

Matter 1

Q4.

The Environment Agency's concerns in respect of flood risk within the Sustainability Appraisal (SA) would be addressed if the score in Appendix 4 of the SA is changed to negative as set out in the Local Authority's Proposed Changes document.

Q14.

Policy CS16 requires infrastructure to be delivered in line with development. The Environment Agency supports this policy.

Matter 2

Q14.

The Biodiversity and nature conservation section of the Core Strategy including Policy CS7 supports key aims of Water Framework Directive (WFD) but Policy CS7 would be enhanced if reference is made to achieving the Thames River Basin Management Plan (RBMP) key objectives (no deterioration, and improvement of status of rivers in Woking Borough Council to a minimum of 'good').

Q.17 & 18.

We suggest reference is made within the Flooding section to forthcoming assessments such as Surface Water Management Plans and the outcomes of these assessments should be considered when developers undertake site specific Flood Risk Assessments.

We suggest the rearrangement of paragraph 5.48 to enhance the context without fundamentally changing it beyond what has been submitted. We believe the suggested changes better accord with Planning Policy Statement 25:

*National policy (PPS25: Development and flood risk) requires Flood Risk Assessments for all development proposals in Flood Zones 3a, 3b and 2 as well as all development proposals of one hectare or above in Flood Zone 1. Applicants will **also** be required to undertake a Flood Risk Assessment for development proposals within or adjacent to areas at risk from **other forms of flooding**. The SFRA **and forthcoming surface water management plan identify** areas of potential risk, although circumstantial evidence will be considered on a case-by-case basis. Where there is potential for other sources of flooding, a Flood Risk Assessment should be **evaluated** to investigate the level and impact of the risk and propose mitigation measures in accordance with the advice in PPS25 and the Council's SFRA. Applicants will be encouraged to recognise the benefits that undertaking a Flood Risk Assessment can bring to a development, even if not required.*

Q.19.

The proposed expansion of Policy CS9 such that it addresses water management generally is welcomed, however, we do not feel the Council's suggested alterations for Policy CS9 within the Proposed Changes document adequately references WFD. The WFD covers more than flooding issues and we feel expanding the Policy to ensure it adequately addresses water management issues including water quality, making adequate links to the objectives of the Thames RBMP is required. The renaming of Policy CS9 to 'Flooding and Water Management' would also help extend the remit of the policy.

We feel reference to the Thames RBMP key objectives (no deterioration, and improvement of status of rivers in Woking Borough Council to a minimum of 'good') is necessary within Policy CS9. The Thames RBMP sets actions for water bodies to achieve good status and prevent deterioration in line with the requirements of the WFD.