

**WOKING BOROUGH**

**CORE STRATEGY**

**EXAMINATION IN PUBLIC**

**EXAMINATION STATEMENT**

**CREST NICHOLSON**

**Submitted 6 March 2012**

**Matter 1 – Vision, Objectives and Places – Whole Doc, Section 3.0; 4.0**

**CS1 – CS5**

20 March 2012

CREST NICHOLSON EXAMINATION STATEMENT 1

**CREST NICHOLSON REF: 080**

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**Introduction**

This Examination Statement has been submitted by Crest Nicholson as part of the Examination in Public on the Woking Borough Local Development Framework Core Strategy. The Statement highlights and where necessary expands upon representations submitted by Crest Nicholson at the Proposed Submission (Regulation 27) stage of the Core Strategy process. It does not repeat representations.

Referencing

Crest Nicholson has referred to its representations submitted on the Proposed Submission 'Publication' Core Strategy throughout the Examination Statement.

## **Abbreviations / Glossary**

- WBC – Woking Borough Council
- Savills – Planning Consultant
- SEP – South East Plan
- PPS – Planning Policy Statement
- WCS – Woking Core Strategy
- TBH SPA – Thames Basins Heath SPA
- SA/SEA – Sustainability Appraisal / Strategic Environmental Assessment

**Matter 1 – Vision, Objectives and Places – Whole Doc, Section 3.0; 4.0****CS1 – CS5**

20 March 2012

**Matter 1: With due regard to its means of production, does the Core Strategy (CS) provide the most appropriate spatial strategy for sustainable development within the context of the Borough? Does it contain clear objectives for the plan period in accord with the aims of Planning Policy Statement (PPS) 12? Is the evidence in relation to the settlement hierarchy and the intended levels of development robust? Does the evidence support the effectiveness of the CS in these regards?**

Introductory Comment

1. Woking Borough is located in affluent Surrey, close to the M3 and M25 corridors. The town has excellent rail links to London and the South Coast. The town centre is a sub regional hub, accessible but relatively constrained by close knit suburbs and the dominance of the railway which dissects the town centre. The town centre is an identified 'centre of significant change', to reflect its importance for retail and commerce. The wider geography of Woking Borough is relatively constrained owing to the Thames Basins Heaths Special Protection Area (SPA) and location within the Metropolitan Green Belt. The town of Woking dominates the Borough, and is fairly compact.
2. A sound Core Strategy should be a positive and spatial and focused on delivery. It needs to be effective and responsive to changing circumstances. The Core Strategy is the principal Development Plan Document (DPD) and strategy from which all others relate (PPS12 paragraph 3.1). It must make the key decisions and spatial choices in order to facilitate the planning applications process (PPS12 paragraph 4.5 & 5.2 (4)).
3. A key component of the Core Strategy is its policies on housing.
4. The primary spatial pressure on the Borough is the Green Belt. To address this over the long term will concern balancing the economic growth pressures of the affluent Surrey location in order to achieve wider sustainability objectives, including social (i.e. meeting housing need) and environmental (i.e. mitigating the impacts on the Thames Basins Heath and providing enhanced Green Infrastructure).

5. Crest Nicholson does not oppose the Core Strategy objectives. The overall quantum of growth is also not questioned. However, Crest Nicholson considers that the present approach of the spatial distribution of development is unsound, notably for housing. The spatial strategy seeks too much growth in the urban areas, notably the town centre. There is not the evidence to justify the intended approach, either of urban capacity or market demand/ need. The approach is not based on robust and credible evidence.
6. Contrary to the present approach of the Core Strategy is evidence that supports a need for further Greenfield development, for which there are sufficient sites from which to make a refined assessment through the Development Management Policies and Site Allocations DPD/ Green Belt Review.
7. The approach of the Borough Council to delay the Green Belt Review is ineffective and would likely result in faltering housing delivery within the plan period, and further the potential delay of the delivery of enhanced Green Infrastructure, which may have adverse effects on the Thames Basins Heath SPA. The approach to delay the Green Belt Review has already resulted in a failed five year supply of housing. In evidence to be submitted with Written Statement 3 (Hearing Session 4 – Housing) Crest Nicholson will contend that the Borough Council can only demonstrate between 3.5 - 4 years housing supply.
8. The Borough Council has acknowledged the need for a Green Belt Review, through the identification of the Green Belt as a 'location of growth' (draft CS Figure 3). The soundness of the delivery strategy is however questioned owing to the timing of the proposed Green Belt Review in 2016/17.
9. The Core Strategy therefore requires modification to enable it to be effective, justified and consistent with national planning policy, principally:
  - a. The spatial strategy with regard to the distribution of housing – with less focus on the town centre and more on Greenfield (draft policies CS2, CS10, Figure 4 Housing Trajectory).
  - b. The timing of the Green Belt Review – sooner and in line with the production of the Site & Development Management DPD (draft policy CS6).
  - c. The parameters of the Green Belt Review and opportunity to also consider Green Infrastructure and Thames Basins Heath SPA mitigation as key attributes in site selection (additional guidance could be outlined in the CS).

- d. Specific minor policy alterations (regarding draft policies CS8, CS11, CS12 and CS17) as outlined in the representations submitted.

1. **What is the relationship between the CS and the SE Plan? Is the former consistent with the latter? Does the CS reflect adequately the aims of the SEP, for example in relation to sustainable development (Policy CC1), climate change (CC2), resource use (CC3) and sustainable design/construction (CC4)?**
10. Crest Nicholson considers the Core Strategy to be broadly consistent with the South East Plan, and notes the Borough Council proposes the same annual housing delivery. Crest Nicholson has no comment to make in relation to CC1 - CC4.
11. However, the Core Strategy may be in conflict with the following South East Plan policies; SP5 (Green Belts), CC8 (Green Infrastructure), C5 (Managing the Rural-Urban Fringe), TC2 (New Development and Redevelopment of Town Centres), LF1 (Core Strategy) and LF3 (Broad Amount & Distribution of Future Housing Development).
12. The South East Plan at policy SP5 is specific about the need for a Green Belt Review to the South of Woking to meet the proposed development needs (for example Housing – H1). This policy has been in place for three years since publication of the South East Plan. The timing of this review would need to be based on local evidence on when the land would be required for release. This matter is discussed extensively in Crest Nicholson's evidence.
13. In relation to SP5, CC8, C5 and LF1, Crest Nicholson will outline concerns with the timing of the Green Belt Review and whether the Core Strategy adequately provides for an adequate Green Infrastructure network in Written Statement 2 (Hearing Session 2)
14. In relation to TC2 and LF3, Crest Nicholson will outline evidence which demonstrates insufficient urban capacity in the town centre to justify the quantum of residential growth envisaged. This is further compounded by the South East Plan regional growth priorities (the town centre as a Centre of Significant Change) and hence competing retail and commercial land use pressures.
2. **What is the evidence supporting the principle of sustainable growth that underpins the CS? How has the CS approach to sustainable development evolved in relation to alternatives? Is the evidence base in support of the chosen strategic approach robust and credible against alternatives? To what extent was a strategy that did not promote growth considered?**

15. Crest Nicholson does not wish to comment on all aspects of the evidence base. Broadly, Crest Nicholson considers that the Sustainability Appraisal (SA) has assessed a range of alternatives. The concerns within the Core Strategy do not relate to the overall development quantum assessed rather the distribution of it.
16. A strategy which does not promote growth would be contrary to the South East Plan and emerging National Planning Policy Framework (NPPF) owing to the additional pressures created on adjacent Local Authorities, all within the same Surrey, Outer London, Berkshire and North East Hampshire economic sub-region/ housing market area.
17. Adjacent Local Authorities have already sought to lower their respective housing requirement, for example Guildford Borough. Surrey Heath was required to amend its Core Strategy at the recent Examination to restore the previous South East Plan housing requirement.
3. **To what extent has the Sustainability Appraisal (SA) informed the content of the CS? Is the Council satisfied that the SA adequately summarises or repeats the reasons that were given for rejecting the alternatives at the time when they were ruled out (and that those reasons are still valid)?**
18. Crest Nicholson has no specific comment to make on this matter. In evidence to be submitted with Written Statement 3 (Hearing Session 4 - Housing) the impact of a redistribution of the housing requirement on the SA will be discussed.
4. **Does the SA (NB Appendix 4/5) accurately assess the impacts of Policy CS9/15 in relation to flooding?**
19. Crest Nicholson has no comment to make on this matter.

5. **Has the production of the Core Strategy followed the Statement of Community Involvement? Has this led to timely, effective and conclusive discussion with key stakeholders on what option(s) for a core strategy are deliverable?**
20. Crest Nicholson does not wish to comment specifically on the Statement of Community Involvement.
21. The Core Strategy is not “owned” solely by the Borough Council, but also by the wider stakeholders/ community (PPS12 paragraphs 4.27 - 4.29). It should be clearly related to the Sustainable Community Strategy (PPS12 paragraphs 4.34).
22. Crest Nicholson was disappointed not to have been afforded a meeting with officers to discuss Green Belt development opportunities during the preparation of the Core Strategy. Crest Nicholson’s interest in the Borough was registered with the Borough Council in September 2011 (Proposed Submission ‘Publication’ stage), at which time Crest Nicholson made representations questioning the approach of the Core Strategy, notably the spatial distribution of development and timing of the Green Belt Review (as being contrary to the available evidence and South East Plan). Crest Nicholson suggested that the Council considers undertaking a Green Belt Review (at least initial work) prior to the actual submission of the Core Strategy based on evidence of:
- a. Housing Need
  - b. Urban Capacity
  - c. Need for early stakeholder engagement
  - d. South East Plan policy requirements (notably SP5, LF1/3)
  - e. To assist in the creation of a longer term network of Green Infrastructure/ SANGs to mitigate the Thames Basins Heath SPA impacts
23. The fact that this option was not taken is a missed opportunity, however, it need not be fatal on the soundness of the Core Strategy, which can be made sound through effective amendments. It must be recognised that CS Figure 3 (Areas Identified for Growth) outlines the Green Belt as a ‘Broad Location for Growth’, as tested within the SA/SEA. This fact is supported, and allows scope for selective redistribution of the strategic development requirement.
24. It will be very important for the Borough Council to liaise closely with key stakeholders with land interests in the Green Belt as part of a swift and focused Green Belt Review.



- 6. To what extent has the production of the CS followed the LDS? How does the CS relate to other intended LDF documents, for example the intended Sites Allocation DPD?**
25. The Core Strategy process has not incorporated the allocation of additional strategic sites (as permitted by PPS12 paragraphs 4.6-4.7). Instead it is proposed that only existing Local Plan allocations be 'rolled forward' as reallocated through the Core Strategy (land at Brookwood Farm and Moor Lane). Owing to this, the swift production of a DPD which allocates sites is required alongside the required Green Belt Review so that sufficient land may be identified for development.
26. It will be important for the Core Strategy to clearly set the onward parameters for detailed DPD production, to outline effective strategic planning requirements.
27. This is made more important owing to the impending abolition of the South East Plan as the Core Strategy will be the only strategic tier of the planning framework.
28. The current working timetable for the Development Management Policies and Site Allocations DPD as provided by the Local Development Scheme is:
- Consult statutory bodies on scope of Sustainability Appraisal      March - April 2011
  - Consult during preparation  
onwards      October 2011
  - Publication and consultation  
2012      October - November
  - Submission to Secretary of State      January 2013
  - Estimated date of pre-hearing meeting      March 2013
  - Estimated date of examination      May 2013
  - Estimated date for adoption      January 2014
  - Update proposals map      January 2014
29. The LDS makes no reference to the Green Belt Review which is surprising owing to the importance of this evidence to the Local Development Framework.
30. The present approach of the Borough Council to delay the Green Belt Review to 2016/17 would result in the need for an almost immediate review of the Development

Management Policies and Site Allocations DPD. This is not an effective use of the Council's resources, and would likely threaten the 6-10 years and possibly 11-15 years supply of housing. This reasons for this will be outlined in Crest Nicholson's evidence relating to Hearing Session 4 - Housing.

**7. Is the CS aligned and coordinated adequately with the Sustainable Community Strategy? Are there areas of discord/omission? Does the CS reflect local distinctiveness adequately?**

31. Crest Nicholson has no comment to make on this matter.

**8. Is the Equalities Impact Assessment adequate and robust? What methodology has been used in its completion?**

32. Crest Nicholson has no comment to make on this matter.

**9. Does the CS contain sufficient justification of its policies? Is more explanation needed of how the policies relate to the key objectives identified within Section 3? Do the objectives link the vision with the policies adequately? Is it sufficiently clear how the policies meet the needs of the Borough identified in the course of the CS preparation?**

33. No, it is not sufficiently clear how the policies (notably CS2, CS6 and CS10) meet the needs identified.

34. The proposed Core Strategy Vision contains a number of aspirations which the Core Strategy objectives and policies need to balance and implement effectively (PPS12 paragraph 4.3). Crest Nicholson has no concerns with the Vision, more its application as worded in the Core Strategy.

35. The vision needs to be dynamic, holistic and cross sector. It should be locally orientated in terms of local challenges and distinctiveness (PPS12 paragraph 2.1). It should relate closely to the South East Plan (PPS12 paragraph 4.2). It should be:

- Informed by the characteristics of the area and its constituent parts
- Related to the key issues and challenges

36. The key local challenges as seen by Crest Nicholson were outlined in the Introductory Comment (paragraphs 1 to 9).
37. The present approach outlined by draft policies CS2, CS6, CS10 and the Figure 4 Housing Trajectory is at odds with aspects of the Vision and further the objectives of a spatial strategy, which should be both place shaping and deliverable (PPS12 paragraph 2.3). The Core Strategy clearly seeks to deliver significant growth in the town centre. However, a relevant additional aim of the vision is new housing development in a range of locations and new 'quality green spaces and infrastructure for recreation and leisure'. The constraints imposed, in particular by draft policies CS6 and CS10 will not assist the delivery of these objectives. These matters will be explored in detail within other Written Statements.
38. Crest Nicholson further contends that aspects of the Core Strategy are not robustly justified, notably through concerns with the available evidence base:
- The Strategic Housing Land Availability Assessment (SHLAA) assumptions over the immediate Five Year Supply of Housing.
  - The physical capacity of the Town Centre to accommodate the quantum of residential envisaged alongside the various retail/ commercial requirements of a 'Centre of Significant Change' and assumptions made over the key 'Gateway' development sites.
  - Proposed Thames Basins Heath SPA Mitigation in terms of SANG land mitigation for all of the anticipated and planned growth to 2027.
  - The absence of any draft or interim Green Belt Review, and importance of this with regard to the housing delivery assumptions.
39. Crest Nicholson contends that the approach to delay the Green Belt Review has already resulted in a failed five year supply of housing, in evidence to be submitted with Written Statement 3 (Hearing Session 4 – Housing). Crest Nicholson contends that the Borough Council can only demonstrate between 3.5 – 4 years housing supply. The faltering five year supply is contrary to the draft NPPF as worded which requires Local Authorities to identify and maintain a rolling supply of specific deliverable sites to provide five years worth of housing, whilst also including an additional allowance of at least 20 per cent to ensure choice and competition in the market for land.

**10. Does the CS acknowledge adequately cross border issues? (Evidence relating to the duty to cooperate?)**

40. Crest Nicholson is concerned that the present approach of the Core Strategy does not adequately address cross border issues through the proposed delivery strategy and spatial distribution of development. The results of this could be to hinder the delivery of development, which may in turn create additional pressures on adjacent Local Authorities. Surrey, outer London, east Berkshire, north West Sussex and north east Hampshire Authorities are all within the same economic sub-region.

41. There is a clear requirement in the South East Plan for a Green Belt Review in Woking as outlined by policies SP5, LF1 and LF3. To be consistent with the South East Plan this Review should be alongside or soon after Core Strategy adoption in order to meet the required growth. This will enable the delivery of wider strategic planning objectives, for example for Woking Town Centre, all of which will have impacts for neighbouring Local Authorities.

**11. Does the CS provide sufficient detail on how much development is intended to happen, where and when?**

42. The Core Strategy provides detail on how much development and broadly where (notably through CS Figure 3); however, it is the timing and distribution which is questioned.

43. As outlined in the introduction and in response to Question 9, Crest Nicholson is concerned that the present approach of the spatial strategy is unsound owing to the broad spatial strategy and distribution of development, notably housing (draft policies CS2 and CS10). The spatial strategy seeks too much growth in the urban areas, notably the Town Centre. This is not based on robust and credible evidence as there are insufficient sites. It is also not based on evidence of market need, which points to a need for further Greenfield development.

44. The Borough Council has acknowledged the need for a Green Belt Review, through identification of the Green Belt as an 'Area identified for Growth' (draft CS Figure 3). As outlined, the approach of the Borough Council to delay the Green Belt Review is ineffective with wider negative consequences.

**12. Are the population growth forecasts robust?**

45. Crest Nicholson has no comment to make on this matter.

**13. Should the vision recognise to a greater extent the technological industries and potential of the Borough?**

46. Crest Nicholson has no comment to make on this matter.

**14. Does the CS take a robust approach to growth and the availability of infrastructure? What is the relationship between the CS and the Infrastructure Delivery Plan? Is there a need to cross reference more clearly the provision of necessary infrastructure? (Note: detailed discussion may be deferred to Hearing 5)**

47. As outlined in response to Question 1, Crest Nicholson is concerned that the present approach to Green Infrastructure and the rural/ urban fringe does not accord with the South East Plan.

48. South East Plan Policy CC8 (Green Infrastructure) and C5 (Managing the Rural-Urban Fringe) seek a positive, spatial and delivery orientated approach. The present spatial strategy seeks to delay development in the Green Belt, and further is not justified by proactive evidence which outlines which locations adjacent to the existing urban edge of Woking could deliver adequate Green Infrastructure. This missed opportunity will need to be corrected soon after the adoption of the Core Strategy based on the alignment of the Development Management Policies and Site Allocations DPD with a Green Belt Review as discussed in Crest Nicholson's response to Question 6.

**15. Does CS 1 indicate sufficient attention to matters of sustainability and does it provide a spatial approach in accord with PPS12 2.2 - 7?**

49. As outlined in the Introductory Comment, and response to Questions 5, 6, 9 and 11, Crest Nicholson does not presently believe the Core Strategy to be sufficiently 'delivery

led' and hence it cannot be said to be spatial. This can be corrected through a set of focused modifications, as outlined in the Conclusion to this Written Statement.

**16. Is sufficient regard and emphasis given to issues of education, heritage and health? (Note: detailed discussion on these matters to be undertaken at Hearings 2 and 3)**

50. Crest Nicholson has no comment to make on this matter.

**17. How does the CS seek to address issues of social deprivation?**

51. Crest Nicholson has no comment to make on this matter.

**CS2 – Woking Town Centre**

**18. Is the approach to Woking compliant with the content of PPS4? To what extent has the strategy relating to retail and town centre development been developed with neighbouring administrative areas?**

52. As outlined in responses to Questions 2 and 11, Crest Nicholson is concerned that the Core Strategy seeks to be overly ambitious with the growth intentions in the Town Centre, notably residential, which may in turn have adverse impacts on delivery and on adjacent Local Authorities.

53. PPS4 is clear on the need to take a 'centres first' approach for retail and commercial land uses. These should be prioritised in the Town Centre.

- 19. Is the proposed increase in retail floorspace justified by the evidence base? Is the evidence sufficiently up to date and robust? How does Policy CS2 reflect the options recommended within the Town, District and Local Centres Study? What evidence supports the likely effectiveness (deliverability) of the CS intentions for Woking?**
54. Crest Nicholson has no comment to make on the robustness of the retail floorspace evidence, apart from to note the competing growth demands within the Town Centre (as a Centre of Significant Change), which may contradict the high levels of planned residential growth.
- 20. Is the CS approach to retail frontages warranted by the evidence base and sufficiently flexible to be effective? Are street markets referenced adequately within the CS?**
55. Crest Nicholson has no comment to make on this matter.
- 21. Does the CS address issues relating to the evening/ night-time economy adequately?**
56. Crest Nicholson has no specific comment to make on this matter, apart from to highlight that by the very nature of a Town Centre location, the area in residential amenity terms is less suited for 'family housing' (3 bedroom plus), for which there is also an identified need.
- 22. Does the CS take a justified and evidenced approach to transport and transport infrastructure within the town centre? How does the CS relate to the proposed Area Action Plan and how will necessary development be secured?**
57. Crest Nicholson has no comment to make on this matter.

**23. Does CS2 provide sufficient flexibility for the refurbishment and/or redevelopment of sites within the town centre?**

58. As outlined, in evidence to be submitted with Written Statement 3 (Hearing Session 4 - Housing) Crest Nicholson contends that the Borough Council can only demonstrate between 3.5 - 4 years housing supply. This is based on a SHLAA critique which includes a detailed analysis of actual physical capacity for additional development within the town centre. There is limited capacity for expansion, as there are limited vacant sites and unoccupied buildings. Further, there is considerable recent development, which is very unlikely to be redeveloped over the plan period. In combination this will mean that existing sites will need to be intensified, which would involve issues of relocation, land availability and assembly.

59. To be effective the Core Strategy should recognise these challenges and incorporate sufficient flexibility and contingency to response to circumstances where delivery falters – notably for housing.

**24. Should the plan include a specific non implementation allowance for development within Woking?**

60. Yes. The plan should reduce the overall planned residential development in the town centre and include a specific non-implementation allowance (normally 10%). This will be discussed in Written Statement 3 (Hearing Session 4).

**25. Has the deliverability of town centre developments been considered fully with particular regard to viability and the provision of infrastructure and affordable housing where necessary?**

61. As outlined, Crest Nicholson has prepared detailed evidence and critique of the housing land supply evidence (notably the draft CS Figure 4 Housing Trajectory and SHLAA) as part of the evidence to be submitted in Examination Statement 3 (Hearing Session 4 - Housing).

62. The capacity for new development in Woking Town Centre is constrained. The available sites do not match the planned provision as outlined in draft policies CS2/CS10. Furthermore, the provision of the development can only cater for a particular



type of residential development, notably one and two bedroomed flats, of which there is a market but not to the level which the Core Strategy plans.

**26. Are development densities of 200 dwellings per hectare (dph) realistic and supported by the evidence base? (Note: Detailed discussion of the evidence will be deferred until Hearing 4 in relation to Housing Policy CS10)**

63. As outlined, this matter will be discussed within the detailed evidence to be submitted by Crest Nicholson.

64. In summary, the delivery of the three 'Gateway' sites (Housing Trajectory period 2017 - 2022) is questioned owing to the location within the primary and secondary shopping areas. The delivery of development and the densities proposed in the town centre is not realistic. This is demonstrated in the capacity analysis undertaken. Further, the development envisaged could not realistically be achieved based on present market.

**27. Does the CS propose any changes to the town centre boundary?**

65. Crest Nicholson has no comment to make on this matter.

**Draft Policies CS3, CS4 & CS5**

66. Crest Nicholson has no comment to make on these matters.

## Conclusions

67. Crest Nicholson believes that the Core Strategy as submitted fails in a number of respects. In order to ensure that it is justified, effective and consistent with National Planning Policy and is therefore sound in PPS12 terms, changes will be required and/or further evidence prepared. To assist with this process Crest Nicholson has produced further evidence, notably a SHLAA critique to be submitted with Written Statement 3 - Hearing Session 4 (Housing).

### What parts of the Core Strategy are unsound?

68. Crest Nicholson requests changes to:

- Draft Policy CS2 (in light of changes to CS10 regarding distribution of housing);
- Draft Policy CS6 (timing of Green Belt Review)
- Draft Policy CS10 (distribution of housing – greater proportion to Greenfield)
- Figure 4 – Housing Trajectory (supply, timing and distribution of housing)
- Supporting text to CS11 regarding housing mix
- Draft Policy CS12 (flexibility on affordable housing provision)
- Draft Policy CS8/ 17 (effectiveness of delivering Green Infrastructure as part of the identification of sites following a Green Belt Review)

69. These changes all remain within the spirit of the SA/SEA and the overall plan, and hence it is unlikely that parties will be prejudiced following them.

70. Details of the proposed changes will be outlined in Written Statement 2 (Hearing Session 2 – Green Belt) and Written Statement 3 - Hearing Session 4 (Housing).

### Which soundness test(s) it fails and why?

71. Crest Nicholson is not satisfied that the present approach of the Core Strategy is justified, effective or consistent with national planning policy.

How the Core Strategy can be made sound. Including the precise changes and wording that is sought

72. The Core Strategy therefore requires modification to enable it to be effective, justified and consistent with national planning policy, principally:
- a. The spatial strategy with regard to the distribution of housing – with less focus on the town centre and more on Greenfield (draft policies CS2, CS10, Figure 4 Housing Trajectory).
  - b. The timing of the Green Belt Review – sooner and in line with the production of the Site and Development Management DPD (draft policy CS6).
  - c. The parameters of the Green Belt Review and opportunity to also consider Green Infrastructure and Thames Basins Heath SPA mitigation as key attributes in site selection (additional guidance could be outlined in the CS).
  - d. Specific minor policy alterations (regarding draft policies CS8, CS11, CS12 and CS17) as outlined in the representations submitted.

**END OF STATEMENT**