

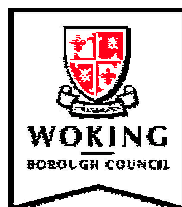


## **Woking Borough Core Strategy Examination**

**Response to Inspector's  
Matters and Issues**

**Hearings 1, 2 and 3  
Matters 1-6**

WBC/12



March 2012

## Abbreviations

AAP - Area Action Plan  
AMR - Annual Monitoring Report  
CS - Core Strategy  
CIL - Community Infrastructure Levy  
DPD - Development Plan Document  
ELR - Employment Land Review (2010)  
HRA - Habitats Regulations Assessment (2011)  
IDP - Infrastructure Delivery Plan (2011)  
LDF - Local Development Framework  
LDS - Local Development Scheme  
LDD - Local Development Documents  
NPPF - draft National Planning Policy Framework (2011)  
PPG - Planning Policy Guidance  
PPS - Planning Policy Statement  
RSS - Regional Spatial Strategy  
SA - Sustainability Appraisal (2011)  
SANG - Suitable Alternative Natural Greenspace  
SAMM - Strategic Access Management and Monitoring  
SHMA - Strategic Housing Market Assessment (2009)  
SHLAA - Strategic Housing Land Availability Assessment (updated 2011)  
SCC - Surrey County Council  
SCI - Statement of Community Involvement (2011)  
SEP - South East Plan (2009)  
SFRA - Strategic Flood Risk Assessment (updated 2011)  
SPA - Special Protection Area  
S106 - Section 106 Legal Agreement  
TA - Transport Assessment by Surrey County Council (2010)  
TBH - Thames Basin Heaths  
WBC - Woking Borough Council

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## Introduction

This Written Statement has been prepared by Woking Borough Council in response to the Inspector's Matters and Issues for the Core Strategy hearings.

The Written Statement relies on cross-referencing to existing documents as far as possible so as to avoid unnecessary duplication.

This Written Statement is structured as follows:

- Statement of the matter and issue.
- The Council's response to the key issue and any subsidiary issue(s).
- Council's conclusion on soundness, including any modifications proposed as a result.

In summary, this Written Statement sets out why the Council considers the Core Strategy to be sound in relation to the questions raised by the Inspector (ID/04), and the points raised by respondents. Any suggested changes put forward in this Written Statement will be collated with those from other Written Statements and the Statements of Common Ground to provide one central reference document for suggested changes.

The Programme Office has produced a Draft Programme for the hearings and the list of participants who have confirmed that they will be attending. This is attached as Appendix 2 to this Statement. It is emphasised that this list could change and it is up to each participant to contact the Programme Officer or check the Council's website for up-to-date information on the programme.

## Hearing 1: Vision, Objectives and Places

Whole Doc, Section 3.0; 4.0 CS1 – CS5

***Matter 1: With due regard to the 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 aim 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 Core Strategy in these regards?***

- 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)?

***What is the relationship between the CS and the South East Plan?***

- 1.1 The South East Plan (SEP) (CD/126) provides the long term strategic spatial planning context for the region including the overall vision for the management of growth. It identifies major infrastructure requirements and sets the housing requirements for the Borough. The SEP is part of the development plan for the area by virtue of Section 38(3) of the Planning and Compulsory Purchase Act 2004 (CD/81). In accordance with PPS12 paragraph 4.50, the Core Strategy (CS) is supposed to be in general conformity with the SEP. The CS interprets the strategic requirements of the SEP at the local level and should therefore be consistent with its provisions. The SEP is a material consideration in all planning decisions in the Borough and as such its development management policies complement the policies of the CS in planning decisions. Paragraphs 1.17 to 1.39 of the Core Strategy Publication Document sets out the contextual framework for the policies of the CS. The relationship between the SEP and the CS is particularly emphasised.
  - 1.2 Woking Borough Council is aware of the Government's intentions to revoke Regional Strategies. Consequently, the Council has carried out locally specific evidence base to justify the policies of the CS.
- Is the CS consistent with the South East Plan?***
- 1.3 The CS is consistent with and in general conformity with the SEP. The Council has prepared a topic paper 'Self assessment of the conformity of the Core Strategy Publication Document with national and regional policy, Woking and Surrey Sustainable Community Strategies, key priorities of the Council' (CD/1) to demonstrate how the CS is in general conformity with the SEP.
  - 1.4 The SEP sets out a number of strategic policy themes for Local Development Documents to take into account. Table 1 demonstrates the extent to which the policies of the CS are consistent with these strategic themes.

Table 1

| <b>South East Plan strategic policy themes</b>     | <b>Consistent policies in the Core Strategy</b>  |
|--|--|
| Sustainable economic growth                        | CS1, CS2, CS3, CS15, CS18  |
| Provision of housing, including affordable housing | CS10, CS12, CS14   |
| Natural resource management                        | CS6, CS8, CS20   |
| Transport  | CS18   |
| Town centres                                       | CS2, CS15, CS18  |
| Management of the built environment                | CS21   |
| Social and community infrastructure                | CS16, CS17, CS19 and Infrastructure Delivery Plan (CD/11) and Social and Community Infrastructure Requirements Study (CD/27) |
| Sport and recreation                               | CS17, CS8  |
| Waste and minerals                                 | Proposals Map, paragraph 1.33 – 1.34   |

1.5 The Core objectives of the SEP are set out in paragraph 3.4. The key objectives set out in paragraph 3.3 of the CS are also consistent with the objectives of the SEP.

1.6 Based on the above, the Council is satisfied that the CS is consistent with the SEP.

***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)?***

1.7 Sustainable Development is at the heart of both the SEP and the CS. In particular, the CS reflects the aims of the SEP. Specific examples to demonstrate this relate to how the CS reflects the cross cutting policies of the SEP (policies CC1 – CC9 of the SEP) (see table 2). The examples used are those highlighted by the Inspector. It is also stressed that the aims of both the CS and the SEP are rooted in their objectives. The CS objectives reflect those of the SEP (paragraphs 3.3 of CS and 3.4 of SEP).

Table 2

| <b>Sustainable development policies of the South East Plan</b> | <b>Core Strategy policies that reflect the policies of the South East Plan</b> |
|--|--|
| Policy CC1   | CS1, CS6, CS7, CS8, CS9, CS18, CS21  |
| Policy CC2   | CS22, CS23   |
| Policy CC3   | CS20, CS22, CS23, CD/40  |
| Policy CC4   | CS22   |
| Policy CC5   | CS13, CS21   |
| Policy CC6   | CS21   |
| Policy CC7   | CS16, CD/17, CS18  |
| Policy CC8   | CS8  |
| Policy CC9   | SHLAA, Public sector asset review  |

**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?**

***What is the evidence supporting the principle of sustainable growth that underpins the CS?***

2.1 PPS12 (CD/98) provides guidance about evidence base for Core Strategies. It stresses that the evidence should contain two elements:

- Participation: evidence of the views of the local community and others who have a stake in the future of the area.
- Research/fact finding: evidence that choices made by the plan are backed up by the background facts.

2.2 Participation - the Council's commitment to put public involvement at the heart of the CS process is emphasised by paragraph 1.13 of the Core Strategy Publication Document. The CS has evolved through various stages with public involvement an integral part of each process. The evidence of consultation and how representations have been taken into account is included in the Council's Consultation Statement.

2.3 The research/fact finding evidence base supporting the principle of sustainable growth that underpins the CS is set out in Appendix 1 of the CS. The Council has also taken into account other plans, programmes and strategies. These are listed in Appendix 1 of the SA Report (CD/37).

2.4 It is stressed that the evidence is up-to-date, comprehensive and fit for purpose. It has also been independently checked by the Planning Advisory Service (CD/16) to ensure all relevant requirements are met.

***How has the Core Strategy approach to sustainable development evolved in relation to alternatives?***

2.5 The Core Strategy has evolved through various stages. The key stages of the process include the Issues and Options, the Draft Core Strategy and the Core Strategy Publication Document. A Sustainability Appraisal (SA) has been carried out for each of these stages and the outcome has been used to inform the overall strategy and policies of the CS. The SA has been carried out as an integral part of the CS with feedback to inform subsequent stages of the CS process. In all the stages, public and stakeholder involvement has been an essential part of SA evidence base. 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 CS are the most sustainable when compared against other realistic alternatives. The SA has been prepared to comply with relevant legislation and best practice guidance. It also encompasses the provisions of the European Directive 2001/42/EC (SEA Directive). The outcome of the SA is an SA Report (CD/37), which forms part of the Submission Documents to the Secretary of State. The Council is confident that it strikes a good balance between the three strands of sustainable development – social, economic and environmental. The SA is informed by a understanding of the spatial portrait of the Borough (Section 8 of SA Report), a comprehensive set of baseline data (paragraph 6.1) and a comprehensive list of robust evidence base (paragraph 6.2).

- 2.6 The SA is objective led, based on a robust Sustainability Appraisal Framework (Sections 12 and 13). It follows a clear methodology that enables key questions to be answered. The key questions are set out in paragraph 14.5 of the SA Report.
- 2.7 The Council is satisfied that the above provides a sound basis for testing the sustainability of various realistic options and to ensure the most sustainable strategy and policies for the CS.
- 2.8 In September 2009, key stakeholders, including the Regulatory Bodies were invited to make suggestions about topics and issues they wished addressed by the CS. An Issues and Options document was published in October 2009 to give the general public an opportunity to help define the issues affecting the Borough and the options available to address them.
- 2.9 PPS12 paragraph 4.38 deals with alternatives. The following sentence is emphasised "it requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan-making process". This requirement has been satisfied by the Council. The Council believes that the word 'reasonable' is significant when considering alternatives.
- 2.10 PPS12 also emphasises that Sustainability Assessment should inform the evaluation of alternatives. A Sustainability Appraisal of alternative options (December 2009) (CD/69) has been carried out. This is a separate document, but an integral part of the SA Report. The outcome of the appraisal of options is summarised in Section 18 of the SA Report. This assessment has been the primary basis for informing the preferred options of the CS. A specific SA of housing options was also carried to test various levels of housing provision (Appendix 5 of the SA Report).
- 2.11 Each option has been specifically appraised. The reporting of the outcome sets out clearly why the preferred option has been selected and the justification for rejecting other alternative options. The appraisal also included the extent to which the various options are in general conformity with national and regional planning policy as well as the Surrey and Woking Sustainable Community Strategies.
- 2.12 The Council is satisfied that there has been a clear evolution of the policies of the CS that includes a comprehensive testing of alternatives and that the CS is the most sustainable strategy when tested against reasonable alternatives.

***Is the evidence base in support of the chosen strategic approach robust and credible against alternatives?***

- 2.13 A Sustainability Appraisal has been used to assess the sustainability of the alternative options. The robustness of the appraisal methodology and the Sustainability Appraisal Framework has been addressed above. The Council is satisfied that the SA Report provides a robust evidence base to justify the chosen strategy against alternatives.
- 2.14 It needs to be emphasised that the Council has carried out a Habitats Regulations Assessment Screening (CD/18). The Habitats Regulations Assessment is particularly relevant to the assessment of the environmental implications of the CS on designated sites and species of European



significance. It is recommended by this assessment that an Appropriate Assessment will not be required for any of the policies of the CS.

***To what extent was a strategy that did not promote growth considered?***

- 2.15 The Council considered a scenario based on how the Borough will look without the intervention of the CS and its proposed growth. This assessment looked at the social, economic and environmental implications without the CS. Details of this consideration are set out in Section 7 of the SA Report. Whilst a strategy that did not promote growth was considered and reported on, the Inspector's attention is drawn to the fact that national guidance requires local planning authorities to seek out and evaluate **reasonable** alternatives. The Council's evidence base in the form of the Strategic Housing Market Assessment (CD/32), the Population Topic Paper (CD/24), the SEP (CD/126), the Employment Land Review (CD/13), and the Town, District and Local Centres Study (CD/40) all clearly justify the need for growth. Furthermore, the Council has not received any evidence to confirm the fact that growth is not needed. Consequently, whilst a strategy that did not promote growth was considered, it was not considered a reasonable enough alternative to be sustainability appraised.

**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)?**

- 3.1 The content of the CS has been significantly informed by its SA. The extent to which this is achieved is demonstrated in the self assessment of the tests of soundness and the legal requirements (WBC/2). SA has been carried for the Issues and Options, Draft Core Strategy and the Core Strategy Publication Document. The outcome of each of the Sustainability Appraisals has been used to inform the subsequent stages of the CS process. The recommendations of the SA are set out in Section 21.0 of the SA Report. The recommendations have informed the development of the policies of the CS. In particular, the wording of policies CS1, CS6, CS8, CS9, CS10, CS11, CS12, CS13, CS14, CS18, CS22, and CS23 reflect directly the recommendations of the SA Report, and are phrased to mitigate any potential negative effects on the sustainability objectives of the CS.
- 3.2 The SA was the key basis for selecting the preferred option for the CS. How the SA has informed the testing of alternatives and the selection of the preferred option is fully addressed in the Council's response to Matter 1 - Issue 2. The Sustainability Appraisal of Options provides a logical justification for why the preferred option of the CS has been selected and alternative options rejected.
- 3.3 It should be highlighted that a Habitats Regulations Assessment Screening has been carried to complement the SA.
- 3.4 The Council is satisfied that the SA adequately sets out the reasons why alternative options were rejected and can confirm that the justifications for that are still valid. Details of the options that are rejected and the reason for doing so are set out in the SA of Options, which is part of the SA Report (CD/37)

**4 Does the SA (NB Appendix 4/5) accurately assess the impacts of Policy CS9/15 in relation to flooding?**

- 4.1 The SA has been prepared with significant input from the Environment Agency. Their advice has been taken into account before the SA Report was finalised. One of the key objectives of the SA Framework against which the policies of the CS are appraised is to reduce the risk of flooding. The potential sustainability effects of Policies CS9 and 15 on flooding has been assessed and the outcomes taken into account in informing the flooding and other policies of the CS. The potential effect of Policy CS9 on the need to reduce the risk of flooding has been recorded as positive. Policy CS9 is about flooding and the Council is satisfied that the impacts of the requirements of the policy will have a positive effect on reducing the risk of flooding.
- 4.2 The potential effect of Policy CS15 on reducing the risk of flooding is recorded as negative and the Council is satisfied that this accurately assesses the impacts of the policy on flooding. The Council's original positive score was a balanced judgment base on the following consideration:
- Policy CS15 seeks to concentrate employment development on existing employment sites, with Policy CS22 ensuring that non-residential development over 1,000sq.m comply with BREEAM very good standards, there is the likelihood that the existing situation could be improved.
- 4.3 However, the assumption was reviewed in response to the Environment Agency's representation and a proposed change has been made to change the score to negative. The Council is satisfied that the revised score accurately assesses the impacts of the policy on flooding.
- 4.4 The Inspector also makes reference to Appendix 5. Appendix 5 deals with the Sustainability Appraisal of Housing Options. The impacts of all the three housing options on reducing the risk of flooding each scored negative. However, it is recorded that the likelihood of options 2 and 3 leading to flooding is real and could be more severe than option 1. The Council is satisfied that the SA accurately assesses the impacts of the three housing options on flooding.
- 4.5 The Council is satisfied that the approach taken in the CS follows advice in PPS25.

**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 options for the Core Strategy are deliverable?**

***Has the production of the Core Strategy followed the Statement of Community Involvement?***

- 5.1 The Core Strategy has been prepared in accordance with the Statement of Community Involvement. A Consultation Statement has been published to demonstrate how this has been achieved. This evidence includes people invited to make representations, methods used for involving them, representations received and how they have been taken into account. The Council has also submitted a topic paper on how the Duty to Co-operate has been met. This sets out the extent of partnership working that has been undertaken to inform the preparation of the CS. Furthermore, a self assessment of the test of soundness and the legal requirements (CD/2) has

been carried out. This document comprehensively addresses how the CS has been prepared in accordance with the Statement of Community Involvement.

- 5.2 It should be noted that public involvement is one of the key principles underpinning the preparation of the CS (paragraph 1.13 of the CS).

***Has this led to timely, effective and conclusive discussions with key stakeholders on what options for the Core Strategy are deliverable?***

- 5.3 The Regulatory bodies and key stakeholders were notified of the preparation of the Core Strategy in September 2009 and invited to inform the Council of the issues that they wished to be addressed. This was taken into account before an Issues and Options document was published for consultation between October and December 2009. A series of events and methods were used to engage the public to inform their representations on the Issues and options. Representations received were taken into account in refining the options that were tested to enable a preferred option to be selected. A Draft Core Strategy was published for consultation to enable the public to comment on the emerging preferred approach for the CS. The Council is satisfied that following the SCI has led to timely, effective and conclusive discussions with key stakeholders.

- 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 Site Allocations DPD?**

***To what extent has the production of the CS followed the LDS?***

- 6.1 The Council has an adopted LDS that identifies a programme for the following Development Plan Documents:
- The Core Strategy;
  - The Sites Allocations DPD;
  - Development Management Policies DPD.

- 6.2 The Core Strategy has been prepared in accordance with timescale set out in the LDS. The extent to which this has been achieved is demonstrated in the 'self assessment of the tests of soundness and legal requirements topic paper (CD/2). The Inspector should also note that the timetable for the preparation of the other DPDs is being followed.

***How does the CS relate to other intended LDF documents, for example the intended Site Allocations DPD?***

- 6.3 The CS provides the strategic context for the scale of development and where it will broadly be directed. It determines the nature and type of infrastructure to support the CS and whether land should be safeguarded to implement it. Furthermore, it sets the strategic context for the preparation of other Local Development Documents, including Development Management Policies DPD.
- 6.4 The Site Allocations DPD will allocate and/or safeguard specific sites to deliver the proposals in the CS. The allocation of these sites should take into account the provisions of the CS.
- 6.5 The Development Management DPD will set detailed policies that may be necessary for the purposes of development management. The CS will provide the strategic context within which the detailed policies will be developed. They will have to be in conformity with the provisions of the CS.

6.6 A topic paper on local plan policies that will be superseded when the CS is adopted has been prepared (WBC/5). The paper provides guidance on the few policies of the local plan that could potentially develop into development management type policies.

**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?**

7.1 The Core Strategy is aligned to the Sustainable Community Strategy and provides a platform for its delivery. The extent to which this is achieved is demonstrated in the Council's 'self assessment of the conformity of the Core Strategy Publication Document with national and regional policy, Woking and Surrey Sustainable Community Strategies and the key priorities of the Council (CD1). The Council do not see any discord/omissions between the two documents.

7.2 The CS adequately reflects local distinctiveness. It identifies a hierarchy of centres with different functionality (paragraph 3.14 of CS). It is underpinned by a comprehensive Character Study that ensures that development reflects local distinctiveness. It identifies Maybury and Sheerwater and the Lakeview Estate area of Goldsworth Park as Priority Places to direct resources to address pockets of deprivation in these areas. The CS is also supported by an IDP (CD/11) that targets infrastructure to address need in specific areas of the Borough. The Inspector's attention is drawn to the fact that the evidence base to support the CS has been tailored to address local issues.

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

8.1 The methodology used for the preparation of the Equalities Impact Assessment (CD/14) follows guidance from the Improvement and Development Agency for Local Government (IDEA). Sections 3 – 7 of the Equality Impact Assessment detail the process for carrying out the assessment. The Council also has a robust Corporate Equality Scheme that requires all Council reports to be assessed against equality criteria. Consequently, each stage of the CS process has been appraised to determine impacts on the equality criteria. The impacts of each policy have been assessed with clear conclusions and recommendations for action. The Council is satisfied that the Equalities Impact Assessment is adequate and robust.

**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?**

***Does the CS contain sufficient justification of its policies?***

9.1 The Council is satisfied that the Core Strategy contains sufficient justification of its policies. Appendix 1 of the CS and the Consultation Statement provides the list of evidence base to support the CS in line with the requirements of PPS12 (CD/98). Appendix 1 of the SA Report (CD/37) includes policies, programmes and other strategies taken into account in preparing the CS. Each policy includes a list of evidence base that has been used to justify it.

***Is more explanation needed of how the policies relate to the key objectives identified within section 3?***

- 9.2 No further explanation is needed to explain how the policies relate to the key objectives. The CS already follows a clear story that begins with the spatial portrait and the issues and challenges facing the Borough. An analysis of the strengths, opportunities, threats and weaknesses of the area has been provided. There is a clear vision that sets out a strategic direction for addressing the issues and a clear set of key objectives that link the vision to the policies. A matrix has been prepared as part of the topic paper 'How the policies of the CS link to the key objectives and the overall vision' (WBC/11) to demonstrate how the policies relate to the key objectives.

***Do the objectives link the vision with the policies adequately?***

- 9.3 The Council has prepared a topic paper of 'How the objectives link to the vision and policies of the Core Strategy' (WBC/11). The entire topic paper is relevant to addressing this issue and is therefore not repeated. The Council is satisfied that the objectives adequately link the vision with the policies.

***Is it sufficiently clear how the policies meet the needs of the Borough identified in the course of the CS preparation?***

- 9.4 The CS lists the issues and challenges facing the Borough. This has been refined through public consultation. A clear vision to set the strategic direction for the objectives and the policies has been established. The objectives and policies have direct linkage to the Issues and the preferred options for addressing them. Furthermore, the Council has published a 'self assessment of how the CS conforms to the requirements of the Woking and Surrey Sustainable Community Strategies (CD/1). This assessment has confirmed that the CS provides a sound foundation for delivering the aspirations of the local community as set out in the Sustainable Community Strategies.

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

- 10.1 The Council's CS acknowledges adequately cross-boundary issues that are relevant for consideration in the CS. Paragraph 2.40 adequately emphasises matters of cross-boundary significance. The Council has also prepared a paper on the duty to cooperate in relation to planning for sustainable development (WBC/1) that sets out in detail how the Council has worked in partnership with Regulatory Bodies and key stakeholders to address matters of cross-boundary significance. Furthermore, the Council has published a 'self assessment of the conformity of the CS with national and regional policy, Woking and Surrey Sustainable Community Strategies and the key Priorities of the Council' (CD/1). The extent to which the duty to cooperate has been satisfied is set out in this document. The Inspector's attention is drawn to the fact it will be difficult to predict all cross-boundary issues that may emerge during the period of the CS. However, there are well established partnership arrangements that exist to enable the Council to respond in the future to any further issues that may arise.

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

11.1 Policy CS1 is upfront about the scale of development expected in the Borough over the life of the CS and where they will be directed. The Places Policies CS2, CS3, and CS4 provide details of the scale of development to be accommodated at the various centres and the timeframe for delivery. Policy CS10 – Housing provision and distribution provides sufficient detail of the number of dwellings that will be provided at various broad locations and includes a housing trajectory that demonstrates the timing of the housing provision. The Council has prepared an IDP (CD/11) to demonstrate the scale of infrastructure needed to support the CS. Part of this is an Infrastructure Schedule that sets out what infrastructure will be delivered, at what time, by which organisation, at what cost. The Council considers that the CS provides sufficient detail on how much development is expected and where and when it will be delivered.

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

12.1 The Council has published a Population Topic Paper (updated February 2011) (CD/24) to inform the CS and the IDP. It uses the ONS 2008-based sub-national population projections for England (revised May 2010) as the main source of information. It is recognised that other organisations use different data sources and methods to estimate future population growth. However, the Council is satisfied its population growth forecast is robust to inform the CS and the IDP.

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

13.1 The vision provides a balanced strategic direction for the sustainable economic development of the area that includes high-technology industries and other small to medium sized industries that meet the varying needs of the community. Objective 5 expands this by emphasising the need for good quality office and industrial space to meet the needs of modern business. Policy CS15, which sets out detailed policy about how the vision will be delivered, specifically promotes smart growth and makes land available to accommodate high technology manufacturing which may result from the development of McLaren and the activities of other high-tech manufacturing companies in the Borough. The Council is therefore satisfied that the vision strikes a good balance in promoting economic growth that addresses the varying needs of the community.

**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?**

***Does the Core Strategy take a robust approach to growth and the availability of infrastructure?***

14.1 The Core Strategy is clear about the scale of growth to be provided over the period of the CS, where it will be accommodated and where relevant, when it will be delivered (Policy CS1). Each of its growth requirements are justified by robust evidence. Appendix 1 of CS includes a list of the evidence base. Each policy that sets out a requirement for growth also includes the evidence base

that has been used to justify it. Each policy also includes a section about how it will be delivered.

- 14.2 The Council has published an IDP (CD/11), which identifies the necessary infrastructure to support growth identified in the CS. An Infrastructure Schedule (WBC/9) has been prepared as part of the IDP. The schedule clarifies the nature of the infrastructure, when it will be provided by whom and at what cost. Furthermore, it sets out what funding sources are available to deliver the infrastructure, the primary policies and objectives of the CS that the infrastructure will assist in delivering, risk associated with delivery and contingencies to address uncertainties.
- 14.3 Based on the above the Council believes that the CS takes a robust approach to growth and the availability of infrastructure.

***What is the relationship between the Core Strategy and the Infrastructure Delivery Plan?***

- 14.4 The IDP (CD/11) provides evidence of what physical, social and green infrastructure is needed to support the amount of development proposed in the Core Strategy. The IDP has therefore been prepared as an integral part of the CS and forms an essential part of its evidence base. The relationship between the policies and objectives of the CS and the various infrastructure items identified to support the CS is set out in the Council's Topic Paper 'Woking Borough Council's approach to monitoring and delivery with particular emphasis on infrastructure delivery' (WBC/9). The Inspector's attention is drawn to the fact the IDP also provides justification for securing developer contributions towards infrastructure provision.

***Is there a need to cross reference more clearly the provision of necessary infrastructure?***

- 14.5 The CS adequately makes reference to IDP (CD/11) where relevant. Furthermore, Policy CS16 – Infrastructure delivery provides a clear direction about how infrastructure will be delivered. The Council had considered including the infrastructure schedule in the CS but decided against that since it is likely to change over time, and there will be the need to review it regularly to bring it up-to-date. There is therefore no need for further cross-referencing in the CS to the provision of necessary infrastructure.

**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?**

- 15.1 Policy CS1 strikes a good balance between the three strands of sustainable development – social, economic and environmental. It ensures a balanced provision of growth that is justified by credible evidence including sufficient provision for housing and economic growth. It directs most new development to sustainable locations at the main urban centres where there is relatively easy access to services and facilities to minimise the need to travel and distance travelled. It does so sensitively by recognising the functions of the various centres. It maximises the efficient use of land by concentrating most new development on previously developed land at high densities. It seeks to protect both the natural and built environment by ensuring that environmentally sensitive sites and heritage assets are protected. It seeks to integrate places where people live, work and visit by good and sustainable transport modes. It commits to release Green Belt land for future development but seeks to ensure that this will not undermine its purpose and integrity. It ensures that there will

be adequate infrastructure to support the delivery of the CS. It ensures that resources are prioritised to address pockets of deprivation in the area. The Inspector's attention is drawn to the fact that the policies of the CS, including CS1 have been subjected to a Sustainability Appraisal.

- 15.2 The CS is a spatial strategy that accords with the requirements of PPS12, in particular Section 2. It has a vision, objectives and policies to deliver the aspirations of the community and create a sense of place where people would like to live, work and visit. It has a positive framework for action on climate change, identifies opportunities for sustainable growth including identifying land for economic and housing growth. It protects environmentally sensitive sites and the heritage assets of the area and ensures that infrastructure is aligned to the delivery of growth. As demonstrated above, Policy CS1 provides a clear direction for addressing these requirements. The Council is therefore satisfied that CS1 accords with PPS12.

**16 Is sufficient regard and emphasis given to issues of education, heritage and health?**

- 16.1 The Council considers that sufficient regard has been given to education, heritage and health. Policy CS16 of the CS deals with infrastructure delivery. Its definition of what constitutes infrastructure includes education and health. The policy makes specific reference to an IDP to set out details of the necessary infrastructure to support identified growth in the CS. The Council has prepared an IDP (CD/11). Section 7 - 9 concentrates on all aspects of education provision to meet the requirements of the CS. Section 10 deals with health provision. As part of the IDP, the Council has prepared an Infrastructure Schedule (WBC/09) setting out the infrastructure identified to support the CS, who will be providing it, the timing of delivery and the funding sources. This schedule also includes education and health provision and they are dealt with comprehensively.

- 16.2 The CS includes policies to deliver open spaces, decent homes and improvements to pedestrian and cycle infrastructure to encourage cycling and walking, all of which will combine to make a significant positive contribution towards the well-being of the community.

- 16.3 Policy CS20 is a specific policy that recognises the need to protect and enhance the heritage assets of the area. The Council has been proactive in carrying out a Character Study (CD/9) to further understand the character of the area beyond designated areas. The Council has prepared a topic paper on heritage matters (WBC/07) settings out how heritage matters has been addressed in the CS. It includes a Statement of Common Ground between the Council and English Heritage. Subject to the proposed minor changes, the Council is satisfied that heritage matters are sufficiently emphasised in the CS.

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

- 17.1 The CS identifies areas of deprivation and includes a specific policy to address that. It recognises that whilst Woking is generally an affluent community, there are pockets of deprivation that need to be addressed. The importance that is attached to this issue is reflected in the spatial portrait, the issues and challenges facing the area and the vision and objectives of the CS. Policy CS5 – Priority Places is a locally distinctive policy designed to address pockets of deprivation at Maybury and Sheerwater and the Lakeview Estate area of



Goldsworth Park. The Council will continue to work with Woking Partnership, Surrey Strategic Partnership and other stakeholders to coordinate resources to address deprivation in these areas.

- 17.2 The CS makes the delivery of affordable housing a priority to meet the accommodation needs of people who cannot afford market housing. It also makes provision for the accommodation needs of the elderly and vulnerable people. It should be noted that other activities of the Council will complement actions identified in the CS.

## CS2 Woking

- 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?**

***Is the approach to Woking compliant with the content of PPS4?***

- 18.1 Woking Borough Council is satisfied that policy CS2 of the Core Strategy is compliant with the content of PPS4. The Council has prepared a topic paper 'Self assessment of the conformity of the Core Strategy Publication Document with national and regional policy, Woking and Surrey Sustainable Community Strategies, key priorities of the Council' to demonstrate how the CS is in general conformity with national policy. This document is published on the Council's website ([www.woking2027](http://www.woking2027)) and is part of the Submission Documents to the Secretary of State (CD/1).
- 18.2 PPS4 sets out national planning policies for economic development. To help achieve the Government's overarching objective of sustainable economic growth, PPS4 sets out in paragraph 10 the objectives for planning.
- 18.3 In line with the objectives of PPS4, policy CS2 of the CS:
- Will improve the economic performance of the town centre by designating it as the primary centre for economic development in the Borough, and as a primary economic centre in the South East.
  - Will enable delivery of a more sustainable pattern of development by encouraging mixed use high density development in the town centre, and reduce the need to travel, especially by car and respond to climate change by provision of a well connected and integrated transport system that provides effective access to key services and facilities by sustainable modes.
  - Will promote the vitality and viability of the town centre by focusing new economic growth and development of main town centre uses in the centre, with retail uses focused in the primary shopping area and A1 uses protected within the primary frontage.
  - Will enable competition between retailers and allow genuine choice for the whole community by planning for the addition of up to 67,600 sq.m of A1 retail space within the town centre and supporting improvements to the market.
  - Will assist conservation of the historic, archaeological and architectural heritage of the town centre by ensuring new development proposals deliver high quality, well designed public spaces and buildings. Proposals affecting

Conservation Areas and Listed Buildings will be subject to Policy CS20 – Heritage and Conservation.

- 18.4 Policy EC1: using evidence to plan positively requires local planning authorities to prepare a proportionate evidence base to understand both existing business needs and likely changes in the market to support policy development. Policy CS2 is underpinned by a suite of evidence base studies which are informed by regional assessments and provide an assessment of the need for land/floorspace for main town centre uses over the plan period. The requirements of Policy EC1 for retail, leisure and other town centre uses are addressed by The Town, District and Local Centres Study (TDLCS) (CD/40) and Employment Land Review (ELR) (CD/13). In addition, the Surrey Hotel Futures (CD/33) provides supporting evidence with respect to hotel development.
- 18.5 Plan making policies are contained in Policies EC2 - EC8 of PPS4. By planning for sustainable economic growth of Woking Town Centre and promoting a competitive town centre environment Policy CS2 complies with Policies EC2 – 4. The Area Action Plan proposed for the town centre will set out a strategy for the management and growth of the centre as required by Policy EC3. Policy EC5 requires local planning authorities to identify an appropriate range of sites to accommodate the identified need. The TDLCS (CD/40) and ELR (CD/13) both consider suitable sites to bring forward new town centre floorspace. A comprehensive list of sites will be detailed in the Site Allocations DPD, which will complement the implementation of the CS. As no identified development sites remain and the majority of the town centre is relatively low-rise the quantity of development proposed can be accommodated through mixed use higher density redevelopment and intensification of existing sites. Policy EC8 sets out requirements for parking standards for non-residential development. These are addressed in Policy CS18 and will be detailed in the reviewed parking standards SPD.
- 18.6 Policy CS2 sets out monitoring requirements to comply with Policy EC9 of PPS4. Policies EC10 to EC19 set out development management policies to apply to economic development uses. These policies complement Policy CS2 of the CS and are not reformulated by it.

***To what extent has the strategy relating to retail and town centre development been developed with neighbouring administrative areas?***

- 18.7 The evidence base which has informed development of Policy CS2 has taken into account information in the SEP. At all consultation stages in the preparation of the CS neighbouring local authorities (as special consultees) have been consulted. In their response to the Publication Draft of the Core Strategy Surrey Heath Borough Council stated that *'retail figures for Woking Town Centre in the Town, District and Local Centre Study are based on maintaining market share in the face of competition from new developments in competing town centres. This unaggressive policy neutral approach to the provision of new retail space is welcomed by Surrey Heath Borough Council.'* In addition, other forums such as Planning Working Group and the West Surrey Group are regularly kept informed of the emerging key issues of the CS.

**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?**

***Is the proposed increase in retail floorspace justified by the evidence base?***

- 19.1 It is the Council's opinion that the figures for additional retail floorspace provided in the CS for the town centre are justified by the evidence base, The Town, District and Local Centres Study (TDLCS) (Roger Tym and Partners, 2009) (CD/40). The figures used in the CS are based on the forecasts used in the base assessment of the TDLCS, which is the preferred approach to quantitative need, being founded on published sources, widely respected in the industry.
- 19.2 Despite an expectation that there is scope for Woking to achieve an improvement in market share in the short-term, the evidence base maintains constant market share over the study timeframe, which is a policy neutral approach.

***Is the evidence sufficiently up-to-date and robust?***

- 19.3 Although the TDLCS was carried out in 2009, the assumptions contained within it, including the population and retail spending forecasts, are still considered valid by the Council. The methodology used in the TDLCS followed all the required steps in Government guidance. The study provides an assessment of the vitality and viability of Woking Town Centre and sets out both qualitative and quantitative need assessments.
- 19.4 The study used retail spending forecasts (from the two major providers of data on retail spending), which had been revised to reflect reduced estimates of retail spending arising as a result of the economic downturn. Forecasts were further broken down into three time periods - 2009-2016, 2009-2021 and 2009-2026, enabling variations in the economic cycle to be taken into consideration within the analysis. In addition, a range of recent forecasts were considered in estimating the comparison goods expenditure growth per capita figures for the three time periods, and a medium growth rate chosen, with the forecast for the period 2016-21 based on past trends and the 2021 – 2026 estimate based on a more cautious ultra-long term past trend. The report made clear that a significant quantum of expenditure growth was identified, and thus sensitivity testing was applied. Although the final floorspace recommendations were based on the base assumptions, the Council remain confident that there is insufficient evidence at this point in time to justify a reduction in the proposed future retail requirement as a result of either an increase in special forms of trading or more cautious growth assumptions.
- 19.5 It is acknowledged that the population projections used in the report are conservative projections. The projections for the core zones which broadly comprise the Borough boundary are based on Surrey County Council projections, which are lower than those used in the SEP. However, as a significant quantum of expenditure growth was identified over the CS period the Council do not consider that it is appropriate at this juncture to alter the population projections in the evidence base, especially given the continued low growth environment in the economy.

- 19.6 Given the inherent uncertainty in long term forecasting, the Council will ensure regular monitoring of the assumptions used, so that a robust evidence base is maintained.
- 19.7 Although recent research by Verdict shows national consumer expenditure growth of just 1.2% during 2011, research by the Local Data Company shows vacancy rates stabilising over the second half of 2011. In April 2008 research analysts CACI published lists of the UK retail destinations that they believed to be most resistant to the credit crunch due to a high proportion of 'credit crunch resistant' shoppers in their catchment areas. Woking was at number six in the national rankings, behind Guildford at two, but ahead of both Kingston-upon-Thames and Reading.
- 19.8 An Evidence Base Review (CD/16) was undertaken by the Planning Advisory Service in September 2011 on a professional and 'critical friend' basis. They concluded that *Woking "has compiled an extensive and comprehensive evidence base to support the Core Strategy to submission"* (para 1.1.14). It also concluded that the topic based evidence is considered as up to date as is reasonable to provide a platform for robust decisions.

***How does Policy CS2 reflect the options recommended within the Town, District and Local Centres Study?***

- 19.9 The retail study found that Woking has significant potential for growth and redevelopment for four key reasons:
- i. Its designation in the SEP as a Centre for Significant Change.
  - ii. Its identification in the SEP as a Regional Hub. Woking's excellent accessibility gives strong support to the notion of future growth.
  - iii. The strategic housing proposals for Woking are likely to result in a rapidly expanding population during the plan period.
  - iv. There is clear evidence of competition from other town centres which over time has the potential to erode the market share of Woking town centre.
- 19.10 Given the shared ambition at regional and local level to change the nature and function of Woking town centre, the study concluded that a 'no action' option was not a realistic alternative. Two main options were set out in the study, the first proposed modest expansion and the second major remodeling of the centre. The consultants concluded that the first option would not achieve the improvement in the town centre necessary for Woking to respond to competition and to fully achieve the aspirations set out in regional policy. Given the Council and other stakeholders support for wholesale change, policy CS2 directly reflects option 2 of the retail study.

***What evidence supports the likely effectiveness (deliverability) of the CS intentions for Woking?***

- 19.11 In order to support major remodeling and development of Woking Town Centre, the Council have acquired Wolsey Place shopping centre. Working in partnership with Moyallen, the Council has already delivered the first phase of improvements/expansion to the retail core and work is currently ongoing on the second phase. This investment will be supported by planned environmental improvements to Town Square and Commercial Way. A third redevelopment phase which would see the development of a second major anchor store for the centre together with additional retail, a hotel and residential accommodation is under consideration. Together these improvements should fulfill the floor space requirements for the period to 2016 and contribute towards the floor space requirements for the period 2016 – 2021 set out in policy CS2. The

delivery of these improvements will assist in bringing forward further retail and commercial space at the Woking Gateway project and other potential sites.

19.12 The Market Appraisal and SHLAA both set out a portfolio of sites which are considered suitable for redevelopment to deliver the growth requirements set out in the CS.

**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?**

20.1 The evidence base recommends that the 'Primary Shopping Area' and 'Secondary Shopping Area' defined in the 1999 Local Plan are amalgamated to accord with Government guidance. Policy EC4 of PPS4 states that local planning authorities should define the extent of the primary shopping area in their Adopted Proposals Map having considered distinguishing between realistically defined primary and secondary frontages. The CS has followed this advice so that the 'Primary Shopping Area' and 'Secondary Shopping Area' defined in the 1999 Local Plan comprise the 'Primary Shopping Area' in policy CS2. The only change to the area is the inclusion within the primary shopping area of the theatre/cinema/library, as it is considered as an integral part of the Peacocks complex. In line with PPS4, primary and secondary shopping frontages have been defined on the Proposals Map. The policy approach to retail frontages in policy CS2 is considered to be sufficiently flexible to be effective. The policy protects A1 retail units within the primary frontage to ensure the primary retailing function of these frontages is maintained and allows a more flexible approach within the secondary shopping frontages, which will enable a mix of uses whilst protecting against any changes that would damage the vitality and viability of the centre.

20.2 The Council consider that adequate reference is made within the CS to street markets and their importance in providing wider consumer choice. Policy CS2 states that 'The Council will support improvements to the market to help ensure that it remains attractive and competitive providing the community with wider consumer choice.'

20.3 The Area Action Plan will consider street market/s in detail, including the most appropriate location/s for a future market/s in the town centre.

**21 Does the CS address issues relating to the evening/night-time economy adequately?**

21.1 The majority of evening/night-time economy businesses in the town centre fall within the A use classes. Policy CS2 sets out the indicative requirement for A2 – A5 floorspace over the CS period in line with guidance in PPS4. Policy CS2 enables such uses to be accommodated within the secondary frontages, and states that 'the Council will consider favourably change of use proposals to other A class uses within secondary frontages if it can be determined they would not have significant harmful effects on the frontage, crime and disorder and the vitality and viability of the town centre.'

21.2 The Town, District and Local Centres study found that there was no pressing requirement for further cinema screens, no evidence of interest in a casino development within Woking and no pressing requirement for further family entertainment facilities in the Borough over the lifetime of the CS.

21.3 Detailed issues set out in policy EC4 of PPS4 (EC4.2(b)) will be addressed in the Development Management DPD and the requirements of the evening/night-time economy will be considered in the Area Action Plan.

**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?**

***Does the CS take a justified and evidenced approach to transport and transport infrastructure within the town centre?***

22.1 The Council considers that the CS takes a justified and evidenced approach to transport and transport infrastructure within the town centre. The CS is underpinned by an up-to-date transport assessment (CD/36). The robustness of the transport assessment and how it has informed Policy CS18 to deal with transport impacts at the Town Centre is addressed by the Council's response to Matter 6 – Issues 27 and 29. Policy CS18 makes specific reference to the IDP (CD/11) to set out details of the nature and type of transport infrastructure to support development. An IDP has been published. Part of it is an Infrastructure Schedule that provides details about the type of transport infrastructure to support development at the town centre, who will provide it where and when and at what cost. It also identifies funding sources to ensure delivery. The identified infrastructure reflects the outcome of the transport assessment.

***How does the CS relate to the proposed Area Action Plan and how will necessary development be secured?***

22.2 The Area Action Plan will articulate how the development proposed for the Town Centre in the CS will be implemented, to assist delivery of the vision for the Borough. It will:

- set out a clear vision for the town centre and demonstrate how this can be delivered;
- demonstrate the functionality of different areas within the centre and how they inter-relate;
- provide guidance on how significant change can occur on key sites and how this new development can be integrated into the existing urban fabric to ensure development enhances the overall character and historic assets of the town centre;
- provide a sound policy framework for assessing planning applications, including detailed design advice.

22.3 As a major landholder, the Council will work in partnership with developers to bring forward development. Various phases of development centred on the Town Square are already permitted/under construction/completed. Where the Council does not own sites, it will still seek to work with stakeholders as an enabler to bring forward sites for redevelopment and will consider utilising compulsory purchase powers if necessary.

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

23.1 The Council consider that the CS and policy CS2 in particular provides sufficient flexibility for the refurbishment and/or redevelopment of sites within the town centre.

23.2 The policy requires new development proposals to deliver high quality, well designed public spaces and buildings, which make efficient use of land, contribute to the functionality of the centre and add to its attractiveness and competitiveness. The policy encourages mixed use high density redevelopment of existing sites and provides the flexibility for sites to be either refurbished or redeveloped. The Site Allocations DPD will identify sites within the centre to bring forward the indicative floorspace requirements set out in the policy.

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

24.1 The SEP requires the Council to provide for a net addition of 5,840 dwellings between 2006 and 2026 (292 dwellings per annum). Between 1 April 2006 and 31 March 2011, 1,502 net additional dwellings had been completed in Woking Borough (including 146 between 1 April 2010 and 31 March 2011) leaving a residual requirement of 4,338 (289 dwellings per annum) to 2026 against the SEP allocation. Given that housing delivery in Woking has taken place at a slightly higher rate than the annual average requirement of 292 the Council do not consider that a specific non-implementation allowance for development within Woking is required.

24.2 As set out in the response to the query in issue 19 '*what evidence supports the likely effectiveness (deliverability) of the CS intentions for Woking*' the evidence base emphasises that there is a realistic prospect of delivering the employment (including retail) floorspace within Woking and thus it is not considered necessary to include a specific non-implementation allowance for such development.

**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?**

25.1 Viability, in particular in regard to the deliverability of affordable housing, has been considered in detail in both the SHLAA (CD/31) and Economic Viability Assessment (EVA) (CD/12). Appendix 11 of the SHLAA sets out the methodology employed to consider the viability of sites for housing, including mixed-use sites in the town centre. The EVA produced by Adams Integra studied the suitability of various potential affordable housing policy positions in terms of likely impact on residential development viability. The assessments took into account a comprehensive range of development costs, including payments towards infrastructure provision and looked at a wide range of scenarios to be appraised including town centre developments.

25.2 The IDP sets out what new infrastructure is required to meet the levels of growth proposed in the CS, including details of where and when the infrastructure will be provided, who it will be provided by and how it will be funded.

- 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)**
- 26.1 Appendix 14 of the Strategic Housing Land Availability Assessment (CD/31) details a number of exemplar residential schemes including town centre schemes, several of which are mixed use developments. All the schemes listed have now been completed. The indicative density for these schemes is 315 dph, with densities ranging from 250 dph to 400 dph.
- 27 *The matters relating to Woking town centre boundary are now dealt with under Hearing 5, Issue 17.***

### **CS3 West Byfleet and CS4 Local Centres**

- 28 Is the evidence base in support of the identified centres/parades robust and up to date? Is it consistent with PPS4? Should the Knaphill boundary be altered? Should Knaphill be a District Centre?**

28.1 Please see the Council's response to this question under issue 19, paragraphs 19.3 to 19.8.

#### ***Is it consistent with PPS4?***

28.2 Policies EC1.3 and EC1.4 of PPS4 (CD/92) set out the evidence base requirements to understand both existing business needs and likely changes in the market. Annex C of PPS4 provides a range of data that will be relevant to the preparation of the evidence. It requires the Core Strategy to be supported by an evidence base that assesses the detailed need for land or floorspace for economic development, or any deficiencies in the provision of local convenience shopping, an assessment of the existing and future supply of land available for economic development and the capacity of existing centres to accommodate new town centre development.

28.3 The Council has carried out the following key evidence base that addresses all the above requirements:

- . Employment Land Review (ELR) comprising the Employment Position Paper (Jan 2010) and the Market Appraisal (published April 2010) (CD/13)
- . Town, District and Local Centres Study (CD/40)
- . Population Topic Paper (CD/24)
- . Retail Monitoring Report (CD/26)
- . (Surrey Hotel Futures (CD/33)
- . Infrastructure Delivery Plan (to support delivery) (CD/11).

Based on the above, the Council is satisfied that the evidence base to support economic development of the town, district and local centres is consistent with PPS4.

28.4 The Inspector's attention is drawn to the fact the Council is committed to prepare a Site Allocations DPD that will identify specific sites for economic development. The documents which make up the evidence base are part of the Submission Documents to the Secretary of State and are on the Council's website.



***Should the Knaphill Centre boundary be altered?***

- 28.5 The Knaphill centre boundary is shown on the Proposals Map which accompanied the Core Strategy Publication Document. The boundary has been drawn more tightly than that set out in the Local Plan 1999 Proposals Map. The definition of the boundary is based on the recommendations in the Town, District and Local Centres Study (CD/39), the boundary on the Proposals Map which accompanied the Local Plan (1999), intensification of activities on the ground and representations received during the consultation on the Core Strategy Publication Document.
- 28.6 Griffiths by Valentino (A1 comparison) is located at 23-27 Broadway. This unit was included within the boundary of Knaphill village centre in the Proposals Map which accompanied the Local Plan (1999) but excluded from the boundary set out in the Town, District and Local Centres Study. Having carefully examined the relationship between this shop and the commercial presence in the Centre, it would seem appropriate to include Griffiths by Valentino within the centre boundary and therefore retain this part of the Knaphill centre boundary as it is in the Local Plan 1999.
- 28.7 The same issue has arisen with the computer shop on the corner of Anchor Hill and Highclere Road but a different view is taken by the Council. The unit fell within the boundary on in the 1999 Proposals Map but the consultants recommended that Highclere Road/Guildford Road was used as the centre boundary and so the shop falls just outside. The road is fairly busy and although there are A1 units on Victoria Road/Lower Guildford Road they do feel peripheral to the centre. The Council felt that Highclere Road/Guildford Road provided an appropriate boundary to the centre. Subject to the proposed changes published as part of the Submission Documents being taken into account, the Council is satisfied that the Knaphill Centre boundary should not be altered any further.

***Should Knaphill be a District Centre?***

- 28.8 The basis of the reclassification of Knaphill as a local centre is the Town, District and Local Centres Study. The study applies a clear criteria and methodology in establishing the hierarchy of centres in the Borough. It is clear from applying the criteria that Knaphill qualifies as a local centre. To categorise it as a District Centre will be inconsistent with the general approach adopted for the classification of the centres. Furthermore, the Council does not consider there is any evidence to justify such a classification.

**29 Is the Horsell local centre boundary based on robust evidence?**

- 29.1 The Horsell Village centre boundary shown on the Proposals Map which accompanied the Local Plan 1999 was drawn quite widely. To the south east the boundary included Horsell Village School (labelled on the base map as Horsell County First School), St Mary's Church and the vicarage next to the church. To the north east it ran up to the junction of the High Street and Ormonde Road.
- 29.2 In Appendix 11 of the Town, District and Local Centres study the consultants proposed revised boundaries for all of the centres, including Horsell. The revised boundary was drawn very tightly and it just included the retail units along the High Street. It was considered that for some of the centres including Horsell, the proposed boundaries had been drawn from a retail perspective and

did not take a holistic view and consider other types of economic development. It was felt that the two pubs, the Parish Hall, Scout hut and war memorial very much formed part of the centre and were so closely located to the shops it was logical to include them in the centre boundary. The Queen Elizabeth Gardens and bowling green have been included in the boundary because they are in between the shops and Parish Hall. They are identified as Urban Open Space.

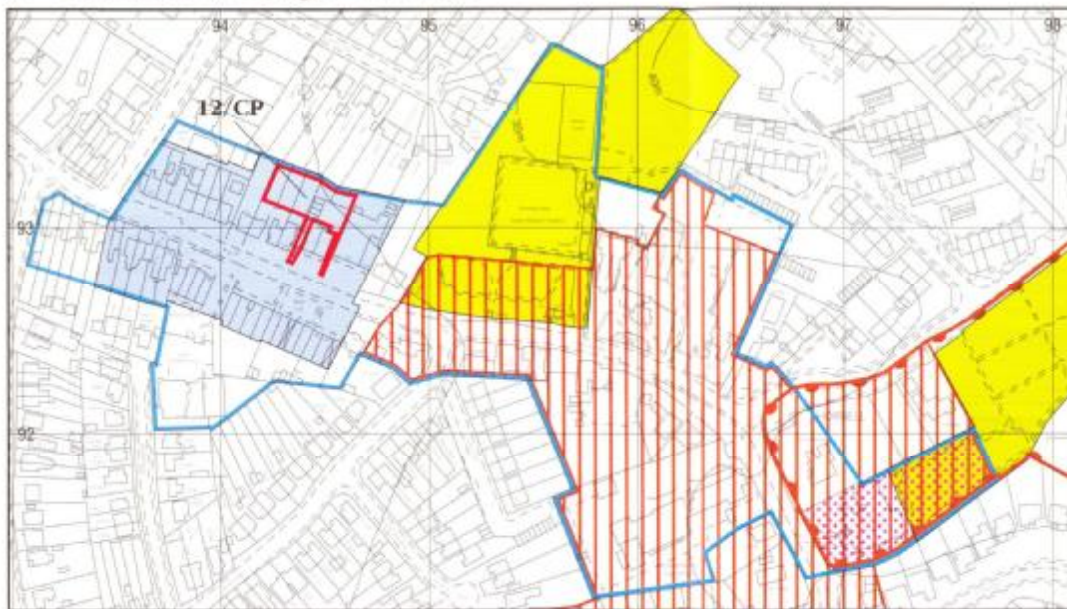
29.3 Supporting this decision is the planned investment in and redevelopment of the community facilities in Horsell. On 10 March 2011 the Council's Executive approved a £1.7 million investment for a proposal to improve the community facilities within Horsell, with priority given to enabling the construction of a replacement building for Horsell Scouts and Guides. The proposals approved also included improving the existing Village Hall to provide disabled access and installing a new multi use games area and tennis court. The work does not yet have planning permission but an application is expected in 2012 with completion timetabled for December 2013.

29.4 Given the planned investment in the centre and the nature of the centre, the boundary put forward by the Council is considered to be the most appropriate.

### Local Plan 1999

Boundary shown in blue


## 7. Horsell Village Centre

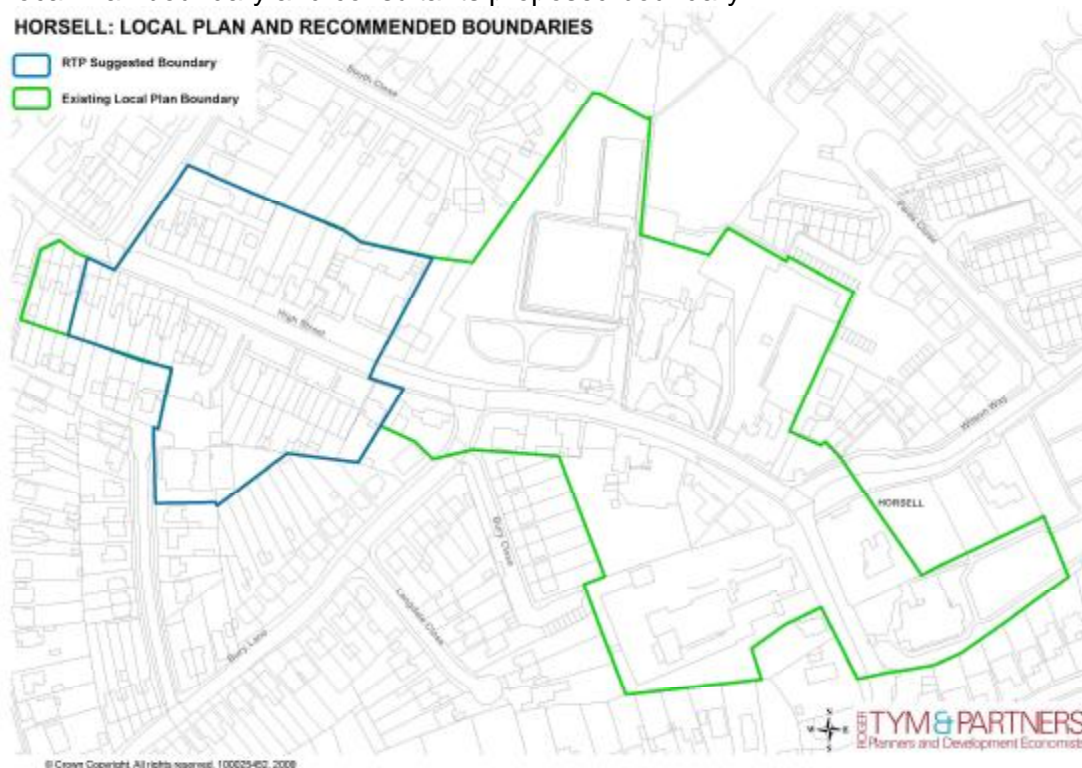


## Town, District and Local Centres Study

Local Plan boundary and consultants proposed boundary

### HORSELL: LOCAL PLAN AND RECOMMENDED BOUNDARIES

-  RTP Suggested Boundary
-  Existing Local Plan Boundary



## Core Strategy Publication Document

Boundary shown in purple

### 1. Horsell



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**30 Does the policy address adequately the small scale local provision of shops and services outside of town centres?**

30.1 In principle the Council seeks to protect all shops which provide a function to their local area. Policy CS4 has been written to protect and, at an appropriate scale enhance, the local provision. The policy applies to local centres, neighbourhood centres and shopping parades and seeks to protect and retain local shops and other small scale economic uses such as post offices, petrol stations and public houses because of the importance of these uses for meeting everyday needs of those living locally, particularly those without access to a car.

30.2 The Council is aware there might be a limited number of shops located outside the shopping areas listed in policy CS4. Policy SHP7 in the Local Plan 1999 seeks to protect such isolated shops. This is one of the policies that has been identified in WBC/4 that will be saved and taken forward as a development management policy. When the Development Management DPD is adopted it will contain a policy to protect this type of isolated shop.

### **CS5 Priority Places**

**31 Does the evidence indicate that Westfield and Kingfield should be a Priority Place in terms of CS5?**

31.1 In answer to this question, reference should be made to the officer response to ID16, Rep 29, concerning this issue.

31.2 Parts of Kingfield and Westfield do indeed experience levels of relative deprivation, as do other areas within the borough. However, in terms of policy CS5, it is not considered that there is sufficient evidence to identify the ward as a 'priority place'.

31.3 One of the factors used to identify the deprivation is the Indices of Deprivation (ID). Based on the ID 2010, the most deprived LSOA in Maybury and Sheerwater falls into the 13% most deprived in the county and Lakeview LSOA falls into the 22% most deprived. The most deprived LSOA in Kingfield and Westfield is in the 43.7% most deprived in the country. There are seven LSOA in Woking Borough more deprived than the most deprived LSOA in Kingfield and Westfield. Based on the ID 2010 the selection of Maybury and Sheerwater and Lakeview as priority places is justified.

31.4 Key to the policies within the CS is their ability to be delivered. The Priority Places have been identified as areas which experience the highest levels of relative deprivation in the county and borough, and those deprivation issues require multiple and multi-agency interventions to achieve outcomes. A large body of evidence exists to support this.

31.5 Maybury and Sheerwater has been identified as one of four Priority Places within the county and the Lakeview Estate is identified by the Woking Partnership as a priority community. There is full partnership commitment to tackling deprivation in these areas. No such partnership agreement is in place for Kingfield and Westfield or any other area within Woking, which may also experience relative deprivation.

- 31.6 The representation regarding Kingfield and Westfield will be passed on to the Woking Partnership to consider and if proven to be the case they will identify resources to address any issues in the area.
- 31.7 It needs to be emphasised that the fact that some areas are not identified as priority places does not mean their needs will be ignored. The Council will continue to work with all of its partners to ensure inequalities in all areas of the borough and any disparity between the area are addressed
- 32 Is the proposed retail space for Sheerwater clear in its intentions so as to be effective in delivery?**
- 32.1 The Council considers the policy wording to be fairly specific and that the intentions are clear. An additional convenience retail outlet in Sheerwater is supported in principle to regenerate the area, enhance consumer choice and provide an adequate retail offer. The policy goes on to state that Compulsory Purchase Order powers would be used if necessary.
- 32.2 The Site Allocations DPD will consider specific sites for the retail outlet. Any application coming forward before this DPD is published will be determined on its own merit in accordance with national planning policy (currently including PPS4) and other policies within the CS, including CS4.
- 32.3 The key to delivery of new retail floorspace, and other socio-economic aspirations for Sheerwater, is the implementation of the proposed road access scheme. The Council has submitted a planning application for this road scheme (PLAN/2011/1197), which is due to be determined by the Planning Committee at its meeting on 20 March 2012. Funding for the road scheme has been identified through the LSTF bidding process and Woking BC committed to underwrite the rest of the cost for implementing the scheme.

## Hearing 2: Environmental Considerations Section 5

### Part 1- Natural Environment – CS6, CS7, CS8, CS9

***Matter 2: Does the CS take a justified and effective approach to issues relating to the Green Belt (GB) and the natural environment which is consistent with national planning policy?***

#### CS6 Green Belt

- 1 Is the Council's approach to GB consistent with the advice of PPG2? What evidence underpins the approach advocated within Policy CS6? Should the GB be an area of potential growth?**

***Is the Council's approach to GB consistent with advice of PPG2?***

- 1.1 The Council considers that the Core Strategy's approach to Green Belt is consistent with the requirements of PPG2 (CD/90). The overriding objective of the Council's approach to the Green Belt is to protect its purpose and integrity. This is emphasised in Policy CS6 of the CS and is consistent with PPG2. Policy CS6 makes reference to PPG2 as a material consideration in planning decisions and as such it should be read in conjunction with the CS. Policy CS6 identifies two Major Developed Sites in the Green Belt. The definition of these sites accords with the guidelines set out in Annex C of PPG2.
- 1.2 The Village of Mayford is washed over by the Green Belt. In accordance with paragraph 2.11 of PPG2, Policy CS6 designates the village of Mayford as an infill only settlement with specific criteria to determine the suitability of any proposed development. The policy is clear to emphasise that the suitability of any scheme that will come forward will be measured against the requirements of PPG2 and other policies of the CS.
- 1.3 The Green Belt has been identified as an area of search to identify specific sites to meet housing need between 2022 and 2027. Whilst the Council is committed to ensure the permanency of the Green Belt boundary, PPG 2 allows scope for the Green Belt Boundary to be reviewed in exceptional circumstances. The approach taken in the CS to review the boundary is therefore not at odds with the provisions of PPG2. This approach is also in general conformity with the requirements of the SEP (Policy LF3 – Broad amount and distribution of future housing development of the SEP) (CD/126).
- 1.4 The Inspector's specific attention is drawn to the fact that the Council is committed to carry out landscape, transport and ecological impacts assessment to inform the Green Belt review. Furthermore, the Site Allocations DPD will be reviewed to take account of the outcome of the Green Belt boundary review.

***What evidence underpins the approach advocated within Policy CS6?***

- 1.5 The following evidence underpins the approach advocated within CS6:
- The South East Plan (CD/126);
  - The Strategic Housing Land Availability Assessment (CD/31);
  - The Strategic Housing Market Assessment (CD/32);
  - The SA Report (CD/37);

- Also the environmental constraints and heritage assets of the Borough.

1.6 Based on the available evidence, the Council has decided to make provision for an additional 292 dwelling per year to include affordable family homes. It has identified a portfolio of suitable sites through the SHLAA to meet about 13 years housing land supply. PPS3 (CD/91) allows scope for broad locations to be identified to meet housing growth between years 11 to 15 of the Plan period. The Council believes that there is opportunity to release Green Belt land to meet the quantity and nature of housing supply envisaged between 2022 and 2027 without undermining its overall purpose and integrity. To demonstrate that the Council has identified sufficient sites to meet its housing need is one of the means of protecting the Green Belt in the long term by avoiding planning by appeal. The Council therefore considers that there is adequate evidence to underpin the approach advocated within Policy CS6.

***Should the GB be an area of potential growth?***

1.7 The Council has carried out a SHLAA, which is reviewed on an annual basis. Based on the evidence contained in the SHLAA, it is clear that the main urban centres alone will not have the necessary capacity to accommodate the scale and nature of the housing need. The density of development that may be required to meet the entire housing need at the main urban centres could compromise their character and appearance (SA Report CD/37). Furthermore, the main centre will not be suitable to meet the entire nature of the need, in particular, the need for affordable family homes. The Green Belt offers the opportunity for a modest amount of land to be released to meet housing need towards the last five years of the period of the CS without undermining its overall purpose and integrity.

**2 Is the planned release of GB land for residential development justified by robust evidence and consistent with PPS12 and PPG2? Why is the GB review planned for 2016/17; should this be earlier? Will the CS be effective over the plan period (how will the housing trajectory be managed in relation to GB land release)?**

***Is the planned release of GB land for residential development justified by robust evidence and consistent with PPS12 and PPG2?***

2.1 The Council's response to Matter 2 – Issue 1 lists the evidence base to justify the approach to the Green Belt boundary review.

2.2 PPS12 requires spatial plans to ensure that the necessary land is available at the right time and in the right place to deliver new housing (paragraph 2.4). Furthermore, it emphasises the importance of making clear the spatial choices about where developments should go in broad terms. The CS directs most new development towards previously developed land within the main urban areas to maximise the efficient use of land. It is also clear about identifying the Green Belt as an area of search to identify specific sites to meet housing need between 2022 and 2027. This approach provides clarity and certainty about how the Council plans to meet its housing requirement and in the Council's view accords with the requirements of PPS12 and PPG2.

***Why is the GB review planned for 2016/17; should it be earlier?***

- 2.3 The SHLAA provides the necessary evidence to justify that sufficient suitable and deliverable sites have been identified to meet about thirteen years housing land supply. Consequently, there will not be any need for Green Belt release for housing development before 2022. Past delivery trends confirms the success of housing delivery on previously developed land and the Council has no reason to believe that this trend will not continue. The timing will also facilitate the delivery of the CS objective to concentrate most new development on previously developed land within the main urban areas. The key objectives of the CS seek to protect the integrity of the Green Belt. The timing of Green Belt release is critical to strike a balance between the objective to protect the Green Belt, the objective to meet housing need and the overall sustainability objectives of the CS.
- 2.4 The review date of 2016/17 has been set to allow sufficient time to carry out all the specified assessments to inform the review. It will also allow sufficient scope for adequate public involvement. The Council considers that no purpose will be served by an early review as the sites will not be released until 2022.

***Will the CS be effective over the plan period (how will the housing trajectory be managed in relation to GB land release)?***

- 2.5 Effectiveness of a CS is defined by PPS12 paragraph 4.44 (CD/98) as being deliverable, flexible and able to be monitored. The Council has already submitted a topic statement on 'Woking Borough Council's approach to monitoring and delivery with particular emphasis on infrastructure delivery' (WBC/9). It concludes that the CS is deliverable and has an in-built mechanism to monitor its performance against its objectives. It also sets out who will be delivering what aspect of the CS at what time. It has sufficient contingencies and flexibility to overcome uncertainties. The Council's response to Matter 8 – Issue 1 demonstrates that the CS has sufficient flexibility to ensure its effective delivery. The delivery of the CS is informed by adequate and robust evidence base. For example, the SHLAA identifies specific deliverable and suitable sites that have the realistic prospect of coming forward at specific times during the period of the CS.
- 2.6 Fig 4: Housing and previously developed land trajectory identifies specific deliverable sites for housing delivery over the period of the CS. On average, there is a shortfall of housing land supply to deliver about 550 new homes between 2022/23 and 2026/27. This will be met by the release of Green Belt land. The housing trajectory will be updated to take into account land released from the Green Belt and when it is likely to come forward for development. The Council has already confirmed that the release of Green Belt land will be given certainty of delivery through the Site Allocations DPD.

- 3 Does the CS approach follow the provisions of SEP Policy LF3? Is the CS consistent with the SEP? Is Woking departing from the intention of potential sustainable urban extensions? Is CS6 sufficiently precise so as to be effective? Does the available evidence support a reference to land availability to the south of Woking?**

***Does the CS approach follows the provisions of the SEP Policy LF3?***

- 3.1 Policy LF3 requires the Council to allocated sufficient land for the delivery of an annual average of 292 net additional dwellings between 2006 and 2026. It also offers an in-principle support for the selective review of the Metropolitan Green Belt to accommodate sustainable urban extensions possibly at Woking. The CS



follows this guidance by making provision for 292 new dwelling per year and committing to review the Green Belt in 2016/17 in order to deliver the SEP housing requirement.

***Is the CS consistent with the SEP?***

- 3.2 The Council has confirmed in its 'Self assessment of the conformity of the Core Strategy Publication Document with national and regional policy, Woking and Surrey Sustainable Community Strategies and the key priorities of the Council (CD/1)' that the CS is in general conformity with the SEP (CD/126). The extent to which the CS is consistent with the SEP and reflects adequately its aims has also been addressed in the Council's response to Matter 1 – Issue 1. As demonstrated above, the Council considers that the Core Strategy's approach to the Green Belt is consistent with Policy LF3 of the SEP.
- 3.3 Policy SP5 of the SEP deals with Green Belts. It supports the selective review of the Green Belt boundary possibly to the south of Woking. The Council has decided not to limit the geographical scope of the review to only the South of the Borough but to carry out a comprehensive review that assesses potential suitable sites in sustainable locations around the urban area. This approach is necessary to be able to defend the permanency of the Green Belt boundary. The Inspector's attention is drawn to the fact that Policy SP5 does not absolutely rule out consideration of sites that are not in the south of the Borough as part of any review. In developing the methodology for the review, the Council will be concerned to ensure that national and regional guidance is followed. The Core Strategy's approach is also consistent with Policy SF5 of the SEP.

***Is Woking departing from the intention of potential sustainable urban extensions?***

- 3.4 Woking is not departing from the intention of potential sustainable urban extensions. The ultimate goal of the review will be to identify suitable and deliverable sites at sustainable locations that will not compromise the purpose and integrity of the Green Belt. Consequently, it will be unreasonable at this stage to limit the geographical scope of the review to the South of the Borough.

***Is CS6 sufficiently precise so as to be effective?***

- 3.5 The Council believes that it is essential for Policy CS6 to be precise to provide certainty and to demonstrate how, when and where the Green Belt review will be carried out. This is necessary to provide certainty of housing delivery. The Council has identified sufficient deliverable sites on previously developed land in the main urban areas to meet over 13 years out its 15 years housing land supply to enable such a precise approach to be taken. The approach taken strikes a balance between the objective of protecting the Green Belt and meeting housing need. It will also help bring forward previously developed land for development. Furthermore, there is adequate monitoring and contingency arrangements in place to cope with unforeseen circumstances/uncertainties.

***Does the available evidence support a reference to land availability to the South of Woking?***

- 3.6 Appendix 4 of the SHLAA (CD/31) includes a list of sites that are excluded from the strategic housing land availability assessment by reason of their location in the Green Belt. A number of the sites could be deliverable and suitable for housing development if they were to be released from the Green Belt. Some of these sites are in the South of Woking. The Inspector should also note that

there are other sites that are not in the south of Woking that are being promoted on the list.

**4 How will sites within the GB be identified for release for residential development? Before or after the GB Review and the Sites Allocation SPD?**

4.1 Sites will not be released from the Green Belt for development before the Green Belt review and/or the Site Allocations DPD. A Green Belt boundary review will be carried out in 2016/17. The Site Allocations DPD is expected to be adopted in January 2014. It will be reviewed before 2022 to take into account the outcome of the Green Belt boundary review before sites will be released for development.

**5 Should Westfield be considered ‘urban’ (as per Proposals map) or ‘semi rural’ as in Dev. Plan? Should the areas identified for growth specifically exclude Conservation Areas, flood plains etc?**

5.1 Westfield has always been ‘urban’ and there is no apparent change from its status in the Proposals Map to the Local Plan and that of the CS. Consequently, it should be referred to as urban. The only reference to a description of Westfield as semi-rural is in the Woking Borough Local Plan Area Summary where it states ‘Westfield alters from a traditional suburban character in the north to semi-rural appearance in the south’. This does not provide any basis to change its status from urban to semi-rural.

5.2 Specific sites identified for growth will take account of environmental designations and the heritage assets of the area in accordance with other policies of the CS. The CS has specific policies to direct development away from areas at risk of flooding and other environmentally sensitive designations such as Conservation Areas and the Special Protection Areas. These policies will be taken into account in the Green Belt boundary review. Furthermore, the review will comprise a number of technical studies to ensure that the sites released for development will not have any adverse impacts on sensitive sites that cannot be mitigated.

**6 Is CS6 consistent in its aims to protect the GB whilst releasing elements for development?**

6.1 There is no conflict between releasing elements of the Green Belt for development whilst protecting its purpose and integrity. The Green Belt boundary review will seek to ensure that any land released from the Green Belt is in a sustainable location and will not undermine its purpose and integrity. The Council has to strike the delicate balance of meeting its development requirements and protecting its environment. The long term protection of the Green Belt will be under significant threat if the Council is unable to demonstrate that it has identified sufficient suitable sites to meet its development needs. The approach adopted accords with PPG2 and the Government’s agenda for growth.

**7 Is the delineation of the GB upon the proposals map accurate?**

7.1 Subject to the proposed changes suggested by the Council, the Council believes that the delineation of the Green Belt on the Proposals Map is accurate.

**8 With due regard to the advice of PPG2, is the McLaren group headquarters a Major Developed Site within the GB? Why is the Carters Lane Sewage Treatment works (and others) a major developed site? Should major development within greenbelt designation of Carters Lane Sewage works be more tightly identified?**

8.1 Annex C of PPG2 provides guidance about Major Developed Sites in the Green Belt. The Council does not believe that the McLaren Group Headquarters will satisfy the test for it to be designated as a Major Developed Site in the Green Belt. Planning application for the headquarters had been granted on grounds of special circumstances and in the Council's view such an approach should continue. The Council will review its position on this matter in future review of the CS if further development were to occur on the site.

8.2 Carters Lane Sewage Treatment Works satisfies the requirement in PPG2 for designating Major Developed Sites in the Green Belt. Sewage Treatment Works is one of the examples given in the Annex as potential sites to be given that status if it can be justified by its scale. The only other site in the CS that is designated as a Major Developed Site in the Green Belt is Broadoaks. This designation is carried forward from the adopted Local Plan 1999. The Council believes that the designation should continue in the CS because of the role that the site plays in delivering its economic strategy.

8.3 The definition of the boundary of Carters Lane Sewage Treatment Works as a Major Developed Site in the Green Belt should remain. The CS is clear to emphasise that any redevelopment and/or infilling proposal on the site should not be significantly larger than the existing structures' footprint. This provides adequate guidance to control any potential redevelopment or infilling proposal that might come forward.

**9 Will areas of GB lost to development be compensated under the terms of policy CS17?**

9.1 Unless sites released from the Green Belt perform a designated recreational purpose or are functional open space, the land lost to development will not have to be compensated under the terms of CS17. Policy CS6 is clear to emphasise that the Council will ensure that any release of Green Belt land for development will not undermine its overall purpose and integrity.

## **CS7 Biodiversity and CS8 Special Protection Areas (SPA)**

**10 To what extent is the content of PPS9, particularly paragraphs 3, 4, and 5 satisfied by the Core Strategy? How are matters relating to geological conservation evidenced and resolved within the CS? How are issues of biodiversity intended to be addressed in other parts of the Local Development Framework (LDF)?**

**To what extent is the content of PPS 9, particularly paragraphs 3, 4 and 5 satisfied by the Core Strategy?**

10.1 The Council is satisfied that the contents of PPS9 are satisfied by the Core Strategy. PPS9 requires local authorities to take an integrated approach to planning for biodiversity and geodiversity when preparing local development documents. Such policies should reflect national, regional and local biodiversity priorities. Furthermore, PPS9 requires local development frameworks to indicate the location of designated sites of importance for biodiversity and geodiversity, making clear distinction between the hierarchy of international, national, regional and locally designated sites. Local Development Frameworks should also identify any areas or sites for the restoration or creation of new priority habitats and support that through appropriate policies. Overall, PPS9 seeks to conserve and enhance sites of biodiversity and geodiversity importance.

10.2 Policies CS7 and CS8 combine to protect conserve and enhance international, national, regional and locally designated sites of biodiversity and geodiversity significance. They seek to resist any development proposal that will cause harm to designated sites. They encourage new development to make a positive contribution to biodiversity through the creation of green spaces, linkages between sites to create biodiversity networks of wildlife corridors and green infrastructure therefore ensuring an integrated approach to their conservation.

10.3 Policy CS7 makes a clear distinction between the hierarchy of international, national, regional and locally designated sites and commits to pay particular attention to it. The reasoned justification to the policy provides detailed information about the sites that comprise the hierarchy. The policy makes a specific reference for the identification of the designated sites on a Proposals Map. The Council has prepared a Proposals Map (CS/66) that identifies the following designated sites:

- Common land;
- Local Nature Reserve;
- Sites of Nature Conservation Importance;
- Sites of Special Scientific Interest;
- Scheduled Ancient Monument;
- Special Area of Conservation;
- Thames Basin Heaths Special Protection Area; and
- Urban Open Space.

10.4 Policy CS8 and its supported avoidance strategy take a strategic and an integrated approach to the conservation of the SPA. This is considered necessary to ensure the long-term protection of the European designated species that are identified in these areas.

- 10.5 Whilst the Core Strategy does not identify specific sites for the restoration or creation of new priority habitats, it offers an in-principle support if such a scheme comes forward. In any case, this matter will be fully explored through the Site Allocations DPD.
- 10.6 Policies CS7 and CS8 are in conformity with paragraph 3 of PPS9, which list specific requirements for regional spatial strategies. The Council has been concerned to ensure that this is the case as the Core Strategy is required to be in general conformity with the regional spatial strategy.
- 10.7 The Inspector's attention is drawn to a minor proposed change to Policy CS8. This is set out in the Council's response to Issue 14.

**How are matters relating to geological conservation evidenced and resolved within the CS?**

- 10.8 Evidence of the geodiversity of the area comprises minerals safeguarded sites that are contained in the Surrey Minerals Plan and information regarding the geology of designated biodiversity sites. The Core Strategy makes specific reference to the Minerals Plan and requires the Proposals Map to safeguard sites that are identified in it for safeguarding. The Council has a Proposals Map, which identifies safeguarded mineral sites (subject to the Proposed Changes). The geodiversity and biodiversity of the area are interlinked. The soils and landforms of the area combine to create the habitats that form the designated biodiversity sites. The Council, through Surrey Wildlife Trust and Natural England has information regarding the special geological characteristics of the designated biodiversity sites. The Core Strategy has robust policies to protect important habitats of the area including their underlying geology.
- 10.9 Further evidence is contained in the geological survey for the county and the British Geological Survey maps. The County Council has published a document called "Geology in Surrey" (CD/148) which also provides useful information.

**How are issues of biodiversity intended to be addressed in other parts of the Local Development Framework (LDF)?**

- 10.10 The LDS (CD/75) identifies the Site Allocations DPD and the Development Management Policies DPD as other parts of the LDF. The SHLAA (CD31), which will be an important evidence base to support the Site Allocations DPD recognises the importance of biodiversity and geodiversity and excludes sites that are within these areas and/or could have potential adverse impacts on their integrity. Regarding the use of previously developed land for development, the Core Strategy ensures that the biodiversity significance of previously developed land will be taken into account when such proposals come forward. The Core Strategy will provide the strategic context for the Site Allocations DPD and the Council will make sure that designated sites are protected as part of that process. The same principle will apply to the Development Management Policies DPD.
- 10.11 The Core Strategy itself includes a number of other policies beyond policies CS7 and CS8 that address issues of biodiversity. Examples are objective 12 of the CS, policies CS10, CS17, CS21 and CS24.

**11 What evidence justifies the chosen approach to biodiversity and nature conservation? How has this drawn upon the advice of PPS9 and its Practice Guide? How has the evidence base been used in the production of the CS? Is the role of Biodiversity Opportunity Areas referenced adequately within Policy CS7?**

***What evidence justifies the chosen approach to biodiversity and nature conservation?***

11.1 The Council's approach to biodiversity and nature conservation is a precautionary one based on avoidance of harm. This approach has been agreed with Natural England and also supported by the Surrey Wildlife Trust. For example, Policy CS8 resists new additional residential development within 400m radius of the SPA and seeks contribution from development between 400m and 5 km towards avoidance measures to prevent harm to the integrity of the SPA. The EU Directive (CD77), PPS9 and the SPA Delivery Framework provide justification for this approach. The Council also has an up-to-date list of LNR, SNCI, Schedule of Ancient Monuments, SACs, SPAs and Urban Open Space to inform how this approach is achieved. The evidence base is regularly updated to inform robust decision making. Further evidence used to support the CS's approach includes the Surrey Biodiversity Action Plan (CD/135), the Habitats Regulation Assessment (CD/18), Biodiversity and Planning in Surrey (CD/8) and the SA Report of the Core Strategy Publication Document (CD/70).

***How has this drawn upon the advice of PPS9 and its Practice Guide?***

11.2 The Council's response to Issue 10 demonstrates how the CS satisfies the requirements of PPS9. In particular, point (iv) of the key principles of PPS9 fully supports the Council's approach to avoid harm to biodiversity and geodiversity conservation interests.

***How has the evidence base been used in the production of the CS?***

11.3 The evidence base has been used to inform the hierarchy of designated sites. It has formed an influential part in determining the spatial distribution of development. The specific requirements of the relevant policies are informed by the evidence base. For example, the HRA has informed the wording of the relevant policies to ensure that biodiversity issues are taken into account. The SHLAA is also informed by the evidence of designated environmental sites. The Core Strategy and its Proposals Map includes specific references to the evidence.

***Is the role of Biodiversity Opportunity Areas referenced adequately within Policy CS7?***

11.4 The Council is satisfied that the role of Biodiversity Opportunity Areas is appropriately referenced in the CS. Paragraphs 5.27, 5.29 and 5.30 recognises and describes the important role of BOAs. This is part of the reasoned justification to Policy CS7, which is the appropriate policy to reference it.

**12 What is the process of evaluating and creating/retaining/ dedesignating SNCIs? How does this relate to the CS?**

12.1 WBC has an agreement with the Surrey Wildlife Trust, for a rolling programme to evaluate SNCI sites. The Defra guidance on Local Sites

recommends that sites are reviewed every 5-10 years. Surrey Wildlife Trust recommend that sites with stable habitats such as woodland should be monitored every 10 years. Less stable habitats such as grassland and heathland should be monitored every 5 years.

- 12.2 The programme evaluates the condition of existing sites to determine their retention and/or any boundary changes to reflect conditions on the ground. It also recommends potential new sites that should be added to the list or existing sites that no longer have the status of SNCI. The recommendations of work done so far have been taken into account in the CS and its Proposals Map.

**13 Is the supporting Habitats Regulations Assessment adequate?**

- 13.1 The Council has prepared an HRA (CD/18) in accordance with the Regulations to ensure that the provisions of the CS do not have any adverse impacts on any European designated site. This work was carried out by consultants, using a robust methodology widely accepted for carrying out HRAs.
- 13.2 The outcome of the assessment does not require an Appropriate Assessment of any policies in the CS. However, the Council has ensured that the recommendations set out in the study have been taken into account in full.
- 13.3 Natural England has been consulted throughout the study and has confirmed their satisfaction with the process and outcome of the study. However, they have recommended that a minor change be made to Policy CS8 to ensure that all aspects of the SEP policies relevant to the SPA are covered when it is eventually revoked. The proposed change is stated in the Council's response to Issue 14.

**14 Does the CS take a robust and justified approach to biodiversity issues, particularly in relation to the Thames Basin Heath SPA? Is CS8 consistent with SEP NRM6? Will CS8 provide adequate policy direction with regard to the Thames Basin Heath SPA? Is there evidence that reasonable mitigation measures can be employed in the event residential development occurs? (Adequacy of SANG over the plan period)**

**Does the CS take a robust and justified approach to biodiversity issues, particularly in relation to the Thames Basin Heath SPA?**

- 14.1 The justification of the CS's approach to biodiversity and geodiversity has been addressed by the Council's response to Issue 11. The key issue in relation to the SPA has been about how to strike a balance between the need to protect and/enhance the SPA and the need to achieve growth to meet the needs of the community (page 16 of CS). The SPA is also identified as an issue of cross boundary significance. Policy CS8 takes a robust and a strategic approach to preventing harm to the SPA whilst at the same time, the Core Strategy ensures that growth is achieved but directed to sustainable locations. The TBH SPA Avoidance Strategy (CD/38) provides a robust basis for achieving this objective.

**Is CS8 consistent with SEP NRM6?**

- 14.2 Subject to the following proposed minor change recommended by Natural England to be added to Policy CS8, the Council is satisfied that the policy is consistent with NRM6. The proposed addition to CS8 is:
- Mitigation/avoidance measures to be delivered prior to occupation of new housing.
  - Mitigation/avoidance measures to be secured and maintained in perpetuity.
  - Where further evidence demonstrates that the SPA can be protected using different linear thresholds or alternative mitigation measures, these must be evidence based and subject to Appropriate Assessment and also agreed with Natural England.
- 14.3 The proposed change will ensure that all aspects of NRM6 are covered in the event that the SEP is revoked. Other than the above, Policy CS8 address fully the criteria and SANG requirements set out in NRM6. The SPA Avoidance Strategy signposted in CS8 provides details about how SANGs will be secured/delivered.

**Will CS8 provide adequate policy direction with regard to the Thames Basin Heath SPA?**

- 14.4 The Council has demonstrated in previous responses that Policy CS8 satisfies international and national biodiversity objectives. It has been demonstrated that the policy is consistent with the requirements of the South East Plan and takes a strategic approach to avoid harm to the SPA. It provides a significant platform to deliver key objective 12 of the CS. Consequently, the Council is satisfied that it provides adequate policy direction with regard to the Thames Basin Heath SPA.

**Is there evidence that reasonable mitigation measures can be employed in the event residential development occurs? (adequacy of SANG over the plan period)**

- 14.5 The TBH SPA Avoidance Strategy (CD/38) identifies the following SANGs that are already secured to contribute towards meeting the SANGs requirement of the Core Strategy's proposed housing provision:
- Brookwood Country Park – 20ha
  - White Rose Lane – 8.2ha
  - Horsell Common, Monument Road – 28ha.
- 14.6 The following SANGs are at an advanced stage of being secured/completed:
- Martins Press – 13 ha
  - Heather Farm – 14.5ha
  - Hoe Valley – 4.06 ha (further land may be added).



| Name of SANG site      | Total SANG area (ha) | Total SANG capacity (dwellings) | Amount of SANG allocated (ha)* | Remaining unallocated SANG area (ha) | Remaining unallocated capacity (dwellings) |
|------------------------|----------------------|---------------------------------|--------------------------------|--------------------------------------|--|
| Horsell Common         | 28                   | 1451                            | 18.3                           | 9.7                                  | 572.9                                      |
| White Rose Lane        | 8.2                  | 425                             | 5.4                            | 2.8                                  | 164.1                                      |
| Brookwood Country park | 20                   | 1036                            | 7.4                            | 12.6                                 | 740.6                                      |
| Martins Press          | 13                   | 674                             | 1.35                           | 11.65                                | 685.3                                      |
| Heather Farm           | 14.5                 | 751                             | 0                              | 14.50                                | 852.9                                      |
| Hoe Valley             | 4.06                 | 210                             | 0                              | 4.06                                 | 238.8                                      |
| <b>Total</b>           | <b>87.8</b>          | <b>4547.2</b>                   | <b>32.4</b>                    | <b>55.3</b>                          | <b>3254.7</b>                              |

\* Based on planning permissions granted to the end of January 2012. Amount of SANGs allocated is based on bedroom number per dwelling of each permission and not an average figure.

14.7 The combined total of the remaining capacity on the original three SANGs plus the capacity of the three new SANGs provides capacity for 3,255 dwellings, which is 11.1 years of housing supply (based on 2.12 projected average occupancy which equals 0.017ha of SANGS per dwelling). In addition, the Council has started discussion with Natural England to secure a further 24 ha of SANG at Westfield. If this SANG is secured, it would provide SANGs capacity for a further 1,412 dwellings. Added to the above this would give the Council a total of 16 years supply and the Council would have met its SANGs requirement for the entire CS period. The Inspector's attention is drawn to the fact that the Borough has capacity to secure additional SANGs to meet its housing need if/when required. This is a view shared by Natural England.

**15 Is Natural England content with the CS and specifically CS8?**

15.1 Subject to the proposed minor change to CS8 set out in the Council's response to Issue 14, Natural England is content with the CS and specifically CS8.

**16 Does the proposed change at para 5.25 represent sufficient recognition of the role of trees within the natural environment?**

16.1 It is considered that the revised paragraph 5.25 contains adequate information in recognition of the importance of trees, and role of trees within the natural environment. The text has been agreed with the Council's Tree Officer who has provided importance and expert input into the formulation of the policy.

## **CS9 Flooding**

### **17 Is the CS compliant with the content of PPS25 and associated guidance?**

- 17.1 PPS25 (CD/108) requires local planning authorities to review flood risk across their districts, steering all development towards areas of lowest risk. Development is only permissible in areas at risk of flooding in exceptional circumstances where it can be demonstrated that there are no reasonably available sites in areas of lower risk, and the benefits of that development outweigh the risks from flooding. Such development is required to include mitigation/management measures to minimise risk to life and property should flooding occur.
- 17.2 Policy CS9 directs development towards areas of lowest risk of flooding (flood zone 1). It makes specific reference to the SFRA to inform planning decisions about the location of development. The Council has carried out SFRA, which is up-to-date and will be regularly updated. Policy CS9 applies the sequential and exception tests emphasised in paragraph 16 – 20 of PPS25. Furthermore, it requires significant forms of development to be accompanied by detailed flood risk assessment to ensure their impacts on flooding are fully assessed. It supports development that relates specifically to reducing risk of flooding and takes into account the implications of flood risk on biodiversity.
- 17.3 The Council has proposed minor changes to Policy CS9 in response to representations received to the CS consultation. Subject to these changes being incorporated, the Council is satisfied that the CS is compliant with the content of PPS25.

### **18 Are matters relating to surface water run off from all forms (not just significant) of development resolved adequately by the CS?**

- 18.1 The CS recognises surface water run off as a significant source of flooding that needs to be addressed (paragraph 5.45 of CS). It suggests measures to address this matter, by requiring development proposals within or adjacent to areas at risk of surface water flooding to be accompanied by a flood risk assessment. Further measures emphasised in the policy to address the issue include requiring applicants to work towards replicating Greenfield run-off solutions. It gives priority to preventing surface water run-off and provides examples of solutions that could be applied (paragraph 5.50 of CS).
- 18.2 The Council is working in partnership with SCC to prepare a Surface Water Management Plan for Woking and Byfleet. When complete, the plan will provide information to inform the review of the SFRA and planning decisions. This is referred to in the delivery strategy.
- 18.3 Based on the above, the Council considers that matters relating to surface water run-off from development are adequately resolved in the CS.

### **19 Is there adequate reference to the Water Framework Directive?**

- 19.1 It is considered that there is adequate reference to the Water Framework Directive (CD/80). Within Policy CS9 a reference to the Water Framework

Directive is proposed to add to the start of the paragraph, so it reads "all proposals must conform with the Water Framework Directive 2000".

- 19.2 The Water Framework Directive 2000 is proposed to be added in the key evidence base box for policy CS9,

## **Other**

### **20 To what extent has the Council considered the content of PPS23, including Appendix A, in the production of the CS?**

20.1 PPS23 (CD/106), paragraph 13 "LDDs should set out the criteria against which applications for potentially polluting developments will be considered".

20.2 Paragraph 21 of PPS23 states, "LDDs should include appropriate policies and proposals for dealing with the potential for contamination and the remediation of land so that it is suitable for the proposed development/use. LDDs have a positive role to play in steering development onto appropriate previously developed land, some of which may be affected by contamination, and to protect greenfield land from avoidable development".

20.3 PPS23 Planning and Pollution Control, Appendix A states 'The following matters (not in any order of importance) should be considered in the preparation of development plan documents and may also be material in the consideration of individual planning applications where pollution considerations arise.'

20.4 It is considered that the CS meets the above requirements subject to the following proposed minor amendments:

- Create a new paragraph (below 5.50): "All development should seek to incorporate pollution prevention control measures and Sustainable Urban Drainage Systems to ensure that impacts on water quality by development are minimised and in the long-term are improved".
- A further bullet point is proposed to be added to Policy CS21, which states: "ensure that the proposed development avoids significant harm to the general amenity from noise, dust, vibrations, light or other releases".

20.5 Most of the points listed in Appendix A of PPS23 relate to development management and will complement the CS in planning decisions. Where relevant, they will be taken forward in the Development Management Policies DPD if they are not covered in the emerging National Planning Policy Framework.

### **21 Are matters relating to waste management dealt with adequately within the CS and is this in line with the advice of PPS10 and its Companion Guide?**

21.1 The Council has already submitted a Statement of Common Ground (SOCG) between Woking Borough Council and Surrey County Council on waste matters (WBC/6). The SOCG sets out how waste matters are addressed in the CS and in the Surrey waste Plan by SCC who is the waste authority for the area. The

Inspector's attention is drawn to the fact that SCC is satisfied of the CS's approach to waste matters and considers that the Surrey Waste Plan and the approach taken in the CS are in accordance with PPS10. It is also satisfied that the CS and its Proposals Map meets the requirement of the Surrey Waste Plan.

**Part 2: Built Environment - CS17, CS20, CS21, CS22, CS23, CS24**

***Matter 3: Is the approach of the CS to design justified by the evidence base, consistent with national planning policy and the most appropriate strategy when considered against alternatives within the context of Woking? Has sufficient regard been had to the historic environment?***

## **CS20 Heritage**

### **1 Is the CS consistent with the advice of PPS5 and its Practice Guide?**

- 1.1 The Council has prepared a topic paper on heritage matters (WBC/7). The paper comprehensively addresses how the CS follows advice in PPS5. It proposes a few minor changes to policy CS20 to enhance the objectives and clarify the evidence base used to inform the CS.
- 1.2 A Statement of Common Ground has been agreed between the Council and English Heritage (WBC/10) on how heritage matters have been dealt with in the CS. Subject to the proposed changes being incorporated into policy CS20, the Council considers the CS to be consistent with PPS5 and the Practice Guidance.

### **2 What evidence base underpins the approach of the CS towards heritage matters? How has any Historic Environment Record been drawn upon? Does the evidence include all designated heritage assets? Is the evidence adequate and robust (up to date)?**

- 2.1 The key evidence base to support the CS and in particular policy CS20 is as follows:
- Character Study, 2010, produced by the Landscape Partnership (CD/9),
  - The Heritage of Woking – An Historic Conservation Compendium, 2000, produced by WBC (CD/19),
  - Planning Policy Statement 5, 2010, Planning for the Historic Environment and accompanying practice guidance, produced by the Department of Communities and Local Government (CD/93).
- 2.2 It is proposed to add the following to the key evidence base box (as agreed with English Heritage):
- List of Ancient Monuments
  - List of Conservation Areas.
  - List of Listed Buildings.
  - List of Locally Listed Buildings.
  - List of Historic Gardens and Landscapes.
  - Historic Environment Record (provided by Surrey County Council).
  - Surrey Design Guide, 2002

The above list incorporates all designated heritage assets across the Borough.

- 2.3 Surrey's Historic Environment Record is maintained by SCC. It is the most comprehensive record of archaeological sites, finds and historic monuments

within the county. The Heritage of Woking (CD/19) also makes up the Historic Environment Record.

- 2.4 A range of documents have been used in the production of the policy including: Buildings and Monuments in Woking Borough Listed since 2000 (CD/61) and All Listed Buildings in Woking Borough - January 2010 (CD/62), these are considered to be up to date.
- 2.5 The list of the Evidence Base has been provided above. The Council is satisfied that collectively they provide a comprehensive list of all of the relevant historic assets of the area.
- 2.6 The Council considers the Evidence Base to be robust and up to date. As the Character Study (CD/9) was produced recently, this is considered to be a robust and up to date piece of the Evidence Base. The study reviews the historic development of Woking Borough and identifies some of the key features and designated sites within Borough in terms of infrastructure, green belt, biodiversity, and heritage. The document also reviews national, regional and local planning policy objectives to provide context to the study. The heritage assets area such as listed buildings are regularly updated.

**3 How will heritage assets be assessed and protected over the lifespan of the plan? How are archaeological assets to be referenced and protected? Should CS20 refer to designated and non designated heritage assets?**

- 3.1 Heritage assets will continue to be assessed by the Council, for example if any buildings should be added to the Local List. English Heritage produces the National Heritage List for England and some information on the Heritage at Risk Register.
- 3.2 It is considered that heritage assets will be protected over the life of the plan, through the requirements of policy CS20 and by thorough evaluation of planning applications.
- 3.3 The Council will take a pragmatic approach, by assessing the condition of its heritage assets by survey on a rolling programme; this is separate from the CS. This has been agreed with English Heritage, and is included in the Statement of Common Ground (WBC10).
- 3.4 Paragraph 4 of policy CS20, sets out when an archaeological evaluation and investigation will be necessary. The following paragraph goes on to outline criteria for development that can take place in an Area of High Archaeological Potential.
- 3.5 It is deemed that the policy includes designated and non designated assets, by referring to listed and locally listed buildings.

**4 How will the CS lead to the design of new development that will be of an appropriate standard which satisfies the objectives of, amongst other considerations, PPS 1?**

- 4.1 PPS1 emphasises the importance of good design in creating a sense of place where people live, visit and work. The CS includes a comprehensive design policy, CS21. This policy not only emphasises the importance of the aesthetic quality of a development but also ensures that proposals embrace sustainable

development principles, take into account the local context, provides adequate landscaping, creates a safe and accessible environment and provides an all inclusive environment which is accessible to all.

- 4.2 Overall, the key principles set out in this design policy accord with the overarching design objectives contained with PPS1. Furthermore, the Council have been proactive to carry out a comprehensive Character Assessment which describes in detail the character of various parts of the borough beyond the designated areas. This document will inform planning decisions when development proposals come forward to ensure that proposals take into account the context within which they are situated. The Council has also produced a Heritage of Woking Compendium (2000) that ensures that the impact of development on the Heritage Assets of the borough are fully addressed as a result of any development proposal.
- 4.3 Therefore, the policy and its supporting evidence base will help to create a sense of place envisaged by PPS1.

**5 How will tall buildings be managed throughout the borough? Is a specific reference/policy warranted?**

- 5.1 At the heart of the CS is the need to achieve sustainable development. A key means to do this is by making efficient use of land and directing most new development to areas well-served by public transport, amenities, and other community facilities. Therefore, in principle high density development is acceptable in Town Centre locations and tall buildings could play a significant role in achieving this. Policy CS1 is clear to emphasis that schemes for tall buildings will only be acceptable in the Town Centre if they are well designed, sympathetic and appropriate to their context.
- 5.2 Due to the existing character and appearance of the borough it is unlikely that any tall buildings will be appropriate outside of Woking Town Centre. Proposals for tall buildings will be design-led, to fit into the context of the vicinity and wider area and to be managed through the development management process. An Area Action Plan for Woking Town Centre will set out the parameters and criteria for future proposals. It is important that specific reference to tall buildings in the Town Centre is made in the CS to establish an 'in principle' support for it and to provide clarity on the Council's position on the matter. This will avoid debate regarding the principle of such development and concentrate resources in answering the following questions if a scheme comes forward:
- Is the proposal appropriate in its context?
  - Is it delivering the objectives of the Core strategy?
  - Is it sympathetic to the character, amenity and appearance of the locality?
  - Is it well designed, functionally credible and well interpreted within the wider character and appearance of the area?

**6 Should there be greater reference upon the existing Character Study of the borough?**

6.1 The Council is satisfied that reference to the Character Study in the CS is appropriately and adequately referenced. As set out in paragraph 5.205 of the CS Publication Document the Council strongly believes that one of the key means to make development acceptable to the community and to achieve sustainable development is good design. The Character Study provides a good description of the character of the various areas of the borough to guide planning decisions when proposals come forward for determination. However, the Council is also clear to emphasise that other evidence base documents, such as the Heritage of Woking Study should be taken into account when looking at development in their context.

**7 Is there any evidence to support the need for detailed residential design advice, including house/room sizes?**

7.1 One of the recommendations of the Character Study (2010) is that Woking Borough Council produce a Design Guidance that is specific to Woking. Such Guidance will ensure all residential developments including new dwellings, extensions, alterations and conversions are of a high standard of design. This will provide guidance for both developers and planning officers and assist in the Development Management process.

7.2 With growing pressures on housing in recent years, there has also been an increasing concern that some of the dwellings/ flats being developed in the Borough have not been of an adequate standard, particularly with regards to their size. Further advice regarding house/ room size will provide clarity and guidance for both developers and Officers to ensure that all new residential developments in the borough are of an acceptable size for the wellbeing of future occupants. It should also help to ensure sustainable development, in providing a useable and flexible environment which can provide for residents' changing needs in accordance with the life time home standards (as set out within the policy text for CS21).

7.3 Such a document will provide a framework to ensure that all residential development is liveable, accessible and does not have a negative impact on the amenity, privacy and aesthetics of the surrounding area. It will ensure that all residential development results in a pleasant living environment.

## **CS22 Sustainable Construction**

**8 Are the references to the Code for Sustainable Homes justified? With due regard to issues of viability, is policy CS22 justified by a robust evidence base and will it be effective in relation to both greenfield and brownfield development sites?**

***Are the references to the Code for Sustainable Homes justified?***

8.1 The Code for Sustainable Homes (the Code) is the nationally recognised standard for the sustainable design and construction of new homes. The Code is the Government's preferred system for measuring the performance of new homes. Although this may change during the plan period it is currently the



case and therefore the Council considers that this justifies its inclusion within the CS.

- 8.2 The Code aims to reduce carbon emissions and create homes that are more sustainable. The code has six levels with mandatory requirements at each regarding energy and water usage (see Table 5 on page 110 of the CS), surface water run-off and waste. Paragraph 5.218 of the CS sets out more detail on the Code. In 2008 the Government set out their intention to bring in the energy efficiency improvement equivalent to the Code's energy standards through stepped changes to the Building Regulations as set out in Table 4 on page 109 of the CS.
- 8.3 The approach of referencing the Code for Sustainable Homes is supported by the supplement to PPS1: Planning and Climate Change, paragraph 32.
- 8.4 Policy CS22 has been written to provide certainty and clearly sets out the relationship between the successive introduction of the Code levels, stepped changes in Part L of the Building Regulations and the Council's expectations for applicants. The policy is justified by the Climate Change Study (2010) (CD/10).

***With due regard to issues of viability, is policy CS22 justified by a robust evidence base and will it be effective in relation to both greenfield and brownfield development sites?***

- 8.5 The key evidence supporting the viability of policy CS22 is the;
- Climate Change, Decentralised, Renewable and Low Carbon Energy Evidence Base
  - WBC Climate Change Strategy 2008
  - Economic Viability Assessment (EVA) (2010)
- 8.6 Reference should also be made to the officer response to ID90, Rep 190, concerning greenfield sites.
- 8.7 The Council has commissioned an Economic Viability Assessment (EVA) which included assessment of the impacts of the Code for Sustainable Homes. Section 3.10 of the EVA specifically considers the costs of carbon reduction measures. The Council has concluded that the standards set by the policy are deliverable and will not compromise the viability of scheme coming forward for development. The policy allows flexibility for a case to be made based on evidence of viability if an applicant can demonstrate that the requirement for Code Level 5 can not be met. This will be considered on a case by case basis.

**9 Are issues of land contamination, remediation and water quality acknowledged sufficiently by the CS?**

- 9.1 One of the representations submitted by the Environment Agency expressed concern that the issue of water quality has not been adequately addressed by the CS. They proposed that the Sustainable Construction policy CS22 may be best suited to include a section on Land Contamination and proposed some additional wording to address the issue. The Environment Agency suggested this would bring the CS more in line with the requirements of the Water Framework Directive and also ensure that groundwater is adequately protected by the overall strategy.

- 9.2 The Council fully supported the additional wording proposed however considered that it was more appropriate to add the wording (exactly as proposed by the Environment Agency) to policy CS9: Flooding. This addition is one of the changes to the CS put forward by the Council.
- 9.3 The Council believes that these additions will adequately address the issues of land contamination, remediation and water quality in the CS
- 10 Should the CS incorporate specific reference to the approach of the Council to energy conservation, particularly with regard to existing buildings?**
- 10.1 Reference should be made to the officer response to ID99, Rep 409, concerning energy conservation measures for existing buildings in the Borough.
- 10.2 The CS appropriately sets high standard for energy conservation (policies CS18, CS21, CS22 and CS23), in particular standards to deal with energy conservation within new buildings. Policy CS22 encourages proposals for residential extensions (to existing dwellings) to incorporate energy and water efficiency measures.
- 10.3 The Council also recognises that there are other measures outside the scope of the CS to help achieve the overall goal of energy conservation. Paragraph 6.14 of the CS emphasises other Council plans and strategies that will complement this delivery, such as the Climate Change Strategy. Both through these other strategies and through other projects, the Council is doing a lot of work to enhance energy conservation of existing buildings.
- 10.4 Further progress in achieving energy conservation of existing buildings will be delivered through the proposed improvements to Part L of the Building Regulations (CD/125) and the Green Deal. Please see the appendix to issue 10 for further details.
- 10.5 The Council is proposing a minor change to Policy CS20 for the Council to work productively with its stakeholders to ensure conservation and enhancement of the historic environment, including identifying opportunities to mitigate and adapt to climate change where that will not harm the integrity of the heritage asset (WBC/10). This is likely to involve existing buildings.
- 10.6 The Council is part of the Action Surrey network, a co-ordinated network of eight Local Authorities. Action Surrey offers advice to residents, schools and businesses on how to reduce energy and water consumption. It provides impartial advice, community outreach and a network of trusted installers. Action Surrey website hosts an online community that is available to residents and members of the public and has case studies of how people have improved their homes. There is a show house in Woking Borough and an advice centre in the town centre where people can drop in. Action Surrey hold annual open days where people can visit retrofitted homes around the borough and talk to the owners about the improvements they have made.
- 10.7 Action Surrey is managed by the Energy Centre for Sustainable Communities Ltd which is a Thamesway Group Company. Thamesway Energy Ltd is wholly owned by Woking Borough Council.

**11 What consideration has been given to the inclusion of specific measures/targets to secure a proportion of renewable energy production upon new developments in line with the advice of PPS22?**

- 11.1 Paragraph 8 of PPS22 (published August 2004) states:  
*“Local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy developments.”*
- 11.2 Policy CS22 requires that development proposals that would have an exceptionally high total energy consumption will be required to generate at least 10% of their energy requirements from renewable sources on site. In this circumstance, the policy requires applicants to secure a proportion of energy from renewable production in line with PPS22.
- 11.3 However, the policy is predominantly objective led and concentrates on outcomes. The Council considers that a policy requiring a minimum percentage improvement in emission rates over the Building Regulations will not only give applicants flexibility over the balance of energy efficiency and use of renewable/low carbon technology, but also focus on the outcome required, which is lower emissions. This is considered to be a more holistic approach without loopholes, based on fuel types and is in step with emerging standards for compliance with the government’s Zero Carbon Homes ambition. The combination of improved energy efficiency and use of connected low/zero carbon energy supplies in new developments (jointly called ‘Carbon Compliance’) has been adopted as the mandatory measures for zero carbon homes from 2016 onwards and is to be expressed in terms of CO<sub>2</sub> emissions per unit area of new building.
- 11.4 Policy CS22 prioritises developments in Woking town centre for connection to low and zero carbon district heating (DH). This reflects the enhanced opportunities for developing DH networks within higher density locations.

**12 What evidence supports the need for Policy CS23?**

- 12.1 The following evidence supports the need for policy CS23:
- PPS22 (CD/105).
  - The South East Plan (CD/126).
  - The Climate Change and Decentralised, Renewable and Low Carbon Energy Evidence Base (CD/10).
  - Past trends of delivery of renewable energy installations.
- 12.2 Based on the above evidence, the Council is satisfied that policy CS23 is justified to be included in the CS.

**13 What is the purpose of Table 6 in the context of CS 23? Can the DECC Review of Renewable and Decentralised Energy Potential in SE England inform the CS to a more specific extent?**

***What is the purpose of Table 6 in the context of CS 23?***

- 13.1 The purpose of table 6 is to provide background information regarding the number of mega watts of renewable energy required in the sub-region to 2016. It provides an indication of the relative potential for the development of different

resources at sub-regional level. The table is an extract from a table in policy NRM14 of the SEP and therefore forms part of the Strategy which has undergone examination and been found sound. Policy NRM14 states;

*“Development plans should include policies ... to contribute to the achievement of the following regional and indicative sub-regional targets for land-based renewable energy” (p111).*

- 13.2 Given the uncertainty surrounding the SEP bringing table 6 into the CS will make a useful addition to the reasoned justification regarding the likely scale of renewable energy required. Individual applications coming forward in the Borough should make a meaningful contribution to the sub-regional target.

***Can the DECC Review of Renewable and Decentralised Energy Potential in SE England inform the CS to a more specific extent?***

- 13.3 The DECC study (CD/124) was commissioned in 2010 to review the potential for renewable and decentralised energy within the South East. The study sought to re-examine the existing evidence base for the potential for renewables within the region. It was originally intended that it would be used to shape the preparation of the new Regional Strategy for the South East and the review of the regional renewable energy targets. Due to the forthcoming revocation of Regional Strategies it was suggested the findings of the study could be used to assist local authorities to prepare targets and strategies for renewable energy development at the local level.
- 13.4 As the responses to reps 273 and 415 highlight, the figures in this review are not targets or even recommended targets but a;
- *“resource assessment which identifies the theoretically accessible resource, not the deployable resource” (para 4.3, p95).*
  - *“The accessible resource is the total amount of potential that is theoretically available... (It does) not represent what could be practically achieved and delivered within the region.*
  - *Further assumptions and scenario testing would need to be undertaken to refine the results i.e. considering deployment, supply chain and planning constraints and opportunities” (para 3.2, p62).*
- 13.5 The Woking borough data is set out in appendix 3.1 of the report. The review drew the same conclusions as the local evidence base, that the key opportunities for the borough are considered to be medium-large scale wind energy, combined heat and power (CHP) and solar heat and photovoltaic (PV). In addition the CS recognises the significant potential for biomass fuel to supply new and existing district heating schemes in the borough.
- 13.6 One of the Council’s proposed changes to the CS is to add the 'Review of Renewable and Decentralised Energy Potential in SE England' (CD/124) to the list of evidence which supports the CS as it is a useful piece of supporting evidence. Given the caveats applied to the findings set out above, the Council does not consider it appropriate to include these resource assessments in the CS. Policy CS23 sets out the Councils positive view on renewable and low carbon energy generation and it is supported by a delivery strategy and monitoring indicators so it is not felt that the information in the DECC review is required.
- 13.7 More specific objectives for renewable and low carbon energy generation will be addressed through forthcoming Development Management policies and

supported by an updated and detailed appraisal of the potential for renewable energy in the borough in the proposed Climate Change SPD.

**14 Does policy CS23 have sufficient ambition? Will it be effective?**

- 14.1 The Council considers the policy to have sufficient ambition and that in combination with policy CS22 and the Council's strong history with LZC energy it will be effective in delivering development of low and zero carbon energy in the Borough. The Climate Change Study (CD/10) identifies there is significant potential for renewable and low carbon energy in the borough and policy CS23 provides in-principle support for delivery.
- 14.2 The Council has been careful to ensure that the policy establishes an in-principle support for renewable energy generation, whilst at the same time making sure that the effects of such installations are appropriately mitigated. The policy is based on encouragement rather than requirement and the Council will work with its partners to ensure delivery. It is not considered necessary to be specific because each type of renewable or low carbon energy in the specific location will be considered on a case by case basis within the in-principle support provided by the policy. It will be effective because the policy is flexible enough to allow schemes to be tailored to specific circumstances and delivery can be monitored.
- 14.3 Policy CS22 contains fairly stringent requirements for CHP integration or connection and anticipates a significant expansion of these community energy networks particularly in Woking town centre.
- 14.4 The existence of a well established ESCo in the borough is almost unique in a Borough of this size and the ESCo's experience in developing and operating community energy systems will help to ensure delivery of any community heat energy. The Council has pioneered the use of CHP in combination with private wire electricity distribution networks and commercial occupiers are now voluntarily seeking to connect their buildings to these networks. The experience gained means it is well placed to encourage further use of this technology. Having an established ESCo in the Borough will help to ensure effective delivery of the policy.
- 14.5 Woking already has a good track record on delivery of renewable and low carbon energy. It has extensive installation of solar hot water, with over 170 private domestic installations. There has been an extensive programme of PV installation on public buildings and local authority housing stock in the last 10 years. During the first 3 months of 2012, the Council is installing 1.3 MWp of PV on over 50 social housing sites, public buildings and schools throughout the borough. This includes 47 kWp on the Leisure Centre and over 24 kWp on the Civic Offices and work is underway on further deployment of PV later this year.
- 14.6 The Council considers policy CS23 to be the most appropriate policy, balancing the need for renewable and low carbon energy generation with the constraints in the borough. It is considered to be realistic and deliverable.

## **CS24 Landscape and townscape**

### **15 What evidence underpins the policy? Should the Character Study be explicitly referenced? How will landscape impact be assessed in the absence of a Landscape Character Assessment?**

- 15.1 The following Evidence Base underpins policy CS24:
- Character Study, October 2010, produced by the Landscape Partnership. The Character Study is explicitly referenced in the Evidence Base of policy CS24 and in Appendix 1 of the CS.
- 15.2 The Landscape and any impact upon it will be assessed through the Development Management process when planning applications come forward for determination.
- 15.3 Development in the Borough for 10 years after the adoption of the CS will be directed to the main urban areas. The Character Study provides the relevant and appropriate Evidence base in this context, as it provides a comprehensive assessment of the urban landscape; to inform planning decisions during this period.
- 15.4 The Council has identified the Green Belt as a future direction of growth to meet housing need between 2022-2027. A Green Belt boundary review will be carried out in 2016/17. Part of this review will be a landscape assessment of the potential impacts of the potential sites, in particular, the impacts on the landscape setting of the area. This study will be comprehensive and robust to assess the landscape impacts of development during this period. Based on the above, the Council does not believe that landscape impacts will be assessed in the absence of a landscape character assessment.
- 15.5 Through the Development Management process, policy CS21 will ensure the effective integration of landscape as part of development and resist any development that will compromise the landscape setting of areas.

### **16 Should there be a reference to the role of trees and soft landscaping within the policy?**

- 16.1 The Council has made a proposed change that highlights the role and importance of trees to the urbanised and natural landscape in the area.
- 16.2 Soft landscaping is referred to in policy CS21 Design. In the policy box, the fourth bullet point contains 'Incorporate landscaping to enhance the setting of the development, including the retention of any trees of amenity value, and other significant landscape features of merit, and provide for suitable boundary treatment/s.'

## **Hearing 3: Economic Development, Transport and Infrastructure**

**Section 5 CS15, CS16, CS18, CS19**

***Matter 4: Does the CS provide the most appropriate and sufficiently comprehensive strategy towards the economy with due regard to cross border issues? Is the approach evidenced adequately with due regard to PPS4? Will the approach be effective, particularly with regard to flexibility?***

***Matter 5: Does the CS take a robust approach towards infrastructure provision in support of the CS objectives?***

***Matter 6: Is the advocated approach to sustainable transport the most appropriate strategy within the context of the Borough? Does the evidence support sufficiently the premise that the approach will be effective?***

### **CS15 Economy**

- 1 To what extent is the content of PPS4 in particular satisfied by the Core Strategy? Has consideration been given within the CS to a specific level of job creation over the plan period?**
  - 1.1 The Council is satisfied that the CS complies with PPS4. The extent to which this has been achieved is comprehensively addressed in the Council's response to Matter 1 – Issue 18.
  - 1.2 The Council's Employment Position Paper (CD/13) sets out two labour demand projections (high growth and low growth scenarios) derived from two sets of Experian trend based total employment figures. Using the method proposed in the ODPM guidance on employment land reviews high and low growth floorspace projections for office, industrial and warehousing were derived. The indicative proposed floorspace figures for these uses set out in the CS are based on labour demand projection one, which showed an increase in employment of 3,957 jobs between 2009 - 2026.
- 2 Has the location and role of employment areas been assessed adequately? Is the evidence in support of the CS approach to employment land retention and release robust (is the CS consistent with the findings of the Employment Land Review)? Does the CS address the issue of warehousing and storage space within the Borough adequately?**

***Has the location and role of employment areas been assessed adequately?***

  - 2.1 The location and role of employment areas was thoroughly addressed in the Market Appraisal which forms part of the Employment Land Review (CD/13), which was published in 2010 by Lambert Smith Hampton. In undertaking the study the consultants were referred to a previous market assessment

completed by Vail Williams in 2005. The appraisal followed ODPM guidance on employment land reviews, and the study considered employment areas/sites in detail. The assessment method used is set out in section 5 of the study.

***Is the evidence in support of the CS approach to employment land retention and release robust (is the CS consistent with the findings of the Employment Land Review)?***

- 2.2 The evidence in support of the CS approach to employment land retention and release is considered robust and in general conformity with the findings of the ELR (CD/13). The only site that was recommended for release in the market appraisal that has been identified for retention in policy CS15 of the CS is the Robin Hood Works. Although it is recognised that this site has a constrained access and is surrounded by residential uses, it has a historically low vacancy rate and is located to the west of the Borough where there are fewer employment areas and relatively high occupancy levels.

***Does the CS address the issue of warehousing and storage space within the Borough adequately?***

- 2.3 The Council consider the CS adequately addresses the issue of warehousing and storage space requirements within the Borough. Policy CS 15 safeguards designated employment areas for B use development in order to meet the projected future requirement for additional space. As demand for industrial space is projected to decline and warehousing space to increase the projected future need for warehousing will be accommodated on vacant sites within the employment areas, many of which will formerly have been used for industrial uses. This process of change is already evident on several sites within the Byfleet Industrial Estate, where industrial uses have been replaced with flexible B use developments which include B8 floorspace.
- 2.4 The majority of existing warehousing land in the Borough is in the range 100 - 1,000 sqm and is located in the larger designated employment areas of Forsyth Road, Monument Way East and West Industrial Estates and Woking Business Park. These estates are characterised by a mixture of employment activities, with the vast majority being a combination of industrial and storage/warehouse use. Lambert Smith Hampton's market opinion concurred with the previous market appraisal undertaken in 2005, that there is unlikely to be substantial demand for further stand alone B8 estates in the Borough. This is primarily due to Woking's location off the main motorway and 'A' road network, unlike other locations in the South East such as Basingstoke and Dartford. Demand for new warehousing space will thus be generated from smaller, locally based occupiers who can be adequately accommodated within existing employment areas.
- 2.5 A planning application (PLAN/2011/1197) for a new access road to improve accessibility to the Sheerwater 'Priority Place', including the employment sites mentioned above is due to be determined by the Planning Committee at its meeting on 20 March 2012. Implementation of this proposal would greatly enhance the accessibility of a considerable area of employment land to the main highway network and reduce the impact of commercial traffic on residential amenity, thus increasing the marketability of this land for warehousing uses. Funding for implementing the scheme has been identified and it is likely that the scheme will be implemented within three years.



**3 What evidence supports the range of uses envisaged in the identified employment areas?**

- 3.1 Policy CS15 safeguards land within the employment areas for B uses as proposed in the ELR. The policy makes two exceptions for the Butts Road/Poole Road and Forsyth Road employment areas but these are based on findings in the ELR.
- 3.2 In respect of the Butts Road/Poole Road site, the policy supports the redevelopment for mixed office and residential use, if it does not result in an overall loss of employment floorspace. This is in response to advise in the market appraisal which states that ‘the estate contributes to a generally “run down” feel to this part of the town’ and ‘given its proximity to the Goldsworth Park Regeneration area, every effort should be made to encourage upgrading and regeneration of the existing stock, so that it is more in keeping with this peripheral town centre location’ and ‘the Council could consider reallocating the present industrial use to other employment use more in keeping with this fringe town centre locality.’
- 3.3 In respect of Forsyth Road site policy CS15 encourages redevelopment of vacant sites for B uses, unless redevelopment is for an alternative employment generating use which contributes to the aims of policy CS5 and would not jeopardise the B use led nature of the employment area. The policy is based on advice in the market appraisal which stated that ‘despite the difficulties highlighted in respect of Forsyth Road / Sheerwater as a whole, we consider the site performs an important role in the context of the local property market / economy and should therefore be retained. The exception to this is the area in office use, which we consider could be considered for alternative employment use or release.

**4 Does the policy/CS cater adequately for micro SMEs?**

- 4.1 The Council believe that policy CS15 of the CS adequately caters for micro SME’s. The policy seeks to ensure that there is an appropriate quantity and range of employment land in the Borough to enable the local economy to function efficiently. It states that the Council will ‘support small and medium sized enterprise (SME) formation and development by encouraging a range of types and sizes of premises including provision for incubator units, managed workspace and serviced office accommodation.’
- 4.2 The Council has published a draft Economic Development Strategy (CD/72) which sets out further policy measures to support businesses in the Borough. One of the actions is to stimulate the provision of easy-in/easy-out commercial premises across multiple use classes, either through the Council’s role as a strategic influencer or through its own property portfolio.

**5 Is CS 15 sufficiently flexible, particularly in relation to Broadoaks in West Byfleet?**

- 5.1 The Council consider that policy CS15 is sufficiently flexible, including with respect to the Broadoaks site.
- 5.2 In line with PPS4, policy CS15 states that councils should plan positively to support the needs of businesses and encourage a flexible approach to

economic development capable of accommodating growth in new sectors and changes in economic circumstances.

- 5.3 The ELR identifies a need for additional employment floorspace and advises that the majority of existing sites are suitable for continued employment use and recommends their retention. Based on this evidence policies in the CS seek to safeguard employment sites within the main employment areas, and town, district and local centres. Due to their location and composition, the employment areas are generally suitable for B use development. To ensure a degree of flexibility for businesses the policy does not seek to restrict the specific B use allowed on individual sites. Policies CS2, CS3 and CS4 also allow a degree of flexibility with regard to existing office sites in the centres.
- 5.4 The Broadoaks site contained a MoD research facility. The Secretary of State directed that an application be approved in 2000 for the redevelopment of the site to provide three new office buildings and restoration of the listed manor house. Block C (phase 1) of the development has been implemented, however development of the site stalled when the developer's assets were taken into administration. In March 2010 a resolution to grant permission subject to a legal agreement was obtained (PLAN/2010/1127) for a change of use of block c to a flexible data centre/office use. The permission provides the flexibility to market the site to office users with an additional dimension that capitalises on the advanced IT systems supply to the site.

**6 For reasons of effectiveness, should the CS include a specific reference to the role of McLaren within the Borough?**

- 6.1 If developed, the proposed Applied Technology Centre (resolved to grant planning permission under PLAN/2011/0823) will underpin McLaren's position as Woking's most high profile business and employer, and provide an opportunity to act as a catalyst for the development of an advanced engineering cluster. However, the proposed amendments to the policy put forward by McLaren are not considered appropriate as any further development at the site will have to be considered on the basis of 'very special circumstances' to justify permission, given the site's location within the Green Belt. It is also not considered appropriate to make further specific reference to McLaren in the policy/policy justification given the strategic nature of the document and the fact that although very specific in its nature and needs, McLaren is not the only major/influential company in Borough.
- 6.2 The draft Economic Development Strategy (CD/72) seeks to support economic development in the Borough and recommends a number of actions in relations to the support for cluster/sector development. The report seeks active engagement with McLaren to influence the formation of an advanced engineering cluster in and around the core A320 facility.

**7 To what extent has the CS considered the role of tourism within the local economy?**

- 7.1 Although Woking has a number of tourism attractions including the Basingstoke Canal, Brookwood Cemetery and the Borough's Muslim Cultural Heritage, these are generally day visitor attractions with minimal development requirements. Business tourism i.e. overnight stays, meetings, events, and conferences, accounts for the majority of Woking's tourism economy. The Town, District and Local Centres Study (CD/40) assessed the need for town

centre uses for the CS period, which included tourism and leisure facilities such as hotels, cinemas and theatres. The CS policies have sought to take into account the findings of this study. The draft Economic Development Study (CD/72) sets out a number of actions in relation to the visitor economy and will provide the main driver for economic growth of the tourism economy. The only action that can be effectively delivered through the CS is the provision of additional bed stock to satisfy identified need. This issue is addressed by policy CS2, and planning permission was granted in 2011 for two hotel developments within the Town Centre. Furthermore, the CS supports the in-principle development of town centre uses at the town and district centres, which includes hotel development.

## **8 How are issues relating to advertisements to be addressed within the CS and the LDF?**

- 8.1 In deciding whether to approve an advertisement application, the Local Planning Authority considers two issues - the interests of amenity and public safety. Advice on these issues is set out in Circular 03/2007 and PPG19. Policies CS20 and 21 require development to respect and enhance the character and appearance of the area in which it is approved, and thus broadly address the first issue. More detailed advice relating to advertisements will be set out by policies in the proposed Development Management (DPD). Until adoption of this DPD, the relevant policies BE18 - 22 of the 1999 Local Plan will be saved. These policies are contained in the list of saved development plan policies submitted to the Inspector (WBC/4).

## **CS16 Infrastructure**

### **9 How will infrastructure requirements be identified and delivered in an effective manner over the plan period.**

- 9.1 The anticipated physical, social and green infrastructure requirements needed to support development over the plan period is identified in the IDP (CD/11), and supporting Schedule of Infrastructure Delivery Requirements (WBC/9). These documents also identify who is responsible for providing the necessary infrastructure and when it is likely to be delivered. These documents will be updated bi-annually to ensure that they provide an up-to-date representation of the infrastructure requirements for the borough.
- 9.2 The above documents also identify the likely sources of funding required to enable the delivery of the required infrastructure. It is expected that a significant proportion of future sources of funding will be via CIL (and prior to this via S106). Section 6 of the CS specifically deals with the delivery and monitoring of the CS. The Council have further prepared a Topic Paper (WBC/09) on the Council's approach to monitoring and delivery, this document specifically sets out how the Council will seek to ensure the effective delivery of the boroughs infrastructure requirements over the plan period.
- 9.3 Both policy CS16 and Section 6 of the CS is suitably worded to reflect the above, to ensure that future infrastructure requirements of the borough are delivered in an effective and timely manner to support development.

**10 Is the CS definition of infrastructure in relation to both CS16 and CS19 adequate and robust?**

10.1 The Council is satisfied that the definition of Infrastructure in both policy CS16 and CS19 are, for the purposes of the CS, adequate and robust. The definition of infrastructure in policy CS16 sets out the social, physical and green infrastructure required to support development and meet the needs for the community over the plan period. In order to ensure a consistent regional approach, the definition reflects that set out in SEP. Policy CS19 identifies further types of social and community infrastructure, including particular examples of such facilities. The policy is supported by a comprehensive review of Social and Community Infrastructure. This is attached in the Social and Community Facilities Study (2011) (CD/27).

**11 Is the CS sufficiently flexible in terms of securing obligations in advance of CIL?**

11.1 The Council considers that prior to the formal adoption of CIL the CS is sufficiently flexible to secure planning obligations. The Council will continue to use Planning Obligations via s106 to secure developer contributions in advance of CIL. In line with Circular 05/05 (CD/113) and the CIL Regulations (2010 and 2011 amendments (CD/85), obligations will relate to the nature and scale of the development, taking into account the objectives of the CS. Where developers claim that they are unable to pay certain contributions due to viability of a development the Council will expect this to be demonstrated through a financial viability assessment.

11.2 The SAMM tariff required from new developments to mitigate against the impact on the SPA is set out in the Council's TBH SPA Avoidance Strategy (CD/38). This tariff is annually updated to ensure it takes into account changing circumstances.

11.3 It is considered that this approach, as set out in policy CS16 will ensure that the site specifics, as well as changing circumstances, will be taken into account when negotiating planning obligations.

**12 What evidence indicated the adequacy of the sewerage system to cater for existing and planned development within the borough over the plan period? How will deficiencies be identified and resolved in a timely manner?**

12.1 The IDP reports on the capacity of the sewerage system. Thames Waters AMP5 (2010-15) sets out that sewerage infrastructure capacity is assessed based on the SEP levels of growth.

12.2 There are no known sewerage capacity issues, and it is the Council's understanding that the request for Major Developed Site in the Green Belt status in Old Woking is not based on any specific need to increase capacity in the area in the short or medium-term.

12.3 At the time of Publication, AMP6 had not yet been published in any form. The Council will continue to engage with Thames Water through normal consultation processes and through updates of the IDP to ensure that any deficiencies are identified and resolved at an early stage. Indeed, the CS

allocates the Old Woking STW as a MDS in order that additional capacity and improvements to the system will be more efficient in the future.

**13 How will the CS seek to balance the demand for water supplied across the borough over the plan period (as identified in the SA)?**

13.1 The growth identified in the CS, particularly in relation to housing will have some impact on water consumption/ demand. Consequently Policy CS22 includes measures within the Code for Sustainable Homes to maximise water efficiency within new developments. The Council have carried out an IDP that sets out the infrastructure requirements for water to support the CS, this takes into account the potential future demand for water.

13.2 Veolia Water has confirmed that based on the projected growth of the borough there is no risk to the supply of water over the plan period. Notwithstanding the above, the Council recognise the need to conserve water and policy CS22 will significantly contribute towards this.

**CS17 - Open space and CS19- Social and Community Infrastructure**

**14 To what extent does the evidence base accord with the advice of PPG17 and its Companion Guide? Is the evidence base sufficiently up to date and robust (is any new evidence available/in production)?**

14.1 The Council has carried out the following evidence base to support policy CS17 and CS19:

- Green Spaces Development Plan, 2005 (CD/15)
- Open Space, Sport and Recreational Facilities Audit, updated 2008 (CD/22)
- Playing Pitch Strategy, 2006 (CD/43)
- Play Strategy, 2007 (CD/44)
- Thames Basin Heaths Special Protection Area Avoidance Strategy 2010-15 (CD/38)
- PPS9 Biodiversity and Geological Conservation
- Draft Infrastructure Delivery Plan, 2011 (CD/11)
- Social and Community Facilities Study, 2011 (CD/27)
- Surrey Infrastructure Capacity Study, 2009 (CD/34).

14.2 The Council has produced a Topic Paper on the requirements of PPG17 (WBC/08) which provides a comprehensive response as to why the Council considers the evidence base regarding the provision of Open Space, Sport and Recreation meets the requirements of PPG17 and its Companion Guide and reflects the circumstances found currently throughout the Borough. The Council are satisfied that the above documents are sufficiently up to date and robust and justify the approach in policy CS17.

14.3 The Council's Social and Community Facilities Study (CD/27) further demonstrates that the facilities in the Borough are considered adequate to serve the needs of residents for the period of the CS.

14.4 As part of the draft IDP (CD/11) the Council has also produced a Schedule of Infrastructure Delivery Requirements (WBC/9). This sets out clearly the type of Infrastructure to be provided, by whom, when and how and at what cost. It

also identified the funding source to deliver the Infrastructure. The evidence base will be renewed regularly to bring them up-to-date.

**15 What are the open space needs of the Borough and how will they be satisfied? How will deficiencies be resolved? Does the CS take an adequate approach to issues of open space (including hierarchy/type)? Is the evidence in support adequate?**

15.1 The open space needs of the borough are identified in the Open Space, Sport and Recreational Facilities Audit, the IDP and Schedule of Infrastructure Delivery Requirements. The Infrastructure Schedule sets out what, how, when, at what cost and the sources of funding required to deliver the Open Space Needs of the Borough.

15.2 The Council have a dedicated Cultural & Community Development Team which monitor and ensure that the existing and future identified needs of the borough are delivered. The CS evidence base sets out the current needs (type) and priorities (hierarchy) for the borough. The Planning Authority will continue to monitor the existing and future needs and demands of the borough through the AMR, as well as bi-annually updating the IDP. Policies CS17 and CS8 are very clear about the need to provide open space and green Infrastructure and how that will be secured. The Council considers that they provide an adequate approach too issues regarding open space. Furthermore policy CS21 seeks the incorporation of landscaping, amenity space and provision of SANGs as part of development.

15.3 The Council is satisfied that policy CS17 is informed by a robust and comprehensive evidence base. These documents identify the level of open space, green infrastructure, sport and recreation required to support development, identifies the costs associated with such provision, along with potential sources of funding as well as the timescales for delivery and gaps in funding.

**16 What constitutes enhancement of open space? How will delivery be monitored?**

16.1 Enhancement of open space, relates to qualitative improvements to existing areas of open space. The Council recognise the importance of developing a consistent approach towards strategic management of green spaces to ensure a consistent high standard that meet the needs of the community. Key sites across the borough, such as Woking Park have management plans to ensure a consistent level of quality is maintained. Pages 18- 21 of the Council's Green Spaces Development Plan sets out the qualitative improvements needed within the borough, this is updated in the IDP and identifies potential sources of funding for such improvements.

16.2 The Council's Cultural & Community Development Team will continue to monitor Council owned open space to ensure a high standard of provision is met across the borough. The Planning Authority will update the IDP and accompanying Schedule bi-annually to ensure that these qualitative improvements are being met and to highlight and existing/ future deficiencies within the borough.

**17 How will allotments be protected and increased across the borough?**

17.1 Policy CS17 resists the loss of open space, including allotments unless it can be demonstrated that such open space is surplus to requirement. Policy CS17 further states that the number of allotments in the borough should be protected and that there will be 'in principle' support for new allotments. As part of any planning application process the Council's Cultural & Community Development Team and the Allotment Society will be consulted on any application involving the loss of allotment land to ensure that the needs of the community are protected where required.

17.2 P151- 153 of the draft IDP (2011) (CD/11) and the Green Spaces Development Plan (CD/15) set out the existing and proposed provision for allotments. The Local Planning Authority will work with the Cultural & Community Development Team to ensure the long term provision of allotments. The IDP is a 'living' document and will be updated bi-annually to ensure that it reflects the needs and requirements of the borough.

**18 How will the CS address effectively the provision and development of Green Infrastructure at a strategic level?**

18.1 Policy CS16 of the CS provides a definition of Green Infrastructure. Policies CS7, CS8 and CS17 set out the requirements for avoidance payments from development to provide SANGs and secure other forms of Green Infrastructure as part of development. This approach was agreed by Natural England and the Thames Basin Heaths Joint Strategic Partnership Board and forms an important component in providing a network of Green Infrastructure. The delivery mechanism for SANGs is set out in the Council's adopted Thames Basin Heath Avoidance Strategy. The Council will continue to work in partnership with Natural England and adjoining boroughs to ensure a coordinated approach to the delivery of SANGs within the borough and across the wider Surrey area. The delivery of SANGs will continue to be monitored against the Council's adopted Avoidance Strategy.

18.2 The Council will also work with the adjoining boroughs and SCC to improve and create new rights of way, as well as the Environment Agency to improve river/ canal corridors across the borough.

18.3 This coordinated approach with SCC, adjoining boroughs and the relevant regulatory bodies will ensure the effective strategic provision of Green Infrastructure.

**19 Is the evidence base that informs Policy CS19 adequate and robust? How will issues relating to the adequacy of service provision be addressed within the Borough, for example libraries?**

19.1 Policy CS19 is informed by the Social and Community Facilities Study, the IDP and Infrastructure Schedule. These documents have been prepared in partnership with Surrey County Council and have taken into account the views of the local community.

19.2 The Social and Community Facilities Study, the IDP and the Schedule of Infrastructure Delivery Requirements identify the future service provision needs of the borough and who is responsible for their delivery. For example, the requirements for future service provision of libraries across the borough

are set out in section 23 of the Social and Community Facilities Study and paragraphs 12.19- 12.41 of the IDP.

- 19.3 Policy CS16 and section 6 of the CS sets out how the delivery of infrastructure will largely be met. The Council have also prepared a Topic paper on the delivery and monitoring of infrastructure (WBC/09). As emphasised in paragraph 5.182 of Policy CS19 the Council will work with key infrastructure providers to ensure the delivery of such services and will continue to monitor their delivery through the IDP.

**20 Are the roles and needs of faith groups recognised adequately within the CS?**

- 20.1 The CS gives no preferential status to any particular group but does recognise the need to ensure that the requirements of all sections of the community are met.

- 20.2 As with all community groups, the Council will work in partnership with faith groups to ensure that their on-going needs are met across the borough. Places of worship are defined as part of social and community infrastructure in the Social and Community Facilities Study. This study sets out what the likely future needs for all community groups, including religious organisations are and how these will be addressed. This document also acknowledges the importance of faith groups, and their wider role in delivering the social and community needs of the borough.

- 20.3 Accordingly it is considered that appropriate and adequate reference to places of worship/ faith groups has been made to policies CS16 and 19.

**21 Are educational needs evidenced adequately and addressed suitably within the CS? Does adequate school pupil capacity exist for the plan period?**

- 21.1 Education needs are set out in detail in Chapter 7 of the IDP (CD/11). As SCC are the providers of education and are also the planning authority for schools, the Council considers the extent to which education is addressed within the CS and supporting evidence is adequate.

- 21.2 Chapter 7 of the IDP (CD/11) provides a detailed assessment of education needs in Woking over the lifetime of the CS. The IDP has recently been supplemented with additional information on specific schemes to provide new classrooms. This is contained in the topic paper "Woking Borough Council's approach to monitoring and delivery with particular emphasis on infrastructure delivery" (WVC/09).

- 21.3 The Council is satisfied that there is sufficient capacity within existing school sites to provide for additional pupils, with some building works.

**22 Are the interests of the arts and cultural facilities addressed adequately?**

- 22.1 The CS recognises the importance of arts and cultural facilities within the borough, both for the benefits it has on the well-being and enjoyment of those who work and live within the borough and surrounding areas, but also in providing economic activity. The CS directs the location of such facilities to



accessible Town and District Centre locations (Woking and West Byfleet), this is emphasised in policies CS2 and CS3. The IDP identifies the future anticipated needs for such facilities. The evidence base to support policies CS2, CS16 and CS19, particularly the IDP (CD/11) and the Social and Community Facilities Study (CD/27), indicates that the current provision within the borough appears to be adequate. Accordingly policy CS2, CS3 and CS19 seeks the retention and improvements to existing facilities as well as making efficient use of such facilities. The IDP sets out where future need is anticipated and further identifies who will be responsible for the provision and how it will be funded.

22.2 This approach is considered both reasonable and effective to ensure that the interests of existing arts and cultural facilities are protected and future needs adequately addressed.

**23 What evidence exists to demonstrate that issues of health are addressed adequately within the CS?**

23.1 Policy CS16 sets out the overall approach to infrastructure provision. It defines health as part of infrastructure and makes reference to preparation of an IDP to set out in detail how the Infrastructure will be delivered.

23.2 Section 10 of the IDP deals with health. The infrastructure schedule emphasises who, what, when and how health Infrastructure will be provided and the source of funding for its delivery. There are other policies, such as CS17, CD18 and CS19 that will contribute towards improving the health and well being of the community.

**24 Does the CS seek to address matters of electronic communication and supporting infrastructure adequately?**

24.1 The Council is satisfied that the CS and its supporting evidence adequately addresses matters relating to electronic communication. The IDP (CD/11) and its supporting Schedule of Infrastructure Delivery Requirements (WBC/09) sets out the anticipated level of infrastructure required to enable/ support future development, identifies funding sources; and sets out responsibilities for delivery. Pages 122- 126 of the IDP specifically deal with telecommunications. The Council will work with service providers to ensure the timely delivery of infrastructure (including telecommunications<sup>1</sup>).

24.2 Policy CS16 provides a clear mechanism to assist in ensuring that electronic communication and other infrastructure needs of the borough are met through CIL and prior to its adoption through S106.

**25 Are matters relating to Woking Football Club addressed adequately?**

25.1 The Council is satisfied that the matters relating to Woking Football Club have been adequately addressed. Officers have previously given a comprehensive response to the representation made by Woking Football Club regarding their requirement for a new Sports Stadium to be explicitly referenced within CS (ID 86, rep 174).

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<sup>1</sup> Woking Borough Council, as part of the wider Surrey Strategic Partnership initiative have recently invited bids to service providers to ensure that every Surrey home has access to superfast broadband by 2013.

- 25.2 The needs and requirements of the club are noted, and the Council will work with the Football Club in trying to meet their on going needs and requirements. The Council considers that this matter is outside the scope of the Core Strategy and will be dealt with as part of the Site Allocations DPD.

## **CS 18 Transport**

### **26 Is the evidence in support of the CS robust and is it consistent with the advice of PPS4, PPG 13 Transport et al? Does the CS maintain consistency with the Transport chapter of the SEP?**

- 26.1 Policy CS18 – Transport is informed by the following evidence:
- Surrey Transport Assessment (CD/36),
  - Draft Infrastructure Delivery Plan (CD/11).
  - The Surrey Transport Plan (Local Transport Plan Third Edition) (CD/39)
  - The Transport and Accessibility Topic Paper (CD/41).
- The evidence base is listed in the policy box for the policy.
- 26.2 The Surrey Transport Assessment (CD/36) carried out by Surrey County Council uses robust methodology based on Trip Rate Information Computer System (TRICS) and the SINTRAM model. These are proven methodologies recognised and used widely to assess transport impacts. The assessment tested a number of development possibilities and the recommendations have influenced the approach adopted in the CS. An IDP (CD/11) has been prepared to identify specific transport schemes to resolve the impacts of the CS. Schemes reflect the outcome of the Transport Assessment.
- 26.3 The Surrey Transport Plan (CD/39) sets out the overall strategic direction for transport provision in Surrey. The CS takes full account of its provision and reference to it is made through the text of Policy CS18.
- 26.4 The Transport Topic Paper (CD/41) provides evidence about the basic facts of transport provision in the area and has been used to justify the transport policy.
- 26.5 The Council considers the evidence base up-to-date and robust to inform the decisions made in the CS.
- 26.6 Both PPS4 and PPG13 promote sustainable patterns of development to reduce the need to travel and distance travelled especially by car and to respond to climate change. PPG13 in particular emphasises the need to promote transport choices and accessibility to jobs, shopping and leisure by public transport, walking and cycling.
- 26.7 Policy CS18 addresses these requirements in full by directing most new development to the main urban areas, served by a range of sustainable transport modes such as walking and cycling. It provides in-principle support to proposals that deliver improvements and increased accessibility to cycle, pedestrian and public transport networks.
- 26.8 Its approach to parking also accords with the requirements of PPG13 (CD/99).

- 26.9 The Council is satisfied that the CS is consistent with advice in PPS4 (CD/92) and PPG13.
- 26.10 Policies T1: Manage and invest and T2: Mobility Management of the SEP seek to manage the location of new development and utilise and control the demands placed on the existing transport system to create an integrated transport approach and re-balance the transport system in favour of sustainable modes. The transport policy (CS18) in the CS conforms with these policies through managing the pattern of development to locate most new development in the main urban area, supporting investments that deliver improvements and increased accessibility to sustainable transport networks and interchanges, in particular through the Local Sustainable Transport Fund, and by managing the demand and supply of parking through use of maximum and minimum parking standards.
- 26.11 Furthermore, the CS transport policy conforms with SEP Policy T4: Parking as the policy adopts a restraint-based maximum parking provision for non-residential developments, supports an increase in the provision in parking at rail stations and through a parking SPD will develop an area-specific parking policy that applies the guidance of PPS3: Housing to take into account expected levels of car ownership, the importance of good design and the efficient use of land.
- 26.12 In accordance with Policy T5: Travel plans and advice, the CS identifies developments for which travel plans should be developed as those that generate significant traffic or have significant impact on the SRN. In addition to this the CS requires Travel Statements from smaller scale developments.
- 26.13 Policy CS15: Sustainable Economic Development is consistent with Policy T6: Communications Technology through encouraging improved ICT infrastructure in refurbished and redevelopment workplace sites and in residential developments to allow home working, thereby reducing levels of commuting to work.
- 26.14 The CS supports and develops the role of Woking Town Centre as a regional hub and regional spoke towards London, in line with Policy T8: Regional Spokes, through focussed investment in the Town Centre, supporting the growth of Woking Rail Station and through proposals for a new access road through Monument Way East and Monument Way West, an identified bottleneck into and out of the Maybury and Sheerwater area, to the east of the Town Centre.
- 26.15 Based on the above, the Council considers the CS to be consistent with the SEP transport chapter.
- 27 Is there sufficient clarity within the CS as to how its transport objectives will be delivered? (Relationship to Surrey Transport Plan, other LDF documents and the work of other stakeholders, including Transport for Woking? Applicability of the need for Transport Assessments? )**
- 27.1 Yes, the transport policy itself reflects the objectives of the Surrey Transport Plan and this is emphasised in the policy. The policy also makes reference to the fact that detailed implementation of schemes will be set out in an IDP. The council has prepared an IDP and an Infrastructure Schedule which sets out

the details of specific transport schemes to be implemented through the CS. Information regarding what will be implemented, by who, when, at what cost and how schemes will be funded are included in the schedule. Schemes identified in the schedule have been informed by the Council's Transport Assessment.

- 27.2 The Transport Assessment has looked strategically at the impact of the CS on the Borough's road network, any proposal that comes forward with significant transport implications will be expected to produce a detailed site specific TA to assess the impacts and appropriate mitigation measures. The council, working with SCC, has prepared a technical note as part of the Transport Topic Paper which identifies a list of schemes from which to select from.

**28 Does the CS give suitable priority to means of transport other than the private car?**

- 28.1 The CS Policy CS18: Transport and accessibility supports proposals which deliver improvements or increased accessibility to cycle, pedestrian and public transport networks and interchange facilities. The policy also reaffirms the Council's commitment to promote sustainable travel through the Cycle Woking scheme and the Local Sustainable Transport Fund, which provide both hard infrastructure and soft measures to promote the use of cycling, walking and public transport use.

- 28.2 Travel modes, other than the private car, will also be encouraged through the use of Transport Assessments, Travel Plans and Travel Statements, as these are techniques used to influence people's travel behaviour towards more sustainable options.

- 28.3 Furthermore the policy sets maximum parking standards for all types of non-residential development including the consideration of zero parking standards in the town centre, to encourage use of available sustainable transport options.

- 28.4 The CS also commits to working with partners to continue improvements to public transport and cycle facilities in the Town Centre (CS2) and prioritises accessibility via sustainable transport modes into and out of the Maybury and Sheerwater Priority Place area (Policy CS5), through bus service and cycle route improvements and investment into a local community transport scheme.

**29 Does the CS address matters of countryside recreation and the use of footpaths/cycleways adequately?**

- 29.1 Policy CS17: Open space, green infrastructure, sport and recreation supports the protection and the enhancement of physical access, including public rights of way, to open space and green infrastructure to encourage increased use of greenspace for outdoor recreation.

- 29.2 Furthermore, the transport policy in the CS advocates an integrated transport system, which provides easy access to green infrastructure and recreation. The policy places significant emphasis in the encouragement of the use of sustainable modes of transport. Through the LSTF and Cycle Woking schemes the use of footpaths and cycleways will be promoted and enhanced through a mixture of hard infrastructure and soft measures.

- 30 Is the CS approach to car parking warranted by the evidence base and consistent with national planning policy?**
- 30.1 The council has an objective to increase the use of alternative modes of travel, of which parking plays a part in the delivery of this objective. In line with this objective, maximum parking standards for non-residential parking has been set by the Council, in accordance with national guidance. The Council is in the best position to determine the correct level of parking standards for the Borough, as advocated in recent PPG13 amendments. It is recognised that the application of car parking standards should also be balanced with the issue of highway safety and accordingly the Council has accepted that minimum standards should apply for residential parking.
- 30.2 The CS maintains flexibility to manage the demand and supply of parking in the borough to control congestion and sustainable transport uses, recognising the role parking can have in promoting such choices.
- 31 Does Woking Railway Station have adequate capacity to deal with the development growth envisaged by the CS?**
- 31.1 The South West Main Line (SWML) has a projected peak hour growth of 24%, as outlined in the London and South East Route Utilisation Strategy (RUS) (July 2011), part of this will be from growth at Woking Railway Station. Currently the SWML is undergoing a scheme to lengthen all peak fast trains into London Waterloo to 10-car operations which will assist in service overcrowding. The RUS also recommends that no work is undertaken which precludes the implementation of 12-car operations. However, the report states that 'modelling has not indicated that this option will be required'. A further seven options are also considered in the RUS to respond to an identified capacity shortfall. In addition to this ticket pricing is another way to distribute passenger numbers more evenly across the day and reduce the demand at peak times. Therefore capacity at Woking Rail Station should not preclude the growth outlined in the CS.
- 32 Should there be a reference to Airtrack within the CS?**
- 32.1 The Airtrack scheme should not be included within the CS as it is not a deliverable scheme. The scheme was withdrawn by BAA in April 2011 due to level crossing issues and public funding availability and the Council is not in a position to propose and deliver such a large scale rail scheme. Surrey County Council is committed to prepare a rail study looking at improving links to Heathrow Airport and the Council will support the strategy and will work in partnership with the County Council and other stakeholders through Transport for Woking to achieve that.
- 33 Does the CS safeguard adequately land for future transport infrastructure (eg Transport Interchange)? Are there any implications for the proposals map?**
- 33.1 The adopted Local Plan (1999) safeguards sufficient land for future transport infrastructure. The CS and the Proposals Map takes this forward but recognises that it is subject to review by the County Council. The outcome of the review by the County Council will inform what land will be required to be safeguarded as part of the Site Allocations DPD. The Proposals Map will be updated to take into account any implications of the review. The Inspector's

attention is drawn to the fact that the County Council has already started the review.

**34 Are matters relating to necessary transport infrastructure over the plan period addressed adequately within the CS and its supporting evidence?**

- 34.1 The policy clearly emphasises that detailed transport mitigation measures will be addressed through an IDP and an infrastructure schedule which has been prepared. This schedule sets out the details of necessary schemes including when they should occur, the cost of each scheme, who will deliver them, how they will be funded and by when. The schemes drawn up have been informed by the Woking Transport Assessment and a Surrey-wide cumulative assessment of future development impacts on the highway network.

# Appendix 1

## *Supplementary to Matter 3 - Issue 10*

### **2012 consultation on changes to the Building Regulations in England - Section two - Part L (Conservation of fuel and power)**

“Consequential improvements” is the term used to describe the use of the Building Regulations to trigger a requirement for extra energy efficiency works in a building where other controlled work is already taking place. Consequential improvements are already required for buildings over 1000m<sup>2</sup> which have an extension added (Building Regs 2010 Part L1B and L2B). However, this requirement excludes the vast majority of extensions and conversions carried out each year, most of which are in homes. The vast majority of homes fall below this size threshold.

The Government is currently consulting on changes to the Building Regulations in England which includes a consultation on Part L, conservation of fuel and power (the closing date is 27 March 2012). The proposed changes would apply the requirements for consequential improvements to all existing domestic buildings which undergo works to add an extension, and also apply it to increases in habitable space (i.e. loft and integral garage conversions). The proposal also includes boiler replacements and when a percentage of windows are replaced. People undertaking building work would have to make consequential improvements to ensure the building complies with the Part L regulations for a new building. The Government state the reason for proposing these changes now is to recognise the urgency of reducing emissions from the existing building stock and, in a time of rising energy prices, to make homes and non-domestic buildings easier and cheaper to heat.

### **The Green Deal**

The Green Deal is a new financial mechanism set up by the Government which removes the need for consumers to pay upfront for energy efficiency measures and instead provides reassurances that the cost of the measures should be covered by savings on the electricity bill. The customer receives a package of energy efficiency measures at no up front cost and the cost of the measures is paid back over the long term through repayments via energy bills. The cost of the repayments will be equal to or less than the expected energy bill savings. The Green Deal is planned for introduction in autumn 2012.

## **Appendix 2 - Draft Agenda**



| Date   |   | Section/<br>Policy  |                              | Section/<br>Policy |
|--|---|---|------------------------------|--------------------|
| <b>Week 1</b>                                  |   |   |                              |                    |
| <p>Tues 20<sup>th</sup><br/>March<br/>2012</p> | <p><b>Opening</b><br/><b>Hearing 1: All day</b><br/><b>Core Strategy Vision &amp; Places</b><br/><b>Matter 1 - Managing Growth</b></p> <p><u>Participants*</u><br/><i>Working Council</i><br/>009- <i>Carer Jonas for Burhill Group Ltd</i><br/>023- <i>Mr and Mrs Brooks</i><br/>026- <i>Terence 'O' Rowke for McLaren Group Ltd</i><br/>032 - <i>The Treasures Trust</i><br/>033- <i>Hook Heath Residents Association</i><br/>040- <i>Mayford Village Society</i><br/>041- <i>Clr Louise Morales</i><br/>050 - <i>Carer Planning</i><br/>072- <i>Mr Peter Dines</i><br/>076- <i>Terence 'O' Rowke for Ace Marcelle Hope Ltd</i><br/>079- <i>Environment Agency</i><br/>080- <i>Savills Plc for Cren Nicholson</i><br/>082- <i>John Hack</i><br/>083- <i>Turley Associates for Taylor Wimpey &amp; West Estates</i><br/>090- <i>Home Builders Federation</i><br/>094- <i>Woolf Bond Planning for Martin Cross Homes</i><br/>099- <i>Working LA21</i></p> | <p>Whole doc</p> <p>Particularly<br/>Sections 3 and<br/>4</p> <p>Policies<br/>CS1,<br/>CS2,<br/>CS3,<br/>CS4,<br/>CS5</p> | <p><b>Matter 1 Contd</b></p> |                    |

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| <p>Wed 21<sup>st</sup><br/>March<br/>2012</p> | <p><b>Hearing 2: All day</b><br/><b>Environmental Considerations</b><br/><b>Matter 2</b><br/><b>Natural Environment( AM)</b></p> <p><b>Participants*</b><br/><i>. Woking Council</i><br/><i>009- Carter Jonas for Barhill Group Ltd</i><br/><i>026- Terence 'O' Rourke for McLaren Group Ltd</i><br/><i>033- Hook Heath Residents Association</i><br/><i>040- Mayford Village Society</i><br/><i>042- Cllr Louise Morales</i><br/><i>049- Mr Douglas Bellworthy</i><br/><i>050 - Carter Planning</i><br/><i>056 - David Lander Consultancy</i><br/><i>072- Mr Peter Dixon</i><br/><i>076- Terence 'O' Rourke for Ace Marcelle Hope Ltd</i><br/><i>079- Environment Agency</i><br/><i>080- Savills Plc for Greg Nicholson</i><br/><i>082- John Hack</i><br/><i>083- Turley Associates for Taylor Wimpey &amp; West Essex</i><br/><i>086- Woking Football Club</i><br/><i>090- Home Builders Federation</i><br/><i>094- Woolf Bond Planning for Martin Grass Homes</i><br/><i>099- Woking LA21</i></p> | <p>Section 5</p> <p>CS6<br/>CS7<br/>CS8<br/>CS9</p> | <p><b>Matter 3</b><br/><b>Built Environment (PM)</b></p> <p><b>Participants*</b><br/><i>Woking Council</i><br/><i>009- Carter Jonas for Barhill Group Ltd</i><br/><i>024 Woking Constituency Labour Party</i><br/><i>033- Hook Heath Residents Association</i><br/><i>040- Mayford Village Society</i><br/><i>079- Environment Agency</i><br/><i>090- Home Builders Federation</i><br/><i>099- Woking LA21</i></p> | <p>CS17<br/>CS20<br/>CS21<br/>CS22<br/>CS23<br/>CS24</p> |
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| <p>Thur 22<sup>nd</sup><br/>March<br/>2012</p> | <p><b>Hearing 3 All day</b><br/> <b><u>Economic Development, Transport and Infrastructure</u></b><br/> <b>Matter 4 – Economy</b><br/> <b>Matter 5 – Infrastructure</b><br/> <b>Matter 6 Transport</b></p> <p><b>Participants*</b><br/> <i>Woking Council</i><br/> 026- <i>Terence 'O' Roarke for McLaren Group Ltd</i><br/> 029 – <i>Jones Lang La Salle Ltd for Stanhope Plc</i><br/> 032 – <i>The Theatres Trust</i><br/> 033- <i>Hook Heath Residents Association</i><br/> 041- <i>Clr Louise Morales</i><br/> 069- <i>Mr Anthony Kremer</i><br/> 073- <i>Knaphill Residents Association</i><br/> 079- <i>Environment Agency</i><br/> 082- <i>John Hack</i><br/> 099- <i>Woking LA21</i></p> | <p>Section 5</p> <p>CS15,<br/>CS16<br/>CS18<br/>CS19</p> |  |  |
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|---|---|--|--|--|
| <p>Tues 3<sup>rd</sup><br/>April<br/>2012</p> | <p><b>Hearing 4: All Day</b><br/><b>Housing</b><br/><b>Matter 7</b><br/><u>Participants*</u><br/><i>Working Council</i><br/><i>009- Carter Jonas for Barhill Group Ltd</i><br/><i>12- K. Fox for Woodham Court</i><br/><i>024 Working Consultancy Labour Party</i><br/><i>033- Hook Heath Residents Association</i><br/><i>034- Mr William Bocking</i><br/><i>042- Cllr Louise Morales</i><br/><i>050 – Carter Planning</i><br/><i>056 – David Lander Consultancy</i><br/><i>079- Environment Agency</i><br/><i>080- Savills Plc for Cren Nicholson</i><br/><i>082- John Hack</i><br/><i>083- Turley Associates for Taylor Wimpey &amp; Wen Estates</i><br/><i>090- Home Builders Federation</i><br/><i>094- Woolf Bond Planning for Martin Grass Homes</i></p> | <p>Section 5<br/><br/>Policies<br/>CS10<br/>CS11<br/>CS12<br/>CS13<br/>CS14</p>                          |  |  |
| <p>Wed 4<sup>th</sup><br/>April<br/>2012</p>  | <p><b>Hearing 5: All Day</b><br/><b>Delivery and Monitoring and the Proposals Map</b><br/><b>Matter 8</b><br/><u>Participants*</u><br/><i>Working Council</i><br/><i>019- Margaret Pain</i><br/><i>023- Mr and Mrs Brooks</i><br/><i>031- Sylvia Griffiths</i><br/><i>050 – Carter Planning</i><br/><i>063- Mr John Roberts</i><br/><i>069- Mr Anthony Kremer</i><br/><i>075- Form Architecture &amp; Planning for The Bay 10 Let Business</i></p>  | <p>Whole Doc<br/>Sections 5 and 6<br/>Infrastructure:<br/>Delivery Plan<br/>Town Centre<br/>Boundary</p> |  |  |

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|---|---------------------------------|--|--|--|
| Thurs. 5 <sup>th</sup><br>April<br>2012 | Reserved for potential over run |  |  |  |
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\* The list of potential participants for each session is indicative and remains subject to change.

Morning sessions to generally run between 10.00 and 13.00

Afternoon sessions to generally run between 14.00 and 17.00

Some sessions may be liable to overrun and therefore some flexibility as regards attendance may be required.

## Appendix 3 – Woking Borough Council Core Documents List

| Doc No | Document  | Web Link  |
|--------|---|---|
|        | <b>Self Assessment</b>  |   |
| CD/1   | Self Assessment of the Conformity of the Core Strategy Publication Document with National and Regional policy, Woking and Surrey Sustainable Community Strategies and the Key Priorities of the Council | <a href="#">Self Assessment Topic Paper</a>   |
| CD/2   | Core Strategy Publication Document – Self Assessment of Tests of Soundness and Legal Requirements   | <a href="#">Self Assessment of Tests of soundness and Legal Requirements</a>  |
|        | <b>Local Plan, SCI and SPD</b>  |   |
| CD/3   | Parking Standards SPD   | <a href="#">Parking Standards</a>   |
| CD/4   | Outlook, Amenity, Privacy and Daylight SPD  | <a href="http://www.woking.gov.uk/planning/policy/ldf/outlookandprivacy/oapdpdf">http://www.woking.gov.uk/planning/policy/ldf/outlookandprivacy/oapdpdf</a>         |
| CD/5   | Statement of Community Involvement  | <a href="#">SCI</a>   |
| CD/6   | Woking Borough Local Plan 1999  | <a href="#">Local Plan 1999</a>   |
|        | <b>Evidence base</b>  |   |
| CD/7   | Annual Monitoring Reports   | <a href="#">Annual Monitoring Reports</a>   |
| CD/8   | Biodiversity & Planning in Surrey   | <a href="#">Biodiversity Action Plan</a>  |
| CD/9   | Character Study   | <a href="#">Character Study</a>   |
| CD/10  | Climate Change and Decentralised, Renewable and Low Carbon Evidence Base  | <a href="#">Climate Change Study</a>  |
| CD/11  | Draft Infrastructure Delivery Plan (IDP)  | <a href="#">Draft Infrastructure Delivery Plan (IDP)</a>  |
| CD/12  | Economic Viability Assessment   | <a href="#">Economic Viability Assessment</a>   |
| CD/13  | Employment Land Review (ELR) (made up of Employment Position Paper and Market Appraisal)  | <a href="#">Employment Position Paper</a>   |
| CD/14  | Equalities Impact Assessment (EIA)  | <a href="#">Equalities Impact Assessment (EIA)</a>  |
| CD/15  | Green Spaces Development Plan   | <a href="#">Green Spaces Development Plan</a>   |
| CD/16  | Review of Evidence Base from Planning Advisory Service  | <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/pasevidencebasereview">http://www.woking.gov.uk/planning/policy/ldfresearch/pasevidencebasereview</a> |
| CD/17  | Gypsies and Traveller Accommodation Assessment  | <a href="#">GTAA</a>  |
| CD/18  | Habitats Regulation Assessment  | <a href="#">Habitats Regulations Report</a>   |
| CD/19  | Heritage of Woking  | <a href="#">Heritage of Woking</a>  |
| CD/20  | Housing Land Supply Position Statement  | <a href="#">Housing Land Supply Position Statement</a>  |
| CD/21  | Housing Topic Paper   | <a href="#">Housing Topic Paper</a>   |
| CD/22  | Open Space, Sports and Recreation Facilities Audit  | <a href="#">Open Spaces Study</a>   |
| CD/23  | Pitch Strategy  | <a href="#">Pitch Strategy</a>  |
| CD/24  | Population Topic Paper  | <a href="#">Population Paper</a>  |
| CD/25  | Public Art Strategy   | <a href="#">Public Art Strategy</a>   |
| CD/26  | Retail Monitoring Report  | <a href="#">Retail Monitoring Report</a>  |
| CD/27  | Social and Community Facilities Study   | <a href="#">Social and Community Facilities Study</a>   |

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|--------------|---|--|
| <b>CD/28</b> | Social and Community Infrastructure Requirements Study            | <u><a href="#">Social and Community Infrastructure Requirements</a></u>  |
| <b>CD/29</b> | Strategic Access Management and Monitoring (SAMM) Tariff Guidance | <u><a href="#">SAMM Tariff Guidance</a></u>  |
| <b>CD/30</b> | Strategic Flood Risk Assessment                                   | <u><a href="#">Strategic Flood Risk Assessment</a></u>   |
| <b>CD/31</b> | Strategic Housing Land Availability Assessment (SHLAA) 2011       | <u><a href="#">SHLAA 2011</a></u>  |
| <b>CD/32</b> | Strategic Housing Market Assessment (SHMA)                        | <u><a href="#">SHMA</a></u>  |
| <b>CD/33</b> | Surrey Hotel Futures  | <u><a href="#">Surrey Hotel Futures</a></u>  |
| <b>CD/34</b> | Surrey Infrastructure Capacity Study                              | <u><a href="#">Surrey Infrastructure Capacity Study</a></u>  |
| <b>CD/35</b> | Surrey Sustainable Community Strategy                             | <u><a href="#">Partnership Plan</a></u>  |
| <b>CD/36</b> | Surrey Transport Assessment                                       | <u><a href="#">Transport Assessment</a></u>  |
| <b>CD/37</b> | Sustainability Appraisal Report                                   | <u><a href="http://www.woking.gov.uk/planning/policy/ldf/sustappraisal">http://www.woking.gov.uk/planning/policy/ldf/sustappraisal</a></u>   |
| <b>CD/38</b> | Thames Basin Heaths Special Protection Area Avoidance Strategy    | <u><a href="#">Thames Basin Heaths SPA</a></u>   |
| <b>CD/39</b> | The Surrey Transport Plan (Local Transport Plan Third Edition)    | <u><a href="#">LTP3</a></u>  |
| <b>CD/40</b> | Town, District and Local Centres Study                            | <u><a href="#">Town, District and Local Centres Study</a></u>  |
| <b>CD/41</b> | Transport and Accessibility Topic Paper                           | <u><a href="#">Transport Topic Paper</a></u>   |
| <b>CD/42</b> | Woking Community Strategy   | <u><a href="#">Woking Community Strategy</a></u>   |
| <b>CD/43</b> | Playing Pitch Strategy  | <u><a href="http://www.woking.gov.uk/planning/policy/ldf/research/ppsmay2006">http://www.woking.gov.uk/planning/policy/ldf/research/ppsmay2006</a></u>   |
| <b>CD/44</b> | Play Strategy   | <u><a href="http://www.woking.gov.uk/community/children/child/playdev/playstratap">http://www.woking.gov.uk/community/children/child/playdev/playstratap</a></u>   |
| <b>CD/45</b> | Climate Change Strategy   | <u><a href="http://www.woking.gov.uk/environment/climate/Greeninitiatives/climatechangestrategy/climatechange">http://www.woking.gov.uk/environment/climate/Greeninitiatives/climatechangestrategy/climatechange</a></u> |
| <b>CD/46</b> | Empty Homes Strategy  | <u><a href="http://www.woking.gov.uk/housing/policies/strategies/emptyhomesstrategy">http://www.woking.gov.uk/housing/policies/strategies/emptyhomesstrategy</a></u>   |
| <b>CD/47</b> | Housing Strategy 2011-2016  | <u><a href="http://www.woking.gov.uk/housing/policies/strategies/hstrategy11-16">http://www.woking.gov.uk/housing/policies/strategies/hstrategy11-16</a></u>   |
| <b>CD/48</b> | Social Inclusion and Community Cohesion Strategy                  | <u><a href="http://www.woking.gov.uk/community/edsi/sinc/sich">http://www.woking.gov.uk/community/edsi/sinc/sich</a></u>   |
| <b>CD/49</b> | Cultural Strategy   | <u><a href="http://www.woking.gov.uk/council/strategies/culturalstrategy/culturalstrategy">http://www.woking.gov.uk/council/strategies/culturalstrategy/culturalstrategy</a></u>   |
| <b>CD/50</b> | Priority Places Action Plan, 2010                                 | <u><a href="#">Hard copies available on request</a></u>  |
| <b>CD/51</b> | Draft Maybury Local Community Action Plan, 2008                   | <u><a href="#">Hard copies available on request</a></u>  |
| <b>CD/52</b> | Sheerwater Local Community Action Plan, 2008                      | <u><a href="#">Hard copies available on request</a></u>  |
| <b>CD/53</b> | Mount Hermon Conservation Area Appraisal                          | <u><a href="http://www.woking.gov.uk/planning/policy/localplan/mounthermon2">http://www.woking.gov.uk/planning/policy/localplan/mounthermon2</a></u>   |
| <b>CD/54</b> | Old Woking Conservation Area Appraisal                            | <u><a href="http://www.woking.gov.uk/planning/policy/localplan/oldwoking2">http://www.woking.gov.uk/planning/policy/localplan/oldwoking2</a></u>   |
| <b>CD/55</b> | Ashwood Road Conservation Area Appraisal                          | <u><a href="http://www.woking.gov.uk/planning/policy/localplan/ashwood">http://www.woking.gov.uk/planning/policy/localplan/ashwood</a></u>   |
| <b>CD/56</b> | Horsell Conservation Area Appraisal                               | <u><a href="http://www.woking.gov.uk/planning/policy/localplan/horsell2">http://www.woking.gov.uk/planning/policy/localplan/horsell2</a></u>   |

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|--------------|---|---|
| <b>CD/57</b> | Byfleet Corner, Rosemount Parade and Station Approach Conservation Area Appraisal           | <a href="http://www.woking.gov.uk/planning/policy/localplan/byfleet2">http://www.woking.gov.uk/planning/policy/localplan/byfleet2</a>   |
| <b>CD/58</b> | Pond Road Conservation Area Appraisal   | <a href="http://www.woking.gov.uk/planning/policy/localplan/pondroad">http://www.woking.gov.uk/planning/policy/localplan/pondroad</a>   |
| <b>CD/59</b> | St Johns Conservation Area Appraisal  | <a href="http://www.woking.gov.uk/planning/policy/localplan/stjohnscas">http://www.woking.gov.uk/planning/policy/localplan/stjohnscas</a>   |
| <b>CD/60</b> | Wheatsheaf Conservation Area Appraisal  | <a href="http://www.woking.gov.uk/planning/policy/localplan/wheatsheafcas">http://www.woking.gov.uk/planning/policy/localplan/wheatsheafcas</a>   |
| <b>CD/61</b> | Buildings and monuments in Woking Borough listed since 2000                                 | <a href="http://www.woking.gov.uk/planning/listedbuildings/whichbuildingsarelisted/listedsince2000">http://www.woking.gov.uk/planning/listedbuildings/whichbuildingsarelisted/listedsince2000</a>   |
| <b>CD/62</b> | All listed buildings in Woking Borough - January 2010                                       | <a href="http://www.woking.gov.uk/planning/listedbuildings/whichbuildingsarelisted/listedbuildingsjan2010">http://www.woking.gov.uk/planning/listedbuildings/whichbuildingsarelisted/listedbuildingsjan2010</a>   |
| <b>CD/63</b> | Cumulative Assessment of Future Development Impacts on the Highway                          | <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/scip2">http://www.woking.gov.uk/planning/policy/ldfresearch/scip2</a>   |
| <b>CD/64</b> | Core Strategy Publication Document  | <a href="http://www.woking.gov.uk/planning/policy/ldf/cores/woking2027/corestratpd">http://www.woking.gov.uk/planning/policy/ldf/cores/woking2027/corestratpd</a>   |
| <b>CD/65</b> | Core Strategy Submission Consultation Statement   | <a href="http://www.woking.gov.uk/planning/policy/ldf/woking2027ptfoob/corestrategy/submissionconsultationstatement/consultationstatement">http://www.woking.gov.uk/planning/policy/ldf/woking2027ptfoob/corestrategy/submissionconsultationstatement/consultationstatement</a> |
| <b>CD/66</b> | Proposals Map (including the Inset Map)   | <a href="http://www.woking2027.info/map">http://www.woking2027.info/map</a>   |
| <b>CD/67</b> | Core Strategy Issues and Options consultation Initial Sustainability Appraisal Report       | <a href="http://www.woking.gov.uk/planning/policy/ldf/sustappraisal/isar">http://www.woking.gov.uk/planning/policy/ldf/sustappraisal/isar</a>   |
| <b>CD/68</b> | Sustainability Appraisal Scoping report for Core Strategy - Consultation Document           | <a href="http://www.woking.gov.uk/planning/policy/ldf/sustappraisal/sascopingjul09">http://www.woking.gov.uk/planning/policy/ldf/sustappraisal/sascopingjul09</a>   |
| <b>CD/69</b> | Sustainability Appraisal of Alternative Options   | <a href="http://www.woking.gov.uk/planning/policy/ldf/sustappraisal/sascopingjul09">http://www.woking.gov.uk/planning/policy/ldf/sustappraisal/sascopingjul09</a>   |
| <b>CD/70</b> | Sustainability Appraisal of the Core Strategy Publication Document                          | <a href="http://www.woking.gov.uk/planning/policy/ldf/sustappraisal/saofcorestrpd">http://www.woking.gov.uk/planning/policy/ldf/sustappraisal/saofcorestrpd</a>   |
| <b>CD/71</b> | Executive Summary of the Sustainability Appraisal of the Core Strategy Publication Document | <a href="http://www.woking.gov.uk/planning/policy/ldf/sustappraisal/execsummsacorest">http://www.woking.gov.uk/planning/policy/ldf/sustappraisal/execsummsacorest</a>   |
| <b>CD/72</b> | Draft Economic Strategy   | <a href="http://www.woking.gov.uk/business/ecdev/ecdevstrategy1">http://www.woking.gov.uk/business/ecdev/ecdevstrategy1</a>   |
| <b>CD/73</b> | Travel Smart  | <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/travelmart/travelmart">http://www.woking.gov.uk/planning/policy/ldfresearch/travelmart/travelmart</a>   |
| <b>CD/74</b> | Employment Needs Assessment (superseded by Employment Land Review)                          | <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/empresse/wenarpt">http://www.woking.gov.uk/planning/policy/ldfresearch/empresse/wenarpt</a>   |
| <b>CD/75</b> | Local Development Scheme  | <a href="http://www.woking.gov.uk/planning/policy/ldf/LDS2/ldsoct11">http://www.woking.gov.uk/planning/policy/ldf/LDS2/ldsoct11</a>   |
|              | <b>European Directives and Guidance</b>   | -   |



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| <b>CD/76</b> | Habitats Directive 92/43/EEC + Amending Acts 97/62/EC, 2006/105/EC                                      | <a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31992L0043:EN:NOT">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31992L0043:EN:NOT</a><br><a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31997L0062:EN:NOT">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31997L0062:EN:NOT</a><br><a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32006L0105:EN:NOT">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32006L0105:EN:NOT</a> |
| <b>CD/77</b> | Wild Birds Directive 2009/147/EC  | <a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:020:0007:0025:EN:PDF">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:020:0007:0025:EN:PDF</a>   |
| <b>CD/78</b> | Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites                              | <a href="http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf">http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf</a>   |
| <b>CD/79</b> | Assessment of the Effects of Certain Plans and Programmes on the Environment (SEA) Directive 2001/42/EC | <a href="http://europa.eu/legislation_summaries/environment/general_provisions/l28036_en.htm">http://europa.eu/legislation_summaries/environment/general_provisions/l28036_en.htm</a>   |
| <b>CD/80</b> | Water Framework Directive 2000/60/EC  | <a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2000L0060:20011216:EN:PDF">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2000L0060:20011216:EN:PDF</a>   |
|              | <b>UK Acts, Regulations, Circulars &amp; Guidance</b>   |   |
| <b>CD/81</b> | Planning and Compulsory Purchase Act  | <a href="http://www.legislation.gov.uk/ukpga/2004/5/contents">http://www.legislation.gov.uk/ukpga/2004/5/contents</a>   |
| <b>CD/82</b> | Wildlife and Countryside Act (as amended)   | <a href="http://jncc.defra.gov.uk/page-1377">http://jncc.defra.gov.uk/page-1377</a>   |
| <b>CD/83</b> | Town and Country Planning (Local Development) (England) Regulations as amended 2008                     | <a href="http://www.legislation.gov.uk/uksi/2008/1371/contents/made">http://www.legislation.gov.uk/uksi/2008/1371/contents/made</a>   |
| <b>CD/84</b> | The Conservation (Natural Habitats, & c.) Regulations 1994 as amended 2008                              | <a href="http://www.legislation.gov.uk/uksi/2008/1371/contents/made">http://www.legislation.gov.uk/uksi/2008/1371/contents/made</a>   |
| <b>CD/85</b> | Community Infrastructure Levy Regulations 2010 (and amendments 2011)                                    | <a href="http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents">http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents</a>   |
| <b>CD/86</b> | Draft Planning Policy Statement: Planning for a Natural and Healthy Environment                         | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/ppsnaturalenvironment/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/ppsnaturalenvironment/</a>   |
| <b>CD/87</b> | Planning Policy Statement 1: Delivering Sustainable Development   | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/pps1/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/pps1/</a>   |
| <b>CD/88</b> | Planning Policy Statement: Planning and Climate Change - Supplement to Planning Policy Statement 1      | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/ppsclimatechange/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/ppsclimatechange/</a>   |
| <b>CD/89</b> | Planning Policy Statement: eco-towns- A supplement to Planning Policy Statement 1                       | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/ppsecotowns/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/ppsecotowns/</a>   |
| <b>CD/90</b> | Planning Policy Guidance 2: Green Belts   | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/ppg2/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/ppg2/</a>   |

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| <b>CD/91</b>  | Planning Policy Statement 3: Housing                                       | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps3/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps3/</a>   |
| <b>CD/92</b>  | Planning Policy Statement 4: Planning for Sustainable Economic Growth      | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps4/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps4/</a>   |
| <b>CD/93</b>  | Planning Policy Statement 5: Planning for the Historic Environment         | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps5/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps5/</a>   |
| <b>CD/94</b>  | Planning Policy Statement 7: Sustainable Development in Rural Areas        | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps7/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps7/</a>   |
| <b>CD/95</b>  | Planning Policy Guidance 8: Telecommunications                             | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg8/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg8/</a>   |
| <b>CD/96</b>  | Planning Policy Statement 9: Biodiversity and Geological Conservation      | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps9/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps9/</a>   |
| <b>CD/97</b>  | Planning Policy Statement 10: Planning for Sustainable Waste Management    | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps10/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps10/</a> |
| <b>CD/98</b>  | Planning Policy Statement 12: Local Spatial Planning                       | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps12/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps12/</a> |
| <b>CD/99</b>  | Planning Policy Guidance 13: Transport                                     | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg13/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg13/</a> |
| <b>CD/100</b> | Planning Policy Guidance 14: Development on Unstable Land                  | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg14/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg14/</a> |
| <b>CD/101</b> | Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg17/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg17/</a> |
| <b>CD/102</b> | Planning Policy Guidance 18: Enforcing Planning Control                    | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg18/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg18/</a> |
| <b>CD/103</b> | Planning Policy Guidance 19: Outdoor Advertisement Control                 | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg19/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg19/</a> |
| <b>CD/104</b> | Planning Policy Guidance 20: Coastal Planning                              | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg20/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/ppg20/</a> |
| <b>CD/105</b> | Planning Policy Statement 22: Renewable Energy                             | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps22/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningspolicystatements/pps22/</a> |

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| <b>CD/106</b> | Planning Policy Statement 23: Planning and Pollution Control  | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/pps23/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/pps23/</a>                 |
| <b>CD/107</b> | Planning Policy Guidance 24: Planning and Noise   | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/ppg24/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/ppg24/</a>                 |
| <b>CD/108</b> | Planning Policy Statement 25: Development and Flood Risk  | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/pps25/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/pps25/</a>                 |
| <b>CD/109</b> | Planning Policy Statement 25 Supplement: Development and Coastal Change   | <a href="http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/coastalchange/">http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicystatements/coastalchange/</a> |
| <b>CD/110</b> | Circular 01/2006: Planning for Gypsy & Traveller Caravan Sites  | <a href="http://www.communities.gov.uk/publications/planningandbuilding/circulargypsytraveller">http://www.communities.gov.uk/publications/planningandbuilding/circulargypsytraveller</a>   |
| <b>CD/111</b> | Circular 04/2007: Planning for Travelling Show People   | <a href="http://www.communities.gov.uk/publications/planningandbuilding/circulartravellingshow">http://www.communities.gov.uk/publications/planningandbuilding/circulartravellingshow</a>   |
| <b>CD/112</b> | Circular 06/2005: Biodiversity & Geological Conservation  | <a href="http://www.communities.gov.uk/publications/planningandbuilding/circularbiodiversity">http://www.communities.gov.uk/publications/planningandbuilding/circularbiodiversity</a>   |
| <b>CD/113</b> | Circular 05/2005: Planning Obligations  | <a href="http://www.communities.gov.uk/publications/planningandbuilding/circularplanningobligations">http://www.communities.gov.uk/publications/planningandbuilding/circularplanningobligations</a>   |
| <b>CD/114</b> | Circular 02/2007: Planning and the Strategic Road Network   | <a href="http://products.ih.com/Ohsis-SEO/847613.html">http://products.ih.com/Ohsis-SEO/847613.html</a>   |
| <b>CD/115</b> | Planning for the Protection of European Sites: Appropriate Assessment (consultation)                                      | <a href="http://www.communities.gov.uk/archived/publications/planningandbuilding/planning2">http://www.communities.gov.uk/archived/publications/planningandbuilding/planning2</a>   |
| <b>CD/116</b> | Code for Sustainable Homes  | <a href="http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf">http://www.planningportal.gov.uk/uploads/code_for_sust_homes.pdf</a>   |
| <b>CD/117</b> | Definition of Zero Carbon Homes and Non Domestic Buildings  | <a href="http://communities.gov.uk/publications/planningandbuilding/zerocarbondefinition">http://communities.gov.uk/publications/planningandbuilding/zerocarbondefinition</a>   |
| <b>CD/118</b> | Zero Carbon for New Non-Domestic Buildings (Consultation)   | <a href="http://www.communities.gov.uk/publications/planningandbuilding/newnon domesticconsult">http://www.communities.gov.uk/publications/planningandbuilding/newnon domesticconsult</a>   |
| <b>CD/119</b> | English Indices of Deprivation 2010   | <a href="http://www.communities.gov.uk/publications/corporate/statistics/indices2010">http://www.communities.gov.uk/publications/corporate/statistics/indices2010</a>   |
| <b>CD/120</b> | Natural England and Rural Communities Act 2006  | <a href="http://www.legislation.gov.uk/ukpga/2006/16/contents">http://www.legislation.gov.uk/ukpga/2006/16/contents</a>   |
| <b>CD/121</b> | Planning for Growth   | <a href="http://www.communities.gov.uk/statements/corporate/planningforgrowth">http://www.communities.gov.uk/statements/corporate/planningforgrowth</a>   |
| <b>CD/122</b> | National Planning Policy Framework  | <a href="http://www.communities.gov.uk/publications/planningandbuilding/draftframework">http://www.communities.gov.uk/publications/planningandbuilding/draftframework</a>   |
| <b>CD/123</b> | The Localism Act  | <a href="http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted">http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted</a>   |
| <b>CD/124</b> | Review of Renewable and Decentralised Energy Potential in South East England  | <a href="http://www.climatesoutheast.org.uk/images/uploads/Renewables_Potential_in_SE.pdf">http://www.climatesoutheast.org.uk/images/uploads/Renewables_Potential_in_SE.pdf</a>   |
| <b>CD/125</b> | 2012 consultation on changes to the Building Regulations in England - Section two Part L (Conservation of fuel and power) | <a href="http://www.communities.gov.uk/publications/planningandbuilding/brconsultationsection2">http://www.communities.gov.uk/publications/planningandbuilding/brconsultationsection2</a>   |

| <b>Regional Documents</b> |  |   |
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| <b>CD/126</b>             | The South East Plan  | <a href="http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.qos.gov.uk/gose/planning/regionalPlanning/815640/">http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.qos.gov.uk/gose/planning/regionalPlanning/815640/</a>   |
| <b>CD/127</b>             | Biodiversity Opportunity Area Statements   | <a href="http://strategy.sebiodiversity.org.uk/map.php">http://strategy.sebiodiversity.org.uk/map.php</a>   |
| <b>CD/128</b>             | South East Biodiversity Strategy   | <a href="http://strategy.sebiodiversity.org.uk/pages/our-aims.html">http://strategy.sebiodiversity.org.uk/pages/our-aims.html</a>   |
| <b>CD/129</b>             | Thames Basin Heaths Special Protection Area Delivery Framework   | <a href="http://www.surreyheath.gov.uk/planning/tbh/guidance.htm">http://www.surreyheath.gov.uk/planning/tbh/guidance.htm</a>   |
| <b>CD/130</b>             | South East Plan Panel Report (Excerpts regarding TBHSPA only)  | <a href="http://www.eipsoutheast.co.uk/home/">http://www.eipsoutheast.co.uk/home/</a>   |
| <b>CD/131</b>             | South East Plan: Thames Basin Heaths Assessors Report, Response to Questions and Addendum Report   | <a href="http://www.eipsoutheast.co.uk/home/thames.aspx">http://www.eipsoutheast.co.uk/home/thames.aspx</a>   |
| <b>CD/132</b>             | The South East Plan The Secretary of State's Proposed Changes to the draft Regional Spatial Strategy for the South East of England. Schedule of Changes and Reasoned Justification | <a href="http://www.eipsoutheast.co.uk/home/thames.aspx">http://www.eipsoutheast.co.uk/home/thames.aspx</a>   |
| <b>CD/133</b>             | Regional Economic Strategy 2006-2016   | <a href="http://www.seeda.co.uk/about-us/how-we-work/res">http://www.seeda.co.uk/about-us/how-we-work/res</a>   |
| <b>County Documents</b>   |  |   |
| <b>CD/134</b>             | Biodiversity and Planning in Surrey  | <a href="http://www.surreywildlifetrust.org/files/bioandplannov10.pdf">http://www.surreywildlifetrust.org/files/bioandplannov10.pdf</a>   |
| <b>CD/135</b>             | Surrey Biodiversity Action Plan  | <a href="http://www.surreycc.gov.uk/environment-housing-and-planning/conservation-and-restoration/surrey-urban-biodiversity-project/surrey-biodiversity-action-plan">http://www.surreycc.gov.uk/environment-housing-and-planning/conservation-and-restoration/surrey-urban-biodiversity-project/surrey-biodiversity-action-plan</a> |
| <b>CD/136</b>             | Surrey Waste Plan  | <a href="http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-waste-plan">http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-waste-plan</a>   |
| <b>CD/137</b>             | Adoption of the Core Strategy and Primary Aggregates Development Plan Documents and Minerals Site Restoration Supplementary Planning Document                                      | <a href="http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-minerals-plan">http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-minerals-plan</a>   |
| <b>CD/138</b>             | Surrey Strategic Partnership Plan (Sustainable Community Strategy)   | <a href="http://www.surreycc.gov.uk/your-council/how-the-council-works/council-policies-and-strategies/surrey-strategic-partnership-ssp">http://www.surreycc.gov.uk/your-council/how-the-council-works/council-policies-and-strategies/surrey-strategic-partnership-ssp</a>   |
| <b>CD/139</b>             | Surrey Climate Change Strategy   | <a href="http://www.surreycc.gov.uk/roads-and-transport/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/climate-change-strategy">http://www.surreycc.gov.uk/roads-and-transport/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/climate-change-strategy</a>   |
| <b>CD/140</b>             | Surrey Design Guide  | <a href="http://www.surreycc.gov.uk/environment-housing-and-planning/planning/surrey-design">http://www.surreycc.gov.uk/environment-housing-and-planning/planning/surrey-design</a>   |
| <b>CD/141</b>             | Surrey Local Area Agreement 2008-2011 (2010 refresh)   | <a href="http://www.zoo-builder.co.uk/admin/clients/sep_live/files/file/080605SurreyLAA08-11.pdf">http://www.zoo-builder.co.uk/admin/clients/sep_live/files/file/080605SurreyLAA08-11.pdf</a>   |

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| <b>CD/142</b> | Surrey Infrastructure Capacity Project Studies       | <a href="http://www.surreyimprovement.info/sicp">http://www.surreyimprovement.info/sicp</a>   |
| <b>CD/143</b> | Surrey Structure Plan 2004                           | <a href="http://www.surreycc.gov.uk/_data/assets/pdf_file/0011/166745/SCC-Structure-Plan-04.pdf">http://www.surreycc.gov.uk/_data/assets/pdf_file/0011/166745/SCC-Structure-Plan-04.pdf</a>   |
| <b>CD/144</b> | The Surrey Local Economic Assessment, 2010           | <a href="http://www.surreycc.gov.uk/environment-housing-and-planning/development-in-surrey/economic-development-in-surrey/surrey-local-economic-assessment">http://www.surreycc.gov.uk/environment-housing-and-planning/development-in-surrey/economic-development-in-surrey/surrey-local-economic-assessment</a>   |
| <b>CD/145</b> | Schools Plan   | <a href="http://www.surreycc.gov.uk/learning/schools/future-provision-of-school-places/school-organisation-in-surrey-2011-2020">http://www.surreycc.gov.uk/learning/schools/future-provision-of-school-places/school-organisation-in-surrey-2011-2020</a>   |
| <b>CD/146</b> | Surrey Local Transport Plan LTP3                     | <a href="http://www.surreycc.gov.uk/roads-and-transport/surrey-transport-plan-ltp3">http://www.surreycc.gov.uk/roads-and-transport/surrey-transport-plan-ltp3</a>   |
| <b>CD/147</b> | Surrey Minerals Plan -Core Strategy                  | <a href="http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-minerals-plan/adopted-core-strategy-development-plan-document">http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-minerals-plan/adopted-core-strategy-development-plan-document</a>   |
| <b>CD/148</b> | Surrey Minerals Plan -The Geology of Surrey          | <a href="http://www.surreycc.gov.uk/_data/assets/pdf_file/0009/171774/Geology-of-Surrey-Background-Report.pdf">http://www.surreycc.gov.uk/_data/assets/pdf_file/0009/171774/Geology-of-Surrey-Background-Report.pdf</a>   |
|               | <b>Adjoining Local Authorities Development Plans</b> |   |
| <b>CD/149</b> | Elmbridge Core Strategy                              | <a href="http://www.elmbridge.gov.uk/documents/detail.htm?pk_document=20046">http://www.elmbridge.gov.uk/documents/detail.htm?pk_document=20046</a>   |
| <b>CD/150</b> | Surrey Heath Core Strategy                           | <a href="http://www.surreyheath.gov.uk/planning/planningpolicyandconservation/CoreStrategyDPD.htm">http://www.surreyheath.gov.uk/planning/planningpolicyandconservation/CoreStrategyDPD.htm</a>   |
| <b>CD/151</b> | Runnymede Borough Local Plan                         | <a href="http://www.runnymede.gov.uk/portal/binary/com.epicentric.contentmanagement.servlet.ContentDeliveryServlet/RBC%2520Portal/LGCL%2520Categories/Environment/Land_premises/Planning/Planning_policy/2001%2520Local%2520Plan/LP_2007_update.pdf">http://www.runnymede.gov.uk/portal/binary/com.epicentric.contentmanagement.servlet.ContentDeliveryServlet/RBC%2520Portal/LGCL%2520Categories/Environment/Land_premises/Planning/Planning_policy/2001%2520Local%2520Plan/LP_2007_update.pdf</a> |
| <b>CD/152</b> | Guildford Borough Local Plan                         | <a href="http://www.guildford.gov.uk/CHttpHandler.ashx?id=1068&amp;p=0">http://www.guildford.gov.uk/CHttpHandler.ashx?id=1068&amp;p=0</a>   |