



Woking Borough Council

Site Allocations Development Plan Document (DPD)

Executive Summary - Sustainability Appraisal Report

October 2018

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Executive Summary

1.0 Introduction

1.1 The Sustainability Appraisal Report (SA) assesses the environmental, economic and social implications of the Proposals of the Site Allocations DPD. It enables an objective assessment of each site and the contribution it makes towards sustainable development of the Borough. It also enables weaknesses in the Site Allocations DPD to be identified and appropriate mitigation measures introduced to make its delivery as sustainable as it can possibly be. The main purpose of the Site Allocations DPD is to allocate specific deliverable sites to enable the delivery of the requirements of the Core Strategy. The majority of sites appraised by the SA are in the urban area. However, the SA also appraises sites in the Green Belt to identify the most sustainable sites to deliver housing and supporting infrastructure between 2022 and 2027 and to safeguard land to meet development needs between 2027 and 2040. Full lists of the sites appraised in the SA are at Appendices 9 and 10 of the SA report. The Core Strategy has been subjected to a comprehensive SA that has been considered at an Examination. The National Planning Policy Framework (NPPF) emphasises that assessments should be proportionate and should not repeat policy assessments that has already been undertaken. The SA of the Site Allocations DPD has been carried out in this context, recognising that the spatial strategy of the Core Strategy that the DPD seeks to deliver has been comprehensively assessed.

1.2 The SA Report is a requirement of the Planning and Compulsory Purchase Act 2004. The SA Report also encompasses the requirements of the European Union Directive 2001/42/EC (SEA Directive).

1.3 The SA has been carried out as an integral part of the Site Allocations DPD process and it will form an important piece of evidence to demonstrate that sustainable development is at the heart of the DPD and has influenced key decisions at each stage of its process.

1.4 A Habitats Regulations Assessment (HRA) has been carried out as a separate document to complement the SA. A copy can be obtained on request from the Planning Policy Team and will also be published on the Council's website (www.woking2027.info).

2.0 The Sustainability Appraisal Framework

2.1 The policies of the DPD were assessed against the objectives of the SA Framework. The SA Framework has been used to provide a consistent basis for describing, analysing and comparing the sustainability effects of the various Proposals of the DPD. The SA Framework is objective-led and hence includes a set of objectives to be achieved by the various elements of the Framework. The SA Framework takes into account the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and is informed by comments of the statutory consultees as part of the consultation on the Scoping Report.

Table 1 below illustrates the SA Objectives. The SA Framework in its entirety can be found in the full SA Report at Table 5.

Table 1: SA Objectives

1. provide sufficient housing which meets the needs of the community and which is at an affordable price
2. facilitate the improved health and wellbeing of the population and reduce inequalities in health
3. reduce vulnerability to flooding and harm from flooding to public well-being, the economy and the environment
4. reduce poverty, crime and social exclusion
5. improve accessibility to all services and facilities
6. make the best use of previously developed land and existing buildings
7. minimise air, light and noise pollution
8. reduce land contamination and safeguard agricultural soil quality
9. conserve and enhance biodiversity
10. conserve and enhance and where appropriate make accessible for enjoyment the natural, historic and cultural assets and landscape of Woking
11. reduce the causes of climate change – particularly by increasing energy efficiency and the production of energy from low and zero carbon technologies and renewable sources – and adapt to its impacts
12. reduce the impacts of consumption of resources by using sustainably produced and local products
13. reduce waste generation and disposal and achieve sustainable management of waste
14. maintain and improve water quality of the region’s rivers and groundwater, and manage water resources sustainably
15. reduce the need to travel, encourage safe, sustainable transport options and make the best use of existing transport infrastructure
16. maintain high and stable levels of employment and productivity, and encourage high quality, low impact development and education for all
17. provide a range of commercial development opportunities to meet the needs of the economy and, in particular, support and enhance the economies of town, district, local and neighbourhood centres

3.0 Key conclusions of the SA (this is grouped under appraisals of objectives, appraisal of options, and appraisal of sites)

3.1 Appraisal of objectives

3.1.1 The overall purpose of the Site Allocations DPD is to facilitate the delivery of the Core Strategy. The objectives of the DPD are therefore exactly the same as the objectives of the Core Strategy, and are set out in paragraph 4.10 of the SA Report. The objectives of the Core Strategy have been appraised against a similar SA Framework. No purpose would be served by repeating the appraisal in the SA of this DPD. The SA Report of the Core Strategy is on the website (www.woking2027.info).

3.1.2 In summary, the SA of objectives of the Core Strategy revealed that majority of the objectives make a significant contribution towards achieving sustainable development in the Borough and consequently, towards delivering the vision for the Core Strategy.

3.1.3 Many of the objectives have neutral impacts on the objectives of the SA Framework.

- 3.1.4 Although not a requirement of the EU Directive or the recommended process for carrying out an SA, an objective compatibility appraisal was carried out for the Core Strategy objectives. A key reason for doing this was to ensure that no single objective is substantially undermined or compromised in order to achieve another objective. In the majority of cases, the objectives were mutually supportive of each other and would complement each other to deliver the overall vision of the Core Strategy. Based on this assessment, there is no evidence that the pursuit to achieve one objective will undermine any of the others if appropriate mitigation measures could be secured.
- 3.1.5 There were a few instances where conflict exists between the objectives. These were mainly related to the objective of concentrating development at the main urban centres where key facilities and service are available and the potential implications on air quality. This will mainly arise from increased traffic. There is no doubt that the main urban centres are the most sustainable locations for development. However, such an approach to development has its implications that have to be addressed. The need to promote public transport, walking and cycling and manage air quality would be critical in ensuring the sustainable development of the area. It is envisaged that the proposed mitigation measures will neutralise potential negative impacts.
- 3.1.6 The above conclusions will equally apply to the appraisal of objectives of the DPD. Consequently, its findings have been used to inform the Site Allocations DPD.

3.2 Appraisal of alternative options

- 3.2.1 The appraisal of alternative options has been done as an integral and important part of the SA process. Proposals in the Site Allocations DPD must be justified, and in particular, it should be the most appropriate strategy when considered against all reasonable alternatives. The appraisal of options is rooted in the spatial strategy of the Core Strategy. Options for the spatial strategy of the Core Strategy were comprehensively appraised as part of the SA of the Core Strategy and scrutinised at the Core Strategy Examination. It concluded that most of the new development proposed in the Core Strategy should be concentrated in the main urban area and land in the Green Belt should be released to deliver about 500 new homes to meet housing need at the back end of the plan period. The Site Allocations DPD reflects this conclusion.
- 3.2.1 Sites that will yield less than 10 net additional dwellings or 500 sq.m of employment floorspace had not been considered for appraisal in the SA because the DPD does not allocate such sites. Small sites are expected to come forward for development as windfall sites.
- 3.2.2 Sites within significant environmental and policy constraints that do not have a realistic prospect of coming forward during the plan period have also been ruled out for appraisal in the SA. The lists of reasonable alternative sites that have been appraised are in Appendices 9 and 10 of the SA report.

4.0 SA findings

- 4.1 There has been a comprehensive appraisal of the Proposals of the Site Allocations DPD against the SA Framework to ensure consistency in the appraisal process.

- 4.2 The SA has been carried out as an integral part of the DPD process with an in-built mechanism for informing the development and refinement of the Proposals of the DPD.
- 4.3 Based on the analyses of the SA findings, the Green Belt sites in Table 2 below have been recommended to Council for consideration for allocation and/or for safeguarding in the Site Allocations DPD for the purposes of the Regulation 19 consultation:

Table 2: Green Belt sites recommended for allocation and/or safeguarding

Site Reference
SHLAAHEA006: Land south of Brookwood Lye Road, Brookwood (formerly known as Land at Coblands Nursery and Lyndhurst)
SHLAAHEA007: Land at Five Acres, Brookwood Lye Road, Brookwood
SHLAAAn/a: Brookwood Cemetery, Brookwood (for infrastructure use)
SHLAABWB010: Land to the south of Parvis Road and High Road, Byfleet (formerly known as land south of High Road, Byfleet)
SHLAABWB011: Land to the south of Rectory Lane, Byfleet (formerly known as land to the south of Murray's Lane, Byfleet)
SHLAAAn/a: Six Crossroads roundabout, Chertsey Road (for infrastructure use)
SHLAAHEA013: Nursery Land adjacent to Egley Road, Mayford
SHLAAHEA024: Woking Garden Centre, Egley Road, Mayford
SHLAAHEA018: Land to the north east of Saunders Lane and Hook Hill Lane, Mayford
SHLAAHEA019: Land to the north west of Saunders Lane, Mayford
SHLAAPYR003: Land rear of 79-95 Lovelace Drive, Teggs Lane, Pyrford
SHLAAHEA002: Land adjacent to Hook Hill Lane, Hook Heath, Woking (for green infrastructure uses)
SHLAABWB030: Land to the south of Parvis Road (also known as land surrounding West Hall), Parvis Road, West Byfleet
SHLAABWB018: Broadoaks, Parvis Road, West Byfleet
SHLAAAn/a: Woking Palace, Carters Lane, Old Woking (for green infrastructure uses)

- 4.4 A series of Green Belt sites have also been appraised and recommended for allocation for use as Suitable Alternative Natural Greenspace (SANG) – these are set out in paragraph 15.28 of the SA report.
- 4.5 It is emphasised that the majority of the sites recommended by the SA for allocation in the DPD are urban sites. The list of urban sites recommended for allocation is in Section 15.32 of the SA report.
- 4.6 The Council at its meeting on 18 October 2018 carefully considered the above sites in Table 2 and decided that exceptional circumstances do not exist so as to justify the release of the following sites from the Green Belt because the use of those sites for residential development would conflict with Policy CS24 (Woking's landscape and townscape) of the Core Strategy, fail to protect or enhance a valued landscape in accordance with paragraph 170(a) of the NPPF, in the case of land to the north west of Saunders Lane fail to conserve designated heritage assets, result in the permanent loss of Green Belt land assessed within the Green Belt boundary review as performing variously a critical and major role to check urban sprawl and a critical and major role towards safeguarding the countryside from encroachment. The release of these

sites from the Green Belt would individually and certainly collectively, critically undermine the overall purpose and integrity of the Woking Green Belt:

- Land to the north east of Saunders Lane and Hook Hill Lane, Mayford;
- Land to the north west of Saunders Lane and Hook Hill Lane, Mayford; and
- Land rear of 79 – 95 Lovelace Drive, Teggs Lane, Pyrford.

5.0 Recommended mitigation to inform the DPD

5.1 The SEA Regulations require the SA process to identify suitable mitigation measures for any significant adverse effects predicted for the Site Allocations DPD. This is also an important component of the SA Report. In addition, recommendations to enhance sustainability measures within the Site Allocations DPD are documented as part of the SA report. The detailed SA Matrices in **Appendices 11 and 12** of the main SA Report include a summary section at the end of each Proposal setting out the mitigation and optimising measures for each proposed site allocation. These have been incorporated into the 'Key Requirements' under each Proposed Site in the Site Allocations DPD, in cases where the recommended preferred sites have been allocated. Examples of some of the proposed mitigations measures are:

- Improved connectivity to green infrastructure;
- Noise impact assessment as a requirement of development;
- Detailed flood risk assessment where relevant;
- Implementation of Sustainable Urban Drainage Systems (SUDS);
- Design of development to protect heritage assets; and
- Improvement to pedestrian and cycle infrastructure.

6.0 Linkages with other strategies of the Council

6.1 The DPD is one of a number of Council strategies and documents that seek to achieve a similar goal of sustainable development. In this regard, the DPD will not sit in isolation but within a wider context of the Council's overall drive to achieve sustainable development of the area. A list of the relevant other documents include:

- The Woking Core Strategy;
- Affordable Housing Delivery Supplementary Planning Document (SPD);
- Housing Strategy;
- Natural Woking (Green Infrastructure Strategy);
- Climate Change SPD;
- Design SPD;
- Community Infrastructure Levy Charging Schedule;
- Economic Strategy.

7.0 Monitoring the effects of the DPD

7.1 The DPD has an in-built monitoring framework with specific indicators to ensure a consistent and comprehensive monitoring of the delivery of the DPD. The outcome of the monitoring will be reported in the Council's Annual Monitoring Report (AMR) that will be published by 31 December of each year. The AMR will be made available to the public via the Council's website.

8.0 Consultation

8.1 The SEA Directive and the Planning Act both recommend public involvement in the SA process. Furthermore, they expect the outcome of public consultation to be taken into account. It is also a requirement that designated consultation

bodies in the UK are consulted at each relevant stage of the SA process. These bodies are:

- Historic England;
- Natural England;
- Environment Agency.

- 8.2 The Council has an adopted Statement of Community Involvement (SCI) that sets out how it will consult the public on the preparation of planning documents. The requirements of the SCI are being followed in preparing the SA Report.
- 8.3 The designated consultation bodies were consulted on the Scoping Report and the SA Framework used for the appraisal. Their comments had been taken into account in finalising the Scoping Report.
- 8.4 It is intended that the SA Report will be published for full public consultation as part of the Regulation 19 consultation on the Site Allocations DPD to give the public an opportunity to input into the process. The consultation is likely to be in November 2018. In addition to the formal consultation, there has been extensive informal consultation with the Council's key stakeholders and this will be on-going until the DPD is submitted.

9.0 Next Stages of the process

- 9.1 The SA Report will be published alongside the Site Allocations DPD for Regulation 19 consultation. This will allow the public the opportunity to comment on the SA Report and to highlight any new information that needs to be taken into account. All comments will be analysed and used to inform further review of the SA Report before the Submission version of the DPD and its accompanying SA Report is submitted to the Secretary of State for examination.

10.0 Conclusion

- 10.1 The preparation of the SA Report is an essential requirement of the Planning and Compulsory Purchase Act (2004). It is fundamental to the preparation of the Site Allocations DPD to ensure its soundness. The SA has been prepared to meet the requirements of the EU Directive and the Planning and Compulsory Purchase Act. It addresses all the key stages and tasks in the Sustainability Appraisal of Regional Spatial Strategies and Local Development Framework (ODPM, November 2005). A checklist of how the SA report meets the specific requirements of the SEA Directive is set out in Table 1 of the SA report. The SA has been prepared as an integral part of the Site Allocations DPD process and its outcomes have informed the sites allocated in the DPD and the key requirements that the development of the sites should satisfy to be acceptable.
- 10.2 It is envisaged that if the outcome and recommendations of the SA Report are followed in the Site Allocations DPD it will make a positive contribution towards achieving sustainable development in the Borough.