



Woking Borough Council

Site Allocations Development Plan Document

Duty to Cooperate Statement

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Produced by the Planning Policy Team

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1.0 Introduction

- 1.1 The Duty to Cooperate Statement has been prepared by Woking Borough Council to demonstrate how it has met the requirements of the Duty to Cooperate as set out by the Planning Act 2004 (as amended) and by the National Planning Policy Framework (NPPF). The Site Allocations is a Development Plan Document (DPD) with potential cross boundary implications, to which the Duty to Cooperate requirements are relevant in its preparation. The purpose of the Site Allocations is to allocate land for a range of uses to deliver the spatial vision and objectives of the Woking's adopted Core Strategy (2012). It makes clear where development will take place, what kind of development it will be and when it is likely to take place.
- 1.2 Paragraphs 24 to 27 of the National Planning Policy Framework (NPPF) emphasises the importance of effective and on-going joint working between strategic policy-making authorities, as integral to the production of a positively prepared and justified strategy. The Local Plan, and in this particular case, the Site Allocations DPD will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Consequently, failure to meet the requirements of the Duty to Cooperate can put at risk the soundness of the DPD.
- 1.3 The Duty to Cooperate requires the Council to engage constructively, positively and actively with the relevant bodies in relation to the preparation of the DPD to address strategic priorities and matters of cross boundary significance. The Council is satisfied that it has met the requirements of Duty to Cooperate. As demonstrated in this Statement, the Site Allocations DPD raises issues of cross boundary significance and infrastructure issues (particularly on transport). However, this should be considered within the wider context of plan preparation by the Council, and is covered in detail in paragraphs 1.15 - 1.27.
- 1.4 Woking's adopted Core Strategy (2012) was reviewed in October 2018 in accordance with paragraph 33 of the NPPF. Key strategic matters such as the overall spatial strategy for the distribution of development, scale and type of housing and employment provision, infrastructure to support development and the protection of the Borough's environmental quality have been agreed in the adopted Core Strategy. The Duty to Cooperate Statement underpinning the preparation of the Core Strategy has been judged to meet the requirements of the Act and national policy by the Core Strategy examination's Inspector. Since 2012, under the Duty to Cooperate requirements, unmet housing need arising from Woking based on the Core Strategy's housing requirement is now being met within the Housing Market Area by Guildford and Waverley Borough Council's Local Plans.
- 1.5 Given that the Site Allocations DPD has a primary purpose to deliver the requirements of the Core Strategy, the Duty to Cooperate should be seen in the

context of this role, and the nature and type of engagement required should be in keeping with this.

Legislative context

- 1.6 Section 110 of the Localism Act deals with the Duty to Cooperate in relation to planning for sustainable development. It inserts S333A (Duty to Cooperate in relation to planning of sustainable development) in Part 2 of the Planning and Compulsory Purchase Act 2004 (local development) (as amended). The Duty to Cooperate requires each person who is:
- (a) A local planning authority;
 - (b) A county council in England that is not a local planning authority; or
 - (c) A body, or other person, that is prescribed or of a prescribed description to cooperate with every other person specified above in maximising the effectiveness with which the following relevant activities are undertaken:
 - (a) The preparation of development plan documents;
 - (b) The preparation of other local development documents so far as they relate to strategic matters. The Duty imposes on the persons listed above:
 - (a) To engage constructively, actively and on an on-going basis in this case, the plan making process; and
 - (b) To have regard to activities of the persons listed above so far as they are relevant to activities listed in subsection 3 of Section 110.

Subsection 4 of Section 110 of the Act defines a strategic matter as:

- (a) Sustainable development or use of land that has or would have significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas; and
 - (b) Sustainable development or use of land in a two tier area if the development or use is a county matter, or has or would have a significant impact on a county matter.
- 1.7 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. Paragraph 20 defines that strategic policies that set an overall strategy for the pattern, scale and quality of development, and make sufficient provision for, should include:
- The homes (including affordable homes) and jobs needed in the area;
 - The provision of retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, waste water, flood risk and coastal change management, and the provision of minerals and energy (including heat)
 - The provision of community facilities, such as health, education and cultural infrastructure; and
 - The conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

- 1.8 These strategic priorities are addressed through the Borough's Development Plan, mainly through the Core Strategy (2012), and to a lesser extent (regarding the delivery of these strategic priorities) through the Development Management Policies DPD (2016) and the emerging draft Site Allocations DPD. The Core Strategy outlines the Borough's overall spatial strategy, setting out the quantum of development required in terms of additional dwellings, retail and commercial development, and sets out broad locations for development. This can be found in Core Strategy Policies CS1: A spatial strategy for Woking Borough, Figure 3. Areas Identified for Growth, and in subsequent policies on the town, district, local and neighbourhood centres (CS2, CS3 and CS4), Priority Places (CS5), housing policies and Policy CS15: Sustainable Economic Development. In addition, the Core Strategy also contains policies on infrastructure delivery (CS16) including for transport (CS18) social and community infrastructure (CS19); on flooding and water management (CS9) and those that address climate change e.g. CS23: Renewable and low carbon energy generation.
- 1.9 Many of the Core Strategy policies highlighted above are detailed further in terms of their delivery in the Development Management Policies DPD (2016), in Supplementary Planning Guidance, for example the Climate Change DPD (2013). The Site Allocations DPD's purpose is to deliver the spatial vision and objectives of the Core Strategy by allocating land for a range of uses. It makes clear where development will take place, what kind of development it will be, when development is likely to take place and safeguards land for infrastructure provision. The Site Allocations DPD therefore helps to deliver the Borough's strategic priorities.
- 1.10 Paragraphs 24 to 27 of the NPPF deals with planning strategically across local boundaries. Local authorities have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out above. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. They should also work collaboratively with private sector bodies, utility and infrastructure providers. As set out in the introduction, a significant number of the strategic priorities have been resolved under the Duty to Cooperate during the preparation of the Core Strategy.
- 1.11 Local Planning Authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross boundary impacts when their Local Plans are submitted for Examination. This Statement is a demonstration of the Council's evidence that the requirements of the Duty to Cooperate have been met.
- 1.12 The Town and Country Planning (Local Planning) (England) Regulations 2012 specifies the bodies and persons that needs to be notified of the subject of the local plan which the local planning authority proposes to prepare and to invite them to make representations about what the local plan with that subject ought to contain. Regulation 4 lists the prescribed bodies for the purposes of the Duty to Cooperate as:

- The Environment Agency;
 - The Historic Buildings and Monuments Commission for England (Historic England);
 - Natural England;
 - The Mayor of London;
 - The Civil Aviation Authority;
 - The Homes and Communities Agency;
 - Each clinical commissioning group established under Section 14D of the National Health services Act 2006;
 - The National Health Service Commissioning Board;
 - The Office of Rail Regulation;
 - Transport for London
 - Each Integrated Transport Authority
 - Each Highway Authority within the meaning of section 1 of the Highways Act 1980(f) (including the Secretary of State, where the Secretary of State is the Highways Authority);
 - The Marine Management Organisation.
- 1.13 Local Planning Authorities should also work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships (LEPs) and Local Nature Partnerships.
- 1.14 The above provides the legislative context within which this Statement has been prepared.

Policy context

- 1.15 The Woking Core Strategy was adopted in October 2012. In accordance with the requirements of paragraph 33 of the NPPF, it was reviewed in October 2018 and considered up to date for the purposes of managing development in the Borough and for providing the strategic context for the preparation of the Site Allocations DPD. The Core Strategy makes provision for the delivery of the following scale of development up to 2027:
- 4,964 net additional dwellings (35% of this to be Affordable Housing);
 - 28,000 sq.m of additional office floorspace and 20,00 sq.m of warehouse floorspace;
 - 93,900 sq.m of additional retail floorspace.
- 1.16 The Core Strategy contains 25 strategic policies, and the Council is committed to their comprehensive delivery against their objectives. The Site Allocations DPD is one of two key Development Plan Documents that the Council is committed to prepare to facilitate the delivery of the Core Strategy, in particular, to identify specific sites for development to enable its development objectives. The other document is the Development Management Policies DPD, which was adopted in October 2016.
- 1.17 Paragraph 1.10 of the Core Strategy commits the Council to prepare the Site Allocations DPD to help facilitate the comprehensive delivery of the Core

Strategy. The DPD puts forward specific sites for development, to enable the delivery of development requirements in the Borough (as detailed in paragraph 3.1) and makes clear what type of development is proposed and when it is likely to take place. Many of the allocations will in effect give permission in principle for the uses proposed, with the exception of minerals or certain other uses, following the enactment of the Housing and Planning Act 2016. Planning applications will still need to address the key requirements of the allocations.

- 1.18 When adopted, the policies of the Site Allocations DPD together with the policies of the Core Strategy and Development Management Policies DPD will provide a comprehensive and up to date policy framework for managing development in the area.

Background to the Duty to Cooperate and approach to partnership working in plan making in the Borough

- 1.19 This section sets out what has already been established under the Duty to Cooperate, as part of plan preparation carried out in the preparation of the Council's Core Strategy. This includes meeting the Borough's housing requirement in respect of the wider Housing Market Area (HMA), the spatial distribution of development, and requirements such as protection of the Thames Basin Heaths Special Protection Area (SPA) and providing adequate infrastructure.
- 1.20 Firstly, the Surrey Strategic Planning and Infrastructure Partnership is a partnership between Surrey Councils, Surrey County Council, Highways England, Network Rail and the Department for Transport. It is a group set up to foster cooperation in dealing with strategic infrastructure issues, such as transport and education. The partnership has worked to develop the Local Strategic Statement (draft interim LSS 2016-2031, published in 2017) which is a non-statutory document. It sets out a consensus on the county's strategic objectives and priorities, and helps align strategic spatial, infrastructure and economic priorities which can then be reflected in Local Plans and strategic infrastructure projects. Much of the work undertaken so far has focused on co-ordinating the approach to strategic infrastructure in Woking and Guildford boroughs, and builds on the Surrey Infrastructure Study, particularly on the A3 and rail infrastructure improvements.
- 1.21 The Surrey Strategic Planning and Infrastructure Partnership have an agreed Memorandum of Understanding, with the purpose to help meet the requirements of the Duty to Cooperate, and local authorities have identified key strategic areas of evidence base that require joint working and could be suitable for combined working. This includes: the identification of housing need, including the agreement of Housing Market Areas and preparation of up to date Strategic Housing Market Assessments; economy and employment needs and opportunities; strategic infrastructure with strong links to the relevant LEPs; development of strategic growth options across the County; constraints such as special protection areas, conservation areas and flooding; and Green Belt designation. This Memorandum is led on a day to day basis by the lead planning

officer for the local authorities through the Surrey Planning Officer's Association (SPOA). See para 2.9 for further detail of this group.

- 1.22 Looking at housing need in the HMA, Woking, Waverley and Guildford Borough Councils have signed a Memorandum of Understanding to work jointly to address cross boundary, strategic planning issues in the West Surrey area. Work carried out has included the joint commissioning of a Strategic Housing Market Assessment, the latest of which was published in 2015 for the period 2013-2033. There is an acknowledgment of the shared responsibility to meet full objectively assessed need for housing in the HMA, as far as is consistent with the NPPF. Woking Borough Council was the first of the three boroughs to adopt a Core Strategy that post-dates the NPPF, with an adopted housing requirement of 292 dwellings per year against its objectively assessed need of 517. There was therefore an unmet need arising from Woking of 225 dwellings per year. Using current data to calculate Woking's objectively assessed need (based on 2014 household projections) the need is estimated at 409 dwellings per year, giving an unmet need of about 117 dwellings per year. The Core Strategy's housing requirement was and continues to be considered consistent with the NPPF in terms of achieving a balance regarding identified constraints and sustainable development, so long as the housing requirement and delivery intentions were expressed as a minimum and a Green Belt review undertaken as early as possible in the plan period to ensure sufficient availability of land for housing. This review has been undertaken and informs the development of the Site Allocations DPD, which seeks to ensure effective delivery of the Core Strategy's housing (and other) requirements.
- 1.23 The Core Strategy was reviewed in accordance with the revised NPPF 2018. Planning Policy Guidance and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended by the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017. This review concluded that there is no immediate need to modify the Core Strategy either in part or as a whole, and therefore the Core Strategy continues to be considered up to date in providing the Borough's strategic policy framework, which includes development requirements, for the Site Allocations DPD and also for managing development.
- 1.24 The Waverley Local Plan was adopted in 2017, and under the Duty to Cooperate the Plan makes provision for half of the unmet need arising from Woking; equating to 83 dwellings per year over the plan period up to 2033. The Inspector concluded that extensive collaboration had been carried out between the Waverley, Woking, Guildford and the County Council, that there had been no failure under the Duty to Cooperate and that the Duty had been met.
- 1.25 The same Inspector did not raise an issue about the Duty to Cooperate at Guildford Local Plan's examination and concluded that the Duty had been met in the preparation of this Plan too. In Guildford, evidence to the plan showed a buffer in capacity for housing delivery, in addition to housing supply to accommodate Guildford's own housing need over the plan period (2015 to 2034). While Woking's residual unmet housing need (that which is not met through

Waverley's requirement) is acknowledged and considered, the buffer was intended to provide a robust supply of housing sites to ensure that Guildford's own housing requirement was met in light of uncertainties relating to the delivery of key infrastructure. The Inspector concluded that the residual amount of unmet housing need from Woking can be accommodated within Guildford Local Plan's buffer or 'headroom' (the difference between Guildford's housing requirement and housing delivery expected from all sources over the plan period). The level of 'headroom' available was considered by the Inspector to be sufficient to ensure the robustness of the plan in the event of slippage in housing delivery at other allocated or committed sites, and to account for the anticipated unmet need from Woking, which includes a continuing level of undersupply over the period of Woking's recently reviewed plan (see para 1.19). This means that the issue of meeting projected housing need across the Housing Market Area has for the current time been resolved, and the shift will be to ensure effective monitoring and implementation of the Borough's respective Local Plans. So far, Woking is delivering its housing requirement, with average delivery since the adoption of the Core Strategy to year end (31 March) 2018/19 matching the requirement of 292 dwellings per year.

- 1.26 The level of growth expected in both Guildford and Waverley is considerably higher than that historically planned for, and increasing the delivery of new homes will help to alleviate the pressures currently being felt due to lack of supply. This will increase certainty and enable delivery of sustainable development, and supporting infrastructure, to a greater degree. The three boroughs will continue to work together to ensure that housing need in the HMA, as planned for in the three Borough's Local Plans is met through effective implementation and monitoring. A Statement of Common Ground has been agreed between the three authorities setting out how they will work together in future to address any unmet housing need in the HMA, in the preparation of subsequent strategic plans, beyond the current plan periods. A copy of the Statement of Common Ground can be found in Appendix 3.
- 1.27 In terms of the spatial strategy, and spatial distribution of development in the Borough, the Core Strategy was considered at examination to adequately consider reasonable alternatives through an iterative Sustainability Appraisal process. The Council had liaised with partners and bodies beyond the Borough boundaries on the spatial strategy. While reservations had been expressed (e.g. on securing the levels of development needed to meet housing needs) the Inspector concluded that there was insufficient evidence to show that the Council's approach was not founded on suitable evidence or was not robust. The Core Strategy's spatial strategy, and the approach outlined on the Green Belt Review (see paragraph 1.15) underpins the spatial approach and distribution of development put forward in the Draft Site Allocations DPD, on which the Council is continuing to engage with partners.
- 1.28 The Core Strategy sets the Council's approach to addressing and protecting the Thames Basin Heaths Special Protection Area (SPA) which was agreed with input from Natural England. This approach was informed by the SPA Delivery

Framework and developed in conjunction with key partners (Natural England and 11 local authorities across Surrey, Berkshire and Hampshire).

- 1.29 Further to this, on flooding, the Council has undertaken a Strategic Flood Risk Assessment (SFRA) for the Borough that influences guidance on the siting of new development and approach to minimise flood risk outlined in Core Strategy Policy CS9. This was agreed with the input of the Environment Agency, who have been further engaged in the sequential approach used to inform the location of sites allocated in the Draft Site Allocations DPD. The SFRA was prepared in partnership with Surrey Heath Borough Council.
- 1.30 On infrastructure, to support the delivery of development and strategic objectives outlined in the Core Strategy, the Council prepared an Infrastructure Delivery Plan (IDP) and consulted with a number of stakeholders in its preparation. While not prescribed Duty to Cooperate bodies (see paragraph 1.7 of this statement the for) the Council consulted a range of utility providers in the preparation of the Infrastructure Delivery Plan, most of whom provided useful information to inform the IDP such as existing capacity of infrastructure networks and future plans for additional capacity, including timeframes and costs. For example, in response to concerns raised by Thames Water about sewerage treatment capacity after 2019, the Council has designated a Major Developed site in the Green Belt at the Woking Sewage Treatment Works on Carters Lane. This should help to ensure that capacity can be increased to meet future demand. This is a positive outcome, showing what the Duty to Cooperate can achieve.
- 1.31 The 'plan, monitor, manage' process was considered a reasonable way to ensure effective delivery of the Core Strategy. It is acknowledged that a delivery document, such as the Site Allocations DPD, needs to ensure that land is safeguarded to enable the delivery of the necessary infrastructure to support the identified growth in the area. This has been undertaken in collaboration with the relevant, prescribed Duty to Cooperate partners, and the Council has prepared and published an Infrastructure Delivery Plan in 2018 in collaboration with these wider bodies and organisations. The Site Allocations DPD also includes site specific key requirements on infrastructure to address localised need. Delivery of local infrastructure is outlined in more detail in section 3.0.

2.0. Methods of cooperating and communicating

2.1 The following means have been used to involve the relevant bodies in the preparation of the DPD:

- Meetings;
- E-mails
- Direct mails;
- Telephone discussions;
- Formal and informal consultation.

2.2 **Cooperation with the Duty to Cooperate prescribed bodies** (listed in paragraph 1.7) including **statutory consultees** (Natural England, Environment Agency, Historic England, Highways England and Network Rail). The Council has been in continuous, positive and on-going consultation with these bodies through informal and formal communications. Highways England, Environment Agency and Natural England particularly have met with the Council on several occasions to be kept up to date on progress on the preparation of the DPD, and to discuss key issues. Historic England have also input into the process. Comments raised have been taken into account before the DPD was formally published for consultation in June and July 2015 (Regulation 18). These bodies have also commented on all the emerging drafts of the DPD, as detailed in paragraphs 2.7 and 3.5. Dates of meetings can be provided on request. Changes incorporated into the DPD have been agreed with the relevant statutory consultees where appropriate.

2.3 **Cooperation with the neighbouring authorities** has also been continuous and positive. Through the Surrey Planning Officers Association, the Planning Working Group and the West Surrey Group all the local authorities in Surrey are regularly kept up to date on progress with the preparation of the DPD and any potential issues they may wish for the Council to note. Bilateral meetings with Guildford, Waverley, Elmbridge, Runnymede, Surrey Heath Borough Councils and Surrey County Council have taken place to identify and agree any direct cross boundary issues that need to be addressed and to find appropriate means to address them. The authorities have also been formally consulted on the Regulation 18 consultation, the consultation on land to the east of Martyrs Lane and Regulation 19 consultation. The Planning Working Group meet regularly (every other month). Surrey County Council is a member of the Planning Working Group and the Surrey Planning Officers Association (see paragraph 2.9 for further detail) and is responsible for both transport and education infrastructure. Examples of projects and work to deliver these forms of infrastructure are detailed in section 3 and Table 1. The Council has signed a Statement of Common Ground with the County Council on how to manage waste across the County, including within Woking Borough, which can be found in Appendix 3d.

2.4 In addition, the Council has signed a Memorandum of Understanding and a Statement of Common Ground with Waverley and Guildford Borough Councils to work jointly to address cross boundary planning issues in the Housing Market Area and the Functional Economic Market Area, which are common to the three

authorities. The Boroughs have undertaken a joint Strategic Housing Market Assessment (2009 and updated in 2015) and have worked together to agree the definition of the Functional Economic Area, as a basis to provide up to date evidence on housing and employment need in the area. The three authorities meet regularly to discuss any cross boundary implications of their respective plans and to find solutions to address them. Formal representations have also been received and responded to through the Regulation 18, land east of Martyrs Lane and Regulation 19 consultation. Dates of meetings can be provided on request.

- 2.5 The revised NPPF (2018) and NPG updated the Government's guidance on maintaining effective cooperation, and specifically on statements of common ground. The NPPF states that strategic plan making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters to be addressed and progress in cooperating to address these. These should be produced using the approach set out in National Planning Guidance.
- 2.6 The Statement of Common Ground on Housing Delivery within the West Surrey HMA, between Guildford, Waverley and Woking, was produced in October 2016, prior to the revised guidance, and has been used to inform the preparation of the Borough's plans (it can be found in Appendix 3). The 2016 Statement of Common Ground meets the majority of criteria set in the NPG, and is considered adequate to demonstrate effective and on-going joint working with these two boroughs for the purposes of the Site Allocations DPD. The relevant Boroughs have agreed that the review of the existing Statement of Common Ground is not necessary at this stage. Going forward, in the preparation of any new strategic plans and policies, Statement of Common Ground documents will be reviewed and amended as required to reflect the current, updated guidance.
- 2.7 Whilst they are not part of the prescribed relevant bodies for the purposes of the Duty to Cooperate, the Council has a strong and continuous working relationship with **the Developers Forum, Neighbourhood Forums and the Resident Associations**. There were bi-annual meetings with these groups to brief them on the preparation of the Council's Local Development Documents and to seek their informal views to inform subsequent stages of the documents. The Council also attends the monthly meetings of **the Chamber of Commerce** to keep them up to date on progress on the preparation of the DPD and to address any issues that they may have. In addition, formal comments were invited, received and responded to through the Regulation 18 consultation. The Council also meets **Network Rail** to discuss significant improvements to the network and stations within the Borough. The detail of this is expanded upon in section Table 1. Dates of the meetings, and when e-mails and letters were sent can be provided on request.
- 2.8 The Regulation 18 consultation took place between 18 June 2015 and 31 July 2015 and consultation on land to the east of Martyrs Lane between 6 January and 27 March 2017. The Regulation 19 DPD was consulted on between 5 November and 17 December 2017. All the consultations have been carried out in

accordance with the Council's Statement of Community Involvement and the relevant Regulations. A Consultation Statement has been prepared to demonstrate the general extent of community involvement in the preparation of the DPD and how representations received have been analysed and taken into account to inform the DPD. The Consultation Statement will be made available on the Council's website.

2.9 Cross boundary and joint partnership relationships

- **Surrey Planning Officer's Association** – comprises all the Surrey Heads of Planning. The Group meets monthly to agree joint working opportunities and arrangements, consider matters of cross boundary significance and PAN Surrey interest. They often delegate policy matters of detailed resolution to the Planning Working Group. The Council is an active member. An example of recent joint work is the preparation of the Local Strategic Statement (2017).
- **Planning Working Group** – a group of Planning Policy Managers in Surrey and the County Council that meets bi-monthly to discuss and find explore solutions to cross boundary policy issues, share information and experience. The Council is an active member.
- **West Surrey Group** – a group of Planning Policy Managers in West Surrey. The Group meets bi-monthly to deal with the sub-county issues, identify opportunities for joint working. The Council has been actively involved in this group and took a leading role. However, this group is no longer functioning.
- **Surrey County Council** – is the County Council for the area, responsible for education and transport provision. It is also responsible for the Surrey Waste Plan, the Surrey Minerals Plan Core Strategy and Primary Aggregates Development Plan Document. The Council actively works bilaterally with the County Council to deliver transport and education objectives. The County Council is also a member of the Planning Working Group, Surrey Planning Officers Society, the west Surrey Group and Surrey Place Ambition group.
- **Thames Basin Heaths Joint Strategic Partnership Board** – a Joint Strategic Partnership Board comprising Councillors of local authorities with Thames Basin Heaths Special Protection Areas (SPA) within their boundaries and Natural England. The Board is set up to ensure a strategic approach to mitigate and manage the impacts of development on the SPA. The Joint Strategic Partnership Board is served by the Thames Basin Heaths Joint Officer's Group. It provides advice and information to the Board to inform strategic decision making. The Council plays an active role.
- **Local Enterprise Partnership (LEP)** – Woking is part of the Enterprise M3 LEP. The Council actively works with the LEP to facilitate economic growth and infrastructure delivery. For example, the Council has recently been awarded significant LEP funding for transport improvements in the town centre, to unlock its growth potential.
- **Surrey Place Ambition** – this group has been set up to facilitate the delivery of a common vision for sustainable growth across Surrey, as set in the Local Strategic Statement. This non-statutory document sets out objectives on key strategic planning issues, including spatial, infrastructure and economic issues. The Local Strategic Statement and work towards its implementation through

projects and plan delivery are important evidence to inform the Surrey Place Ambition, and is evidence of cooperation on strategic matters across Surrey's local authorities.

- **Joint Infrastructure Group** – The Group comprises Highways England, Woking Borough Council, Guildford Borough Council, Network Rail, Surrey County Council, Enterprise M3 LEP and the Department for Transport. It has the specific task of assessing and developing solutions to address development impacts on the strategic network, in particular the A3 and rail infrastructure, to facilitate growth in Woking and Guildford Boroughs. Both Boroughs have been identified as growth towns by the LEP. The Group meets quarterly.
- **Local Nature Partnership** – Surrey Nature Partnership has been set up to protect biodiversity in Surrey in line with DEFRA's Biodiversity 2020 Strategy. Its partners include Surrey County Council, Natural England, Surrey Wildlife Trust, Surrey Community Action and the University of Surrey. However, Surrey Nature Partnership is relatively recently created and is currently forming working groups to take forward work in particular areas across Surrey. The Council has addressed issues raised by the partnership, through representations received from Surrey Wildlife Trust at the Regulation 18 and 19 stages of consultation on the DPD. As a landowner in the Borough, Surrey Wildlife Trust has not been engaged in informal discussion about site selection due to the potential conflict of interest.

3.0 The process of identifying strategic and cross boundary implications of the Site Allocations DPD

3.1 In May 2012, the Council began the process of consulting on the DPD. All the relevant bodies listed for the purposes of the Duty to Cooperate and other stakeholders were notified by letter of the Council's intention to prepare the DPD, as part of a suite of Development Delivery DPDs. These bodies were invited to make representations on the broad policy areas and issues that they would like the DPD to cover. The letter was sent on 31 May 2012, and a copy is attached as Appendix 1. Representations were received from:

- Environment Agency;
- Highway Agency (Highways England);
- Natural England;
- Surrey County Council;
- Thames Water Property Services;
- Historic England.

3.2 The representations received can be found in Appendix 2. They helped define the scope of strategic matters to be addressed, and are taken into account in the development of the allocations to the Regulation 19 stage. A brief summary of the key strategic issues raised are:

- Flooding - ensuring that sites are located in the lowest probability areas of flood risk through sequential testing;
- Helping to achieve the area's River Basin Management Plan by ensuring that development does not lead to the deterioration of waterbodies;
- Concern about any material increase in traffic on the A3 and M25 junctions 10 and 11, and that when development proposals are considered, any impacts on the strategic road network are identified and mitigated as far as reasonably possible;
- That development avoids harming environmentally sensitive assets, and enhances local landscape character, habitats, biodiversity and green infrastructure;
- Infrastructure planning, particularly with regard to provision of transport and education, water supply and wastewater, and capacity issues regarding the latter;
- That development includes rigorous assessment of suitability for development in terms of potential impacts on the historic environment.

3.3 The Council has worked with the agencies involved to work through the issues raised. In many cases further work has been undertaken, with the input of the agencies involved, and where appropriate criteria have been built into the Site Allocation's policies to ensure any remaining issues are addressed through the development management process. Further detail on these issues, how they have been dealt with, and how further engagement will be achieved can be found in Table 1 below.

- 3.4 The Council undertakes an annual call for sites, to ensure its Strategic Housing Land Availability Assessment (SHLAA) and five year housing supply is up to date. These documents are important evidence to inform the Site Allocations DPD. The prescribed Duty to Cooperate bodies, together with other stakeholders have been contacted as part of the Call for Sites. For the majority of Duty to Cooperate bodies, no response was received and/or no new sites were suggested. The only response was from Highways England in April 2014, suggesting that the Government surplus land and property should be considered, and providing a link to the Government's surplus land website. This has been considered but has not led to the identification of further sites or land within the Borough, in addition to those included in the draft Site Allocations DPD.
- 3.5 The Council also consulted the Duty to Cooperate bodies on the draft Site Assessment Methodology, a technical document, in September and October 2014. A number of responses were received from the following Duty to Cooperate bodies: Natural England; Environment Agency; and Surrey County Council. Responses were also received from Runnymede, Guildford, Elmbridge and Surrey Heath Borough Councils. These comments were used to amend and improve the Site Assessment Methodology, as appropriate. This consultation shows a collaborative approach to identifying sites.
- 3.6 The prescribed Duty to Cooperate bodies and a range of other stakeholders have been formally consulted at the Regulations 18 consultation stage of the DPD's preparation. An example of changes made to the DPD follow the Environment Agency's comments about groundwater vulnerability and the location of sites on aquifers, which have been incorporated into relevant Site Allocations. The DPD is currently being updated to take into account of representations made to the Regulation 19 stage DPD, where appropriate. These changes will be published as a schedule of proposed modifications on the Council's website alongside the submission version of the DPD. The proposed modifications will be incorporated into the DPD if they are approved by the Inspector during the examination of the DPD.
- 3.7 It is important to note that there has been continuous engagement with Duty to Cooperate bodies in previous stages of preparation of the Council's Development Plan and supporting evidence. This is set out in paragraphs 1.14 to 1.21 and is important in informing various strategic and cross boundary issues linking to the Site Allocations DPD.
- 3.8 Table 1 below highlights the key issues raised and discussed as part of the Council's Duty to Cooperate work, some of which has already been addressed in the Core Strategy (see this paper's Introduction). It shows the objective for the issue identified, the bodies involved, how the issue has been dealt with so far and future engagement and cooperation that may be required.

Table 1: Duty to Cooperate Issues, Progress and Future Engagement

Strategic or cross boundary issue	Council objective for the Site Allocations DPD	Bodies involved in cooperation	Progress: How the issue has been dealt with so far	Future engagement and cooperation
Housing need in the Housing Market Area. It is important to clarify, as set out in the Introduction of this paper, that these matters are best addressed by the Core Strategy.	To allocate specific sites for development to enable the delivery of the Borough's development requirements, as set in the Core Strategy. It also safeguards land to meet future development needs beyond the current Core Strategy plan period, and to ensure the enduring permanence of the Green Belt Boundary.	Guildford Borough Council, Waverley Borough Council, Elmbridge Borough Council, Surrey Heath Borough Council	<p>Meeting, e-mailing and formally consulting with Guildford and Waverley Boroughs on housing need in the housing market area, to address cross boundary issues and discuss how to go forward. The Council has agreed a Memorandum of Understanding and joint partnership working, and have carried out a revised SHMA to assess the objectively assessed housing need in the Housing Market Area. The Council has also met with Elmbridge and Surrey Heath Borough Councils on housing need in the wider area, and regularly discusses the issue at the joint partnership groups (e.g. Surrey Planning Officers Association and Planning Working Group) outlined in paragraph 2.8.</p> <p>The Council has prepared written responses to address Regulation 18 and Regulation 19 representations from the Councils shown to the left, where representations have been submitted.</p>	<p>Meeting the Borough's and Housing Market Area's objectively assessed need will be an ongoing issue beyond the current plan period (to 2027). The Council will continue to work on this issue with Waverley, Guildford and other neighbouring local authorities.</p> <p>A Statement of Common Ground has been agreed between Woking, Guildford and Waverley Borough Councils to set out the scope of future partnership working.</p>

Strategic or cross boundary issue	Council objective for the Site Allocations DPD	Bodies involved in cooperation	Progress: How the issue has been dealt with so far	Future engagement and cooperation
			<p>A common issue raised by other Councils was the fact that Woking is unable to meet its OAN (which was independently assessed and confirmed through the examination of Woking's Core Strategy) yet identifies safeguarded land for release from 2027 to 2040. If this land is available and suitable for development, these authorities contend that it should be used to meet need for housing within the plan period. The Council's response to this issue has been dealt with in the responses to Regulation 18 and Regulation 19 representations.</p> <p>For the current plan period Woking's anticipated unmet housing need has been met through Waverley and Guildford's adopted Local Plans (see detail in paragraphs 1.22-1.23) and the issue of meeting the Housing Market Area's identified need resolved, subject to effective housing delivery. This will be closely monitored.</p>	
Transport, and whether there is sufficient capacity on roads and rail to	To ensure adequate transport (road and rail) infrastructure to support growth and to mitigate	Local Enterprise Partnership, Network Rail, Cross Rail 2, Highways	Various meetings have taken place to discuss:	The Council will continue to work with the identified bodies to ensure that there is adequate transport

Strategic or cross boundary issue	Council objective for the Site Allocations DPD	Bodies involved in cooperation	Progress: How the issue has been dealt with so far	Future engagement and cooperation
support the level of growth proposed.	impacts of development at the specific sites allocated.	England, Department for Transport, South West Trains, Surrey County Council, Guildford Borough Council, Surrey Heath Borough Council, Runnymede Borough Council.	<p>- Rail infrastructure, with the LEP, Network Rail and Crossrail II and SouthWest Trains. This includes a recent, successful Council bid for £95 million funding to replace the Victoria Arch Bridge and deliver other transport improvements. These works will be essential to Network Rail's planned separation junction at Woking (Woking flyover) earmarked for delivery in their Control Period 6 (2019-2024, further detailed in draft site allocation UA7). Network Rail has been an active supporter of the bid;</p> <p>- A3 corridor improvements with Guildford, Highways England, the Department for Transport;</p> <p>- M25 Corridor improvements with the Department for Transport;- transport mitigation to support the Site Allocations DPD, including the key requirements within policy as detailed to the right, developed with Surrey County Council and other relevant authorities (part of continuous engagement with SCC on transport and accessibility in the Site Allocations DPD). This has included an A320</p>	<p>infrastructure to support growth and to mitigate the impacts of development.</p> <p>Key requirements on transport and mitigation measures are included as part of all relevant allocations. The draft DPD also allocates specific sites for transport improvements (site refs UA7 and GB6).</p> <p>In addition, the Council will continue to work with its partners to help plan and deliver a range strategic transport projects.</p>

Strategic or cross boundary issue	Council objective for the Site Allocations DPD	Bodies involved in cooperation	Progress: How the issue has been dealt with so far	Future engagement and cooperation
			Corridor Study, looking at the potential impacts of vehicular trips from development proposals in Woking, Runnymede and Surrey Heath Boroughs on the A320 Corridor;	
<p>Social and community infrastructure:</p> <ul style="list-style-type: none"> - Health 	To ensure that adequate social and community infrastructure is delivered to support the sites allocated in the DPD.	Clinical Commissioning Groups, Health and Well Being Board, the NHS Commissioning Board and Local Area Team, Surrey County Council.	<p>Health: While contact and engagement with the Clinical Commissioning Groups (CCG) and NHS has in the past been difficult, it has recently improved. The Council is liaising with groups involved in delivery of health services and is working to improve this provision. The CCG recently gave a presentation to Heads of Planning in Surrey about the organisation of health provision across Surrey and in nearby counties, and creating an improved relationship for input into the planning process. Woking is also now part of a task group set up by the health providers to identify the role of planning in addressing healthy weight issues, in particular how health and promotion of healthy lifestyles can be linked to land use planning e.g. through open space, and sports and recreational facilities. On 13 May 2019, Planning Working Group organised a workshop with</p>	<p>Health: The Council will continue to work with the Clinical Commission Group and NHS to ensure there is adequate health infrastructure, and to explore how provision could be aligned to the proposed development to avoid unacceptable standards of provision in the area. Previous work carried out for the Infrastructure Delivery Plan showed that there was adequate GP provision to meet overall demand in the Borough, but noted locally specific pressures. The Council will strive to ensure that the situation is not worsened by development proposed in the draft DPD.</p> <p>It is noted that traditionally health provision reacted to meet projected demand. There is a change in the way that health provision is now planned and it is seen as an integral part of the various elements that help create sustainable places where people can</p>

Strategic or cross boundary issue	Council objective for the Site Allocations DPD	Bodies involved in cooperation	Progress: How the issue has been dealt with so far	Future engagement and cooperation
<p>- Education</p>			<p>health providers to map out how best to work in future to improve health and well being of local residents.</p> <p>Education: There has been constructive, continuous dialogue with Surrey County Council about need, catchments and potential locations for new school provision in the Borough, which has informed the site selection process in the Site Allocations DPD and also the DM Policies DPD (Policy DM21 Education Facilities). The County Council has played a key role in inputting into the Infrastructure Delivery Plan. An example of the joint partnership work between the Council and County Council is the building of a new secondary school on Egley Road, to meet secondary education need throughout the plan period and beyond.</p>	<p>live healthier lifestyles. The Council will seek to work with the CCG and other relevant bodies to ensure that healthy lifestyles are promoted through a coordinated approach to land use planning.</p> <p>Education: There will be continuing dialogue with the County Council and other relevant bodies about the delivery of education, and other social and community infrastructure. However, no major concerns have been raised in this respect by the relevant Duty to Cooperate bodies to date.</p>

Strategic or cross boundary issue	Council objective for the Site Allocations DPD	Bodies involved in cooperation	Progress: How the issue has been dealt with so far	Future engagement and cooperation
Utilities infrastructure	To ensure there is adequate utilities capacity to support development proposed in the DPD.	Thames Water, Veolia Water, Scotia Gas Networks, Thamesway Energy.	<p>While not a prescribed Duty to Cooperate body (as per paragraph 1.7) a response to initial consultation was received from Thames Water (see Appendix 2), covering both water supply and sewerage capacity, and timeframes given for improvements and upgrades to the network.</p> <p>A further formal response was received to the Regulation 18 consultation, requesting amendments to ensure developments' demand for wastewater infrastructure and surface water drainage can be met, and raising concern about additional demand and capacity of the wastewater network. These issues have been considered and the Council is satisfied that, through site criteria requiring Sustainable Drainage Systems and Flood Risk Assessments, together with the requirements set out in the Council's Core Strategy and Development Management Policies DPD, that wastewater and sewerage issues will be addressed at the planning application stage.</p>	The Council will continue to engage with Thames Water and other bodies involved in the delivery of utilities in the forthcoming stages of the Site Allocations DPD.

Strategic or cross boundary issue	Council objective for the Site Allocations DPD	Bodies involved in cooperation	Progress: How the issue has been dealt with so far	Future engagement and cooperation
			Energy and gas suppliers and another water company operating in the Borough, Veolia Water, have also been contacted in the development of the Site Allocations DPD.	
Flood risk and flooding.	To ensure that sites are suitably located with regard to flood risk, and make sure that their development does not increase the risk of flooding.	Environment Agency, Surrey Heath Borough Council	There has been continuous engagement with the Environment Agency on the Site Allocations DPD, including input on the Site Assessment Methodology and on the Sustainability Appraisal Scoping Report, showing their involvement in the site selection and assessment process. The Environment Agency were also informally consulted prior to the Regulation 18 consultation, with comments leading to further sequential test approach work being undertaken to ensure sites met the necessary requirements. In addition, the Environment Agency submitted a formal representation to the Regulation 18 consultation, which have been considered and modifications made as appropriate. Similarly they have made representations to the Regulation 19 consultation, which have been taken into account.	The Council will continue to work with the Environment Agency in the development of the Site Allocations DPD. It is confident that its joint working with the Agency so far has led to allocations which are suitably located with regard to flood risk, and will not increase the risk of flooding.

Strategic or cross boundary issue	Council objective for the Site Allocations DPD	Bodies involved in cooperation	Progress: How the issue has been dealt with so far	Future engagement and cooperation
			The Council has also worked in partnership with Surrey Heath Borough Council to prepare a Strategic Flood Risk Assessment, to ensure any cross boundary issues are addressed.	
Suitable Accessible Natural Greenspace (SANG) provision.	To allocate sufficient SANG land to mitigate the impact of additional residential development in the Borough upon the Thames Basin Heaths Special Protection Area (SPA).	Natural England, Surrey Heath Borough Council and other Councils that are partners to the Thames Basins Heaths Joint Strategic Partnership Board.	<p>The Council has worked with Natural England and a range of local authorities to produce the Thames Basin Heaths Special Protection Area Delivery Framework and the Avoidance Strategy.</p> <p>The draft Site Allocations DPD states that there is enough SANG capacity at existing sites to mitigate the impact of 3255 dwellings on the SPA, or 11.1 years. A further 3.9 years supply of SANG (equivalent to mitigating the impacts of 1138 dwellings on the SPA) is needed and the Draft DPD allocates new sites to meet this infrastructure requirement.</p>	The Council will continue to work with its partners to ensure the implementation of new SANG sites required to meet the Borough's population growth as a result of development.

4.0 The outcomes of cooperation

- 4.1 Table 1 shows a range of strategic and cross borough issues raised in the Site Allocations DPD, how the Council has worked with the prescribed Duty to Cooperate bodies (as per paragraph 1.7) and other partners and bodies to develop approaches to deal with these issues, and the future action it will take in working on these issues in the forthcoming iterations of the Site Allocations DPD.
- 4.2. The **key outcomes of cooperation** can be summarised as follows (for detail please refer to Table 1):

Housing

- A Statement of Common Ground between Woking, Waverley and Guildford Borough Councils setting out how unmet housing need within the HMA will be met;
- objectively assessed need for the Housing Market Area has been established between Woking, Guildford and Waverley through the West Surrey Strategic Housing Market Assessment. The three boroughs have worked together to meet this need and resolve the issue of unmet housing need arising from Woking, and will continue to do so;
- the Council has worked with Boroughs outside the Housing Market Area to discuss and deal with wider housing issues. It has been agreed that none will require each other to meet their unmet need;
- a Statement of Common Ground has been agreed between Woking and Runnymede Borough Council;
- a Memorandum of Understanding signed between Woking, Waverley and Guildford Borough Councils, amongst a number of other agencies, sets out how they will work together to address strategic cross boundary issues, as part of the Surrey Strategic Planning and Infrastructure Partnership

Transport

- good working relationships have been established with a variety of bodies to ensure the delivery of adequate transport to support planned growth;
- this includes regular involvement in the Surrey Strategic Planning and Infrastructure Partnership, which fosters cooperation in dealing with strategic infrastructure issues on transport;
- joint work with the County Council to develop a transport model for the town centre;
- joint working with the County Council to prepare Transport Assessments for proposed sites in the draft DPD;
- joint work with the County Council to develop transport mitigation measures for the A245 and A320 Corridors. An A320 Corridor Study has been published in

April 2018, looking at the potential impacts of vehicular trips from development proposals in Woking, Runnymede and Surrey Heath Boroughs on the A320 Corridor. A similar study for the A245 has also been completed and published on the Council's website;

- joint working with the County Council, Runnymede and Surrey Heath Borough Councils to assess the cumulative, cross boundary impacts of development in the three authorities on the A320 Corridor;
- significant LEP funding for transport improvements in the town centre to unlock significant development. Works are on-going;
- ongoing partnership working with Network Rail for significant rail improvements, including the Woking flyover, which is detailed for implementation in Control Period 6 (2019-2024, as detailed in draft policy UA7);
- ongoing partnership working with the County Council, neighbouring Councils and other service providers such as Network Rail, to update the Transport and Accessibility section of the Infrastructure Delivery Plan (IDP) and its supporting Requirements Schedule. These documents facilitate the positive planning of transport infrastructure required to support planned growth;
- partnership work with Surrey County Council and Network Rail to prepare a bid to secure funding for the replacement of the Victoria Arch Bridge and other transport improvements. The bid was successful, with the outcome announced by the government in June 2019. It will mean that £95 million government funding is invested in Woking.

Social and community infrastructure

- there has been constructive dialogue with Surrey County Council about need and provision for education in the Borough, feeding into the allocation of a site for a new school, which has now been built (site ref GB7) and informing the update of the Education section of the IDP and its supporting Requirements Schedule. This identifies how the spatial distribution of sites might affect future school organisation plans;
- The Council is liaising with groups involved in delivery of health services to improve this provision and ensure that adequate health infrastructure is provided to meet the needs of residents of new development. It is also part of a task group set up by the health providers to identify the role of planning in addressing healthy weight issues, in particular how health and promotion of healthy lifestyles can be linked to land use planning e.g. through open space, and sports and recreational facilities.

Utilities infrastructure

- the Council has engaged with utility providers to ensure adequate capacity to meet development requirements. It has also taken appropriate steps to ensure key requirements within allocations account for this. This is in addition to the

solution put forward at previous stages of plan development (see paragraph 1.20).

Flood risk

- there has been engagement and cooperation with the Environment Agency throughout the production of the DPD. This has ranged from early engagement in site selection and assessment, through to more detailed input on allocation key requirements;
- the Environment Agency has provided significant input on the preparation of the Strategic Flood Risk Assessment and have scrutinised the Sequential Test. This has ensured that the sites identified in the DPD will not be susceptible to risk of flooding or their development will not exacerbate flood risk elsewhere, and that the approach taken is sufficiently robust.

Suitable Accessible Natural Greenspace (SANG) provision

- the Council has worked in collaboration with Natural England and other partners to develop an approach (through a Delivery Framework and the Thames Basin Heaths Special Protection Area Avoidance Strategy) and to identify sufficient SANG land to deal with the mitigation of impacts from the proposed increase in residential dwellings in the Borough.

- 4.3 Overall, partnership working has helped improve the quality of the DPD. Delivery of the DPD will help to achieve the overall goal of sustainable development.

5.0 On-going cooperation

- 5.1 As outlined in Table 1, the Council will continue to actively and constructively engage with key stakeholders, and neighbouring and nearby authorities. This will involve on-going discussions to address cross boundary strategic issues that may emerge in the future such as housing need in the Housing Market Area beyond the current plan period. A Statement of Common Ground has been agreed between Woking, Guildford and Waverley Borough Councils to set the scope of future discussions. This covers what further measures might be required to monitor housing delivery against the housing requirements set out in the Boroughs' respective Local Plans.
- 5.2 Other areas for on-going cooperation are transport improvements, where the Council will continue to work with the relevant bodies to help plan and deliver a range of strategic transport projects to help support growth in the Borough and to ensure it remains well-connected.
- 5.3 On the Council's Duty to Cooperate with regard to health provision, as detailed in Table 1, despite some earlier difficulties in establishing cooperation and discussion, the Council has joined one of the Strategic Groups set up by the Commissioning Group, and is working to improve healthy lifestyles. Part of this work will be to identify the role of planning in addressing healthy weight issues and maximise the contribution that planning can make towards this goal. Through this method, it is anticipated that positive cooperation will be established. This should enable the Council to discuss with the Clinical Commissioning Group and other relevant bodies the need for health services in the Borough to support the expected additional housing and population. Further to this the Council will work with Ashford and St Peter's NHS Trust, which serves the Borough, to ensure sufficient capacity is available to deal with growing demand, as outlined in their annual report.
- 5.4 The engagement and cooperation outlined in this statement has helped to ensure that the Site Allocations DPD:
- Takes into account any detailed comments Duty to Cooperate and other key organisations might have to enhance the quality of the Plan;
 - Is based on up to date information;
 - Is in general conformity with national and international requirements;
 - Does not create any unacceptable impacts that could potentially impact on another authority in the future.
 - Has regard to issues covered in other plans and strategies.
- 5.5 This statement has shown that prescribed Duty to Cooperate bodies, including the neighbouring authorities and statutory consultees, and wider partnership groups and bodies have been regularly updated on progress with the preparation of the DPD, consulted on pre-publication draft versions of the DPD where relevant, and formally consulted at the Regulations 18 and 19 stages of consultation.

6.0 Conclusion

- 6.1 The Council has a duty to provide evidence to demonstrate that it has met the requirements of the Duty to Cooperate. This Statement satisfies this requirement. At the current stage of preparation of the Site Allocations DPD, having completed the Regulation 18 consultation, additional consultation on land to the east of Martyrs Lane, and consultation on the Regulation 19 version of the DPD, this version of the Statement supports the submission version of the DPD.
- 6.2 The Statement shows that the Council has engaged constructively and collaboratively with the prescribed Duty to Cooperate bodies and other key stakeholders and organisations to date. Issues and areas for ongoing work have been identified, and ways to address these established. This includes a Memorandum of Understanding between the Boroughs making up the Housing Market Area, and a number of partnership and joint working arrangements with other organisations. This will ensure that policy issues of strategic significance will continue to be explored, identified and addressed and that Woking Borough Council continues to play an active role in joint working arrangements.

Appendix 1

Early consultation letter sent from the Council, May 2012

Letter/email sent to all 'specific consultation bodies in Core Strategy Consultation Statement' as follows:

Dear All,

Woking Borough Council - Local Development Documents

I would like to notify you that Woking Borough Council is about to begin the process of preparing the following Local Development Documents:

- **Site Allocations DPD** – this document will allocate specific sites for the delivery of all forms of development, including residential, commercial and retail development. Where relevant, it will also safeguard land for the delivery of infrastructure. The programme for the preparation of this DPD is set in the Council's adopted Local Development Scheme (LDS). The LDS can be found at <http://www.woking2027.info/lDs>.
- **Development Management Policies DPD** – it will set specific detailed policies for the management of development and the use of land. The programme for the preparation of this DPD is set out in the LDS. It should be emphasised that the Core Strategy will provide the policy framework for determining the suitability of a significant number of development proposals that will come forward. Consequently, this DPD will concentrate on policies where detailed guidance is necessary to guide the management of development.
- **Supplementary Planning Document for design**: it will provide detailed design guide to ensure that development enhances the distinctive character of the area without constraining creativity and innovation. It will include guidance to manage the development of hot food takeaways and other such uses.
- **Supplementary Planning Document for affordable housing**: It will provide detailed clarification of the requirements of the affordable housing policy of the Core Strategy (Policy CS12: Affordable Housing) and how it will apply. For example, how affordable housing could be secured on the back of commercial development.
- **Supplementary Planning Document for sustainable construction and renewable energy**: it will set out detailed guidance for the application of the sustainable construction and renewable energy policies of the Core Strategy (Policies CS22: Sustainable construction and CS23: Renewable and low carbon energy generation). Examples of what the SPD might include are the zones within which new development will be required to connect to a CHP station or district heating network and details of the allowable solutions framework and the Council's carbon offset fund.
- **Supplementary Planning Document for Thames Basin Heaths Special Protection Areas Avoidance Strategy**: it will provide detailed guidance for the protection and enhancement of the Thames Basin Heaths Special Protection Area.
- **Community Infrastructure Levy**: it will set out a Charging Schedule, a funding gap and differential rates to be levied on development to secure contributions toward the delivery of local infrastructure to support development.
- **Review of the car and cycle parking standards**: the review will seek to bring the existing standards up to date to reflect current residential and business needs as well as national planning policy on parking.

Before the Council begin the preparation of the documents, I would like to seek your views about the broad issues/topics that you would like the documents to cover. This will enable the Council to take that into account from the beginning of the process.

The Council has a project plan with specific timescales for the preparation of these documents. In this regard, I will appreciate it if you can respond to this request by 29 June 2012. I will ensure that you are involved in all the key stages during the preparation of the documents.

You might be aware that Woking's Core Strategy is going through an independent examination. The Hearing part of the Examination took place between 20 March 2012 and 4 April 2012. In the light of the publication of the National Planning Policy Framework, the Council has resolved to give the policies of the Core Strategy significant weight for the purposes of development management and other planning decisions (except Policies CS6, CS10 and CS12). It is therefore important that any suggestions that you make are consistent with the relevant policies of the Core Strategy. This is also necessary to ensure that the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 are met.

Yours sincerely

Ernest Amoako

Planning Policy Manager

Woking Borough Council

Appendix 2. Representations received to the letter sent by the Council in May 2012 (see Appendix 1).

Name/organisation	Site Allocations DPD
Neil Landricombe, Environment Agency	<p><u>Site Allocations DPD</u></p> <p><i><u>Flood risk – sequential approach</u></i></p> <p>The National Planning Policy Framework identifies that a sequential approach needs to be followed locating sites at lowest probability of flooding (from all sources). The Woking Strategic Flood Risk Assessment (SFRA) should inform the sequential testing.</p> <p><i><u>Impacts on water bodies and protected areas</u></i></p> <p>Local authorities should include policies in their plans to help achieve River Basin Management Plan (RBMP) actions, and to ensure no deterioration of waterbodies. As such, you should ensure that any site(s) allocated for development will not lead to deterioration of a waterbody. Furthermore, any such allocation should not prevent the achievement of waterbody objectives. Local authorities have a duty to have regard to the RBMP when preparing spatial plans (under regulation 17 of the WFD regulations). Whilst you will need to refer to the RBMP as a “relevant plan, policy or programme” under SA/SEA, the RBMP includes useful data on waterbodies within your borough. We would also recommend that you refer to other Environment Agency plans and strategies such as the Catchment Flood Management Plan (CFMP), and relevant Catchment Abstraction Management Strategies (CAMS) such as the Wey.</p>
Patrick Blake, Highways Agency	<p>Thank you for your letter dated 31 May 2012 inviting the Highways Agency (HA) to provide views about broad issues/topics that should be covered as you begin the process of preparing a number of Local Development Documents (LDD).</p> <p>As you will be aware, the HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. In the case of Woking Borough this relates to the A3 and the M25 junctions 10 and 11. In broad terms we would be concerned if there was a material increase in traffic on these sections of SRN as a result of proposed development in Woking without careful consideration of mitigation measures. It is important that the LDDs provide a planning policy framework to ensure development cannot progress without appropriate measures in place.</p> <p>When considering development proposals, any impacts on the SRN need to be identified and mitigated as far as reasonable possible. The HA, in general will support a local authority proposal that considers sustainable measures which will manage down demand</p>

	<p>and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort.</p> <p>I hope this is helpful and please contact me if you would like to discuss further.</p>
John Lister, Natural England	<p>Thank you for notifying Natural England of your intention to begin work on a range of LDDs. At this stage in the process, I have little to say, but I hope the following comments are helpful.</p> <ul style="list-style-type: none"> ▪ Site Allocation DPD - I assume you have a set of criteria, drawing on the objectives and policies of the Core Strategy and on the NPPF, to ensure that the most sustainable locations are chosen for assessment as possible allocations. Also that, wherever possible, development avoids the most sensitive assets and has the scope to bring enhancement to the local landscape character, the network of habitats, biodiversity and green infrastructure. If it would be helpful to have early, informal discussion or comments on the criteria or possible sites - please let me know.
Katharine Harrison, Surrey County Council	<p>Thank you for consulting Surrey County Council on the above. We have only minor and general comments to make at this scoping stage, although we do envisage that we will have a significant input at a later stage, particularly with regard to the Site Allocations DPD, Development Management DPD, CIL charging schedule, and review of parking standards.</p> <p>It is envisaged that Development management issues will include issues such as the sustainable location of development, transportation provision, schools and other infrastructure, necessary to support development and identified in the Infrastructure Development Plan. You will be aware that the situation with regard to forecasts for education need has changed since the current IDP was prepared and we would urge you to engage with our education planning service before moving forward with the Development Management DPD. We should be pleased to facilitate a meeting to discuss this further.</p> <p>I hope these comments are useful and look forward to future engagement between our authorities on your developing Local Plan documents.</p>
Mark Mathews, Thames Water Property Services	<p>As you will be aware from our representations to the Core Strategy, Thames Water is the statutory sewerage undertaker for the Borough. Thames Water is not the water supply undertaker for the Woking Borough. With regard to water supply, this comes within the area covered by the Veolia Water Company. We have the following comments on an number of the proposed Local development Documents:</p>

<p>Mark Mathews, Thames Water Property Services</p>	<p><u>Site Allocations DPD</u></p> <p>A key sustainability objective for the preparation of the Local Development Framework/Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the new National Planning Policy Framework (NPPF), March 2012, states:</p> <p><i>“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</i></p> <p>Paragraph 162 of the NPPF relates to infrastructure and states:</p> <p><i>“Local planning authorities should works with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</i></p> <p>Part 9 the South East Plan, 2009, relates to Natural Resource Management and includes a separate section on Sustainable Water Resources and Water Quality Management. Policy NRM1 relates to Sustainable Water Resources and lists a number of water supply infrastructure issues which local authorities should take into account in preparing Local Development Documents including ensuring that development is directed <i>“....to areas where adequate water supply can be provided from existing and potential water supply infrastructure. In addition ensure, where appropriate, that development is phased to allow time for the relevant water infrastructure to be put in place in areas where it is currently lacking but is essential for the development to happen.”</i> Policy NRM2 relates to Water Quality and lists a number of water quality/sewerage infrastructure issues which local authorities should take into account in preparing Local Development Documents including ensuring that: <i>“....adequate wastewater and sewerage capacity is provided to meet planned demand...”</i>.</p> <p>With the abolition of the Regional Spatial Strategies this increases the importance that the LDF must contain policies covering the key issue of the provision of water and sewerage infrastructure to service development.</p>
<p>Mark Mathews, Thames Water Property Services</p>	<p><u>Sewerage Comments</u></p> <p>Due to lack of information on the size/location of proposed developments and the complexities of sewerage networks, Thames Water are unable to clearly determine the infrastructure needs at this stage. Drainage areas do not fit neatly over local authority boundaries and therefore we also need to consider neighboring boroughs proposed developments as well.</p> <p>Thames Water will need to investigate the impact of the proposed development sites on the sewerage/waste water network. Even small infill development and brownfield redevelopment can have a significant impact on the infrastructure and, if necessary, developers</p>

	would be required to fund impact studies and upgrading of the network.
Mark Mathews, Thames Water Property Services	It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.
Mark Mathews, Thames Water Property Services	In very general terms it is quicker to deliver infrastructure on a small number of clearly defined large sites than it is in a large number of small sites, which may not be clearly defined.
Mark Mathews, Thames Water Property Services	<p>It is vital infrastructure in place ahead of development if sewer flooding and low / no water pressure issues are to be avoided. It is also important not to under estimate the time required to deliver necessary infrastructure, for example:</p> <ul style="list-style-type: none"> -local network upgrades take around 18 months - Sewage Treatment & Water Treatment Works upgrades can take 3-5 years - New water resources & treatment works can take 8-10 years <p>In light of the above comments, we consider that the following section should be added to the DPD to ensure the provision of adequate sewerage [and water] infrastructure to service development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property and pollution of land and watercourses:</p> <p><u>“Water Supply & Sewerage Infrastructure</u></p> <p><i>Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Drainage on the site must maintain separation of foul and surface flows.</i></p> <p><i>Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at:</i> <i>http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm</i></p> <p><i>Or contact can be made with Thames Water Developer Services</i></p>

	<p>By post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;</p> <p>By telephone on: 0845 850 2777;</p> <p>Or by email: developer.services@thameswater.co.uk</p>
Martin Small, English Heritage	<p>Thank you for advising English Heritage of the impending commencement of the process of preparing a number of Local Development Documents and seeking the views of English Heritage on the broad issues/topics that we would like to see covered in the documents. I have the following suggestions:</p> <p>Site Allocations DPD: Sites allocated for development within this DPD should of course be selected following a rigorous assessment of their suitability for development. That assessment should include potential impacts on the historic environment: both designated and undesignated heritage assets, known or potential archaeological sites, and the setting of these assets. The National Planning Policy Framework (NPPF) advises in paragraph 157 that Local Plans should '<i>identify land where development would be inappropriate, for instance because of its environmental or historic significance</i>'.</p>

Appendix 3a

STATEMENT OF COMMON GROUND (October 2016)

HOUSING DELIVERY WITHIN THE WEST SURREY HOUSING MARKET AREA

Purpose

To demonstrate the commitment by Guildford, Waverley and Woking Borough Councils to work together on an ongoing basis to identify and address strategic cross boundary issues with implications for plan making. In particular, to strive to meet the objectively assessed housing need within the West Surrey Housing Market Area (HMA).

Context

The Localism Act 2011 and the National Planning Policy Framework (NPPF) make it a requirement under the Duty to Cooperate for local authorities to engage constructively, actively and on an ongoing basis in the preparation of development plan documents and other local development documents. This is a test that local authorities need to satisfy at an Examination in order to achieve a sound development plan document. The Duty to Cooperate applies to strategic planning issues of cross boundary significance.

The National Planning Policy Framework (NPPF) requires that local planning authorities use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with policies in the NPPF.

Woking, Waverley and Guildford Borough Councils have signed a Memorandum of Understanding (MoU) to work together to address strategic planning issues in the West Surrey area. The West Surrey Housing Market Area (HMA) comprises the districts of Guildford, Waverley and Woking. In the context of the above MoU, the local authorities jointly commissioned GL Hearn to prepare a Strategic Housing Market Assessment (SHMA) for the HMA. The latest and final version of the West Surrey SHMA was published in September 2015. This identifies the full objectively assessed need for the period 2013 to 2033 as follows:

- Guildford: 693 homes per annum
- Waverley: 519 homes per annum
- Woking: 517 homes per annum
- **Total for the HMA: 1,729 homes per annum**

Statement of Common Ground

Guildford, Waverley and Woking Borough Councils acknowledge the shared responsibility to meet the full objectively assessed need for housing within the West Surrey HMA, as far as is consistent with the NPPF.

Of the three authorities, Woking Borough Council is the only one with an adopted Core Strategy that post dates the publication of the NPPF. It has an adopted housing requirement of an annual average of 292 dwellings against its objectively assessed

housing need of 517. The Core Strategy was adopted on October 2012 and has a plan period up to 2027.

Currently local plan preparation within the three districts is at different stages, as set out below:

	Guildford BC*	Waverley BC
Local Plan time period	2013 to 2033	2013 to 2032
Publication date (Regulation 19)	LP Strategy and Sites: June/July 2016 LP Development Management Policies: Jan/Feb 2019	LP Part 1: Strategic policies and Sites: July/Aug 2016 LP Part 2: Non-strategic Policies and Sites: April 2018
Submission for Examination	LP Strategy and Sites: December 2016 LP Development Management Policies: April 2019	LP Part 1: Strategic policies and Sites: Nov/Dec 2016 LP Part 2: Non-strategic Policies and Sites: July 2018
Adoption	LP Strategy and Sites: December 2017 LP Development Management Policies: December 2019	LP Part 1: Strategic policies and Sites: Sept 2017 LP Part 2: Non-strategic Policies and Sites: March 2019

*This timetable is as currently set out in the adopted Local Development Scheme (LDS) however it is no longer considered achievable. A new LDS is expected to be adopted in early 2017. This is likely to include a further targeted Regulation 19 consultation on the Local Plan Strategy and Sites document.

Woking Borough Council is presently also preparing two separate Development Plan Documents to enable the delivery of its adopted Core Strategy.

- The Development Management Policies DPD comprises detailed policies to help determine day to day planning applications. The DPD was adopted on 20 October 2016, and it is not expected that it will have any cross boundary implications;

- The Site Allocations DPD allocates specific sites to enable the delivery of the development requirements of the Core Strategy, including sites for housing. It is intended to publish it for Regulation 19 consultation in late 2017.

The emerging Local Plans for Guildford and Waverley Borough Councils are both expecting to identify sufficient deliverable sites to meet the respective objectively assessed needs of 693 and 519 homes pa over the respective plan periods.

Each authority has undertaken a Green Belt review to assess whether the potential release of Green Belt land would be appropriate to meet OAN. All three authorities are seeking to amend Green Belt boundaries through their respective local plans. The current evidence base that supports each council's emerging plan demonstrates that neither Guildford nor Waverley Borough Councils will be in a position to accommodate the unmet need arising from Woking.

All three local planning authorities acknowledge the need to work together to ensure that as far as possible, and subject to policies in the NPPF, housing needs across the HMA as a whole are met. To this end, each authority is committed to working together in future, to address unmet housing needs arising within the HMA. However, in the interim it is considered imperative that both Guildford and Waverley are able to put in place up to date local plans that each seeks to meet their respective housing needs. Within each authority this is a level of growth which is considerably higher than has historically been planned for and the delivery of these homes in the short term would go some way in helping to alleviate the pressures currently being felt due to a lack of supply. This will introduce some certainty and enable the delivery of sustainable development that is accompanied by supporting infrastructure through the implementation of the Community Infrastructure Levy.

Subject to the housing requirements for Guildford and Waverley being supported by the Secretary of State at Examination and adopted, the three authorities will monitor closely the delivery of housing against the requirements and focus future ongoing discussion on:

- How to align respective evidence base studies with common methodologies and assumptions to ensure consistency;
- When it would be appropriate to review relevant development plans, either in part or in full, in order to address issues of unmet need;
- What measures might be necessary to facilitate the delivery of housing;
- Exploring the merits of and putting in place a mechanism to align the plan periods of the three authorities to facilitate effective cross boundary cooperation and outcomes.

Conclusion

Significant cooperation has already taken place in order to identify and address many common strategic issues in the HMA. This includes the agreement that we

collectively form a Functional Economic Market Area. The Duty to Cooperate is an ongoing process that will need to continue after the emerging Development Plans have been adopted. More importantly, there is a strong commitment to continue to explore how unmet needs within the HMA may be accommodated, once the housing requirements for Guildford and Waverley have been confirmed.

Appendix 3b. Memorandum of Understanding between Woking, Waverley and Guildford Borough Councils, on joint working to assess housing need.

Duty to cooperate

Introduction and basis for the Memorandum of Understanding

The Localism Act 2011 and the National Planning Policy Framework (NPPF) make it a requirement under the Duty to Cooperate for local authorities to engage constructively, actively and on an on-going basis in the preparation of development plan documents and other local development documents. This is a test that local authorities need to satisfy at an Examination to get a sound development plan document. The Duty to Cooperate applies to strategic planning issues of cross boundary significance. Woking Borough Council, Waverley Borough Council and Guildford Borough Council are all at various stages of preparing their Local Development Documents. However, they all have common strategic housing issues that they should work together to address.

The Government places much emphasis on housing delivery as a means for ensuring economic growth and addressing the current national shortage of housing. Consequently, the Planning Inspectorate is critical at Local Plan Examinations to ensure that local authorities are exploring all possible means to meet the objectively assessed housing need in their housing market area. Paragraph 47 of NPPF is very clear to emphasise that 'local planning authorities should use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...'.

Where strategic planning matters are concerned, the requirements of the Duty to Cooperate are not a choice but a legal obligation.

Memorandum of Understanding

The memorandum of understanding sets out a framework for partnership working between Woking Borough Council, Waverley Borough Council and Guildford Borough Council to carry out a Strategic Housing Market Assessment for the West Surrey Housing Market Area. The three authorities have agreed that their combined geographical area should form the West Surrey Housing Market Area for the purposes of identifying and meeting objectively assessed housing need for the area in accordance with the requirements of the National Planning Policy Framework.

The three authorities will jointly work together to commission consultants to carry out the Strategic Housing Market Assessment (SHMA) to determine the objectively assessed housing need for the West Surrey Housing Market Area. The cost for carrying out the SHMA will be shared equally between the three authorities. It is expected that this particular study will be carried out by June 2014 to provide the baseline data for quantifying housing need in the Housing Market Area. The three authorities have agreed to subsequently review the SHMA every three years to bring it up to date if it is justified by changing circumstances and/or critical to support a Development Plan Document. The cost of reviewing the SHMA will also be shared equally between the three authorities. All relevant information pertinent to the successful completion and subsequent reviews of the study will be shared amongst the three authorities.

A brief setting out the requirements, terms and conditions of the study will be agreed by the three authorities before the study is commissioned. The three authorities will work jointly and

mutually to monitor and manage the preparation of the study to its completion and sign off. The three authorities will continue to work together to seek to rationalise the timing for the review of their local plans. When this is achieved, the timing for the review of the SHMA will be re-aligned with the review of the local plans.

Other strategic planning issues

The three authorities have acknowledged that there are other strategic planning matters that they could work in partnership to address. Paragraph 178 of the NPPF stresses that public bodies have a duty to cooperate on planning issues that cross administrative boundaries such as

- jobs;
- provision of retail, leisure and other commercial uses;
- provision of infrastructure for transport, telecommunication, waste management;
- water supply, flood risk and green infrastructure etc;
- employment;
- the provision of health, security, community and cultural infrastructure; and
- climate change mitigation and adaptation.

Where relevant and on a case by case basis, the three authorities will work together to address these matters if it is considered beneficial to do so.

Working arrangements

For the duration of the preparation of the SHMA, the three authorities will endeavour to meet once a month to review progress of the study and the use of its recommendations. Thereafter, they will meet quarterly to review progress on the preparation of their local development documents and identify any strategic matters that they can jointly work to address.

Limitations

The three local authorities are fully aware that the Duty to Cooperate does not always result in agreement. In this regard, the Memorandum of Understanding will not restrict the discretion of any of the authorities in the exercise of its statutory functions and powers, or in its response to consultation or determining planning applications. In this regard, it is not intended that this document is legally binding.

Signatories



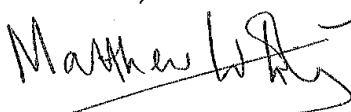
27.03.14.

Head of Planning Services (Jeni Jackson) – Woking Borough Council - Date



27 March 2014.

Head of Planning Services (Carol Humphrey) – Guildford Borough Council – Date



26 March 2014

Head of Planning Services (Matthew Evans) – Waverley Borough Council - Date

Appendix 3c Statement of Common Ground between Woking and Runnymede Borough Councils

Statement of Common Ground

Constituent parties to the Statement of Common Ground

-Runnymede Borough Council

-Woking Borough Council

Geographical area covered by this Statement of Common Ground

This is an annex Statement of Common Ground (SoCG) which should be read in conjunction with the primary Runnymede-Spelthorne SoCG and the Guildford, Waverley SoCG.

The Runnymede-Spelthorne SoCG provides detailed information on the Runnymede-Spelthorne HMA and its linkages with the wider area including with Woking Borough. Specifically, this primary SoCG concludes:

- That Runnymede and Spelthorne boroughs form a Housing Market Area but also has particular links with a number of adjoining local authorities including Woking.
- The Functional Economic Area analyses carried out by Runnymede and Spelthorne Borough Councils conclude that Runnymede and Spelthorne boroughs have the strongest economic links with each other but have some economic links with other local authorities in the surrounding area including Woking.
- The Runnymede retail work had found that Woking is a retail destination for Runnymede residents.

A review of the evidence base prepared by Woking Borough Council to underpin its Local Plan identifies some links with Runnymede Borough. In particular:

- The West Surrey Strategic Housing Market Assessment (September 2015) concludes that based on an analysis of price trends and dynamics, commuting flows and migration patterns, Guildford, Waverley and Woking form a Housing Market Area. Beyond the HMA, the strongest relationships are with Rushmoor, Runnymede and East Hampshire. Engagement with authorities in these areas was concluded to be important through the Duty to Cooperate.
- The West Surrey Functional Economic Market Area for Guildford, Waverley and Woking Borough Councils (August 2016) concludes that these three Boroughs make a logical Functional Economic Market Area. The complexity of cross-boundary issues in the region is also recognised in the report with secondary interactions between Guildford and Rushmoor; Woking and Runnymede; and Waverley and East Hampshire being reported along with the region's strong relationship with London.
- The Woking Town, District and Local Centres Study from September 2009 concludes that there are strong links between the southern half of Runnymede and Woking, with Woking being a recognised retail and leisure destination for Runnymede residents.

These linkages are considered to warrant the production of a Statement of Common Ground between Woking and Runnymede to confirm where agreement has been reached to date through the Duty to Cooperate on strategic cross boundary matters relevant to these two Local Authorities and to provide an effective mechanism for future engagement.

Appendix 1 of this Statement of Common Ground reproduces the map appended to the primary Runnymede-Spelthorne SoCG which this annex agreement was produced in connection with and which shows the geographical area of interest.

Key strategic cross boundary matters between the constituent parties to this agreement

This section of the Statement of Common Ground sets out the key specific strategic cross boundary matters of relevance between Runnymede and Woking Borough Councils and the agreed position between the two authorities.

Housing

The two parties agree that:

1-Runnymede and Spelthorne Boroughs form a separate HMA. Woking Borough is in a separate West Surrey HMA with the boroughs of Guildford and Waverley.

2- It is recognised that the Runnymede and Spelthorne Housing Market Area and the West Surrey Housing Market Area has secondary relationships with each other. It is agreed that there are localised cross boundary links between Runnymede and Woking Borough Councils regarding housing matters.

3- In the first instance, and in line with paragraph 47 of the NPPF, Runnymede and Woking Borough Councils agree that they will work collaboratively with their respective HMA partners to meet their identified housing needs in full within their respective HMA boundaries.

4-Runnymede and Woking Borough Councils are also committed to working together under the Duty to Cooperate to address strategic housing matters of cross boundary significance where they could not be addressed within their respective Housing Market Areas, paying particular attention to local connections. This could relate to circumstances where there is either an undersupply or oversupply of housing in either HMAs. At the current time, based on the available evidence, Runnymede Borough Council has indicated that it is unlikely to be able to take any part of Woking's unmet housing need. However, this will be confirmed after the Runnymede and Spelthorne Local Plans are adopted. Woking Borough Council has an adopted Core Strategy with a housing requirement which is lower than its housing need and is therefore unable to meet any part of Runnymede's potential unmet housing need as it is unable to meet its own need. The Waverley Local Plan has committed to meet part of Woking's unmet housing need. It is yet to be confirmed whether the Guildford Borough Local Plan will be able to meet any part of Woking's unmet housing need. Resolution to this matter will occur when the Guildford Borough local plan is adopted.

The economy

The two parties agree that:

1-The analysis and conclusions of the Runnymede Functional Economic Area analysis (June 2015) and the West Surrey Functional Economic Market Area for Guildford, Waverley and Woking Borough Councils (August 2016) are considered robust. These reports conclude that Woking, Guildford and

Waverley Boroughs form a Functional Economic Market Area, and Runnymede and Spelthorne boroughs have the strongest economic links with each other but have some economic links with other local authorities in the surrounding area including Woking.

2-The Woking Core Strategy makes provision for the delivery of 28,000sq.m of office floorspace, 20,000sq.m of warehouse floorspace and 93,900 sq.m of retail floorspace. In accordance with the spatial strategy for the borough, the delivery of the above economic needs will be met within the urban area and at existing employment areas. Specific sites are being identified by the Site Allocations DPD to enable the delivery of the requirements. The draft Runnymede Local Plan proposes to meet identified economic needs primarily within its Strategic Employment Areas, at the Enterprise Zone at Longcross and at the Byfleet Road strategic allocation in New Haw.

3- Runnymede and Woking Borough Councils are committed to working together under the Duty to Cooperate to address strategic economic matters of cross boundary significance where they arise, paying particular attention to local connections. This could relate to circumstances where there is either an undersupply or oversupply of economic floorspace that cannot be addressed within the respective FEAs (Runnymede would look to Spelthorne then Elmbridge for assistance in the first instance given that for B class uses this is where it has its strongest functional links). Neither Runnymede nor Woking Borough Councils are requesting assistance in meeting any unmet economic needs at the current time.

Retail

The two parties agree that:

1-The catchment area of Woking Town Centre extends into Runnymede for retail and leisure purposes, especially in the southern half of Runnymede (which includes Addlestone and Chertsey).

2-Neither Runnymede or Woking Borough Councils are requesting assistance in meeting any unmet retail needs at the current time. Runnymede Borough Council has identified that based on its current retail forecasts (commissioned in 2015) it will need to identify additional retail development opportunities post 2027 in the Addlestone/Chertsey area. The Council is committed to refreshing its retail forecasts within the next 18 months to ensure that the understanding of the level of need remains up to date and reflects the changing retail climate. The Council will continue to explore opportunities to meet any unmet retail needs in the latter part of the Plan period.

Gypsies and Travellers

The two parties agree that:

1-Both authorities are committed as a principle to meet their identified accommodation needs for gypsies and travellers in full within their individual borough boundaries over the periods of their Local Plans. Neither Runnymede nor Woking is currently able to meet any unmet need for gypsies and travellers in the other's area. Consequently neither authority is requesting the other to meet any part of their unmet need for Travellers accommodation at this time.

Infrastructure

The two parties agree that they will prepare and keep under review their Infrastructure Delivery Plans to identify the necessary infrastructure to support their proposed development over their plan periods.

Transport

The two parties agree that:

1-Runnymede and Woking Borough Councils agree that the stretch of the A320 corridor between the Chilsey Green Road / B388 Thorpe Road / Staines Road / St Ann's Road roundabout, Chertsey to the Victoria Way / Chertsey Road roundabout in Woking, and the A320 St Peter's Way from Guildford Road to the M25 Junction 11 is of cross boundary interest to both Authorities. The route serves both Chertsey and Woking Town Centres and links both areas to, the M25 motorway. It also serves a number of large employers in both authorities such as St Peters hospital, McLaren and the Hillswood Business Park). The corridor is subject to congestion, particularly at peak times, and is projected to be exacerbated by future development if appropriate measures of mitigation are not introduced.

2-The potential future development of a number of major allocations along this corridor in both Local Authority Areas (and within Surrey Heath) will generate significant traffic along the A320 corridor.

2-Runnymede and Woking Borough Councils are committed to continued partnership working with Surrey Heath Borough Council and Surrey County Council to identify measures of mitigation along the corridor to help address the current and future cumulative development impacts along the corridor.

Green Belt

The two parties agree that:

1-They will continue to keep each other informed of the approach taken to Green Belt particularly where proposed Green Belt releases are close to/adjacent to shared Borough boundaries.

Flooding

The two parties agree that:

1-There are several watercourses which run through both Local Authority areas/ along the shared administrative boundary including the Rive Ditch, the River Wey Navigation and the Basingstoke Canal.

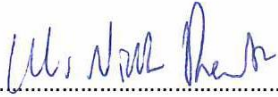
2-They will continue to work collaboratively on strategic cross boundary matters related to flooding and flood risk as appropriate.

Governance arrangements

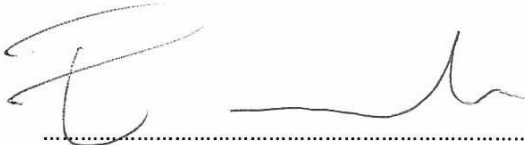
It is agreed that informal discussions will occur between the two authorities on the cross boundary issues referred to in this SoCG in the form of Officer level meetings at least once every 6 months with escalation of matters to Member level where necessary.

It is agreed that this Statement of Common Ground will be monitored and reviewed by the two authorities annually by 31 December of each year, and any necessary modifications will be agreed at one of the regular Officer meetings highlighted above. Where either of the parties to this SoCG is undertaking a Regulation 18 consultation, Regulation 19 publication or submitting a Local Plan to the Secretary of State, it will be the responsibility of that party to co-ordinate the review and updating of this SoCG for that event (as necessary).

Signatories



.....
On behalf of Runnymede Borough Council



.....
On behalf of Woking Borough Council

DATE: 18 MAY 2018

Appendix 3d Statement of Common Ground on Strategic Planning Policies for Waste Management in Surrey

Town & Country Planning (Local Planning) (England) Statement of Common Ground

Concerning Strategic Planning Policies for Waste Management in



Surrey

April 2019

Version	Amendments	Sent to	Date
FINAL v 1.0		Epsom & Ewell BC, Mole Valley DC, Reigate & Banstead BC, Runnymede BC, Surrey Heath BC, Tandridge DC, Waverley BC & Woking BC for final agreement and signature	27 March 2019
FINAL v 2.0	Additional text added: Section 6.4 Reigate & Banstead. Other subsequent Sections renumbered.	Reigate & Banstead BC for signature.	01 April 2019
		All districts and boroughs	02 April 2019
FINAL v 3.0	Confirmation of Mole Valley DC signature		02 April 2019
FINAL v 3.1	Additional bullet under para 6.6 – Oakleaf Farm - Action to resolve disagreement	Spelthorne BC for signature	02 April 2019
	Confirmation of Reigate & Banstead BC Signature.		
FINAL v 3.2	Confirmation of Epsom & Ewell BC Signature Additional text added: Section 6.9 Waverley Borough. Woking Borough Section renumbered.	Waverley BC for signature	08 April 2019
FINAL v 3.3	Amending wording in Section 6.1 - Elmbridge Borough Council - Action to be taken to resolve disagreement.	Elmbridge BC for signature	08 April 2019
FINAL v 3.4	Confirmation that Mike Goodman has signed for Surrey County Council		09 April 2019
FINAL v 3.5	Current status for submission	PINS with Waste Plan & documents	12 April 2019
FINAL v 3.6	Confirmation of Runnymede BC signature		23 April 2019
FINAL 3.7	Para 5.2.5 - text amended to make it clear that general agreement to ILAS is subject to the particular areas of disagreement and points of clarification in Section 6.	Waverley Borough Council Woking Borough Council Tandridge District Council	25 April 2019
FINAL 3.8	Confirmation of Tandridge DC signature Appendix amended re Woking Core Strategy	Woking BC	29 April 2019

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1. Parties Involved

This Statement of Common Ground is between Surrey County Council and the Borough and District Councils within Surrey namely:

Elmbridge Borough Council
Epsom & Ewell Borough Council
Guildford Borough Council
Mole Valley District Council
Reigate & Banstead Borough Council
Runnymede Borough Council
Surrey Heath Borough Council
Spelthorne Borough Council
Tandridge District Council
Waverley Borough Council
Woking Borough Council

Introduction

Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries¹.

Surrey County Council is currently updating the planning policies on waste management. Borough and district local plans are at different stages. For a full list of the relevant adopted Development Plan Documents in Surrey, including the stages of review, see Appendix.

This document represents a Statement of Common Ground (SoCG) between Surrey County Council and the eleven district/borough councils within Surrey. It sets out areas of common ground and disagreement² on strategic matters relating to the planning of waste management in the county. Where there are any outstanding matters, the document sets out any action being taken to address these.

Specifically, this SoCG covers the following strategic matters:

- Safeguarding of waste management facilities
- Locating new waste management facilities
- Landfill of non-inert waste
- Wastewater treatment

¹ Paragraph 24 and 25 of the revised National Planning Policy Framework

² Areas of disagreement or 'uncommon ground' are those areas where agreement between the parties does not exist. These are listed in Section 7 'District and Borough Specific Matters' along with specific areas of agreement.

2. Signatories

Authority	Signatory	Status
Surrey County Council	Mike Goodman, Cabinet Member for Environment and Transport	Signed on 9 April 2019 (Confirmation email dated 9 April)
Elmbridge Borough Council		Agreed by officers. Pending sign off by Leader.
Epsom & Ewell Borough Council	Councillor Graham Dudley, Chairman of Licensing and Planning Policy Committee	Signed 3 April 2019 (Confirmation email 3 April)
Guildford Borough Council		Pending final officer agreement
Mole Valley District Council	Councillor David Harper, Cabinet Member for Planning Policy	Signed 2 April 2019 (Confirmation email dated 2 April)
Reigate & Banstead Borough Council	Councillor Keith Foreman, Executive Member and Portfolio Holder for Planning Policy	Signed 3 April 2019 (Confirmation letter dated 3 April 2019).
Runnymede Borough Council	Councillor Gail Kingerley Chairman of Planning Committee	Signed 17 April 2019 (Confirmation email dated 18 April with pdf signature)
Surrey Heath Borough Council		Informally agreed by officers and portfolio holder pending formal consideration by Executive on 28 May 2019
Spelthorne Borough Council		Agreed by officers for discussion with Leader and Portfolio Holder
Tandridge District Council	Keith Jecks Chair Planning Policy Committee	.Signed 25 April 2019 (Confirmation email 29 April)
Waverley Borough Council		Agreed by officers. Pending sign off by Leader
Woking Borough Council		Agreed by officers. Pending discussion with Deputy Chief Executive and Leader

3. Strategic Geography

- 3.1 Surrey County Council is the waste planning authority for the two tier area of Surrey with responsibility for planning for the future management of waste in the county by preparing relevant strategic policies. The eleven borough and district councils within Surrey have responsibility for planning other development such as housing and employment as well as helping to ensure that waste is managed in accordance with the Development Plan³ when determining planning applications⁴.
- 3.2 Surrey's location and unique environment (see Figure 1) influence the structure and composition of the economy in terms of the dominant business sectors, the availability of development land and the distribution of the resident population. These factors also contribute to the quality of life enjoyed by Surrey's residents. In turn, these factors also present opportunities and challenges for future growth and will influence the form and location of new waste development.
- 3.3 The 2011 census found there to be some 1.14 million people living in Surrey. Estimates for 2017 show an increase in the total population to 1.19 million people. While the majority of the county can be classed as rural in nature, there are urban areas located in the north of Surrey, near the boundary with London, and also in the form of the large towns of Guildford, Woking, Reigate/Redhill, Leatherhead, Camberley and Farnham. Projected population growth for Surrey over the next two decades, suggests an increase from 1.18 million people to 1.37 million by 2037.
- 3.4 There are approximately 483,000 dwelling houses distributed across Surrey with development of a further 86,000 households forecasted between 2015 and 2033⁵.
- 3.5 Surrey County Council has a duty to plan for the key aspects of the infrastructure that will be required to support those new homes, which includes additional waste management capacity. Waste management is a key component of a modern economy. All businesses depend on the efficient management of their waste and the waste management sector itself will generate employment and add value to the local economy.
- 3.6 The strategic road network, comprising motorways and trunk roads, has evolved principally to serve London, with several nationally important routes passing through the county, including the M3, M23, M25 and the A3. This means that waste arising in one area of the county can easily be transported to another area for management. Some waste is also transported into Surrey from neighbouring areas for management and similarly, some waste arising in Surrey is managed beyond the county boundaries.

³ This includes in accordance with the Waste Hierarchy (See Appendix A of National Planning Policy for Waste. The waste hierarchy expects waste to be managed in the following order of preference: Prepared for reuse; Recycled and/or composted; Recovered in ways other than recycling/composting; and, finally, Disposed).

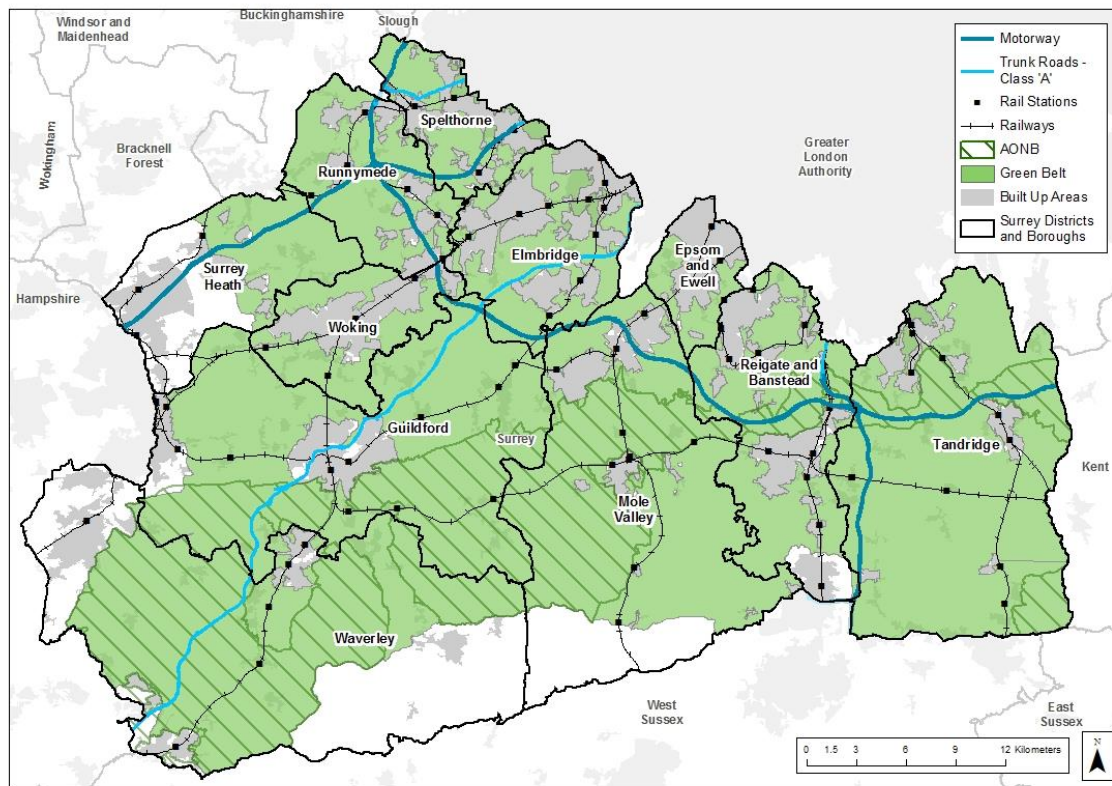
⁴ See paragraph 8 of National Planning Policy for Waste and Planning Practice Guidance para ref.: ID 28-010-20141016

⁵ MHLG 2014 based household projections in England, 2014 to 2039

- 3.7 Surrey roads are known to experience congestion and the county council is seeking to promote development which includes options for sustainable transport. However, alternative transport options are limited within the county and consequently many business sectors, including the waste management sector, are heavily reliant on road transport.
- 3.8 The Surrey Hills Area of Outstanding Natural Beauty (AONB) and a small area of the High Weald AONB cover approximately 26% of the county. AONBs have a protected status that reflects the unique character of their landscapes.
- 3.9 73% of Surrey is located within the Green Belt and this places a significant constraint on development. Waste management is considered to be inappropriate development within the Green Belt and so can only be permitted if very special circumstances exist. The boundaries of the Green Belt are defined by district and borough councils in their Local Plans, and to be consistent with national policy⁶, these boundaries can only be changed in exceptional circumstances. A total of nine sites designated for their nature conservation interest at an international and/or European level are located wholly or partly within Surrey. Those sites include four Special Protection Areas (SPAs) designated under the EU Wild Birds Directive, three Special Areas of Conservation (SACs) designated under the EU Habitats Directive, and two Ramsar Sites designated under the Convention on Wetlands of International Importance.
- 3.10 An area of some 12,000 hectares within Surrey is covered by ancient woodland that is land known to have had continuous tree cover since at least 1600 AD. Ancient woodlands are found throughout Surrey, with particular concentrations in the North Downs and the Weald. Ancient woodlands, and veteran trees, are of value for their biodiversity interest, as well as cultural and historical significance.
- 3.11 In Surrey (especially in the northwest of the county), the combination of a large population, low lying land and a significant number of watercourses, increases the probability of people, property and the environment being adversely affected by any flood events that do occur.
- 3.12 Due to particular constraints on development within the greater London urban conurbation, and the fact that Surrey neighbours this area, waste arising in London may be exported to Surrey for management. This issue is addressed in separate SoCG between the county council and certain London borough councils.

⁶ See NPPF paragraph 136.

Figure 1: Location of Surrey and the eleven boroughs and districts



- 3.13 While this SoCG is concerned with planning for future management of waste, other SoCGs may exist between Surrey County Council and the boroughs and district councils concerning other strategic cross boundary matters.

4. Strategic matters

- 4.1 The management of waste is an inherently strategic matter as waste that arises in one area is frequently managed in a different area. Economies of scale also mean that strategic⁷ waste management facilities generally have a catchment wider than the borough or district within which they are located. This means that decisions to locate a waste management facility in a certain area will impact not just on that area but other neighbouring areas and beyond.
- 4.2 The emerging Surrey Waste Local Plan has identified that, overall, Surrey remains net self-sufficient⁸ with a surplus of waste management capacity but within this there are some key areas of need to be addressed by the new SWLP.
- 4.3 Currently a need for additional recycling capacity over the period of the SWLP has not been identified overall but there is an identified need for facilities which fall under the definition of 'other recovery'⁹. However, the Plan will always encourage the management of waste by activities which are higher on the waste hierarchy and within different types of recycling there may still be a need for further capacity e.g. need for more bulking and storage capacity at Community Recycling Centres.
- 4.4 In particular, in light of the lack of capacity in Surrey for the management of 'Dry Mixed Recyclables' (DMR) (e.g. paper, cardboard, glass, metal and plastic) collected from households, a specific site has been identified for this purpose at Trumps Farm within the borough of Runnymede.
- 4.5 The emerging Surrey Waste Local Plan (SWLP) includes policies, as well as site allocations and areas of search which are intended to address this issue.
- 4.6 Furthermore, the SWLP sets out policy concerning the development of capacity for the treatment of wastewater (including sewage). The need for wastewater treatment capacity is very much a function of the level of development, e.g. housing, in an area and so estimates of future requirements are based on the level and nature of development that can be expected in future. District and Borough Councils are largely responsible for planning for future development in their Local Plans and so it is important that policy on future wastewater treatment capacity, prepared by the County Council, takes account of the adopted and emerging district and borough Local Plans.

⁷ A 'strategic' facility is taken to be a facility that manages at least 20,000 tonnes of waste per annum.

⁸ 'Net self-sufficient' means that the existing waste management capacity within an area is equivalent to the quantity of waste arising in that area.

⁹ 'Other recovery' is capacity capable of managing waste by a means other than landfill but does not include recycling and composting. Energy from waste is a common form of 'other recovery'.

4.7 In light of the above it is considered that the particular strategic matters of concern to both the County Council and the district and borough councils are as follows:

- The allocation of land for waste management;
- identification of areas of search;
- safeguarding existing and planned¹⁰ waste management sites; and,
- provision for wastewater management capacity.

4.8 The areas of common ground between the County Council and the district and borough councils on the strategic matters are set out in detail below. There are also areas of disagreement between the County Council and particular district and borough councils and these are specified in Section 6.

4.9 It should be noted that there are policies concerning waste management within the SWLP which will require implementation by the district and borough councils. As the SWLP forms part of the Development Plan, where relevant these policies will, as a matter of course be implemented by the district and borough Councils when assessing planning applications. These matters are not considered to be 'strategic' although the county council has carefully considered any district and borough council concerns with the nature and wording of these policies. The matters include:

- The beneficial use of inert waste¹¹ (generally produced from construction, demolition and excavation activities);
- The production, storage and collection of waste associated with all forms of development other than that related to waste management facilities.

¹⁰ 'planned' in this context means permitted or allocated

¹¹ Inert waste means waste that does not undergo any significant physical, chemical or biological transformations.

5. Common Ground between the County Council and the District and Borough Councils

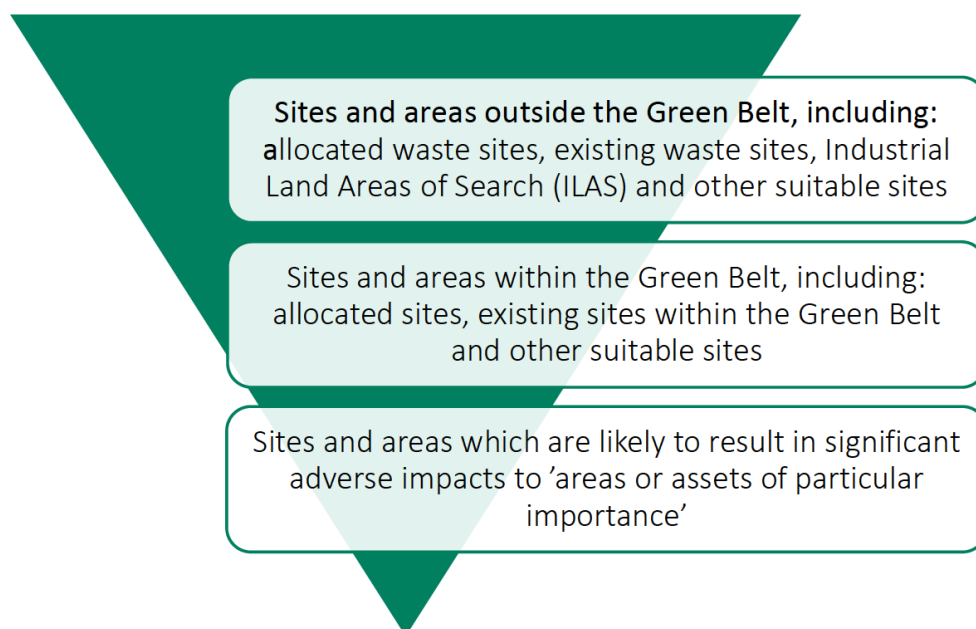
5.1 Safeguarding of Existing and Planned Waste Management Facilities

- 5.1.1 The purpose of safeguarding waste sites, is to ensure that the need for existing or planned waste management infrastructure is taken into account when decisions are made on all new development in Surrey. This is considered to be a strategic matter, as, when taken as a whole, the existing waste management facilities within Surrey play an important strategic role in ensuring that waste arisings can be adequately managed.
- 5.1.2 As the responsibility for determining the majority of planning applications for non-waste related development in Surrey lies with the borough and district councils, these authorities agree that they have a shared responsibility for ensuring the safeguarding of waste management facilities through implementation of the Development Plan.
- 5.1.3 The Surrey Minerals and Waste Consultation Protocol¹² has been agreed by the county council and the district and borough councils and sets out how they will work together constructively to ensure waste safeguarding issues are taken into account as appropriate during the preparation of local plans and in the determination of planning applications.
- 5.1.4 The eleven borough and district councils will work together with the county council to ensure that the protocol and associated standing advice is maintained to provide up to date guidance on safeguarding issues. In particular, joint work will be undertaken to update the protocol following adoption of the SWLP.

¹² Minerals & Waste Consultation Protocol. Surrey County Council, October 2016

5.2 Locating New Waste Management Facilities

- 5.2.1 All twelve authorities recognise that in order to meet future requirements of waste management in Surrey additional development will be necessary¹³. The authorities agree that the spatial strategy for the development of new waste facilities set out in the SWLP is appropriate. This strategy articulates broad preferences for development on certain types of land and in accordance with the hierarchy below:



- 5.2.2 The authorities also agree that, whilst the Plan provides a steer as to particular locations and types of land where development might be suitable, all policies of the Development Plan, including the Surrey Waste Local Plan will be taken into account when determining the suitability of proposals, and so, depending on its exact nature, development may in fact not be suitable in those locations or on those types of land. General policies in the Plan (including Policy 1 and Policy 14) are included which will ensure that development that is proposed which is unsuitable, due to likely impacts on communities and the environment, because, for example, of its size, appearance and nature, or is not required will not be granted planning permission.
- 5.2.3 The Authorities agree that development of waste management uses on any land will be subject to landowner agreement.

a) Previously Developed Land and Industrial Land Areas of Search (ILAS)

- 5.2.4 In many instances, the recycling and processing of waste can be carried out within modern, purpose-designed buildings that can be located in urban areas and industrial estates. In light of this, when reviewing local plans, district and borough councils agree to acknowledge within their Local Plans that locating waste management facilities on industrial estates and on other suitable previously developed land is may be acceptable in principle.

¹³ [This is evidenced by the 'Waste Needs Assessment', January 2019](#)

5.2.5 Industrial Land Areas of Search (ILAS) have been identified in Part 2 of the emerging SWLP. Subject to the particular areas of disagreement and points of clarification added in Section 6, it is agreed that land which is suitable for waste management development is more likely to be found in ILAS. The ILAS comprise land over five hectares¹⁴ identified or allocated in relevant local plans as being suitable for B2 and/or B8 uses. The ILAS are listed by district and borough below. It is agreed, in principle, that the approach taken to identify the ILAS¹⁵ is appropriate.

Industrial Land Area of Search	District/Borough
1 Brooklands Industrial Pk, Wintersells Road Industrial Pk and Byfleet Industrial Est	Elmbridge and Woking
2 Molesey Industrial Estate, West Molesey	Elmbridge
3 Hersham Road North and Lyon Road / North Weylands, Walton-on-Thames	Elmbridge
4 Longmead Industrial Estate	Epsom and Ewell
5 Slyfield Industrial Estate	Guildford
6 Woodbridge Meadows	Guildford
7 Land around Burnt Common warehouse, London Road, Send	Guildford
8 North and south of Lysons Avenue, Ash Vale	Guildford
9 Riverway Industrial Estate, Astolat Business Park and Weyvern Park at Peasmarsh	Guildford
10 Land near Dorking West Station, Curtis Road/Station Road	Mole Valley
11 Holmethorpe Industrial Estate	Reigate and Banstead
12 Perrywood Business Park	Reigate and Banstead
13 Salfords Industrial Estate	Reigate and Banstead
14 Thorpe Industrial Estate	Runnymede
15 Byfleet Road Employment Allocation	Runnymede
16 York Town Industrial Estate, Doman Road and Stanhope Road	Surrey Heath
17 Windmill Road, Sunbury	Spelthorne
18 Hobbs Industrial Estate, Felbridge	Tandridge
19 Farnham Trading Estate including Land off Water Lane, Farnham	Waverley
20 Land at Dunsfold Aerodrome (As part of new settlement)	Waverley
21 Coxbridge Business Park	Waverley
22 Monument Way East Industrial Estate (includes Woking Business Park)	Woking

5.2.6 Any proposal for waste management at these locations would have to demonstrate consistency with other policies in the Development Plan (including the SWLP) (see Section 7).

b) Strategic waste site allocations

5.2.7 It is also recognised that, due to competition from other land uses and commercial and practical considerations, the development of waste uses within ILAS cannot be wholly relied on to deliver the required waste management capacity over the plan period¹⁶. Hence the

¹⁴ Five hectares was considered an appropriate minimum size because ILAS are intended to be broad areas of search, not individual units or small sites with a limited number of occupiers. Therefore, 5ha was taken as an area that represented an area large enough within which it was considered likely that opportunities would come forward.

¹⁵ See [Industrial Land Areas of Search Identification Report, December 2018](#)

¹⁶ See [Report on Delivering the Spatial Strategy, January 2019](#)

allocation of specific sites in the SWLP capable of accommodating a range of potential waste management facilities is supported in principle. The allocated sites are included in Section 6.

- 5.2.8 It is also agreed in principle that the approach taken to identify the site allocations¹⁷ is appropriate.
- 5.2.9 Development for waste facilities in the Green Belt is generally regarded as inappropriate and it is agreed that very special circumstances would need to be demonstrated before the grant of planning permission could be considered. Factors which may contribute to very special circumstances would likely take account of the overarching need for waste management in Surrey combined with a lack of suitable alternative sites outside the Green Belt and the need to locate facilities close to sources of waste. The determination of planning permission for development at sites within the Green Belt will be subject to Green Belt policy and any sites allocated in the Green Belt are not preferred over any suitable sites outside the Green Belt that might be available at that time.
- 5.2.10 For each allocated site, details regarding the types of waste management use that are likely to be appropriate and what is specifically agreed between the county council and the relevant borough or district council are contained in Section 6 of this SoCG. It is acknowledged that there remain some areas of disagreement and these are also set out in Section 6.

c) Allocation of a Site for a Household Waste Materials Recycling Facility

- 5.2.11 The district and borough councils, as waste collection authorities, and the county council, as the Waste Disposal Authority (WDA), are responsible for implementing the Joint Municipal Waste Management Strategy.
- 5.2.12 Currently residents separate certain types of recyclable waste (e.g. paper, cardboard, glass, metal and plastic) from other household waste for separate collection. The recyclable waste, known as Dry Mixed Recyclables (DMR), is collected by the district and borough councils and transported by road to facilities in Hampshire, Slough, North London, and Birmingham. The only site within Surrey that currently recycles dry mixed recyclables is the Grundon Facility at Randalls Road, Leatherhead.
- 5.2.13 It is agreed that the export of DMR for management outside of Surrey is not consistent with the Surrey Joint Municipal Waste Management Strategy that seeks to maximise value for Surrey residents and treat waste as a resource in the most sustainable way¹⁸. There is therefore justification¹⁹ for considering the allocation of a further site specifically for the management of DMR, although the need for an additional site and its proposed location at Trumps Farm is not agreed by Runnymede Borough Council (See Section 6.4).

¹⁷ See [Site Identification and Evaluation Report, January 2019](#)

¹⁸ See Joint Municipal Waste Management Strategy Revision 2 (2015)

¹⁹ See Joint Municipal Waste Management Strategy Revision 2 (2015) Actions and Outcomes Work Area 9 Action 3

5.3 The Landfill of non-inert Waste²⁰

- 5.3.1 Waste sent for disposal to landfill should be the residues left following treatment such as recycling and recovery that cannot be dealt with in any other way. The demand for, and availability of, non-inert waste landfill capacity is reducing across the South East of England, however landfill continues to have a role. While the SWLP does not allocate a specific site for landfill, it is agreed that it is an option that needs to be planned for including through ongoing joint working with other south east waste planning authorities,

5.4 Wastewater Treatment

- 5.4.1 There is an established network of sewage facilities within Surrey that are safeguarded.
- 5.4.2 It is recognised that, due to the need to maintain efficiency, significant spare capacity is not maintained at WWTWs and future upgrades may therefore be required to serve growth proposed in Local Plans but, except in the case of the relocation of the existing Guildford STW, this is unlikely to involve additional land during the period of the SWLP.
- 5.4.3 The sewerage undertaker will continue to review and assess the capacity for WWTWs, using the best available information in relation to new development (including housing and employment allocations) and the county council will continue to engage with the district and borough councils in the preparation of their Infrastructure Delivery Plans which set out the need for additional waste water treatment capacity. Should, in future, evidence from the sewerage undertaker justify the need for more land for wastewater treatment then the county council will engage with the relevant district or borough to ensure suitable land is safeguarded through the Local Plan or a review of the SWLP.

²⁰ Non-inert waste is waste that will biodegrade or decompose, releasing environmental pollutants. Examples include: wood and wood products, paper and cardboard, vegetation and vegetable matter, leather, rubber and food processing wastes.

6. District and Borough Specific Matters (Where relevant)

6.1 Elmbridge Borough

Allocated site:

Former Weylands Treatment Works, Walton-on-Thames

Particular areas of disagreement between Surrey County Council and Elmbridge Borough Council:

The site should not be allocated since:

- It is located in an area of strongly and moderately performing Green Belt assessments.
- A change from the current mix of uses to an alternative form of waste processing, especially if an AD or incinerator were to be developed, would give rise to unacceptable impacts on nearby housing especially from odour and noise.
- Waste development could give rise to potentially unacceptable impacts from HGV movements

Action being taken to resolve disagreement:

- Further technical studies and evidence work to be provided on the impact of noise/odour pollution and traffic impacts on existing residential development to Elmbridge Borough Council for consideration.

Industrial Land Areas of Search

Particular areas of disagreement between Surrey County Council and Elmbridge Borough Council:

- The key environmental sensitivities identified in the 'Surrey Waste Local Plan, Part 2- Sites and areas of search' fail to include noise and odour. Both of these significant concerns are highly relevant for any proposed waste site development and operation within the three ILAS in Elmbridge Borough.

Action being taken to resolve disagreement:

- Further technical studies and evidence work to be provided on impact of noise/odour pollution and traffic impacts on existing residential development to Elmbridge Borough Council for consideration.

6.2 Guildford Borough

Allocated site:

Land to the north east of Slyfield Industrial Estate, Moorfield Road,

Particular areas of agreement between Surrey County Council and Guildford Borough Council:

- Potentially suitable for small, medium and large scale facility(s) up to and potentially beyond 120,000 tpa.
- Based on the findings of the HRA for the SWLP, the site is considered unlikely to be suited to the development of any scale of thermal treatment facility.
- Potentially suitable for a range waste management types. However, based on the findings of the HRA for the Plan, the site is considered unlikely to be suited to the development of any scale of thermal treatment facility.
- The allocated site forms part of the wider area covered by the Slyfield Area Regeneration Project²¹ (SARP) being led by Guildford Borough Council. To enable the proposed mixed use re-development of the SARP area, the allocated site will enable a new council waste management depot (relocated on site); a new sewage treatment works; and new or enhanced waste management facilities (including a waste transfer station and a community recycling centre). The sites currently occupied by these existing waste uses are considered to form an exception under Policy 7 - Safeguarding of the SWLP under the understanding that equivalent, suitable and appropriate replacement capacity can be provided at the allocated waste management site in advance of non-waste development of these existing sites.
- The site is accessed from the A320 (Woking Road) to the west. The junction of Moorfield Road and the A320 may require improvements.

Particular area of disagreement between Surrey County Council and Guildford Borough Council:

- It should be made clear that the site is not suitable for any scale of thermal treatment facility (as appears to be justified by the HRA evidence).

Action being taken to resolve disagreement:

- Surrey County Council to provide further information on the risks associated with thermal treatment or incineration of waste.

²¹ Site Allocation Policy A24 in the emerging Local Plan

Industrial Land Areas of Search

Particular area of disagreement between Surrey County Council and Guildford Borough Council:

- Despite provisions at 5.2.5 above, at the present time Guildford Borough Council, as land owner at Slyfield Industrial Estate, Woodbridge Meadows and land north and south of Lysons Avenue, is not pursuing waste uses on these sites and hence they are not regarded as currently available for this type of use. Guildford Borough Council considers that areas 5, 6 and 8 should be omitted based on landowner intent.

6.3 Mole Valley District

Allocated site:

Land adjoining Leatherhead Sewage Treatment Works, Randalls Road, Leatherhead

Particular areas of agreement between Surrey County Council and Mole Valley District Council:

- Potentially suitable for small, medium and large-scale facility(s) up to and potentially beyond 120,000 tpa.
- A larger scale facility would likely require appropriate improvements to the site access road and improvements at the junction of the A245 Randalls Road and Oaklawn Road.
- Suitable for a range of potential waste management types.
- The site is within the Green Belt. As part of its review of the Green Belt boundary, associated with the review of the Local Plan, Mole Valley District Council agrees to seriously consider the merits of taking the site out of the Green Belt

Particular area of disagreement between Surrey County Council and Mole Valley District Council:

- The use of the site for thermal treatment or incineration of waste because of concerns about the effect on public health.

Action being taken to resolve disagreement:

- Surrey County Council to provide further information on the risks associated with thermal treatment or incineration of waste.

Industrial Land Areas of Search:

Particular area of disagreement between Surrey County Council and Mole Valley District Council:

- The potential use of the industrial land area of search for thermal treatment or incineration of waste because of concerns about the effect on public health.

Action being taken to resolve disagreement:

- Surrey County Council to provide further information on the risks associated with thermal treatment or incineration of waste.

6.4 Reigate & Banstead Borough

Plan Policies: Policy 11a – Strategic Waste Site Allocations

Point of clarification:

- The Borough Council considers that the land around Earlswood Depot/Waste Transfer Station and the Earlswood Sewage Treatment Works, Redhill is unsuitable for intensification/further waste management activities, especially thermal treatment technologies, particularly due to effects on nearby residents and “in combination” effects with existing waste operations. To this end, the Borough Council supports the conclusions of the County Council’s evidence in respect of these sites and the consequent omission of this site from the submission Plan.

Industrial Land Areas of Search

Point of clarification:

- The Borough Council’s local policies seek to protect the identified ILASs in order to meet the borough’s future need for B use employment premises. Waste uses and related development could be acceptable in these areas provided they support this objective and do not compromise the future attractiveness and operation of ILAS sites for their predominant B use/economic purpose identified in the Local Plan.

6.5 Runnymede Borough

Allocated site:

Land adjacent to Trumps Farm, Kitsmead Lane, Longcross

Particular area of disagreement between Surrey County Council and Runnymede Borough Council:

- Runnymede Borough Council do not accept that this site should be allocated in the Plan as it is not considered that the policy is either justified by the evidence, effective or consistent with national planning policy for the following reasons:
 1. It has not been demonstrated that there is a need for the site for the type of waste facility proposed;
 2. It has not been demonstrated that the site is suitable for the use or scale of waste facility proposed and alternative sites are available;
 3. The Policy text is inconsistent with the NPPF and conflicts with other policies in the proposed SWLP.

Action being taken to resolve disagreement:

- Surrey County Council to clarify why this site is so important for development as a facility for the management of Dry Mixed Recycling.

6.6 Spelthorne Borough

Plan Policies

Particular area of disagreement between Surrey County Council and Spelthorne Borough Council relating to the Policies in the Plan:

- The Borough Council is concerned that, historically, sites in the Green Belt, which have been subject to mineral extraction and restoration, have been used for the co-location of waste facilities and that these activities have either significantly delayed the final restoration or become established and intensified to become permanent waste sites, contrary to the original proposals to restore the site to an open Green Belt use.
- The Borough Council considers that the relevant policies in the plan and the application of these policies should provide greater assurance that demand for waste facilities, particularly in the Green Belt, does not result in the unacceptable extension of minerals and waste operations at a site and delay final restoration to the detriment of amenity or the environment.

Action being taken to resolve disagreement:

- Surrey County Council will respond to these concerns to provide assurances concerning the application of policy.
- A significant proportion of construction and demolition recycling capacity in Surrey has historically been provided by temporary sites at operational mineral workings. The county council will continue to work with Spelthorne Borough Council as a revised Minerals Plan is prepared from late 2019 onwards, at which time future options for providing construction and demolition recycling capacity will be reviewed.

Allocated site:

Oakleaf Farm, Stanwell Moor

Particular areas of agreement between Surrey County Council and Spelthorne Borough Council:

- Potentially suitable for small, medium and large-scale facility(s) up to and potentially beyond 120,000 tpa and for a range of potential waste management types (but Spelthorne Borough Council do not agree that thermal treatment is suitable – see below) subject to.
 - Greater clarity and detail on the types and scale of future waste operations, particularly thermal treatment.
 - The impact on the openness of the Green Belt and demonstration of very special circumstances.
 - Fully mitigating the impact of any additional HGV traffic on the village of Stanwell Moor through full assessment of potential access improvements.
 - Appropriate Assessment under the Habitat Regulations.
- This site falls within the airport safeguarding zone of Heathrow Airport. There may be height restrictions for development. In addition, if any tall flues or chimneys are proposed an Instrument Flight Procedure (IFP) Assessment may also need to be carried out.

Particular area of disagreement between Surrey County Council and Spelthorne Borough Council:

- Definition of the extent of the boundary of the allocation site and its description as previously developed land (PDL).
- Spelthorne Borough Council is concerned at potential harmful impacts to local residents as a direct result of waste management activities and HGV movements.
- Spelthorne Borough Council does not consider the site to be suitable for any form of thermal treatment and requests Surrey County Council removes all reference to thermal treatment of waste at Oakleaf Farm from the Waste Local Plan.

Action being taken to resolve disagreement:

- Surrey County Council to clarify its description of the site as PDL in relation to the activities on the site and the definition of the site boundary.
- Surrey County Council to provide further information on the risks and impacts associated with waste management activities.

6.7 Surrey Heath Borough

Industrial Land Areas of Search

Point of clarification:

- Para 7.3 – The Borough Council is not proposing any joint allocations for employment and waste within the Surrey Heath Local Plan. The borough council accept that waste management may be an appropriate use in employment areas but that the proposed use needs to be tested against the policy criteria.

6.8 Tandridge District

Allocated site:

Lambs Business Park, Terra Cotta Road, Tillburstow Hill Road, South Godstone

Particular areas of agreement between Surrey County Council and Tandridge District Council:

- Potentially suitable for small, medium and large-scale facility(s) up to and potentially beyond 120,000 tpa.
- Potentially suitable for a range of waste management types including thermal treatment.
- The site is within the Green Belt but is proposed to be removed through the emerging Tandridge Local Plan.
- As part of this allocation the district council recognises that the county council proposes that part of the site be allocated as suitable for waste management potentially associated with energy recovery.
- Proposals that seek to utilise the existing rail network and siding in order to support sustainable transport patterns will be encouraged.
- In the event that a proposal for the development of a new Energy from Waste plant comes forward in this location, it is agreed that, if practicable, this should be designed to enable the future use of surplus heat to serve the South Godstone Garden Community and the operations of Lambs Business Park.

6.9 Waverley Borough

Industrial Land Areas of Search

Particular area of disagreement

- Despite the provisions of paragraph 5.2.4 and 5.2.5 above, at the present time Waverley Borough Council, as the owner of a substantial part of the Farnham Trading Estate ILAS, is not pursuing waste uses on that site and hence it not regarded as currently available for this type of use. Waverley Borough Council considers this area should be omitted based on landowner intent

6.10 Woking Borough

Industrial Land Areas of Search

Point of clarification:

- Policy CS15 (sustainable economic development) of the Woking Core Strategy safeguards land within Byfleet Industrial Estate and Monument Way East Industrial Estate to meet its future need for B Class Uses. This is necessary to enable the delivery of the economic strategy of the Core Strategy. The Council would therefore resist any waste development proposal that would not meet this overall objective and/or undermine the delivery of this objective. The uncertainty embedded in the ILAS policy could be overcome by the Waste Local Plan being specific about the nature and type of waste facilities that could be promoted on the sites.

7. Delivery and Governance arrangements for the planning of waste management

- 7.1 The delivery of the SWLP is principally the responsibility of the county council who will guide waste development by the private and public sectors. However, the county council and all eleven district and borough councils are co-operating meaningfully and on an ongoing basis to minimise areas of conflict between the authorities on planning policy concerning waste management.
- 7.2 This Statement of Ground was initiated by the county council and has been prepared following several meetings between officers of Surrey County Council and the district and borough Councils. These meetings were informed by earlier drafts of the Statement of Common Ground. The Duty to Cooperate statement evidences the cooperation that has taken place that has generally been in the form of correspondence and meetings.
- 7.3 Officers of Surrey County Council and the district and borough councils have worked closely²² to seek common ground between the councils on the strategic matters concerning the management of waste as set out above, having particular regard to:
- Minimising conflict between site allocations and areas of search proposed in the SWLP and policies (including site allocations) in the district and borough councils' adopted, and emerging, Local Plans;
 - working together with district and borough councils to seek joint allocations for employment and waste within the Development Plan, as appropriate. This joint working is intended to result in local plan policy wording that ensures waste management is seen as an appropriate use which supports the delivery of employment alongside B2 and B8 uses and does not conflict with the strategic uses of an area or site;
 - the agreement and implementation of the joint consultation protocol that, amongst other things, addresses safeguarding of waste infrastructure²³. Following adoption of the SWLP it is agreed that the county council and district and borough councils will work together to update the joint consultation protocol to ensure it reflects the SWLP.
- 7.4 As shown in section 2 above, this SoCG has been agreed by the leaders, or the relevant lead councillors, of the county council and the eleven district and borough councils. There are certain matters which pertain specifically to individual district and borough councils and these are detailed in Section 6.

8. Timetable for agreement, review and update

- 8.1 The county council will report the position with respect any SoCGs to which it is a signatory in its Annual Monitoring Report and this will include the need for, and progress with, any reviews. Co-operation between the county council and the district and borough councils will continue and this will involve meetings on a county wide level and on a one to one basis.

²² See Duty to Cooperate Statement for a full record of engagement

²³ See the [Minerals and Waste Consultation Protocol, 2016](#). This protocol also concerns the safeguarding of on minerals supply facilities and mineral resources.

Activity undertaken to satisfy Duty to Co-operate provisions will be reported in the Authorities' Annual Monitoring Reports.

- 8.2 The county council and the district and borough council planning authorities are all members of the Surrey Planning Officers Association (SPOA) that meets on at least a bi-monthly basis to discuss issues relevant to planning across Surrey quarterly basis. The 'Planning Working Group' (PWG) also exists for planning policy officers from the county council and the district and borough council to discuss and resolve 'cross-Surrey' issues PWG also meets on a bi-monthly basis. These fora will be used a means to disseminate information on this SoCG and in particular the need for, and progress on, any updates. Specific issues relating to this SoCG may be discussed at SPOA and/PWG. Co-operation activity will also be reported in the Authorities' Annual Monitoring Reports.

Appendix – Relevant Development Plan documents and stages of review

District/Borough	Adopted Planning Document	Stage of review (at March 2019)
Elmbridge	Core Strategy (2011) Development Management Plan (2015)	New Local Plan - Strategic Options Consultation (2017)
Epsom & Ewell	Core Strategy (2007) Development Management Policies Document (2015)	New Local Plan Issues & Options Consultation (2017)
Guildford	Local Plan (2003)	Submission Local Plan (2018)
Mole Valley	Core Strategy (2009) Local Plan (2000)	New Local Plan – Evidence gathering (2018)
Reigate & Banstead	Adopted Core Strategy (2014)	Proposed Submission Plan, Regulation 19 Stage (2018)
Runnymede	Local Plan (2001)	Submission Local Plan (2018)
Spelthorne	Spelthorne Core Strategy and Policies DPD (2009) Spelthorne Allocations DPD (2009)	New Local Plan – Issues and Options (2018)
Surrey Heath	Local Plan (2000)	New Local Plan - Issues and Options (2018)
Tandridge	Core Strategy (2008)	Local Plan: 2033, (Submission 2019)
Waverley	Local Plan (2002) Local Plan Part 1: Strategic Policies and Sites (2018)	Local Plan Part 2 - Preferred Options (2018)
Woking	Core Strategy (2012)	Review adopted October 2018