



Woking Borough Council

Site Allocations DPD

SA/SEA Adoption Statement

October 2021



Produced by the Planning Policy Team

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

1.0 Introduction

- 1.1 The preparation of the Site Allocations Development Plan Document (DPD) has evolved over time with Sustainability Appraisal undertaken at each key stage of the process. The Site Allocations DPD was submitted to the Secretary of State for Independent Examination on 31 July 2019. The Examination Hearings took place between 2 December and 11 December 2020. The Hearings provided an opportunity for everyone who wished to be heard to make their case for it to be considered by the Inspector of the Secretary of State. The Inspector published his Post Hearings letter setting out the possible areas that he wished to make recommendations and why. This formed part of the basis of his schedule of Main Modifications which was published for consultation between 18 September and 14 December 2020. The Inspector has taken into account all representations received before submitting his Final Report to the Council. He was satisfied that the Sustainability Appraisal work undertaken to inform the preparation of the DPD is adequate and accords with the relevant legislative requirements. Overall, the Inspector has concluded that subject to his Main Modifications, the Site Allocations DPD is sound and legally compliant. Its preparation has met the requirements of the Duty to Cooperate. The Examination completed when the Inspector submitted his Final Report to the Council. Officer's report on the Inspector's Report with a recommendation to accept the Main Modifications and adopt the DPD will be considered by Council at its meeting on 14 October 2021. Subject to Council adopting the Site Allocations DPD, this post adoption Sustainability Appraisal Statement will be published on the website. The Inspector's Report can be accessed by visiting: <https://www.woking2027.info/allocations/sadpdexam/sadpdreport>.
- 1.2 An integral part of the preparation of the Site Allocations DPD was the preparation of a Sustainability Appraisal (SA) Report and Habitats Regulations Assessment that meet all necessary legislative requirements. The SA demonstrated how the DPD has addressed all relevant economic, social and environmental objectives. The DPD has therefore been significantly informed by the outcomes of both the SA and the Habitats Regulations Assessment, and the Council is satisfied that the provisions of the DPD are the most sustainable as it could possibly be. The Site Allocations DPD and its supporting SA Report and Habitats Regulations Assessment can be found on the Council's website at: <https://www.woking2027.info/allocations>. Paper copies can be inspected at the various libraries in the Borough and/or at the Council offices, Gloucester Square, Woking (by appointment). Copies can be obtained from the Planning Policy Team on 01483 743871 or e-mail planning.policy@woking.gov.uk.
- 1.3 The Examination of the Site Allocations DPD completed on 6 August 2021 when the Inspector submitted his Final Report to the Council. The extent to which the Site Allocations DPD was supported and informed by a SA Report and Habitats Regulations Assessment was comprehensively debated at the Examination as part of the assessment of the legal and procedural requirements for preparing the DPD. The Inspector concluded that the SA and the Habitats Regulations Assessment met the necessary legislative requirements.
- 1.4 The SA assessed the environmental, economic and social implications of the policies in the Site Allocations DPD. SA of Development Plan Documents is a requirement of the Planning and Compulsory Purchase Act 2004 (as amended). The methodology used to carry out the SA is proven, and encompassed the provisions of the European Union Directive 2001/42/EC (SEA Directive), transposed into English law by the Environmental Assessment of Plans and

Programmes Regulations 2004 (SEA Regulations), which require an assessment of the effects of certain plans and programmes on the environment. The purpose of the SEA Directive is to provide adequate protection for the environment and to ensure the integration of environmental considerations into the preparation of plans and programmes. Based on the Inspector's Report, this purpose has also been satisfied. The various iterations of the SA can be accessed by: <https://www.woking2027.info/allocations>.

- 1.5 A separate Habitats Regulations Assessment screening was carried out to assess the impacts of the effects on the Thames Basin Heaths Special Protection Areas, Special Areas of Conservation and Ramsar sites. The need for this assessment is set out in Article 6 of the EC Habitats Directive 1992, and interpreted into English and Welsh law by the Conservation of Habitats & Species Regulations 2010 (as amended). The aim of the HRA is to 'maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of community interest'. The Directive takes a precautionary approach to the conservation of the protected areas and species. Consequently, it expects that plans and programmes will only be approved if in this case, the Council is satisfied that there will not be any adverse effects on the integrity of the protected areas. The various iterations of the HRA can be accessed by: <https://www.woking2027.info/allocations>.
- 1.6 Both the SEA Directive and SEA Regulations require a number of post adoption procedures to be carried out, which includes amongst other things a statement summarising:
 - how environmental considerations have been integrated into the plan or programme;
 - how the environmental report has been taken into account;
 - how opinions expressed as a result of public and stakeholder consultations have been taken into account;
 - the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
 - the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.
- 1.7 This statement seeks to address the above post adoption requirements and is structured in the order as they appear above. In accordance with good practice, the above points and the entire statement are addressed in the context of sustainability that looks at all its strands – environmental, social and economic rather than focusing only on the environmental implications of the Site Allocations DPD as required by the EU Directive¹.

2.0 **How sustainability considerations have been integrated into the Site Allocations DPD**

- 2.1 The Site Allocations DPD has evolved over time through various stages with community engagement central to its preparation. The key stages include Regulations 18 and 19 stages and consultation on main modifications. A Sustainability Appraisal (SA) had been carried out as an integral part of each of these stages and the outcomes have been used to inform the key requirements of the policies of the DPD. The key requirements are what is necessary to ensure

¹ Domestic regulations derived from EU law covering strategic environmental assessment and the protection of habitats and species quality as retained EU law following the exit from the European Union.

that development is acceptable. During Regulations 18, 19 and consultation on the main modifications stages of the SA process, public and stakeholder involvement had been an essential part. Representations received throughout the process have informed the SA Report at each stage. The SA examined the social, economic and environmental effects of each stage of the process, and appropriate mitigation measures were incorporated to ensure that the preferred strategy and policies of the Site Allocations DPD are the most sustainable when compared against other realistic alternatives. It should be emphasised that the SA has been prepared to comply with relevant legislation and best practice guidance and informed by an understanding of the spatial portrait of the Borough, a comprehensive set of baseline data and a comprehensive list of robust evidence base. The Council prepared a Scoping Report that sets out the scope of the SA for the DPD. A copy of the Scoping Report can be accessed by: <https://www.woking2027.info/allocations/allocation.pdf>. The Scoping Report identified relevant policies, plans and programmes and sustainability objectives. It outlines the baseline information, identified sustainability issues and problems and defined the sustainability appraisal framework for carrying out the SA.

3.0 **How the Sustainability Appraisal Report (environmental report) has been taken into account**

3.1 The policies of the Site Allocations DPD have been significantly informed by the Sustainability Appraisal (SA) Report. SA was carried out for the Regulation 18, Regulation 19 stages and on the main modifications published by the Inspector for public consultation. At each stage, a Habitat Regulations Assessment (HRA) was also undertaken. The outcome of each of the Sustainability Appraisals has been used to inform the subsequent stages of the Site Allocations DPD process. Sections 15 to 16 of the Sustainability Appraisal Report deals with appraisal of objectives, appraisal of alternatives, appraisal of policies and cumulative impacts respectively. Key conclusions are set out under each of the appraisals.

- Section 15 of the SA Report deals with Sustainability Appraisal of objectives and options. Preferred sites for allocation and safeguarding in the DPD are clearly set out. For example, the list of Green Belt sites recommended for allocation/safeguarding in the DPD are set out in Table 7 of the SA Report. The list of Green Belt sites rejected after the SA are in Table 8 of the SA Report.
- Section 16 deals with cumulative impacts. The overall impacts of the implementation of the DPD on the SA objectives are set out in Table 9 of the SA Report;
- Section 17 sets out the recommended measures of mitigation. The recommended mitigation measures have directly informed the development and wording of the key requirements of the policies of the DPD. The policies of the DPD are carefully phrased to mitigate any potential negative effects of the sustainability appraisal of the policies.

3.2 The Habitats Regulations Assessment (HRA) was carried out separately and for a specific purpose but also to complement the SA process. It assessed the environmental implications of the policies of the Site Allocations DPD on designated sites and species of European significance. The recommendations of the HRA had also been used to inform the DPD. The HRA recommended that:

'Woking Site Allocations DPD has been screened out as having no likelihood of leading to adverse effects on European sites through effects on:
Recreational Pressure on Thames Basin Heaths SPA - The Council

has confirmed that each site allocation proposed will have sufficient SANG to serve the increased population that will occupy the development.

Air Quality - In its adopted Core Strategy, the Council does commit to '*proactively work in partnership to deliver projects of cross-boundary significance such as the strategic monitoring and mitigation of Thames Basin Heaths Special Protection Areas...*'. Contribution toward a monitoring framework by which air quality measures can be linked to the air quality in the European site before and for a number of years after introduction of measures to improve air quality across the Borough is an important aspect of such collaboration, such that further measures can be devised if the air quality does not improve. In making these assessments the critical load for the relevant habitat should be used as the target for assessment.

Recommendation for Allocation GB6 - Proposed allocation GB6 lies adjacent to the SPA. The project would involve upgrade of the existing junction and therefore there is potential for disturbance and reduced air quality on the adjacent SPA as a result of the construction process. It is recommended that a project specific HRA should be undertaken for this development should it be approved, and that this is included as a requirement for this allocation in the Site Allocations DPD'.

- 3.3 As a consequence of the HRA, the following sites have been allocated in the DPD as Suitable Alternative Natural Greenspace (SANG). They are collectively more than is needed to support the housing requirement of the Core Strategy over the entire plan period:
- GB12 - Byfleet SANG, land to the south of Parvis Road, Byfleet;
 - GB13 – Brookwood arm SANG, adjacent to Brookwood Farm Drive, Brookwood;
 - GB14 – Westfield Common SANG, land to the east of New Lane;
 - GB15 – First SANG at Gresham Mill, High Street, Old Woking; and
 - GB16 – Second SANG at Gresham Mill, High Street, Old Woking.
- 3.4 Key requirements have also been included in relevant DPD policies requiring both Community Infrastructure Levy (CIL) contributions towards SANG provision, and Strategic Access Management and Monitoring (SAMM) contributions. In addition, key requirements for site-specific air quality assessments (which take into account in-combination effects) have been added to relevant policies where the scale of development has potential to cause traffic impacts to roads within 200m of European protected sites, and thus potentially lead to ecological impacts from emissions, in line with policy DM6 of the Development Management Policies DPD on Air and Water Quality. Where assessments identify the need for avoidance/mitigation measures, the Council will take appropriate measures to address that, including working with the Thames Basin heaths Board if the issues are of cross-boundary significance.
- 3.5 The following key requirement has been included in Policy GB6 (Six Crossroads roundabout and environs) as a result of the HRA: 'provide a site specific Habitats Regulations Assessment, given the site's proximity to the Special Protection Area'.
- 4.0 **How opinions expressed as a result of public and stakeholder consultations have been taken into account**
- 4.1 The Planning Act and the SEA Directive both recommend public involvement in the SA process. They expect the outcome of the public consultation to be taken

into account in the SA process. It is also a requirement that the following designated consultation bodies are specifically consulted at each relevant stage of the SA process:

- Heritage England;
- Natural England;
- Environment Agency.

4.2 The Council has published a Statement of Community Involvement (SCI) that sets out how it will consult the public on planning documents. The requirements of the SCI were followed in consulting the public on the SA. It is also stressed that the consultation bodies were actively involved at each stage of the SA and Site Allocations DPD preparation process to ensure that both processes are effectively integrated. The Statement of Community Involvement can be accessed by: <https://www.woking2027.info/community>. The SCI is presently being reviewed in accordance with Government legislation.

4.3 The Council carried out consultations on the SA Report for the Regulation 18 version, Regulation 19 version of the DPD and on the Inspector’s Main Modifications. The dates for the various consultations are set out in the Table below:

Stage of preparation	Date
Regulation 18 consultation	18 June 2015 – 31 July 2015
Consultation of land east of Martyrs Lane	6 January 2017 – 27 February 2017
Regulation 19 consultation	5 November 2018 – 17 December 2018
Date of Hearings	2 December 2019 – 11 December 2019
Consultation on main modifications	14 September 2020 – 14 December 2020
Informal consultation with statutory consultees and neighbouring authorities	Throughout the process

The dates for the various consultation exercises and details of the consultation events are also included in the Council’s Consultation Statement that was submitted to the Inspector for the Examination. The Consultation Statement is on the Council’s website and can be accessed by this link: <https://www.woking2027.info/allocations/sadpds/sub/sadpdconsstatement>.

4.4 Overall, each of the consultation periods lasted a minimum of six weeks in accordance with statutory requirements. A number of consultation methods were used, including resident seminars, Zoom meetings, press releases, meetings, website information, e-mails, distribution of leaflets at key locations such as supermarkets and Woking rail station, drop-in events and public presentations.

4.5 Representations that were received were comprehensively analysed and taken into account to inform the Site Allocations DPD and/or subsequent stages of the SA process. A summary of representations that were received, the Council’s response to them with recommended actions about how they should be taken into account are published on the website and can be accessed by these links:

<https://www.woking2027.info/comment;>
<https://www.woking2027.info/allocations/sadpdsb/regnineteentopicpaper;>
<https://www.woking2027.info/allocations/responsereg18.>

5.0 The reasons for choosing the Site Allocations DPD as adopted, in the light of the other reasonable alternatives dealt with

5.1 A Sustainability Appraisal (SA) was carried out as an integral part of the Regulation 18 version of the Site Allocations DPD. The SA assessed all the available alternative sites to ensure that the policies of the Site Allocations DPD are the most appropriate strategy when considered against all reasonable alternatives. The SA methodology ensured that the SA was done in a consistent manner. It also ensured that the preferred sites for the Site Allocations DPD are those that will deliver the most sustainable development for Woking. The SA Report sets out a clear justification of why preferred sites were selected and other sites were rejected. Overall, it was concluded that the preferred sites provided the most sustainable options when tested against the other alternatives. The outcome of the SA also demonstrated that the implementation of the Site Allocations DPD will overall make a positive contribution towards achieving sustainable development in the Borough.

5.2 The conclusions of the HRA are stated above in paragraphs 3.2 – 3.4.

6.0 The measures that are to be taken to monitor the significant environmental effects of the implementation of the Site Allocations DPD

6.1 Article 10 of the SEA Directive deals with monitoring. It emphasises the following:

- 1 Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.
- 2 In order to comply with paragraph 1 (above), existing monitoring arrangements may be used if appropriate, with a view to avoiding duplication of monitoring.

6.2 The Site Allocations DPD includes a section on how the policies will be delivered and its performance monitored. The monitoring framework is objective-led to ensure that the Site Allocations DPD is delivering on its sustainability objectives. It should also be emphasised that each policy of the Site Allocations DPD includes a section on monitoring that sets out how the performance of the particular policy will be monitored and the key dates to trigger potential action if there is significant under delivery. Potential actions if performance are not met are clearly set out.

6.3 It is intended that the outcome of the monitoring will be reported annually in an Annual Monitoring Report (AMR) and published on the Council's website for public information. The Site Allocations DPD also includes a clear set of measures to deal with risk and contingencies. The contingency measures are sufficiently comprehensive and robust enough to detect and address at an early stage if the Site Allocations DPD is under performing against its environmental, social and economic objectives.

6.4 The Site Allocations DPD is supported by an Infrastructure Delivery Plan (IDP) to ensure the timely delivery of necessary and adequate infrastructure to support the development proposals of the Site Allocations DPD. The delivery of the

specific schemes identified in the IDP's Infrastructure Schedule will also be monitored annually and reported in the AMR. The IDP itself will be reviewed bi-annually to bring it up-to-date, accordingly, the IDP is presently being reviewed. The latest IDP is on the Council website and can be accessed by: <https://www.woking2027.info/ldfresearch/infrastructure>.

- 6.5 The Council has adopted Community Infrastructure Levy (CIL) as the primary mechanism for securing developer contributions towards the delivery of the identified infrastructure. This will assist in ensuring that infrastructure delivery keep pace with development.
- 6.6 All the policies of the DPD has anticipated timescales for their delivery. This will enable the effective monitoring of the delivery of the policies of the DPD.
- 6.7 The Council has approved the following Local Development Documents to help facilitate the effective delivery of the social, environment and economic objectives of the Site Allocations DPD:
- Affordable housing Supplementary Planning Document (SPD). This is being reviewed;
 - Climate Change SPD. The SPD is presently being reviewed;
 - Design SPD;
 - Thames Basin Heaths Special Protection Area Avoidance Strategy SPD. The SPD is presently being reviewed;
- 6.8 To meet its social and equality obligations, the Site Allocations DPD identifies sufficient land at sustainable locations to meet the accommodation needs of Travellers.

7.0 Further information

- 7.1 Copies of the Site Allocations DPD, the SA Report, The Habitats Regulations Assessment Screening and the post adoption SA Statement can all be found on the Council's website www.woking.gov.uk. Paper copies can be inspected at the Civic Offices, Woking, Byfleet, Knaphill and West Byfleet (when opened) libraries.
- 7.2 For further information regarding any of the above documents, please contact the Planning Policy Team on 01483 743871 or e-mail planning.policy@woking.gov.uk.
- 7.3 The address of the Planning Policy Team is:
- Planning Policy
Woking Borough Council
Civic Offices
Gloucester Square
Woking
GU21 6YL

8.0 Conclusion

- 8.1 The primary objective of the Site Allocations DPD is to achieve sustainable development. This post adoption SA Statement has demonstrated that Sustainability Appraisal (incorporating requirements of the Strategic Environmental Assessment Regulations) has been an integral part of the Site

Allocations DPD preparation process. The outcome of each stage of the SA process has informed the relevant parts of the Site Allocations DPD. Public involvement has been an essential part of the SA process and representations that were received during the various consultation periods have been taken into account as vital evidence to underpin the SA process. Overall, the SA has demonstrated that the implementation of the policies of the Site Allocations DPD will assist the sustainable development of Woking. The Council is determined to ensure the comprehensive delivery of the policies of the DPD to fully realise its sustainability benefits. In this regard, it has an in-built monitoring framework to monitor how well the Site Allocations DPD will be delivering against its environmental, social and economic objectives.

- 8.2 The EU Directive requires a number of post adoption procedures to be satisfied. This statement satisfies these requirements.

