PPG insofar as it states that the PiP "consent route is an alternative way of obtaining permission for *housing-led* development"²⁰³ (my emphasis)?

- iv.7.1 As outlined in Paragraph iv.5.1, the reference to "permission in principle" for the three Traveller sites does not refer to the term as defined in the TCPA Paragraph 58(a).
- iv.7.2 Nonetheless, should permission in principle as defined in the TCPA Paragraph 58(a) be sought, either by way of the Brownfield Land Register or an application, these sites might reasonably be considered "housing-led." While they do not fall within the C3 dwellinghouse use class, they nonetheless constitute housing in their provision of permanent residential accommodation.

Question 8: Would the grant of PiP be consistent with the PPG's advice on habitats development²⁰⁴?

- iv.8.1 As outlined in Paragraph iv.5.1, the reference to "permission in principle" in relation to the three Traveller sites does not refer to the term as defined in the TCPA Paragraph 58(a).
- iv.8.2 Nonetheless, should permission in principle as defined in the TCPA Paragraph 58(a) be sought, either by way of the Brownfield Land Register or an application, the sites would need to be considered as habitats development. However, as outlined in the PPG²⁰⁵, permission in principle can under certain circumstances be granted to habitats developments. Namely this is where the LPA is satisfied, with regard to mitigation measures proposed in an appropriate assessment, that the development would not adversely impact the integrity of the protected site.

²⁰¹ *Permission in Principle*

²⁰² Available at: <http://www.legislation.gov.uk/ukxi/2017/403/contents/made>

²⁰³ Paragraph: 001 Reference ID: 58-001-20180615 Revision date: 15 06 2018; and section 58A(i) of the Town and Country Planning Act 1990 (as amended)

²⁰⁴ Paragraph: 005 Reference ID: 58-005-20190315 Revision date: 15 03 2019

²⁰⁵ Paragraph 005 Reference ID: 58-005-20190315 Revision date: 15 03 2019

Question 9: Should the term “full planning permission” in relation to these PiP sites be amended to read “technical details consent”?

iv.9.1 The term “full planning permission” should be retained as the reference to the “permission in principle” for the three Traveller sites does not refer to the term as defined in the TCPA Paragraph 58(a). Rather, it seeks to establish that planning permission for permanent use would be acceptable in principle should such an application be made through the Development Management process.

Issue (v) Will the SADPD’s proposals to provide Suitable Alternative Natural Greenspace (SANG) meet identified requirements?

Question 1: Could SANGS be washed over by the GB rather than removed from it?

v.1.1 In this regard, yes, SANGs can be washed over by Green Belt. There are examples of existing operational SANGs in the Green Belt such as Horsell Common and Brookwood Country Park. There are also SANGs outside the Borough – for example all of those in Guildford Borough – which are in the Green Belt.

v.1.2 The in principle use of Green Belt land for recreational purposes is supported by the NPPF²⁰⁶. Natural England also supports the use of Green Belt land for SANGs.

Question 2: To what extent would the allocated sites meet the requirement for SANGs over the plan period?

v.2.1 At the time of the Core Strategy, the Council had identified 11.1 years' worth of SANG land. Therefore a further 3.9 years is required to be identified to mitigate the impacts of 1138 dwellings, which is the equivalent of around 21ha of SANG land to meet the shortfall. The SADPD allocates a total of 70.24ha of land with the capacity of 2474 number of dwellings, which is over and above the 3.9 years. However, it is recognised that whilst there is sufficient cushion, some sites can achieve a higher or lower amount of development and the Council will continue to monitor capacity and where necessary there could be scope to identify more SANG land.

Question 3: Do the SADPD’s policies contain explicit links between housing allocations and allocated SANGs to underpin planning obligations to support the delivery of those SANGs²⁰⁷?

v.3.1 Yes, the Council has a schedule that aligns the allocations to specific SANGs²⁰⁸. The Council is committed to bring forward SANGs when it is necessary to do.

v.3.2 As a consequence of the People over Wind Court ruling, the Council has introduced an approach for Appropriate Assessment which aligns the list of the SADPD sites with the appropriate SANG to give assurance that there is specific mitigation for development on the various sites²⁰⁹. Given that agreements on capacity and details of development proposals are approved at the Development Management stage, it would not be appropriate to prescribe the details of the schedule in Policy. The schedule would best be applied effectively if treated as evidence base that informs the day to day

²⁰⁶ In particular at paragraphs 138, 141 and 145 of the Framework

²⁰⁷ Per the suggestion on page 27 of the Habitats Regulation Assessment (June 2018) Document reference: WBC/SA/006

²⁰⁸ The SANG Assignment Schedule is available on the [Examination website](#), Document reference: WBC/SA/023A

²⁰⁹ Ibid.

planning applications with the flexibility to amend it when required. The schedule is regularly monitored and reviewed when necessary.

- v.3.1 In addition to SANG, the Thames Basin Heaths (TBH) SPA Avoidance Strategy²¹⁰ also includes Strategic Access Management and Monitoring (SAMM) and habitat management to improve the habitat of the protected birds. The Council provides quarterly receipts of SAMM money to Hampshire County Council which collects the funds on behalf of the TBH Joint Strategic Partnership Board.

Question 4: Due to the uncertain quantity of residential development anticipated on some sites (including UA44) what measures are in place to ensure sufficient delivery of SANGs were delivery over the plan period to exceed the 4,964 unit assumption?

- v.4.1 Overall there is sufficient SANG proposed and existing to meet the SADPD with a cushion to compensate for oversupply of housing delivery. However, if there is a significant increase in housing provision that has not been anticipated, the Council's approach to SANG provision builds in contingency to expand two of the existing/proposed SANGS.
- v.4.2 The existing SANG which could be expanded is that at Horsell Common and Brookwood Farm if needed. The Council has an in principle agreement with Horsell Common Preservation Society to expand Horsell Common SANG if necessary and within a reasonable time.
- v.4.3 Moreover, at this stage, planning approval has not been granted for the football club and as such it is very difficult to anticipate the extent of its SANG requirement.

Question 5: Several of the SANG allocations are subject to biodiversity designations, or adjacent to land so designated-what effect would this have on delivery, and on the overall supply of SANG?

- v.5.1 There are no absolute constraints which prevent any of the SANG sites from coming forward. Where there are biodiversity implications such as at Westfield Common, Natural England has suggested the SANG can be delivered and be operationally effective with careful design to take into account the biodiversity of the site.
- v.5.2 A number of existing SANGs have been used to appreciate the biodiversity value without compromising their integrity. For example, Brookwood Country Park has been carefully designed to allow tours of school children to study the fauna/flora value of the site without compromising the current biodiversity of the site.

Question 6: What alternative strategies could be pursued to make appropriate provision of SANG to address any unanticipated shortfalls?

- v.6.1 There is an oversupply of SANG land if all the development comes forward as expected. In the immediate to short term two sites - Horsell Common and Brookwood Farm - can be expanded to provide significant additional capacity. For example there is 18.49ha of SANG land that can be added to the Horsell Common SANG to provide capacity for 929 additional homes. The Horsell Common Preservation Society which owns Horsell Common have agreed in principle to provide the additional land for SANG expansion.
- v.6.2 In the medium to long term, the Council can bring forward alternative SANG land through the future review of the plan. Depending on the scale of the development, developers could also be asked to bring forward bespoke SANG to support their development.

²¹⁰ Document reference: WBC/SA/023

Question 7: Would the biodiversity implications of the development of GB land²¹¹ create an additional requirement for SANG over and above the amount contemplated in the *Thames Basin Heaths Special Protection Area Avoidance Strategy*²¹²?

- v.7.1 It is not automatically required to provide over and above the requirements set out in the TBH SPA Avoidance Strategy²¹³. However, it is noted, where it is relevant Natural England have suggested a different threshold, in particular where it relates to scale of development and its proximity to the TBH SPA. For example, this was suggested by Natural England in their response to the Martyrs Lane Consultation²¹⁴.
- v.7.2 Natural England would provide advice if a planning application comes forward and requires a different approach.
- v.7.3 Given that there is sufficient cushion in the provision of SANG to cater for an oversupply or other such contingencies, this can be addressed if and when it is necessary.

Question 8: Given that a proportion of the GB14 (GB16) site is already common land and publicly accessible, to what extent would its allocation constitute SANG? How would the mooted measures to improve access to the site effect its biodiversity?

- v.8.1 The TBH SPA Avoidance Strategy²¹⁵ and Natural England guidelines for the creation of SANGs²¹⁶ sets out how SANG capacity is calculated, in particular, how a certain amount of capacity is discounted from the overall capacity for sites that are already publicly accessible. The indicative capacities of the proposed SANGs takes this into account.
- v.8.2 Each of the proposed SANGs will have a SANG management plan and a SANG proposal to ensure it is well designed and does not adversely affect the biodiversity on the site. For example, a well-sited path with good signage could take pedestrians away from sensitive biodiversity areas of the Common and therefore provide a potential benefit.
- v.8.3 Natural England has suggested the SANG can be delivered and operated effectively with careful design to take into account the biodiversity on the site.

Issue (vi) are the SADPD's other GB allocations and policies justified and effective?

Question 1: GB9 is a safeguarded site to provide green infrastructure-given the nature of the proposal is removal of the site from the GB justified?

- vi.1.1 The removal of the site from the Green Belt is justified as the NPPF para 136 requires updated plans to establish changes to the Green Belt boundary with regard to 'their intended permanence in the long term, so they can endure beyond the plan period'. Further to this, the NPPF states in para 139(f) that plans should 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'. The removal of GB9 from the Green Belt ensures that a defensible Green Belt boundary is drawn, with the permanence intended, and that the objectives of the NPPF on promoting sustainable development and safeguarding to meet long term development and Green Infrastructure

²¹¹ Noted in the Sustainability Appraisal Report Document reference: WBC/SA/005 at page 95

²¹² Document reference: WBC/SA/023

²¹³ Document reference: WBC/SA/023

²¹⁴ Replicated in the 'Land to the east of Martyrs Lane Consultation Duty to Cooperate Bodies Topic Paper', Document Ref: WBC/SA/E041

²¹⁵ Document reference: WBC/SA/023, paragraphs 3.5, 3.6 and 3.7

²¹⁶ Document reference: WBC/SA/023B

needs can be met. It will also help ensure the accessible and beneficial use of remaining Green Belt land.

Question 2: Is the removal of GB18 (GB12 in the July 2019 version of the SADPD) from the GB justified?

vi.2.1 In light of the allocation of Broadoaks (GB11) and Land Surrounding West Hall (GB10), retaining GB18 West Byfleet School Playing Fields would lead to an isolated island of Green Belt within the urban area, which would not be a defensible GB boundary. Retaining GB18 in the Green Belt would not be in conformity with the purposes of the Green Belt (NPPF para 134) nor offer a defensible Green Belt boundary, taking account of the permanence and clear, recognisable boundaries referred to in NPPF²¹⁷. The Council is prescriptive in its designation of the site as Urban Open Space to Serve School, to ensure the recreational use of the site as playing fields for the school is retained.

Question 3: Would Local Green Space designation be appropriate for GB18 (GB12)?

vi.3.1 The site is currently valuable infrastructure that serves the proper functioning of the school. At this stage, it is not intended to give it a Local Green Space designation. However, this is a matter that could be considered in due course, in the preparation of a future review of the Core Strategy, as part of a comprehensive assessment of open space and with adequate consultation with the school and local stakeholders. In the meantime, the Urban Open Space to Serve School designation and allocation, together with Policy CS17²¹⁸, is considered to afford the site adequate protection from development.

Question 4: Are the proposals for the McLaren Campus set out in GB13 of the July 2019 version of the SADPD justified and consistent with national policy?

vi.4.1 Yes. Proposal GB13²¹⁹ is justified and consistent with national policy. Paragraph 80 of the NPPF expects planning policies and decision to help create the conditions in which business can invest, expand and adapt. McLaren is a successful global brand and a significant contributor to the local and national economy. The need for it to be able to respond to fast-changing technological advances and global competitiveness is real. The proposal would allow the company to flexibly respond to those challenges but with much attention to ensure that any expansion or changes in operations does not undermine the important landscape and ecological integrity within which the Campus sits. This is in general conformity with what the NPPF seeks to achieve by way of paragraph 80. The site continues to remain in the Green Belt and the designation would not be leading to any alteration of the Green Belt boundary. It is an existing operation in the Green Belt - the NPPF allows scope for limited infilling and redevelopment which would not undermine the overall openness of the Green Belt. It is stressed that the proposal satisfies the definition of Major Developed Sites in the Green Belt set out in the Core Strategy²²⁰.

vi.4.2 At this stage, the Council cannot anticipate with precision what further proposals might come forward on the site and the specific key requirements that would apply. It is therefore proposed to amend the last bullet point of the key requirements to read: "The scope of the key requirements that will be relevant to any proposal that is submitted for planning permission will be decided by the Council during pre-application discussions with the applicant, along with any other site specific requirements on a case by case basis depending on the nature of the scheme".²²¹

²¹⁷ Paragraphs 136 and 139(e) and (f).

²¹⁸ Document reference: WBC/SA/E017

²¹⁹ Of the July 2019 version of the SADPD, Document reference: WBC/SA/002A

²²⁰ Document reference: WBC/SA/E017, p.167

²²¹ See revised modification reference 57 in the Schedule of Proposed Modifications (WBC/SA/002) and in the table below

Question 5: In relation to Policy GB13 of the July 2019 version of the SADPD, is its restriction of development to that “for the specific and sole use by McLaren Group Limited and solely for operations undertaken by the Group” justified?

vi.5.1 Yes, the restriction of development at GB13 to that of the specific and sole use by McLaren Group Limited and solely for the operations undertaken by the Group is justified. It is consistent with the original condition allowing McLaren to operate on the site. Given McLaren’s commitment to remain on the site for the long term, it is not envisaged that this restriction will affect their operational effectiveness or efficiency. The site is in a very sensitive location. It is directly adjacent to the Thames Basin Heaths Special Protection Area (SPA) and Site of Nature Conservation Importance. A significant part of the site fall within the 400m exclusion zone of the SPA. The environmental sensitivity of the site needs to be carefully managed, and the Council has worked closely with McLaren to make sure that the integrity of the site is a key consideration of their operations on the site. The occupation of McLaren on the site has been granted by very special circumstances justification, and it is necessary in this regard that the approval is applied to the occupier of the buildings on the site. The original planning permission for McLaren to operate on the site was a ‘personal permission’ for their sole use. The condition specified that ‘this consent shall enure for the benefit of TAG McLaren Holdings Ltd including other companies within the TAG McLaren Group, and the development hereby approved shall only be occupied by those companies except with the prior of the Local Planning Authority’.²²² The proposed designation in the SADPD is consistent with the condition for McLaren’s occupation on the site. If McLaren were to vacate the site, the SADPD and/or the Core Strategy have inbuilt mechanisms to review the situation to determine the appropriate use of the site.

Question 6: Is the extent of land included in GB17 (GB19 in the July 2019 version of the SADPD) justified?

vi.6.1 Woking Palace is a Scheduled Ancient Monument which is an important Heritage Asset for Woking; there is no alternative to this site. Much of the area designated is believed to have formed part of the historic grounds of the Palace. The Council considers the designated area is appropriate for the proposed use of the site for a Country Park and conservation of a historic asset. The site boundary mirrors that adopted in the Woking Local Plan 1999.²²³

vi.6.2 The list of evidence base studies and policies used to justify the site are within the Site Allocations DPD²²⁴. Section 16 of the NPPF, Core Strategy Policy CS20²²⁵ and the Development Management Policies DPD Policy DM20²²⁶ support the conservation of heritage assets. Historic England’s representation also confirmed that they support Policy GB17.²²⁷

Question 7: Is GB17 (GB19) deliverable in the plan period?

vi.7.1 The Council owns the ancient monument but not the land surrounding it. The Council will seek to acquire the land through negotiations but has Compulsory Purchase Powers, which it would be prepared to use to purchase the land and bring forward the proposed improvements, as there is no alternative to this site. There is a realistic prospect that this will be during the plan period.

²²² Condition 7

²²³ The policy and site boundary set out in the Local Plan 1999 are available via document references: WBC/SA/E056 and E056A

²²⁴ Document reference: WBC/SA/002A, Appendix 1, p.347

²²⁵ Document reference: WBC/SA/E017

²²⁶ Document reference: WBC/SA/027

²²⁷ Document reference: WBC/SA/003; Regulation 19 representation reference: 06006/1

vi.7.2 The Council has begun researching and appraising the site and has produced a Conservation Management Plan 2016²²⁸ and a Master Plan²²⁹ for the Country Park. The Council supports the conservation of this important heritage asset and has a desire for the public to gain access to the site.

Question 8: Should the supporting text of GB17 (GB19) refer to the necessity to gain Scheduled Monument Consent where necessary?

vi.8.1 Agreed. A note stating ‘that any works impacting directly on the scheduled area will require Scheduled Monument Consent’ will be added as a proposed minor modification²³⁰.

Question 9: Has the effect of GB17 (GB19) on agricultural land and potential minerals resources been considered?

vi.9.1 As part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural quality. The majority of the site is Grade 4 (poor quality) and 3b (moderate). The north of the site is Grade 2 (very good) and 3a (good). Any versatile agricultural land within the site could be retained for agricultural use without compromising the objectives for the site. It is considered that the agricultural use of the land and the other proposals could co-exist.

vi.9.2 The designation of mineral safeguarded areas is not an absolute constraint to the preservation of this historic asset. Surrey County Council, the Minerals Planning Authority, has been consulted during the plan preparation process and has not raised an objection to the site’s allocation on the grounds of the minerals allocation.²³¹ There is no likelihood of minerals being extracted on the site during the plan period and beyond.

Issue (vii) does the SADPD’s approach to safeguarded land accord with the Framework²³²?

Question 1: Is it necessary for the SADPD to identify areas of safeguarded land?

vii.1.1 Yes, it is necessary for the SADPD to identify areas of safeguarded land. As part of the process of comprehensively reviewing Green Belt boundaries, the Council has followed the guidance of the NPPF para 139 c) in identifying areas of safeguarded land between the urban area and GB to meet longer term development need beyond the plan period. This ensures the enduring permanence of the GB boundary and the Council’s commitment to plan strategically ahead.

Question 2: To what extent is the amount of safeguarded land included in the SADPD justified?

vii.2.1 The amount of safeguarded land is justified dually by: the need to plan for the long term, beyond the plan period, when reviewing GB boundaries, to ensure their permanence and enduring nature²³³; and the evidence contained in the Green Belt Boundary Review (GBBR)²³⁴. This identifies parcels of land that have potential for removal for the GB, which have been further assessed for their development

²²⁸ Document reference: WBC/SA/E061-61G

²²⁹ Document reference: WBC/SA/E061H

²³⁰ See modification reference 72 on the updated Schedule of Proposed Modifications (and in the table below), Document reference: WBC/SA/002

²³¹ Document references: WBC/SA/003 and WBC/SA/004; Regulation 19 representation reference: 04960/1

²³² At paragraph 139

²³³ NPPF paragraphs 136 and 139

²³⁴ Document reference: WBC/SA/E018

suitability through the Sustainability Appraisal²³⁵. The GBBR²³⁶ highlights that there are no further parcels of land suitable for removal from the Green Belt.

vii.2.2 Based on the evidence, SADPD Policy SA1 allocates sites GB1, GB7 and GB10 to meet the CS identified housing requirement from 2022-2027. The four sites safeguarded in Policy SA1 i.e. GB4, GB5, GB8 and GB9, are those considered suitable for release from the Green Belt, but are not brought forward through the allocations to meet the CS requirement. In accordance with the NPPF²³⁷ the safeguarded sites are not allocated for development during the plan period.

Question 3: Does the SADPD make the status of the safeguarded land it identifies clear, in accordance with paragraph 139(d) of the Framework?

vii.3.1 Yes. It does this in Policy SA1 under the sub-heading Safeguarded sites, on pages 234-235 (or pages 237-238 in the July 2019 version) and in the Policy for each Safeguarded Site, which are Policies GB4, GB5, GB8 and GB9²³⁸. Policy wording ensures safeguarded sites are not released for development before 2027, and that they are only released through the review of either the CS and/or the SADPD, which could propose their development.

Question 4: To what extent does the identification of safeguarded land demonstrate that GB boundaries would not have to be altered at the end of the plan period?

vii.4.1 As outlined in Paragraphs vii.2.1-vii.2.2, the SADPD identifies and allocates sufficient land to meet the Core Strategy²³⁹ housing requirement over the latter part of the plan period. The safeguarded land identified will contribute to enabling the Council to continue to meet development need beyond the plan period. The GBBR²⁴⁰ is clear that there are no further parcels of land suitable for removal from the Green Belt. The Council is confident that in light of the evidence base, and the policy of the NPPF which has informed its approach to safeguarding land, it has created a permanent, enduring Green Belt boundary that will not need to be altered at the end of the plan period.

²³⁵ Document references: WBC/SA/005 & 005B

²³⁶ At paragraph 3.5.22

²³⁷ Paragraph 139.d)

²³⁸ Site references are those of the Regulation 19 version of the SADPD, Document reference: WBC/SA/001, although they remain the same in the July 2019 version (reference: WBC/SA/002A)

²³⁹ Document reference: WBC/SA/E017

²⁴⁰ Document reference: WBC/SA/E018, paragraph 3.5.22

Hearing Statement 4 in Response to Matter 4

Matter 4: Are the allocated sites in the urban area justified and deliverable?

Issue (i) is the SADPD's approach to the provision of housing in the urban area justified and deliverable?

Question 1: Are the policy requirements related to the sites informed by evidence of affordable housing need, infrastructure requirements, the inclusion of local and national standards and a proportionate assessment of viability?

- i.1.1 The proportions of affordable housing required on the urban area housing allocation sites have been determined by the standard proportions for each type of site required by policy CS12 of the Core Strategy²⁴¹. The affordable housing requirements of the Core Strategy were informed by the 2009 SHMA²⁴². The SHMA was reviewed in 2015²⁴³ and the conclusions continue to justify the Core Strategy requirements.
- i.1.2 The SADPD is supported by a comprehensive Infrastructure Delivery Plan (IDP)²⁴⁴. The IDP sets out the nature and type of infrastructure that will be needed to support the delivery of the SAPDP, how and when that will be provided and at what cost. The extent to which the SADPD is based on a robust assessment of the required supporting infrastructure is also addressed in the Council's response to Matter 2- Issue (v).
- i.1.3 The urban area housing allocation sites all require contribution to CIL. CIL receipts will be used to fund the identified infrastructure. Specific on and off site highways works required by the policies have been informed by policies CS18 and CS21. Green infrastructure requirements contained in the policies are informed by policy CS17 and the Natural Woking Biodiversity and Green Infrastructure Strategy²⁴⁵. Some sites have a key requirement relating to connection to the CHP network; this is informed by policy CS22, the Climate Change SPD²⁴⁶ (in particular pages 47-53) and NPPF paragraph 151.
- i.1.4 The policy requirements are supported by comprehensive and proportionate viability assessments. More details on this are given under the response to Matter 5, Issue (ii), Question 11.

Question 2: To what extent would housing sites anticipated to come forward in the next 5 years be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years?

- i.2.1 The SADPD is informed by a SHLAA²⁴⁷, which demonstrates that the sites allocated in the DPD have the realistic prospect of coming forward during the plan period up to 2027. The assessment of the SHLAA sites follows a clear methodology which takes into account suitability, availability and constraints.²⁴⁸ Below is a summary of the current planning status of the urban area housing sites.

²⁴¹ Document reference: WBC/SA/E017

²⁴² Document reference: WBC/SA/E022A

²⁴³ Document reference: WBC/SA/E022

²⁴⁴ Document reference: WBC/SA/E036

²⁴⁵ Document reference: WBC/SA/024

²⁴⁶ Document reference: WBC/SA/022

²⁴⁷ Document reference: WBC/SA/E020

²⁴⁸ Document reference: WBC/SA/E020E

- i.2.2 Sites with full planning approval on all or part of the site include UA5, UA15, UA23, UA26, UA41 and UA42. Site UA25 has hybrid planning permission (part full, part outline). Sites UA11, UA13, UA32, UA33, UA34, UA36, UA37, and UA38 are supported by infrastructure funding from the Housing Infrastructure Fund with a delivery deadline of 2024. All these sites (including the majority of site UA25) are considered fully deliverable for development in the next five years, from April 2019.
- i.2.3 The remaining parts of site UA25 are phased to complete by 2025. Other sites with outline planning permission include UA22 and most of site UA42. Sites with extant planning applications with resolutions to grant permission pending Section 106 agreement include UA13, UA29 and UA36. Site UA2 has an extant planning application pending consideration. Sites which previously had planning permission (now expired) include UA20, UA21 and UA29; all these also fall into other categories discussed in paragraphs i.2.2 and i.2.3. Site UA8 had a resolution to grant permission pending Section 106 at the time the SADPD was submitted, subsequently subject to a No Further Action decision. Site UA14 has had permission for housing refused within the last year, which is subject to an ongoing appeal. The refusal was not against the principle of housing development but detail, in particular height. Site UA3 had prior approval for conversion to housing refused in 2016. Sites where the landowner of all or part of the site has expressed interest in housing development include UA1, UA4, UA6, UA11, the remainder of UA15, UA20, UA21, UA24, the remainder of UA26, UA30, UA31, UA33, UA34, UA37, UA39, UA43 and UA44. All these sites, as well as the whole of site UA25, are considered either deliverable or developable within the next eight years, as of 1 April 2019.

Question 3: For sites scheduled later in the plan period, are these in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged?

- i.3.1 Sites without known landowner interest, but considered to be in a suitable location for housing development and to have a reasonable prospect of becoming available and viable for housing development between 2024 and 2027, include UA9 and UA19.

Question 4: Several allocations relate to sites which require site assembly before development activity can commence, and with active uses ongoing- how have these factors been taken into account in arriving at the SADPD's phasing and delivery assumptions?

- i.4.1 The phasing and delivery assumptions in the SADPD are derived from the SHLAA sites with the benefit of planning approval, pre-application discussions and expressed interest from developers. The SHLAA methodology²⁴⁹ takes account of the potential need for site assembly and current use of sites when assessing their availability for development. The sites are being promoted for development and have the realistic prospect of coming forward during the Plan Period.
- i.4.2 Several of the sites in multiple ownership already have planning permission for development on parts of the site, such as UA15, UA26, and UA42. In the case of UA15 and UA42 the number of dwellings with permission on part of the site equals or exceeds the indicative figure for the whole site that is shown in the SADPD. The Council considers it reasonable to assume that the same could take place on other sites, in particular given that some of the multiple-ownership sites such as UA11 and UA14 are supported by HIF funding. For example, McKay Securities PLC have provided information²⁵⁰ on how they plan to deliver part of site UA15, which is in multiple ownership.

²⁴⁹ Document reference: WBC/SA/E020E, paragraphs 8.1-8.3 and 8.7

²⁵⁰ Document reference: WBC/SA/003, page 520; Regulation 19 representation reference: 06538/1

- i.4.3 The Council has significant interests in a number of the sites such as UA6 and has entered into development agreements to bring forward the sites. The Council has a proven track record of assisting businesses to relocate to enable development to happen, and assembling land, such as to facilitate the regeneration of site UA25 in Sheerwater. The Council is willing to use its compulsory purchase powers in accordance with Section 6 of the Core Strategy.²⁵¹
- i.4.4 In several cases of multiple ownership sites, the Council has specific confirmation from landowners within the site that those sites can be delivered within the plan period. For example, EcoWorld²⁵² and Coplan Estates²⁵³ have confirmed their commitment to bringing forward sites UA13 and UA6 respectively.
- i.4.5 The SADPD builds in a sufficient cushion of over-supply (about 25%) to compensate for the non-delivery or late delivery of some sites.

Question 5: Does reliance on mixed use sites in the urban area, with undefined quanta of differing uses, provide sufficient certainty that housing requirements would be delivered over the plan period? Is the SADPD sufficiently flexible to adapt to lower than expected housing delivery on mixed use sites?

- i.5.1 The exact proportion of each type of use to be delivered on each mixed use site is flexible, as set out in i.6.1 below. However, indicative capacities for housing on each site are stated. These show the approximate number that would be expected to be delivered by a scheme that complies with the indicative densities in Policy CS10 and with Policy CS21²⁵⁴, taking into account the expected provision of other uses on site; or that has already been shown through the development management process to be suitable for the site. The sum of all these indicative numbers, in combination with completions and with other developments that have planning permission, gives a substantial buffer against the outstanding Core Strategy dwelling requirement, which would allow for lower than expected delivery on some sites. The SADPD builds in a sufficient cushion of over supply (about 25%) to compensate for the non-delivery or late delivery of some sites. In addition, the provision of significantly higher numbers than the indicative figures in the SADPD on several town centre sites is secured by the Housing Infrastructure Fund; this would still further compensate for any under-delivery that may occur on other sites.

Question 6: Is the mix of uses anticipated on urban sites (eg UA4, UA12, UA13) insufficiently flexible, and what effect could this have on housing output on those sites?

- i.6.1 The Council does not consider the mixes of uses proposed on sites are insufficiently flexible. On the great majority of mixed use allocations, the policy text only specifies the types of use required, while indicative quantities of each use are given in the supporting text, and in Appendix 4 of the SADPD. These anticipated quantities are stated as indicative to allow flexibility to take site-specific characteristics into account during the Development Management process. Only three mixed-use sites include requirements for the existing office floorspace to be reprovided on site. On retail there are only four mixed-use sites with specific policy requirements, none of which are quantitative. Several sites which currently house community uses or other specialised facilities do have policy requirements for this to be reprovided as part of development, and in two cases enhanced. However this should be seen in the context of both the need for community facilities of various types (as highlighted in the IDP²⁵⁵) and of Policy CS19. The indicative dwelling numbers on each site are also flexible as highlighted in Policy CS10 of the Core Strategy.²⁵⁶

²⁵¹ Document reference: WBC/SA/E017

²⁵² Document reference: WBC/SA/003, page 225; Regulation 19 representation reference: 06618/1

²⁵³ Document reference: WBC/SA/003, page 163; Regulation 19 representation reference: 06587/1

²⁵⁴ Document reference: WBC/SA/E017

²⁵⁵ Document reference WBC/SA/E036

²⁵⁶ Document reference: WBC/SA/E017

Question 7: Would the amalgamation of sites UA12 and UA13 offer more flexibility as to how development could be brought forward?

i.7.1 Sites UA12 and UA13 are separated from each other by a road and by allocation site UA11, so would not easily lend themselves to combining into a single allocation. It would be possible to combine all three sites together, potentially also with UA10. Whilst each of the sites can come forward as stand-alone developments on their own merits, the Council would not object to the principle of a comprehensive redevelopment of the sites. If the sites could be assembled, it would offer more flexibility for their comprehensive redevelopment, but this should not preclude them coming forward as individual sites. Current pre-app discussions on a proposal that crosses all four sites (UA10-13) demonstrates that the presence of separate allocation policies need not deter comprehensive development.

Question 8: Would the scale and nature of the proposed uses set out in UA44 be compatible with the character, appearance and residential amenity of the site's surroundings?

i.8.1 The proposed uses set out in UA44 are a football stadium (the July 2019 proposed modifications state 'with enhanced facilities'), residential including affordable housing, and commercial retail uses. No scales of development are specified, including in the supporting text. There is a football stadium already on the site; the surrounding area is predominantly residential, with a mixed character, and commercial/retail units nearby (in comparable surroundings) in Kingfield Local Centre and Westfield Neighbourhood Centre. Therefore it is considered that the nature of all of these uses are compatible with the character, appearance and residential amenity of the surroundings. The policy also contains multiple key requirements to ensure that development on this site, at whatever scale that may be proposed, will only be approved if it is compatible with the character, appearance and residential amenity of the surroundings.

Issue (ii) is the SADPD's approach to the delivery of other uses in the urban area justified and deliverable?

Question 1: Is the delivery of employment, retail and other uses achievable and realistic over the plan period?

ii.1.1 The SADPD provides a range of sites sufficient to deliver employment, retail and other uses, in line with the NPPF's encouragement of suitable mixes of uses (see para 85.a. for town centre sites). The Employment Floorspace Topic Paper²⁵⁷ and Retail Topic Paper²⁵⁸ provide insight on changing economic circumstances and retail trends since the adoption of the Core Strategy. They also highlight delivery of these uses so far in the plan period, and demonstrate the potential supply of sites to meet the outstanding floorspace requirement. The topic papers highlight that outstanding requirements need to be monitored and continuously sense checked with regard to current and ongoing changes to market signals and the latest evidence. Therefore the delivery of employment, retail and other uses will be assessed on a case by case basis with regard to the latest evidence.

ii.1.2 Emerging trends show growth in delivery of floorspace for mixed employment (B class) uses, mixed retail and leisure uses (both mixed A and mixed A/D2 permissions) and A3 restaurant uses. While consideration of applications need to be responsive to changing business needs and a dynamic economy, it should also be sensitive to the context of longer term market trends. This is further detailed in the response to Matter 2, Issue (ii) Questions 11 and 12.

²⁵⁷ Document reference: WBC/SA/E025

²⁵⁸ Document reference: WBC/SA/E048

- ii.1.3. The requirements for employment and retail will be continually monitored by the Council, as part of the plan-monitor-review approach embedded in the plan making process, and inform the future review of requirements and the Core Strategy.
- ii.1.4. Woking Chamber of Commerce was asked about the risks to delivery and retention of employment and commercial uses, and has provided the following statement:
- ii.1.5 *“The Chamber recognises that Woking is a vibrant, growing place to do business. One of the reasons behind that is the current diversity of types of commercial space, industrial units and residences. To protect the vibrancy of the borough and ensure it does not become purely a commuter town with no commercial heart it is essential that the balance and diversity is maintained.”*
- ii.1.6 The Chamber also notes that while the way that commercial space is used is changing, the loss of office blocks “could endanger the scale and diversity of business in Woking”. This supports the Council’s objectives and policies for employment and economic growth as contained in the Core Strategy²⁵⁹, and its delivery through the SADPD.

Question 2: What effect would residential amenity considerations related to housing included on mixed use sites have on the deliverability and flexibility of employment uses also anticipated for such sites?

- ii.2.1 The uses allocated on sites have been carefully considered in the preparation of the SADPD. They are complimentary uses that can co-exist without creating amenity issues, as long as they are designed to a high quality. The sites proposed for mixed use are deliverable, in that they are available and the mix of uses put forward are viable, as supported by the Council’s Economic Viability Assessment²⁶⁰, Community Infrastructure Levy Viability Study²⁶¹ and Follow Up Property Market Update – house price trends²⁶². Mixed use development is supported by national²⁶³ and local policy (CS1 and CS2²⁶⁴) as a way to achieve an effective use of land in meeting the need for homes and other uses, and minimise the need to travel.
- ii.2.2 SADPD policies include a key requirement regarding residential amenity (including appropriate levels of daylight and sunlight) and high quality design²⁶⁵. Development should take account of CS21 *Design*²⁶⁶ and relevant SPDs (Outlook, Amenity, Privacy and Daylight SPD and the Design SPD)²⁶⁷. The Council also has a Design Panel, to scrutinise major development at an early (pre-application) stage and contribute to detailed consideration at the outset of the Development Management process.

Question 3: Would the allocations for residential development (UA6, UA10, UA11, UA13 and UA34), including the proposed modifications included in the July 2019 version of the SADPD, ensure that dwellings would be integrated effectively with the safeguarded²⁶⁸ rail aggregates depot, and ensure that unreasonable restrictions would not be placed on its operation²⁶⁹?

²⁵⁹ Document reference: WBC/SA/E017

²⁶⁰ Document reference: WBC/SA/E046

²⁶¹ Document reference: WBC/SA/E036F

²⁶² Document reference: WBC/SA/E036G

²⁶³ NPPF paragraph 117-118

²⁶⁴ Document reference: WBC/SA/E017

²⁶⁵ Document reference: WBC/SA/002A

²⁶⁶ Document reference: WBC/SA/E017

²⁶⁷ Document references: WBC/SA/E060 and WBC/SA/E059

²⁶⁸ Per Policy MC6 of the Surrey Minerals Plan Core Strategy 2011

²⁶⁹ Per paragraph 182 of the Framework

- ii.3.1 A modification to policy UA34 has already been proposed through the Schedule of Modifications, July 2019.²⁷⁰ With regard to the other sites, the Council is satisfied that they would ensure that the dwellings would be integrated effectively with the safeguarded rail aggregates depot, and ensure that unreasonable restrictions would not be placed on its operation.
- ii.3.2. However, the proposals could be strengthened further to achieve this objective. Therefore it is proposed that Surrey County Council as Minerals Planning Authority for the area be consulted at an early stage for any proposal to develop the sites. A key requirement should therefore be added to the above policies to read as follows:
- ii.3.3 ‘In view of the sites location within the consultation zone of the safeguarded Downside Goods Yard rail aggregates depot, as detailed in the Surrey Minerals Plan Policy MC6, applicants are advised at an early stage to consult Surrey County Council to ensure that development would not prevent, directly or indirectly, the minerals function and the operational requirements of the Aggregates Depot.’²⁷¹

Question 4: Does the SADPD make appropriate arrangements to re-provide community, assembly and leisure facilities as part of site redevelopment?

- ii.4.1 The SADPD allocates 8 sites for community, assembly and leisure uses, which include UA15 Big Apple, UA25 Sheerwater, UA42 Land at Station Approach and UA44 Football Stadium. Arrangements for the delivery of these uses are included in policy wording on each site, as required. Two examples follow, with the first being Sheerwater, where a key requirement of Policy UA25 requires a phasing strategy to deliver the required community facilities in line with proposed residential development.²⁷² In West Byfleet, Policy UA42 includes wording to retain or replace the library²⁷³, which is taken forward in the Outline Planning permission for Sheer House²⁷⁴ with potential additional new library floorspace of 110sqm (existing is 190sqm).
- ii.4.2 The SADPD will be used in conjunction with the Council’s policy on community and leisure uses, contained in CS19 *Social and community uses*, CS2 *Woking Town Centre* and CS3 *West Byfleet District Centre*²⁷⁵. The latter policy includes a requirement (no.5) for adequate community facilities and social and community infrastructure, and safeguarding of existing facilities. The Retail Topic Paper²⁷⁶ highlights the growth of leisure and restaurant uses in the Borough’s centres in recent years, and points to the need for responsiveness to a dynamic (retail) market. The inclusion and arrangement for delivery of community, assembly and leisure uses on allocated sites will be determined on a case-by-case basis at planning application stage, informed by the latest available evidence, including future updates to the Infrastructure Delivery Plan (IDP)²⁷⁷. The Council has a proven record of facilitating such development, for example at Victoria Square.

Question 5: Would the industrial uses proposed for UA40 be compatible with the character, appearance and residential amenity of the surrounding area?

- ii.5.1 Yes. The site is adjacent to an existing employment use at Camphill Industrial Estate and is bounded by the train line to the south and Old Rive Ditch and Basingstoke Canal to the north. Residential areas

²⁷⁰ Document reference: WBC/SA/002

²⁷¹ See modification reference 73 in the revised Schedule of Proposed Modifications (WBC/SA/002) and in the table below

²⁷² Document reference: WBC/SA/001, p.137

²⁷³ Document reference: WBC/SA/001, p.220

²⁷⁴ Planning application reference: PLAN/2017/0128

²⁷⁵ Document reference: WBC/SA/E017

²⁷⁶ Document reference: WBC/SA/E048

²⁷⁷ Document reference: WBC/SA/E036

adjoin the train line to the south and Canal to the north, giving a buffer between the proposed industrial uses and existing residential. A key requirement is included in Policy UA40 that 'proposed development should avoid significant harm to the environment and general amenity, resulting from noise, dust, vibrations, light and other releases'.²⁷⁸ The rest of the Development Plan applies, including CS21 *Design*²⁷⁹, which promotes high quality design. It includes specific criteria to require new development to achieve a satisfactory relationship to adjoining properties, avoiding significant harmful impacts. The Development Management Policies DPD²⁸⁰ includes a number of detailed policies on pollution, specifically DM5 *Environmental pollution*, DM6 *Air and Water Quality* and DM7 *Noise and light pollution*. The application of these policies in the assessment of any proposal will help ensure effective management with regard to the character, appearance and residential amenity of the surrounding area.

Question 6: Has the effect of the retail development contemplated for the UA44 site on the vitality and viability of the Borough's centres been considered?

ii.6.1 Yes. The retail development is considered appropriate as part of a sustainable mixed use development, in providing convenient access to local shops and services for new residents at the site, and residents in the surrounding area. This is part of the Council's objective to plan positively for provision for community facilities, including local shops, sports venues and meeting places, as part of an approach to promote healthy communities as per the NPPF²⁸¹. Retail (for merchandise) that directly supports the site's key function as a much improved football club may also be incorporated. The type and scale of retail expected is not expected to impact the town centre or local centres, and is in keeping with the NPPF²⁸² and the Borough's spatial strategy, contained in CS1. Despite this, any retail floorspace proposed will be considered with regard to the Development Plan, particularly CS1 and CS4 with regard to impact on the town and local centres, and the NPPF²⁸³.

Question 7: What is the justification for the requirement for re-provision of conference facilities at the UA15 site?

ii.7.1 Surrey Hotel Futures Study²⁸⁴ considers potential growth for conference tourism in Surrey. It identifies that the conference facilities in Woking, at the HG Wells Centre, are one of only two purpose built conference and events venues in Surrey. The centre's potential to host multi-day conferences or exhibitions has so far been hindered by the lack of high quality hotel capacity. This hotel capacity is currently under construction at Victoria Square, meaning there may be greater potential for increased use of conference facilities, which could be supported by stronger marketing of the town as a conference destination.

ii.7.2. It is acknowledged that a conference facility is part of the uses at Victoria Square, which would cater to corporate customers. However, the HG Wells Centre provides space for a range of other markets. This includes culture, music and dance, including the festivals and concert markets²⁸⁵. Public sector organisations (e.g. the NHS and Police), charitable organisations, churches and religious groups also use the centre on a regular basis, at a reasonable cost. There are very limited alternative venues in the centre that can accommodate these activities, and therefore re-provision is vital.

²⁷⁸ Document Ref: WBC/SA/001, P.212

²⁷⁹ Document Ref: WBC/SA/EO17

²⁸⁰ Document Ref: WBC/SA/027

²⁸¹ Paragraph 92.a)

²⁸² Paragraph 85.d)

²⁸³ Paragraph 89

²⁸⁴ Document reference: WBC/SA/E051

²⁸⁵ <https://www.hgwells.co.uk/what-we-do> and <https://www.hgwells.co.uk/events>

- ii.7.3 The activities outlined above are key to the dynamic economy, including cultural economy, of Woking, providing significant social benefits and civic pride. It should be noted that culture and music are a growing sector²⁸⁶ which the Council seeks to actively encourage and accommodate.
- ii.7.4 The inclusion of conference and event facilities at the site (underlined text suggests a further minor modification to the second key requirement²⁸⁷) to meet identified need, supports the delivery of the town centre as an economic and transport hub with a flourishing, diverse and innovative economy, as set out in CS1 and CS2.²⁸⁸

Question 8: What is the justification for the requirement to re-provide community facilities as part of the UA31 site?

- ii.8.1 The site contains an existing youth centre, which in line with CS19 *Social and community uses*²⁸⁹ is protected unless certain criteria can be met. CS19 sets out to provide accessible and sustainable social and community infrastructure to support growth in the Borough. The site's proximity to the town centre, its location within the High Density Residential Area designation and in one of the Borough's Priority Places²⁹⁰ makes it particularly suitable to support growth in this way. The importance of the community (specifically youth) use of the site was highlighted by local Councillors at the Council meeting of 25 July 2019, indicating its local significance. WBC will work with Surrey County Council, who own the site, to promote re-provision of the existing community use.

Question 9: Does UA7 give appropriate regard to the requirements of buses and associated garaging?

- ii.9.1 Policy UA7 confirms that the transport hub at Woking Station will include a bus interchange²⁹¹. The allocation does not seek to prescribe a specific layout for the interchange, but rather allocates land sufficient to enable this development. An important issue identified in the policy's Reasoned Justification is that "bus waiting facilities are poor and not well-signed from the northern exit of the station, despite being located nearby."²⁹² It is therefore expected that this will be addressed in any scheme that might come forward. Indeed, Surrey County Council (SCC) notes that the Woking Sustainable Transport Package, identified as Scheme ID: PRRN 4 in the Woking Forward Programme²⁹³, is "expected to [incorporate]...a new entrance on the northern side of Woking railway station that makes it easy to transfer between buses and trains."²⁹⁴ Furthermore, during the Regulation 19 consultation, SCC (the local transport authority) did not express any concern that UA7 was inadequate in this regard. Additionally, during this consultation, Network Rail welcomed the allocation of UA7 and further collaboration on delivery. Adequate regard has therefore been given to buses and their requirements, and implementation details will be agreed through the Development Management process.

Question 10: Is the road infrastructure anticipated for UA28 deliverable and would an alternative mix of uses render it and the wider development of the site more viable?

²⁸⁶ Document reference: WBC/SA/E048

²⁸⁷ See modification reference 74 of the revised Schedule of Proposed Modifications, Document reference: WBC/SA/002, and table below

²⁸⁸ Document reference: WBC/SA/E017

²⁸⁹ Document reference: Ibid.

²⁹⁰ CS5 Priority Places highlights parts of the Borough where the Council seeks to work with partners to target resources. Scope for intensification of housing is expected in Maybury through the redevelopment of poor quality housing stock and outmoded and outdated employment floorspace.

²⁹¹ Document reference: WBC/SA/001, p.57-58

²⁹² Document reference: WBC/SA/001, p.58

²⁹³ Document reference: WBC/SA/E036B, p.2

²⁹⁴ <https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/major-transport-projects/woking-major-transport-schemes>

- ii.10.1 The proposed road infrastructure at UA28 is considered deliverable. This principle has been established by the Core Strategy wherein Policy CS5: *Priority Places* outlines the Council's commitment to "work with Surrey County Council to bring forward proposals for a new access road through Monument Way East and Monument Way West. This is expected to be delivered within the period of the Core Strategy."²⁹⁵ It is also noted that the Employment Land Review: Market Appraisal considers "access for industrial traffic [to Monument Way West to be]...poor."²⁹⁶ Therefore the market interests – to improve access to enable industrial development – would align with the Council's commitment to infrastructure provision.
- ii.10.2 UA28 is unsuitable for uses other than those for which it is allocated. The site falls within a designated Employment Area and is therefore safeguarded for B uses in accordance with Policy CS15²⁹⁷. Although a B1 use might be theoretically acceptable in this regard, the Employment Land Review: Market Appraisal confirms that the location is inappropriate for offices²⁹⁸. Therefore, even if an alternative mix of uses would make the road infrastructure and wider site more viable – which is not necessarily the Council's view - such a mix of uses would be inappropriate in policy terms.

²⁹⁵ Document reference: WBC/SA/E017, p.44

²⁹⁶ Document reference: WBC/SA/E026A, p.49

²⁹⁷ Document reference: WBC/SA/E017, p.81-82

²⁹⁸ Document reference: WBC/SA/E026A, p.49

Hearing Statement 5 in Response to Matter 5

Matter 5: Are the SADPD's policies justified, consistent with national policies, and clearly written and unambiguous so it is evidence how a decision maker should react to development proposals?

Issue (i) General Points

1: Policies are repetitive and have overlapping requirements that would benefit from simplification and amalgamation in the interests of clarity. Some elements of policy text (e.g the points relating to CIL liability) would also be better incorporated in reasoned justification and supporting text.

2: Also to aid legibility of the plan, given the number of policy criteria related to each allocation, those criteria should be a numbered rather than a bullet pointed list.

3: Paragraph numbers would greatly assist both applicants and decision-takers to reference salient parts of the SADPD and should be applied.

4: In the interests of clarity a table including likely development yields and projected timing of delivery should be appended to each allocation.

Issue (ii) Is it evident how a decision maker should react to viability issues related to development proposals?

Question 1: The *Implementation* section of the SADPD²⁹⁹ outlines that “Very robust finance evidence will be required to justify any negotiation away from the requirements of the Core Strategy and the Site Allocations DPD... The Council will expect development negotiations on specific sites to be supported by an open book financial appraisal process.” Would these requirements be more fittingly expressed in a standalone overarching SADPD policy?

ii.1.1 The Council's position on financial appraisals regarding viability is set out in Core Strategy policy CS12 and CS16, and the Affordable Housing Delivery SPD³⁰⁰. PPG on viability³⁰¹ also contains detailed guidance on the topic. These provide an adequate basis and flexibility for viability matters to be determined on a case by case basis through the Development Management process. The open book approach to financial appraisals has been a practice used by the Council for a long time and there is already existing guidance on the process.

²⁹⁹ At Page 345 of the July 2019 version / p327 of the Regulation 19 version

³⁰⁰ Section 8.2 and Appendix F

³⁰¹ *Viability* PPG Paragraphs: 007-021

- ii.1.2 Given this policy context, the Council does not consider it fitting or necessary to include an additional policy on this topic in the SADPD. If policy needs to be further clarified or expressed in any other form, the review of the Core Strategy would be the appropriate mechanism.

Question 2: Does the expressed approach to viability accord with the advice expressed in the PPG that “Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage”³⁰²?

- ii.2.1 Yes, the policy requirements are set at a level so as to avoid the need for further viability assessment at the decision making stage. As set out in the answer to Matter 3, Issue (iii), Question 1, and Matter 4, Issue (i), Question 1, the policy requirements reflect the requirements of the Core Strategy.³⁰³ The Core Strategy requirements were informed by a comprehensive viability assessment³⁰⁴ that took into account policy requirements such as the need for development to meet lifetime homes standard, an Infrastructure Delivery Plan³⁰⁵ and a Strategic Housing Market Assessment.³⁰⁶ It concluded that the Affordable Housing requirement could be met taken into account the other policy requirements of the Core Strategy.
- ii.2.2 The Council has subsequently carried out a Community Infrastructure Levy Viability Study³⁰⁷ to take account of the implications of the CIL Charging Schedule. The Council introduced CIL on 1 April 2015. The development scenarios used for the viability assessment are reasonably representative of residential and non-residential development types that are likely to come forward across the Borough. The Charging Schedule has been set to build in sufficient cushion to ensure positive viability for residential and retail development and there is evidence in the study to suggest that residential development, including the affordable housing requirements of the Core Strategy, will continue to remain viable across the Borough.
- ii.2.3 The Council has published property market update – house price trends (2014)³⁰⁸. The study demonstrates that it is unlikely that there would be deterioration in viability outcomes relative to those set out in the CIL viability study. The Council is therefore satisfied that the approach to viability follows guidance in the PPG and takes into account the policy requirements of the Core Strategy including the need for development to meet lifetime homes standards.
- ii.2.4 In any case, the Council is open to any suggestion that the Inspector may be minded to offer on this matter.

Issue (iii) Would the policies of the SADPD prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution³⁰⁹?

³⁰² Viability Paragraph: 002 Reference ID: 10-002-20190509 Revision date: 09 05 2019

³⁰³ Document reference: WBC/SA/E017

³⁰⁴ Document reference: WBC/SA/E046

³⁰⁵ Document reference: WBC/SA/E036H

³⁰⁶ Document reference: WBC/SA/E022A

³⁰⁷ Document reference: WBC/SA/E036F

³⁰⁸ Document reference: WBC/SA/E036G

³⁰⁹ Per the Framework paragraph 170(e)

Question 1: Would the policies of the SADPD prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution?

iii.1.1 Paragraph 11 of the Site Allocations DPD Self-Assessments of Tests of Soundness Table³¹⁰ addresses this issue, describing how Policy DM7 of the DMPDPD³¹¹ on noise and light pollution will provide a robust policy context for managing noise pollution. Paragraphs 8.6-8.10 of the Regulation 19 Consultation Issues and Matters Topic Paper³¹² also detail how the SADPD sufficiently addresses the effects of noise pollution, and highlights the policies that have incorporated bespoke requirements for Noise Impact Assessments to be conducted at planning application stage. For example, Noise Impact Assessments are a key requirement of Proposals GB1, GB7, GB10 and GB11.

Issue (iv) Would the SADPD's policies for housing which make use of the Government's optional technical standards address an identified need for such properties³¹³?

Question 1: Would the SADPD's policies for housing which make use of the Government's optional technical standards address an identified need for such properties?

iv.1.1 The need for such standards was established at Core Strategy³¹⁴ stage: Policy CS13 *Older people and vulnerable groups* sets out how new specialist accommodation should incorporate 'Lifetime Homes' standards. Policy CS21 *Design* also promotes Lifetime Homes standards. With the introduction of optional technical standards, accessibility or adaptability requirements sought by these policies are now achieved by reference to the nearest equivalent requirements in Part M of the Building Regulations. Thus where an element of residential use is foreseen in any site allocation, a key requirement has been incorporated as per modification ref. 10 in the Schedule of Proposed Modifications³¹⁵. Similarly, Core Strategy Policy CS22 establishes water efficiency requirements for new homes, and the justification for this in paragraphs 5.222-5.223³¹⁶. Upon the abolition of the Code for Sustainable Homes, the equivalent optional technical standard for Code Level 4 water efficiency is sought. Key requirements in the SADPD therefore require development to meet these sustainable construction standards if relevant. The approach is set out in detail in the Guidance Note on the Implementation of Housing Standards³¹⁷.

iv.1.2 This ensures development is delivered in line with needs identified by evidence underpinning the Core Strategy. The requirements of the Core Strategy were informed by a comprehensive viability assessment³¹⁸, as updated via the CIL Viability Study³¹⁹ undertaken to assess the implications of the CIL Charging Schedule on development viability. The CIL rates build in sufficient cushion to enable the requirements of the Core Strategy to be achieved.

³¹⁰ Document reference: WBC/SA/013

³¹¹ Document reference: WBC/SA/027

³¹² Document reference: WBC/SA/003

³¹³ In accordance with footnote 46 of the Framework; *Housing for older and disabled people* PPG; and *Housing: optional technical standards* PPG

³¹⁴ Document Reference: WBC/SA/E017

³¹⁵ Document reference: WBC/SA/002

³¹⁶ Document reference: WBC/SA/E017

³¹⁷ Document reference: WBC/SA/022A

³¹⁸ Document reference: WBC/SA/E046

³¹⁹ Document reference: WBC/SA/E036F

Issue (v) Are any requirements for affordable housing contributions from sites delivering less than 10 dwellings consistent with national policy³²⁰?

Question 1: Are any requirements for affordable housing contributions from sites delivering less than 10 dwellings consistent with national policy?

vi.1.1 There are no allocated sites in the SADPD expected to deliver less than 10 dwellings. If any of the sites should, contrary to expectation, deliver a housing development with less than 10 dwellings, they would be subject to the Affordable Housing Delivery SPD³²¹ and the WBC guidance note 'Affordable Housing Provision: Implementation of Policy CS12 following the Introduction of New National Affordable Housing Threshold and Vacant Building Credit'³²². When read together, these requirements are consistent with national policy.

Issue (vi) Do the the SADPD's policies related to heritage assets accord with the statutory duties³²³ of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act), and the Framework³²⁴?

Question 1: Do the SADPD's policies pay appropriate regard to the significance of the Borough's designated and non-designated heritage assets?

vi.1.1 Yes. Core Strategy Policies CS20 *Heritage and Conservation* and CS24 *Woking's landscape and townscape*³²⁵ provide the strategic policy framework for the SADPD. Where allocated sites contain or are within the vicinity of designated or non-designated heritage assets (as identified by the Sustainability Appraisal³²⁶), key requirements have been introduced to SADPD policies to ensure due regard is paid to the significance of these assets, in accordance with the Development Plan for the area – which also includes policy DM20 *Heritage assets and their settings*.³²⁷ Historic England helped structure the SA Framework – objectives, indicators and targets – in order to effectively assess effects upon the historic environment and identify where mitigation measures should be included in policies to address any potential impacts. Historic England has subsequently provided a Statement³²⁸ of support for the DPD.

vi.1.2 Examples of key requirements include those incorporated into Town Centre allocations which ensure appropriate regard is paid to the Town Centre Conservation Area (UA4, UA5, UA6, UA7, UA15, UA32), and those of allocations such as GB10 and GB11 which ensure appropriate regard is paid to statutory and locally listed buildings within and adjacent to the sites. When preparing and determining planning applications, guidance such as the 'Heritage of Woking' study³²⁹ will prove a useful source of information.

vi.1.3 The SADPD also allocates historically significant sites, which include GB3 'Brookwood Cemetery' and GB19 'Woking Palace', to enhance the Borough's heritage assets and to provide opportunities for their enjoyment by the wider community.

³²⁰ Expressed in paragraph 63 of the Framework

³²¹ Document reference: WBC/SA/E057

³²² Document reference: WBC/SA/E058

³²³ Ss. 16(2), 66(1) and 72(1)

³²⁴ Paras 184 to 202

³²⁵ Document reference: WBC/SA/E017

³²⁶ Document references: WBC/SA/005, WBC/SA/005A, WBC/SA/005B and WBC/SA/005C

³²⁷ Document reference: WBC/SA/027

³²⁸ Document reference: WBC/SA/030

³²⁹ Document reference: WBC/SA/E055

Question 2: Do the policies reflect both the statutory duties set out in the Act and national policy set out in the Framework?

vi.2.1 Yes, the SADPD policies aim to ensure development proposals comply with the Development Plan policies of the area – including Core Strategy³³⁰ Policies CS20 and CS24, and DMPDPD³³¹ Policy DM20 – which seek to preserve and enhance the heritage assets of the Borough and in turn reflect the statutory duties set out in the Act and national policy set out in the Framework. Where development of sites may affect heritage assets and/or their setting, the key requirements included in the SADPD policies reinforce the need to pay due regard to the significance of these assets, such as statutory and locally listed assets buildings, Conservation Areas, Scheduled Ancient Monuments, Sites of Archaeological Significance and Ancient Woodland. Examples are given in response vi.1.2-1.3 above. Such key requirements will ensure that development coming forward does not undermine statutory duties and policies in place to prevent adverse impacts to heritage assets and their settings.

Issue (vii) Are the SADPD’s policies relating to design, character, appearance and amenity matters clearly written and unambiguous and consistent with national policy³³² and guidance³³³?

Question 1: Would the anticipated density of urban allocations result in developments that maintain the area’s prevailing character and setting, or promote regeneration and change³³⁴?

vii.1.1 The anticipated densities of the urban allocations would result in development that maintains the area’s prevailing character and setting and promotes regeneration and change. The anticipated densities in the SADPD have been informed by the indicative density ranges set out in Policy CS10 *Housing provision and distribution* of the Core Strategy³³⁵ and the Character Study³³⁶. Policy CS10 aims to ensure that the prevailing character of the distinctive areas of the Borough is not compromised and ensures the effective use of land without stifling innovation and creativity. For example, the following Key Requirement has been included in the urban allocations of the SADPD to reflect this; “Density of development should maximise the efficient use of the site without compromising the general character of the area”. Given the flexibility built into Core Strategy policies on design and the indicative densities, it is envisaged that it could also facilitate regeneration and change.. Therefore, if a scheme comes forward for a site with a density that falls outside of the anticipated density, the appropriateness of the scheme will be assessed at the development management stage, taking into account the relevant policies. This flexibility is necessary to tailor development proposals to the site specific constraints and characteristics of the site, in particular, to allow for design solutions that would facilitate regeneration and an enhancement of the existing character. An example is the redevelopment of Victoria Square. Each scheme will also be assessed in accordance with policies CS21 *Design* and CS24 *Working’s landscape and townscape* of the Core Strategy. The Council has published a character study³³⁷ that describes the distinctive character of the various parts of the Borough. This study is helpful in making sure that development does not significantly detract from the character of the area in which it sits.

³³⁰ Document reference: WBC/SA/E017

³³¹ Document reference: WBC/SA/027

³³² Particularly paras 122 to 132 of the Framework

³³³ Including PPG *Design Process and tools*; and the *National Design Guide* (September 2019)

³³⁴ Per paragraph 122(d) of the Framework

³³⁵ Document reference: WBC/SA/E017

³³⁶ Document reference: WBC/SA/E052

³³⁷ Ibid.

Question 2: Do the anticipated densities of urban allocations take into account the importance of securing well-designed, attractive and healthy places³³⁸?

- vii.2.1 The anticipated densities of the urban allocations would result in development that takes into account the importance of securing well-designed, attractive and healthy places.
- vii.2.2 As addressed in Question 1, the anticipated densities are indicative and have been informed by Policy CS10 *Housing provision and distribution* of the Core Strategy³³⁹. This policy allows flexibility in order to tailor the density of schemes to allow scope for high quality design solutions, ensuring the development does not detract from the character of the area in which it sits, and also to take account of any other site specific requirements, such as the incorporation of public and private amenity space.
- vii.2.3 The density of a scheme will be an important aspect that is assessed at the Development Management stage. This will be assessed in accordance with Policy CS21 *Design*, which will ensure that the density of the scheme that comes forward is appropriate and can incorporate the aspects which secure well-designed, attractive and healthy places.
- vii.2.4 In addition to Policy CS21, the Council also has an adopted Design SPD³⁴⁰ and an Outlook, Amenity, Privacy and Daylight SPD³⁴¹, both of which are helpful in shaping schemes to deliver high quality design outcomes. Furthermore, for schemes comprising tall buildings, these will be subject to a Design Review Panel where the scheme is scrutinised by a panel of design experts in order to achieve the best design outcome.

Question 3: Do the SADPD's policies taken together seek to create places that are safe, inclusive and accessible and which promote health and well-being with a *high standard* of amenity for existing and future users³⁴²? (my emphasis)

- vii.3.1 The SADPD follows a spatial strategy that direct most development to previously developed land at the main centres that are accessible to key services and facilities, including sustainable modes of transport to help reduce the need to travel by car and providing opportunities for walking and cycling. The SADPD also allocates/safeguards a lot of land for SANG and green infrastructure to promote healthy lifestyles, in particular, walking and countryside activities, examples of these being proposals GB9 and GB14-18 inclusive³⁴³.
- vii.3.2 A number of allocations include provision of community facilities to facilitate social cohesion. Most of the key requirements seek to promote good design in accordance with Policy CS21: *Design*, which ensures that development incorporates open spaces and layouts that address safety and fear of crime.³⁴⁴
- vii.3.3 There is strong emphasis to ensure that development takes full account of heritage assets and also to ensure that development takes account of adjacent uses, an example being UA34 which is situated next to a minerals aggregate site, and therefore a Key Requirement has been introduced to ensure a satisfactory relationship between that and the proposed residential development.
- vii.3.4 A number of mixed use allocations are proposed to offer an integrated approach to development which maximises efficient use of land. Combined with robust design policies and the ability for a design panel to scrutinise some of the schemes that come forward, The Council is confident that the Site

³³⁸ Per paragraph 122(e) of the Framework

³³⁹ Document reference: WBC/SA/E017

³⁴⁰ Document reference: WBC/SA/E059

³⁴¹ Document reference: WBC/SA/E060

³⁴² Per paragraph 127(f) of the Framework

³⁴³ Of the Regulation 19 version of the DPD reference WBC/SA/001

³⁴⁴ Document reference: WBC/SA/E017

Allocations, taken as a whole, would create places that are safe, inclusive and which promote health and well-being with a high standard of amenity for existing and future users.

Question 4: Is it clear from policies whether developments are expected to either (a) enhance, or (b) respect, or (c) merely avoid compromising the character of their surroundings? Could the design aspects of policies be more streamlined and consistent in these regards?

- vii.4.1 The key requirements of the SADPD were prepared with the overall design objectives of the Core Strategy³⁴⁵ in mind, i.e. all forms of development should make a positive contribution to the environment and strengthen the character and distinct identity of the area, as amplified in Policy CS21 *Design*. Development proposals should comply with Policy CS21 and thus “respect and make a positive contribution to the street scene and the character of the area in which they are situated”. Developments are therefore expected to enhance, and respect, and avoid compromising the character of their surroundings (also in line with Policy CS24: *Working’s landscape and townscape*).
- vii.4.2 However, it is acknowledged that the design aspects of the SADPD policies – including those key requirements where design must pay regard to heritage assets - could be more streamlined and reworded to provide clarity. A modification has been proposed in the revised Schedule of Proposed Modifications³⁴⁶ to direct developers to the strategic policies of the Development Plan for the area, including Core Strategy Policies CS20, CS21 and CS24. For example, where development of a site has potential to affect an identified heritage asset such as the Town Centre Conservation Area, the key requirement would read: "The Town Centre Conservation Area is adjacent to the site. Development proposals should be designed in accordance with Policy CS20: *Heritage and conservation* and Policy DM20: *Heritage assets and their settings*".

Issue (viii) Is the SADPD’s approach to transport matters consistent with national policy³⁴⁷?

Question 1: Is the SADPD’s approach to parking standards consistent with the Framework (at paragraph 106)?

- viii.1.1 The key policy regarding parking standards is Core Strategy Policy CS18: *Transport and Accessibility*³⁴⁸ which was reviewed in October 2018³⁴⁹, and is considered to be in general conformity with Paragraph 106 of the NPPF.
- viii.1.2 Policy CS18 establishes the principle that there will be maximum car parking standards for non-residential development and minimum car parking standards for residential development. More specific detail regarding the implementation of CS18 is provided in the Parking Standards SPD.³⁵⁰
- viii.1.3 The SADPD does not seek to amend the requirements set out in the Parking Standards SPD. For developments where parking provision may be necessary, it refers to the adopted car and cycle parking standards within the key requirements for the relevant policy.

Question 2: Should the requirements for Travel Plans, where appropriate, be positively worded in terms of the promotion of opportunities to maximise the use of sustainable transport solutions, rather than in terms of minimising car use?

³⁴⁵ Document reference: Ibid.

³⁴⁶ Modification reference 77 of document reference WBC/SA/002

³⁴⁷ Particularly paragraphs 102 to 111 of the Framework

³⁴⁸ Document reference: WBC/SA/E017

³⁴⁹ Document reference: WBC/SA/E017B, Table 1

³⁵⁰ Document reference: WBC/SA/021

viii.2.1 It is not considered necessary to amend the wording. Minimising car use is the overall aim to be achieved in various ways, including firstly by reducing the overall need to travel and secondly by promoting sustainable transport for journeys which cannot be avoided, both of which are promoted by the NPPF, in Paragraphs 103 and 102(c) respectively. To phrase the key requirement in terms of maximising sustainable transport use would only cover the modal shift and not the reduction in overall need to travel.

Question 3: Should policies require the achievement of safe and suitable access for all people to ensure consistency with the Framework³⁵¹?

viii.3.1 This would be duplication as Core Strategy Policy CS21: *Design* specifies that new development should “be designed in an inclusive way to be accessible to all members of the community, regardless of any disability... [and] create a safe and secure environment.”³⁵² Therefore, it will be ensured through the Development Management process that new development on any of the allocated sites would achieve safe and suitable access.

Issue (ix) Are the SADPD’s policies relating to biodiversity consistent with national policy³⁵³?

Question 1: Does the SADPD allocate land with the least environmental value; and where significant development of agricultural land is anticipated are areas of poorer agricultural quality preferred to those of a higher quality³⁵⁴?

ix.1.1 Yes, as part of the site selection process, the Council ruled out potential development on land classified as being of high agricultural value. The Sustainability Appraisal Objective 8³⁵⁵ and the Green Belt Boundary Review, Section 3.3.19 onwards³⁵⁶ considered the environmental constraints for each parcel of land to make sure that the most versatile agricultural land is not used for development.

ix.1.2 The agricultural land classification data, obtained from Natural England was taken into account. For example GB7 falls into grade 4 poor and GB10 falls into grade 3 good to moderate.

Question 2: Does the SADPD take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure³⁵⁷?

ix.2.1 Yes, the SADPD takes a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.

ix.2.2 Regarding habitats of cross boundary significance, the Council is part of the Thames Basin heath Joint Strategic Partnership Board (JSPB), which includes Natural England. The board has published a Delivery Framework³⁵⁸ which sets out the strategic framework for the avoidance of harm to the Special Protection Areas. This is necessary to ensure a consistent and co-ordinated approach to preserve the habitats for the endangered species of European significance. The Delivery Framework expects Local Authorities to identify sufficient SANG land to mitigate the impacts of housing

³⁵¹ At paragraph 108 (b)

³⁵² Document reference: WBC/SA/E017, p.102

³⁵³ Particularly paragraphs 170 to 177 of the Framework

³⁵⁴ Per paragraph 171 and Footnote 53 of the Framework

³⁵⁵ Document reference: WBC/SA/005

³⁵⁶ Document reference: WBC/SA/E018

³⁵⁷ Per paragraph 171 of the Framework

³⁵⁸ Document reference: WBC/SA/023C

developments in their area. The SADPD acts accordingly and allocates sufficient SANG land to support residential development during the entire plan period.

- ix.2.3 In addition to SANG, the JSPB Avoidance Strategy also includes Strategic Access Management and Monitoring (SAMM) and habitat management to improve the habitat of the protected birds. The Council provides quarterly receipts of SAMM money to Hampshire County Council who collect the funds on behalf of the JSPB to monitor and manage the SPAs.
- ix.2.4 The Council has produced a Biodiversity and Green Infrastructure Strategy 'Natural Woking Supporting Information'.³⁵⁹ It contains maps 24 and 25 that show the existing green infrastructure in the area and the potential to link together to create a strong green infrastructure network. The document contains advice for developers on page 94 onwards on how to survey, design, deliver and maintain green infrastructure connections whilst protecting important habitats and species. There is therefore clear evidence that the Council takes a holistic and an integrated approach to green infrastructure and its provision.
- ix.2.5 The SADPD contains key requirements for the retention/enhancement of biodiversity and green infrastructure networks within the above strategic context.

Question 3: Does the SADPD promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity³⁶⁰?

- ix.3.1 The Core Strategy sets out the strategic policy framework for the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species. Core Strategy³⁶¹ Policy CS7: *Biodiversity and nature conservation* and Policy CS8 *Thames Basin Heaths Special Protection Areas* are examples of such policies. The SADPD has been prepared in accordance with these policies and identifies sufficient SANG land to support development to ensure the protection and recovery of the SPAs and the protected wild bird species. Examples of SANGs are proposals GB14-GB18. GB6, GB7 and GB10 are also examples where the key requirements of the proposals include a requirement for ecological assessments to make sure that the site specific impacts of development on ecology are appropriately assessed and addressed. The proposed modification set out in the statement of common grounds between the Council and the Environment Agency includes introducing a 10m buffer along the river corridor to protect its ecological integrity.³⁶²
- ix.3.2 The Council is piloting a biodiversity net gain project at Proposal GB14 Westfield Common to ensure the restoration of Great Crested Newts in the area. This project is promoted by the government as an example of good practice.³⁶³ Development will be contributing to this scheme in meeting this requirement. Early monitoring is indicative that the project is proving successful. Policy CS7 encourages development to make positive contribution to biodiversity. Consequently, biodiversity net gain will also be secured through the development management process.
- ix.3.3 Biodiversity off-setting is a new policy that the government has introduced, which the Council has taken on board and will monitor the effectiveness of the ongoing projects and expand and do more in the future.

³⁵⁹ Document reference: WBC/SA/024A

³⁶⁰ Per paragraph 174 of the Framework

³⁶¹ Document reference: WBC/SA/E017

³⁶² Document reference: WBC/SA/032

³⁶³ PPG *Natural Environment*, Paragraph: 022 Reference ID: 8-022-20190721 Revision date: 21/07/2019

Issue (x) Are the SADPD's policies with regard to drainage and sustainable construction clearly written and unambiguous?

Question 1: Would the SADPD's policies including the proposed modifications secure appropriate drainage arrangements for developments?

- x.1.1 This issue is addressed in Section 7 of the Issues and Matters Topic Paper, particularly paragraphs 7.5-7.6³⁶⁴. Reflecting wording proposed by the Environment Agency (EA) during consultation, specific key requirements have been incorporated into the SADPD policies where evidence³⁶⁵ highlighted the need to minimise the risk of flooding, including surface water flooding, potentially using appropriate drainage infrastructure. Key requirements include:
- submitting a Flood Risk Assessment in accordance with policy CS9 of the Core Strategy, and devising a suitable scheme designed to address any identified flood risks;
 - demonstrating sufficient mitigation of surface water flood risk in the design of development due to the built-up nature of the site, including in some circumstances submitting a surface water drainage strategy with any relevant mitigation measures;
 - submitting a detailed drainage strategy if upgrades to the existing drainage infrastructure has been identified as likely by Thames Water;
 - meeting relevant Sustainable Drainage Systems requirements at planning application stage.
- x.1.2 The Council has agreed a Statement of Common Ground with the Environment Agency³⁶⁶ which will strengthen these key requirements further, including ensuring proposals take into account projected flood risk due to climate change. These are measures that are already agreed by the Council³⁶⁷.
- x.1.3 It is possible that some of the key requirements regarding drainage would benefit from amalgamation. The Council is open to advice by the Inspector that will enhance the presentation of the SADPD without compromising substance. The Council would be happy to review the key requirements and consolidate them where necessary either as minor modifications or as main modifications subject to the recommendations of the Inspector.

Question 2: Are the requirements for Sustainable Drainage Systems (SuDS) as expressed in the SADPD clearly written so it is evident how a decision maker should react to development proposals?

- x.2.1 Core Strategy³⁶⁸ policy CS9 *Flooding and water management* requires significant forms of development to incorporate appropriate SuDS as part of development proposals. Key requirements regarding SuDS were incorporated into SADPD policies where the SA Report identified potential impacts of flooding, in order to ensure surface water runoff is best managed by development; and also to reflect changes to national planning policy designed to strengthen the adoption of SuDS by all major developments³⁶⁹. The SADPD key requirements were supported by the EA during consultation.
- x.2.2 The requirement for SuDS is reasonable and justified. However, it is accepted that these could benefit from further modification to improve consistency and clarity, and to direct developers to the Council's

³⁶⁴ Document reference: [WBC/SA/003](#)

³⁶⁵ Evidence including Woking's Strategic Flood Risk Assessment and Maps (2015) (Ref: [WBC/SA/E035-035B](#)); Sequential Testing of Sites in the Site Allocations DPD (2018) (Ref: [WBC/SA/E039](#)); the Sustainability Appraisal Report (ref: [WBC/SA/005-005B](#)); and the Environment Agency's risk of surface water flood maps.

³⁶⁶ Document reference: [WBC/SA/032](#)

³⁶⁷ See response reference U0001227 on p242 of the Council's 'Summary of Individual Representations Received with Officers' Response and Recommendations' (June 2019), Document reference: [WBC/SA/003](#)

³⁶⁸ Document reference [WBC/SA/E017](#)

³⁶⁹ Changes took effect from 6 April 2015 as per the [Written Statement to Parliament](#) published on 18 December 2014.

Advice Note on sustainable drainage³⁷⁰ which was produced following changes to national policy. It is proposed that the following modifications are made where the reference to SuDS occurs within SADPD policies: "Development to meet relevant Sustainable Drainage Systems requirements at the time of planning application for the development of the site" be amended to read: "Development to incorporate sustainable drainage systems in accordance with both Core Strategy Policy CS9: Flooding and water management, and the supplementary Advice Note supporting the provision of a Surface Water Drainage Statement".³⁷¹

Question 3: Are policy requirements related to sustainable construction clear and consistent with national policy and guidance?

- x.3.1 Core Strategy³⁷² Policy CS22 provides the strategic policy framework for sustainable construction. The policy is in part in general conformity with the latest government policy – since the adoption of the Core Strategy, the Code for Sustainable Homes was abolished and a cap set on energy performance standards to a Code Level 4 equivalent³⁷³. The Council's 'Guidance Note on the implementation of policies in the Core Strategy following the Housing Standards Review'³⁷⁴ describes how the new government policy applies in combination with policy CS22. Government measures to address climate change continue to evolve and the pace of change is often ahead of how quickly local plans can respond in a formal way. To futureproof the SADPD key requirements and provide clarity amid this changing area of national planning policy, a further modification is proposed to the relevant key requirements as follows: "Development to meet sustainable construction requirements in accordance with Policy CS22: Sustainable Construction of the Core Strategy, taking into account supplementary planning guidance on the implementation of policy CS22 (or any future national requirement)³⁷⁵". This futureproofs the policy taking into account a) the Council's intention to replace the Guidance Note with a revised Climate Change SPD and b) the intention of government to introduce the Future Homes Standard.

³⁷⁰ The '[Advice Note supporting the provision of a Surface Water Drainage Statement](#)' was published following changes to national planning policy and guidance in April 2015. Document ref: WBC/SA/E050

³⁷¹ See modification reference 75 of the Schedule of Proposed Modifications, WBC/SA/002, and within the table below

³⁷² Document reference: WBC/SA/E017

³⁷³ As clarified by the [Written Statement to Parliament](#) published on 25 March 2015 and now incorporated into PPG Paragraph: 012 Reference ID: 6-012-20190315

³⁷⁴ Ref: [WBC/SA/022A](#)

³⁷⁵ See modification reference 76 of the Schedule of Proposed Modifications, WBC/SA/002, and within the table below

³⁷⁵ Document reference: WBC/SA/E017

Hearing Statement 6 in Response to Matter 6

Matter 6: Does the SADPD set out effective mechanisms for monitoring and implementation?

Issue (i) Does the SADPD set out effective mechanisms for monitoring and implementation?

Question 1: The SADPD sets out³⁷⁶ that ‘in some cases delivery will be assisted by additional guidance provided through Supplementary Planning Documents’ (SPDs). Are any specific SPDs contemplated, and if so what is the timetable for their production?

- i.1.1 This statement refers to the Council’s adopted SPDs, as listed at <https://www.woking2027.info/supplementary> and any updates. These will be used in the assessment of development applications, as appropriate, in conjunction with the statutory Development Plan, and expand on the policies and proposals contained within DPDs. No new SPDs are contemplated at the current time, but a number of updates are in progress and expected to be adopted over the next year.
- i.1.2 In terms of updates, the Council will work to ensure that SPDs are updated to be pursuant to the up to date development plan for the area, and has a rolling programme to reflect that. The Outlook, Amenity, Privacy and Daylight SPD³⁷⁷ (adopted 2008) was consulted on in May-June 2019 and a draft updated SPD has been produced (and is available at the web link above). An update to the SPA Avoidance Strategy has been drafted and is undergoing targeted consultation. The Climate Change SPD³⁷⁸ is also being updated and will be consulted on, together with the SPA Avoidance Strategy, next year if the draft has been completed. The Affordable Housing SPD³⁷⁹ is also due to be updated in the next year. In addition, Conservation Area Appraisals will be updated in a rolling programme. Following consultation, updated SPDs will go to the relevant committees and to Council for adoption.

Question 2: Does the monitoring framework set out a clear set of indicators against which to assess the effectiveness of the SADPD’s policies and allocations?

- i.2.1. As set out in the Implementation and Monitoring section of the SADPD³⁸⁰ the sites allocated in the SADPD contribute to the amount and types of development planned for the 2027 in the Core Strategy, and will therefore be monitored alongside the Core Strategy³⁸¹. The Core Strategy establishes an extensive monitoring framework to assess the delivery of policies, and the SADPD will be monitored against these in terms of residential completions, and additional employment and retail (A1-A5) and other types of floorspace. In addition, progress of individual sites will be monitored against the capacity and phasing information set out under the Policy proposal and Delivery Arrangements section of each allocation.

³⁷⁶ At page 340 of the July 2019 version of the document

³⁷⁷ Document reference: WBC/SA/E060

³⁷⁸ Document reference: WBC/SA/022

³⁷⁹ Document reference: WBC/SA/E057

³⁸⁰ Document reference: WBC/SA/002A, page 340

³⁸¹ Document reference: WBC/SA/E017

Question 3: Does the monitoring framework set out clear actions that could be taken should development not come forward at the rate anticipated in the SADPD?

i.3.1 Risk and contingencies are covered in the Implementation section of the SADPD³⁸². If persistent under use and under-delivery of sites becomes an issue, due to market conditions or other factors, that cannot be addressed by policies or Council action, then review mechanisms will be triggered, in line with the plan-monitor-review process that is embedded in plan-making. Alternative, suitable uses will be considered and key requirements of sites reviewed, and actions will be taken to attempt to kick-start development. It should be noted that the Council has a proven record of working with partners to facilitate development, as can be seen at Victoria Square. As set out in Section 6 of the Core Strategy³⁸³, the Council has Compulsory Purchase Powers that it is willing to use to bring forward sites if proven to be necessary and defensible. It is stressed that the SADPD builds in sufficient cushion to cater for non-implementation. It builds in about 25% over-supply of units to make sure that at least the 292 yearly requirement is achieved.

Question 4: Is the SADPD clear in terms of the triggers for such action?

i.4.1 The Risk and contingencies section of the SADPD reflects the two risks identified in paragraphs 6.20 and 6.21 of the Implementation and monitoring section of the Core Strategy³⁸⁴. The two potential areas of risk are as follows;

a) Failure of sites coming forward for residential and/or employment development due to difficulties of land assembly and/or residential and employment delivery falling behind the projected trajectory

b) Infrastructure provision to support development.

i.4.2 Should these risks become a reality, this will trigger the necessary action that needs to be taken in order to address development not coming forward.

i.4.3 As stated in the answer to Question 3, the SADPD sets out the necessary steps which should be taken in ensuring the under-use or under-delivery of sites, and these steps are covered in further detail in the Implementation and monitoring section (paras 6.19-6.21) of the Core Strategy.

Question 5: Does the SADPD make clear which development plan policies it will supersede?

i.5.1. The SADPD is not intended to supersede any of the policies of either the Core Strategy³⁸⁵ or the Development Management Policies DPD³⁸⁶. It has a clear and specific purpose as set out on page 4 of the SADPD to identify sites to enable to delivery of the Core Strategy. The requirement to specify the saved policies which the DPD is supposed to supersede is therefore not engaged in this particular case.

³⁸² Document reference: WBC/SA/001 p327-331 (or WBC/SA/002A p.344-345)

³⁸³ Document reference: WBC/SA/E017

³⁸⁴ Document reference: WBC/SA/E017

³⁸⁵ Ibid.

³⁸⁶ Document reference: WBC/SA/027

Summary of Additional Proposed Modifications

The following table provides a summary of proposed minor modifications pursuant to the Inspector's Matters, Issues and Questions. These have been incorporated into a revised Schedule of Proposed Modifications.

Modification Reference	Policy or reference in Regulation 19 document (Ref: WBC/SA/001)	Page in Regulation 19 document	Reason for modification	Proposed Modification
57	Section B	p.289	Revised in response to Inspector's question	Amend the final key requirement in the proposed McLaren Campus policy to read as follows: <ul style="list-style-type: none"> The scope of the key requirements that will be relevant to any proposal that is submitted for planning permission will be decided by the Council during pre-application discussions with the applicant, along with any other site specific requirements on a case by case basis depending on the nature of the scheme.
72	GB17	p.319	In response to Inspector's question	Add the following wording to the supporting text: "any works impacting directly on the scheduled monument will require Scheduled Monument Consent."
73	UA6, UA10, UA11, UA13, UA34		In response to Inspector's question	Add the following key requirement: "In view of the sites' location within the consultation zone of the safeguarded Downside Goods Yard rail aggregates depot, as detailed in the Surrey Minerals Plan Policy MC6, applicants are advised to consult Surrey County Council at an early stage to ensure that development would not prevent, directly or indirectly, the minerals function and the operational requirements of the Aggregates Depot."
74	UA15	p.93	In response to Inspector's question	Amend the second key requirement to: "re-provision of the existing conference and events facility is a pre-requisite of redevelopment of this site".
75	All relevant policies		In response to Inspector's question	Amend key requirement for "Development to meet relevant Sustainable Drainage Systems requirements at the time of planning application for the development of the site", to read: "Development to incorporate sustainable drainage systems in accordance with both Core Strategy Policy CS9: Flooding and water management, and the supplementary Advice Note supporting the provision of a Surface Water Drainage Statement".

76	All relevant policies		In response to Inspector's question	Amend key requirement for "Development to meet relevant sustainable construction requirements at the time of planning application for the development of the site....", to read: "Development to meet sustainable construction requirements in accordance with Policy CS22: Sustainable Construction of the Core Strategy, taking into account supplementary planning guidance on the implementation of policy CS22 (or any future national requirement)".
77	All relevant policies		In response to Inspector's question	Aspects of policies where various terminologies (e.g. 'respect', 'enhance', 'protect', 'take into account', 'carefully consider') are used to ensure harm is avoided to heritage assets and/or character should be consolidated and reworded to make direct reference to the strategic policy in the Core Strategy, including CS20, CS21 and CS24, to ensure development is in accordance with these policies.
78	UA7, UA27, UA42		Changes already approved by Council at its meeting on 25 th July 2019 and agreed with the Environment Agency. See page 242 of the Issues and Matters Topic Paper (WBC/SA/003)	A key requirement should be added to the list of key requirements to read as 'current or historic contaminative uses may have led to soil and groundwater contamination that will need to be considered during any development of the site, dependent on detailed proposals and consultation with Environmental Health section of the Council and the Environment Agency. Investigation required and remediation may be necessary.
79	GB17		Changes already approved by Council at its meeting on 25 th July 2019 and agreed with the Environment Agency. See page 242 of the Issues and Matters Topic Paper (WBC/SA/003)	A key requirement should be added to the list of key requirements to read as 'a minimum 10 metre undeveloped ecological corridor alongside the River Wey will be protected from development and proposals to enhance the ecological value of the river corridor and steps to improve habitat linkages will be provided. The enhancements should have regard to the Thames River Basin Management Plan and the Wey Landscape Partnership's Catchment Plan and be agreed in consultation with the Environment Agency.
80	GB12, GB15, GB16		Changes already approved by Council	A key requirement should be added to each proposal to read as 'the design of SANGs including the circular walks should be sensitive to the biodiversity

			at its meeting on 25th July 2019 and agreed with the Environment Agency. See page 242 of the Issues and Matters Topic Paper (WBC/SA/003)	and ecological corridor along the River Wey. Where any physical ancillary development or infrastructure is to be provided, it should be set back to create a 10 metre undeveloped buffer.
81	UA1, UA22, UA25, GB1, GB2, GB17		Changes already approved by Council at its meeting on 25th July 2019 and agreed with the Environment Agency. See page 242 of the Issues and Matters Topic Paper (WBC/SA/003)	A key requirement should be added to each of the proposals to read as 'a sequential approach should apply to the layout of development on the site'.
82	GB3		Changes already approved by Council at its meeting on 25th July 2019 and agreed with the Environment Agency. See page 242 of the Issues and Matters Topic Paper (WBC/SA/003)	Add the following text to the reasoned justification: the groundwater in the Bagshot Beds Acquirer to the south west of GB3 may be shallow. Since burials should not be in groundwater, there should be a requirement to carry out an investigation to determine the maximum seasonal depth to groundwater and if shallow parts of this extension site may only be suitable for single burials.
83	UA1, UA8, UA19, UA20, UA22, UA27, UA28, UA29, UA31, UA32, UA40, GB1, GB2, GB10,		Changes already approved by Council at its meeting on 25th July 2019 and agreed with the Environment	A key requirement should be added to each of the proposals to read as 'Flood Risk Assessments should take into account the most up to date climate change projections and the Environment Agency's latest guidance on Climate Change'.

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	GB11, GB12, GB13, GB15, GB16, GB17		Agency. See page 242 of the Issues and Matters Topic Paper (WBC/SA/003)	
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