



Woking Borough Core Strategy Examination

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

**Hearings 4 and 5
Matters 7-8**

WBC/13



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 CS 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 Officer 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 1 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 4: Housing, Section 5; CS10, CS11, CS12, CS13 and CS14

Matter 7: Is the Core Strategy's approach to housing provision sufficiently justified and consistent with national planning policy such as found within Planning Policy Statement 3: Housing (PPS 3)? With particular regard to deliverability, will the Core Strategy be effective in meeting the varied housing needs of the Borough over the plan period?

- 1 Is the evidence base in support of the housing policies robust and credible? How does this relate to the PPS3 and its associated guidance? To what extent is the content of PPS1 and 3 particularly satisfied by the Core Strategy? How has the CS been informed by, and is consistent with, the Council's Housing Strategy?**

Is the evidence base in support of the housing policies robust and credible?

- 1.1 The Council considers that the evidence base supporting the housing policies of the CS is robust and credible. The key documents CD/12 (viability), 17 (GTAA), 20 (five year supply statement), 31 (SHLAA) and 32 (SHMA) have all been prepared in accordance with the requirements of PPS1 and PPS3 and associated guidance and best practice advice documents.
- 1.2 In response to this question and the extent to which each CD meets the needs of PPS1 and PPS3, attention is drawn to CD/16 – an independent review of the evidence base, which was prepared by the Planning Advisory Service. This critical review concluded that the evidence base is up-to-date, adequately robust and adequate to inform decisions taken in the CS.

How has the CS been informed by, and is consistent with, the Council's Housing Strategy?

- 1.3 The CS and Housing Strategy (CD/47) have very much been developed in tandem. Although for practical reasons, joint consultation on the two documents was not possible, the result of consultation on each document has informed the other throughout the respective processes. Detailed information on the Housing Strategy consultation, including the joint work with the LDF team, is available on the Council's website:
<http://www.woking.gov.uk/housing/policies/strategies/hstrategy11-16/hsconsultation#internal>
- 1.4 The Housing Strategy therefore provides a significant platform to deliver the housing policies within the CS.
- 1.5 The Council's SHMA (CD/32) was prepared jointly by the Council's Planning and Housing service areas. The SHMA has therefore provided a consistent evidence base for policy development in both the CS and Housing Strategy.
- 1.6 Other evidence base documents, particularly the SHLAA (CD/31), the GTAA (CD/17) and the Economic Viability Assessment (CD/12) were also developed with significant input from the Council's Housing department and were used to support the development of the Housing Strategy as well as the CS.

- 1.7 The Sustainability Appraisal process has also considered the requirements of the Housing Strategy on the CS (CD/37).
- 1.8 In addition, it is noteworthy that the Housing Strategy was considered and adopted at the Council meeting in July 2011, the same meeting which considered and approved the CS Publication document. The relationship between the two documents, in particular the ability of the Housing Strategy to deliver the objectives of the CS was emphasised at the meeting.

2 Is the latest SHLAA robust? (to include: what extent was a joint SHLAA with neighbouring authorities considered? Why was the site size threshold set at 6 units? Should the net increase in housing from subdivisions be considered in the overall housing supply figures? Why are net housing increases from small sites only included in the overall housing supply figures for the last 5 years of the plan period? Were assumptions made as regards the potential impact of CIL?)

Is the SHLAA robust?

- 2.1 The SHLAA is considered to be robust and credible. It is up-to-date to 1 April 2011. It has been, and will continue to be, updated annually.
- 2.2 Particular attention is drawn to Appendix 5: The core outputs and process checklist, Appendix 6: Consultation Statement, and to Appendix 10: Independent review of the SHLAA.

What extent was a joint SHLAA with neighbouring authorities considered?

- 2.3 Discussions about carrying out a joint SHLAA with neighbouring authorities took place, however, due to practical timetabling and resource issues, this was not possible. Officers from neighbouring authorities are in regular contact with each other, and meet formally through Planning Working Group and the West Surrey Policy Officers group to discuss and take account of the emerging issues regarding each others CS.
- 2.4 Attention is drawn to SHLAA paragraphs 3.2 – 3.8 in answer to this question, and to CD/16, section 3.7.

Why was the site size threshold set at 6 units?

- 2.5 In order to keep the number of sites assessed in the SHLAA to a manageable level, a site size threshold was agreed, in consultation with the stakeholders group. Paragraph 4.4 of the SHLAA states:

“During the five year period between April 2006 and March 2011, 88% of residential completions within the Borough were on sites of 6 or more units. A site size threshold of 6 units has been set for the purpose of the SHLAA - only sites considered capable of accommodating 6 or more net additional dwellings have been included in this Assessment. This is primarily to keep the number of sites assessed to a manageable level and in recognition of the requirement not to include a windfall allowance for the first ten years of housing land supply unless there are specific and justifiable local circumstances.”

- 2.6 Further justification is provided in paragraphs 4.5 – 4.7 of the SHLAA.

Should the net increase in housing from sub-divisions be considered in the overall housing supply figures?

- 2.7 The Council's approach to assessing supply from sub-divisions is set out in SHLAA paragraph 4.5. The Council considers that the unpredictable nature of this type of housing land supply means that it is not possible to determine specific sites or numbers. However, this source of supply will continue to come forward, and is included as part of the small sites estimate in the housing trajectory.

Why are net housing increases from small sites only included in the overall housing supply figures for the last 5 years of the plan period?

- 2.8 In accordance with paragraph 59 of PPS3, the Council has not included a 'windfall' allowance (small sites estimate) in the first 10 years of land supply, as specific sites have been identified.

Were assumptions made as regards the potential impact of CIL?

- 2.9 At the time of preparing the SHLAA, the Government's intentions for the CIL were not confirmed, and so no assumptions for CIL were made in assessments. However, when assessing the viability of sites, infrastructure contributions secured through s106 were taken account of. Details of this are set out in Appendix 11 of the SHLAA.
- 2.10 The Council has since committed to adopting a CIL. An assessment of the impact of the CIL tariff on the viability of the SHLAA sites is in the process of being commissioned. Future reviews of the SHLAA will also include CIL viability considerations within the assessments.

3 To what extent, and in what ways, was the chosen spatial distribution of housing considered against alternatives? Is the spatial distribution of intended housing over the plan period clear?

- 3.1 The Council considered a number of alternatives in relation to the spatial distribution of housing. A full and detailed response to the process of considering alternatives has already been provided in response to Matter 1, Issue 2 (WBC/12).
- 3.2 In summary, the spatial distribution of housing was determined through an ongoing process of sustainability appraisal (in particular the sustainability appraisal of options), public engagement, and consideration of the results of a comprehensive evidence base.
- 3.3 The Council considers that Policy CS10 is clear in setting out the spatial distribution of housing over the plan period. As set out in the Council's LDS, a Town Centre Area Action Plan and Site Allocations DPD will be prepared which will allocate specific sites within the framework set out in CS10.

4 Does the Council have a demonstrable housing land supply consistent with PPS3? Is the intended release of Green Belt deliverable? What reliance is made upon windfalls?

- 4.1 Consistent with PPS3, the Council is able to demonstrate a five year housing land supply. This is set out in detail in CD/20.

- 4.2 PPS3 (paragraphs 53 – 57) provides guidance on housing land supply. In accordance with this, the SHLAA identifies specific sites which are considered to be deliverable/ developable to meet over 13 years supply. Additionally, policies CS6 and CS10 identify the Green Belt and the town centre as broad locations for housing land supply after 2021/22.
- 4.3 The Council has provided a full response to this question in response to Matter 2 – CS6: Green Belts.
- 4.4 The Council is aware of a number of potential sites in the Green Belt (identified in the SHLAA) which may be considered for future housing release. A comprehensive assessment of these, and other sites, will be undertaken in 2016/17.
- 4.5 The Council has not made any allowance for windfall developments in the first ten years of the housing trajectory. The trajectory includes a ‘small sites estimate’ which takes account of housing developments of 5 or less units, which may come from sub-divisions and other small scale developments.

5 How will matters relating to housing design be addressed to meet the aims of PPS3 et al?

- 5.1 The Council is satisfied that policy CS21: Design accords with the fundamental principles of good design, including those contained within PPS3. The policy aims to provide places which; meet the needs of people, are visually attractive, safe and accessible, provide suitable outdoor space and landscaping and are inclusive for all. The policy also emphasises the need to take into account the local character and appearance of the area, as well as sustainable development (including construction) and biodiversity.
- 5.2 Policy CS20: Heritage and conservation also emphasises the need for new development to make a positive contribution to the character, distinctiveness and significance of the historic environment. This is also stressed in CS24: Landscape and townscape.
- 5.3 In response to Matter 3, question 4 the Council has prepared a detailed response regarding the importance of good design for all development.

CS10: Housing

6 Is the number of new homes consistently stated in CS? Are the house prices up to date in Para 2.14? Should current ONS stats be used?

- 6.1 The Council is not aware that there are any inconsistencies within the CS regarding the number of homes in the Borough, and would be pleased to correct any typographical errors that exist.
- 6.2 For the avoidance of doubt, the CS makes provision for an average of 292 additional new homes per year to 2027.
- 6.3 The house prices quoted within the CS are those published by the Land Registry October-December 2010 available from DCLG website. This data source was selected so as to be consistent with the Council’s Housing Strategy.

6.4 The Council accepts that house prices fluctuate with the changes of the economy. However, this is not likely to undermine or change the course adopted in the CS. At the time of writing this Statement, the latest data available is for Q3 2011, which shows that the average house price in Woking is £260,000.

6.5 CLG live tables:

<http://www.communities.gov.uk/documents/housing/xls/141395.xls>

7 What is the primary evidence to support the housing distribution identified in CS10? Is the evidence base robust? (to include 2007 Fordham's Research Paper) Can the required housing trajectory be delivered? Is the proposed approach to housing supply adequate and reasonable when considered against the evidence of need?

What is the primary evidence to support the housing distribution identified in CS10?

7.1 The primary evidence base supporting CS10 is the SHMA (CD/32) and the SHLAA (CD/31). These documents set out the need and demand for new housing in the Borough and the sites that are available to meet that need and demand.

7.2 As set out in CD/01, the CS has been prepared to be in conformity with the South East Plan, which sets the context for policy CS10. With reference to a justification for a housing target, this can be found in the Housing Topic Paper (CD/21), particularly Appendix 4, the SA report and the evidence base that supports the South East Plan.

Is the evidence base robust? (to include 2007 Fordham's Research Paper)

7.3 The Council considers that the evidence base is robust. All housing evidence base documents have all been prepared in accordance with the requirements PPS3 and associated guidance and best practice advice documents. Attention is also drawn to CD/16 – an independent review of the evidence base, which was prepared by the Planning Advisory Service, and to each individual document.

7.4 With regard to the SHMA which was published in 2009, the Council considers that although the data is not as up-to-date as it might be, the level of need for affordable homes in the Borough is such that, in the context of the current economic climate, the need for affordable homes will only have increased, as reflected in the number of people on the housing register. The implication of any variations in the data for the Core Strategy would be minimal in terms of the deliverability of new affordable housing.

7.5 The Council is currently in discussions with Guildford and Waverley Councils with regard to future updates.

Can the required housing trajectory be delivered?

7.6 The housing trajectory is based on extensive research including the SHLAA, annual data monitoring and annual surveys of planning agents, developers and landowners regarding the progress of sites. The Council therefore considers that the delivery of housing in accordance with the trajectory is achievable.

Is the proposed approach to housing supply adequate and reasonable when considered against the evidence of need?

7.7 Affordability of housing is a key issue for the Borough. The SHMA found that there is need for around an additional 499 new affordable homes per year. Having considered all the evidence, the Council does not find that meeting this level of need is deliverable. The Housing Topic Paper (CD/21) – particularly Appendix 4 – sets this justification out in detail. In addition, various options have been assessed in detail through the SA process. The SA concluded that the damage to the environment of adopting these higher growth options outweigh any benefits of delivering a higher housing target.

8 Is the policy sufficiently flexible to enable different density and housing mixes?

8.1 The density ranges given in policy CS10 are indicative as stated in the policy box. The indicative density and housing mix (set out in Policy CS11) is based on the housing need and demand identified in the SHMA and the SEP, and has been tested through the SHLAA Exemplar sites, which reflect the character of the area.

8.2 The Council is satisfied that the wording of both policies CS10 and CS11 provides sufficient flexibility to balance the need to provide a sustainable and balanced community, meet the housing needs of the borough and take into account the local character of the area (which includes layout, density and housing mix), this is emphasised in paragraph 5.64.

9 Is the policy on Green Belt (GB) release robust and effective?

9.1 The Council has provided a full and detailed response to this question in Matter 2, CS6: Green Belts.

10 Are the indicative density ranges deliverable when considered against the required housing mix of the Borough?

10.1 The Council has prepared a response to this question under Matter 7, Issue 8.

11 Where is the evidence that the town centre can support 200dph to meet the target of 2300 dwellings? Will this be the required type of housing?

11.1 As set out in response to Matter 1, Issue 26, the SHLAA (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. The indicative density of 200dph is therefore much lower than that currently being approved and implemented, and will therefore allow scope for larger unit sizes.

12 Is there sufficient flexibility within Policy CS10? Particularly in relation to potential non-implementation? Should a non-implementation figure of 10% be applied?

12.1 The issue of non-implementation has been addressed by the Council's response to Matter 1, Issue 24.

13 Is the annual housing figure an indicative minimum target? Is the figure too low? To what extent have alternatives been considered?

Is the annual housing figure an indicative minimum target?

- 13.1 The figure of 292 is an expected annual average, which will take into account flexibility in changing economic markets. The Council's housing target is 4,964 dwellings between 2010 and 2027.
- 13.2 The Council will take action to address any under/ over provision that will undermine the objectives of the CS, as set out in Chapter 6 of the CS.

Is the figure too low?

- 13.3 In the context of the evidence in the SHMA, the figure of 292 per year is low. However, the CS must also take into account other factors such as the availability of land for development and environmental factors, and the Council is therefore satisfied that given all the evidence, 292 is a reasonable and justifiable annual target. A full justification of the number can be found in Appendix 4 of CD/21.

To what extent have alternatives been considered?

- 13.4 The Core Strategy Issues and Options consultation presented three options for housing numbers. A full analysis of the responses to this consultation can be found in the Consultation Statement.
- 13.5 The SA of the CS included a detailed testing of alternatives – please refer to CD67 and CD69.

14 Is housing at Moor Lane and Brookwood Farm justified by the evidence base? Is it deliverable?

Moor Lane

- 14.1 The Council considers that the development of housing is justified by the evidence set out in the SHMA, SHLAA and other evidence base documents, and that is deliverable. Further, the site is already safeguarded for residential development.
- 14.2 The Moor Lane site, part of a PFI funding initiative, has outline permission for 447 homes. However, it is likely that in practice, the site will deliver less than this – around 190 affordable homes and 150 market homes.
- 14.3 A full planning application is due to be submitted for the development in Autumn 2012.

Brookwood Farm

- 14.4 Again, the Council considers that the development of housing is justified by the evidence set out in the SHMA, SHLAA and other evidence base documents, and that is deliverable. Land at Brookwood Farm has been safeguarded to meet long-term development needs, and forms an essential part of the Borough's housing land supply, particularly for affordable family homes. Outline planning permission was granted for the site in 2006, however, this permission has now expired.
- 14.5 Pre-application discussions and consultations are currently underway and it is expected that a planning application will be submitted by CALA Homes by the end of March 2012.

CS 11: Housing Mix

15 Is the policy sufficiently flexible to cater appropriately for specialist housing schemes such as care homes?

15.1 The intention of policy CS11: Housing Mix is to ensure that the general housing needs in terms of unit size are met in the Borough across the plan period. The policy allows for sufficient flexibility for the appropriate percentage of different housing types and sizes to be influenced by the established character and density of the neighbourhood and the viability of the scheme.

15.2 It should be noted that the requirements for specialist housing schemes such as care homes are also addressed in policy CS13: Older people and vulnerable groups, which provides in principle support for such developments.

16 Does the CS plan adequately and upon a robust evidence base for the projected increased proportion of elderly within the population?

16.1 The Council recognises the changing nature in the population, particularly in relation to the ageing population. In this regard, the CS is supported by evidence in the form of the SHMA, the Population Topic Paper, the Housing Strategy, the Extra Care Strategy and the IDP.

16.2 The CS specifically addresses the accommodation need of the elderly through policy CS13. The IDP ensures the provision of adequate social and community infrastructure, including supported accommodation, which will contribute significantly to meet the needs of the elderly.

17 How will the aims of para 5.72 be realised? Is this supported by evidence? Consistent with CS 13?

17.1 The mix set out in 5.72 reflects that within the most up-to-date evidence. The mix enables flexibility, depending on the nature of the proposal under consideration.

17.2 As set out in Paragraphs 5.74 - 5.77, the Council will regularly monitor the effectiveness of policy CS11 through the annual monitoring process. In addition to this, the Council will take a proactive approach to implementation of this policy, through early engagement with developers, and the setting of specific housing mix requirements for sites allocated through the Site Allocations DPD. The development management process will ensure the appropriate standards are tailored to each site.

17.3 It should be emphasised that the purpose of policies CS11 and 13 are different. CS11 seeks to ensure delivery of a range of housing sizes to meet the *general needs* of the population over the plan period. The policy has been developed to enable sufficient flexibility dependant on a number of considerations including, character, viability and the changing nature of need as evidenced in the SHMA. Policy CS13 has been prepared specifically to address the needs of the ageing population and other vulnerable groups, in recognition that those needs will be different (for example in the case of a care home development).

18 How will the delivery of necessary family housing be secured and managed?

- 18.1 The Council is satisfied that the delivery of family homes will be managed effectively via the methods set out in CS Paragraphs 5.74 – 5.77. In the event that the desired amount of family accommodation is not being delivered, Chapter 6 of the CS provides details of the mechanisms in place to review the policy.

CS12: Affordable Housing

19 To what extent is the CS approach to the total provision of affordable housing justified by the evidence base? How much affordable housing (and of what size/tenure mix) is required and how will it be delivered? Are the thresholds justified? Should the affordable housing target be greater than 35%?

To what extent is the CS approach to the total provision of affordable housing justified by the evidence base?

- 19.1 The Council is satisfied that the CS approach to affordable housing delivery is justified, based on the evidence of the SHMA (CD/32), viability assessment (CD/12), Council's Housing Strategy.

How much affordable housing (and of what size/tenure mix) is required and how will it be delivered?

- 19.2 The SHMA indicates that an average of 499 new affordable homes are required every year. As has been discussed elsewhere, the Council does not consider that delivery of this level of affordable housing is achievable, when considered against other economic, social and environmental considerations (see Appendix 4, CD/21).
- 19.3 Based on the available evidence, the CS commits to delivering 1,737 new affordable homes over the plan period, which is 35% of the overall housing target, which is considered to be realistic and deliverable.
- 19.4 Full details of affordable housing tenure and mix can be found in the SHMA, and summarised in the Housing Topic Paper (CD/21), however, in summary it can be said that there is net annual need for 499 new affordable homes in the Borough every year, of which 70% is required to be social rented and 30% in intermediate tenure.
- 19.5 The main means for delivery will be on the back of market housing developments, via s106 agreement. Delivery will also be secured through a variety of means as set out in the policies delivery strategy (CS paragraphs 5.90-5.94), including annual monitoring of progress, the preparation of supplementary guidance, use of CPO, collaboration with landowners and other key stakeholders, Woking Borough Homes and working with RSLs, for example.

Are the thresholds justified?

- 19.6 The thresholds set out in CS12 are justified by the evidence contained within CD/12.

Should affordable housing target be greater than 35%?

- 19.7 The viability study (CD/12) found that an overall target of 35% is achievable in Woking Borough. A higher target is likely to be unrealistic on many sites and therefore undeliverable. Furthermore, any significantly higher target is likely to compromise the delivery of the overall housing target.

Are housing waiting lists increasing or decreasing?

- 19.8 The CS states that at April 2011 there were 2,140 households with applications on the register (paragraph 5.80). This number changes frequently as applications come in and drop off. As of 27 February 2012 there were 2,273 active applications, which is slightly higher than previous months in the year – with officers reporting a slight increase since the New Year.

Does the policy address social deprivation adequately?

- 19.9 Access to decent housing is one of the key indicators of social deprivation. The CS and in particular policies CS5, CS10 and CS12 are therefore critical to addressing issues of social deprivation, alongside the Council's Housing Strategy and Community Strategy (see below).

- 19.10 Although CS10 and CS12 do not explicitly mention social deprivation, the Council is satisfied that the CS intentions regarding deprivation are clear when read as a whole.

Does the policy reflect the Council's Housing and Community Strategies?

- 19.11 A full response to the relationship between the CS and the Housing Strategy has been provided in response to Issue 1.

- 19.12 The CS has been prepared to be fully in line with the community strategy, as set out in the SA and self assessment documents (CD/1 and CD/2).

20 Are issues of development viability recognised adequately? Are the assumptions of the Viability Assessment unrealistic (market conditions; CSH level 4 not 5)? Will development be deliverable?

- 20.1 With reference to affordable housing viability, the Council is satisfied that the CS is based on a robust and credible evidence base, and that the CS is deliverable.

- 20.2 The Council commissioned an assessment of viability (CD/12), which is the key evidence source and provides a comprehensive assessment of market cycles and a range of other factors effecting viability including CSH and planning benefits.

- 20.3 The Council has prepared a detailed response to the issue of CSH 4/5 in terms of viability in response to Matter 3, Issue 8.

- 20.4 The Council is committed to preparing an SPD which will provide details of how the affordable housing policy will be implemented in practice, including details of how the Council will assess viability through an open book approach. Furthermore the delivery strategy set out in CS paragraphs 5.90 – 5.94 and the mechanisms for monitoring and review outlined in Chapter 6 of the CS will ensure that affordable housing delivery is managed efficiently and effectively over the lifetime of the CS.

21 Is the proposed change to para 5.83 clear?

21.1 The Council has proposed a change to paragraph 5.83 in order to provide clarity in this matter. This is set out in the 'Proposed Changes to the Core Strategy Publication Document' (December 2011).

22 Is 'affordable' adequately defined and consistent with PPS3? Are the tenure splits justified by the evidence base? Is there adequate detail with regard to the need and intended supply of dwelling house sizes – is this consistent with the evidence base?

Is 'affordable' adequately defined and consistent with PPS3?

22.1 It is proposed that the definition of affordable should be included in the glossary. The following definition is provided:

"In relation to housing, 'affordable' means accommodation which meets the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices; and include provisions for:

1. the home to be retained for future eligible households; or
2. if these restrictions are lifted, for any subsidy to be recycled for alternative affordable housing provision.

In the Council's Housing Strategy, this is taken to mean housing which meets and continues to meet the needs of people on low and middle incomes who would otherwise not be able to attain housing locally on the open market. Affordable housing is that which can be afforded where the dwelling has the smallest number of rooms appropriate to meet the needs of a household which cannot afford to buy or rent on the open market without some form of subsidy.

The preferred means of delivery of affordable housing in order of preference is:

- Social housing either for rent, or through shared equity schemes.
- Subsidised low cost market housing for sale or rent (65-80% market)
- Off site provision - This is only considered suitable in exceptional circumstances, and can be offered via land, buildings, or financial contribution. This will be controlled with a planning obligation.

PPS3: Housing Annex B provides the definition of affordable housing tenures."

Are the tenure splits justified by evidence base?

22.2 The Council is satisfied that the tenure splits proposed in the reasoned justification for policy CS12 are based on the evidence of housing need contained within the SHMA.

22.3 The Council has proposed a change to paragraph 5.86 regarding tenure splits, as set out in 'Proposed Changes to the Core Strategy Publication Document' (December 2011).

22.4 The Council's response to Matter 7, Issue 28 addresses the issue of the new RSL rents.

Is there adequate detail with regard to the need and intended supply of dwelling house sizes – is this consistent with the evidence base?

- 22.5 The Council is satisfied that policy CS12, in combination with CS11, provide adequate detail regarding the need for different types/ sizes of new accommodation, in line with the latest SHMA.
- 22.6 In order to ensure flexibility in terms of changing needs over the lifetime of the CS, paragraph 5.93 sets out that the Council will address the issue of size/ type of affordable units through SPD, in order that policy can remain up-to-date and responsive to changing circumstances in this regard.
- 22.7 Additionally, housing mixes will be specified for sites allocated through the Site Allocations DPD.

23 How will the off-site provision of affordable housing be managed? Is the intended approach justified?

- 23.1 In the first instance, the Council will expect new affordable homes to be provided on-site as part of any new development. In certain circumstances, such as the size of the development or local housing need variations, it may be preferable to provide the affordable units off-site. The preference, as set out in the policy and Paragraph 5.83 will be to provide the homes in an alternative site or to provide a financial contribution. This will be secured and managed through a S106 agreement. Further details of this intended approach will be set out in SPD, as a matter of detail.

24 What is the evidence base in support of enabling the payment of commuted sums for alternative provision elsewhere? Will the potential for off site affordable housing provision lead to an unbalanced proportion of affordable housing on the alternative site? Is this element of policy warranted by the evidence base?

- 24.1 Paragraph 29, PPS3 permits the use of developer contributions and off-site provision, stating that DPDs should:

“Set out the approach to seeking developer contributions to facilitate the provision of affordable housing. In seeking developer contributions, the presumption is that affordable housing will be provided on the application site so that it contributes towards creating a mix of housing. However, where it can be robustly justified, off-site provision or a financial contribution in lieu of on-site provision (of broadly equivalent value) may be accepted as long as the agreed approach contributes to the creation of mixed communities in the local authority area.”

- 24.2 The Council's viability assessment, particularly Section 3.7, provides the evidence base for the CS approach to this matter. The Council considers that policy CS12 provides a sufficient framework for the delivery of off-site affordable homes and that such provision will not lead to an imbalance of provision. Details of how the policy will be implemented will be set out in the Affordable Housing SPD.

25 Is the 50% requirement for affordable housing on greenfield sites warranted by the evidence base? Why should land in public ownership be treated differently? Is this justified and effective? Will 50% target for affordable housing on greenfield be ineffective in terms of stymied delivery?

25.1 The Council is satisfied that the EVA (CD/12) provides a robust and adequate evidence base to support the requirement for a higher level of provision of affordable housing to be yielded from greenfield and public-sector land. Based on the viability assessments, it is considered that up to 50% affordable housing will be deliverable. Site specific viability appraisals will be accepted by the Council inline with the open book approach.

25.2 A detailed response to this issue has been provided in the Council's response to Representation ID 230.

26 Is para 5.89 inflexible?

26.1 The Council does not consider para 5.89 to be inflexible. The paragraph acknowledges the inability to deliver sufficient affordable housing to meet the need identified in the SHMA. However, it allows the flexibility of exploring opportunities to provide affordable housing on exception sites. Whilst the Council's intention to secure a substantially higher percentage of affordable housing on exception sites, the approach adopted allows flexibility for details to be agreed on a site by site basis through negotiation. The Council will ensure that the provision of affordable housing will not compromise the provision of other elements necessary to the delivery of the scheme.

27 Is the policy clear with regard to affordable housing and non residential development schemes? Is this approach supported by robust evidence?

27.1 The requirement for financial contributions to fund affordable housing needs, generated by non-residential development is based on SEP policy LF4.

27.2 The Council is satisfied that this element of the policy is justified. The evidence base which supported the SEP is still valid. Paragraph 5.85 sets out that the Council will provide details of the implementation of this requirement in an SPD.

28 Should the issue of RSL rents be addressed within the CS?

28.1 The Council has interpreted this question of RSL rents, as meaning the new 'affordable rent' level which RSLs are now allowed to set at 80% of market rent. This new rent level is newly introduced and it is not considered appropriate to include it within policy at the moment, but to include it within SPD when more detail is known about how it will operate.

28.2 The Council will address this issue within its Council Tenancy Strategy, which will be in place by 2013 (as required by the Localism Act). This will be prepared in conjunction with the Affordable Housing SPD.

CS13: Older people and vulnerable groups

29 What is the need for accommodation to serve older people and vulnerable groups? What is the evidence to justify 3rd para of CS13?

What is the need for accommodation to serve older people and vulnerable groups?

29.1 The evidence base to support the need for accommodation for the elderly and other vulnerable groups is contained within the SHMA (CD/32), Housing Strategy (CD/47), Extra Care Housing Strategy and the IDP (CD/11).

What is the evidence to justify 3rd para of CS13?

29.2 Evidence from the Housing Needs Survey (within the SHMA) and information from WBC Housing Services has indicated that older people do not wish to live in bedsits. In recent years, WBC Housing Services has found letting bedsit accommodation to elderly people problematic. This has led to some sheltered accommodation being 'decommissioned' and put into the general housing stock.

29.3 In addition, consultation with elderly people and their representatives has revealed that older people wish to have a spare room for friends and relatives to come and visit and/ or for live-in carers. In Woking, there are a number of single elderly tenants living in large properties. A key reason cited for these residents being unwilling to leave their 'family' sized home into smaller accommodation is the lack of homes with guest space, which they consider would have a significant impact on their quality of life, health and well-being.

29.4 The Council has proposed a change to this paragraph to provide clarity. This is set out in the 'Proposed Changes to the Core Strategy Publication Document' (December 2011).

30 Does CS13 cater adequately for the leisure and service needs of an ageing population?

30.1 In policy CS13, the Council commits to working to ensure that the leisure needs of the elderly and vulnerable groups are met. This is complimentary to policies CS17 and 19, which set out how the Council will deliver the leisure, recreation and service needs of the community.

30.2 The Council has recently published a Social and community facilities audit (CD/27) which provides a comprehensive assessment of community facilities provision across the Borough. As well as informing future infrastructure delivery (CD/11), this evidence base will also be used to inform future service provision (both Council-led, and in partnership with other agencies such as the county council and the PCT) and also to assist in the community grants scheme.

30.3 Attention is drawn to CS paragraph 5.178 which explains that the Council actively encourages the development of multi-use community buildings, which are capable of being used by more than one group of people, in order to make the best use of resources. In addition, the Council will seek to develop community 'hubs', which again, will serve the whole community, rather than specific groups.

CS14 Gypsy and Travellers

31 Is the evidence for gypsy/traveller pitches robust? Is the 'pitch' requirement justified?

Is the evidence for gypsy/traveller pitches robust?

31.1 The current GTAA provides a robust evidence base to support the need for new pitches to 2016. The GTAA was subject to independent review at the EiP into the Partial Review of the South East Plan which took place in February 2010. Following the election of the Coalition Government, the EiP was never concluded, however, the incomplete draft report was published later in 2010. No specific conclusions regarding Woking's supply of pitches to 2016 were made in that report.

31.2 The Council accepts that the evidence base for pitch provision post 2016 is inadequate and progress has been delayed on updating that evidence due to the issues surrounding the EiP and (forthcoming) revocation of the South East Plan. Over recent months, officers from across the county have jointly developed a methodology to enable each of the 11 authorities to update their GTAA in a robust and consistent manner. The methodology is due to be approved by the Surrey Planning Officers Association (SPOA) at its next meeting. It is the Council's intention to undertake a new GTAA using this new methodology following publication of new national policy on Travellers which is expected in the spring. This evidence base will then be used to inform the Site Allocations DPD.

Is the 'pitch' requirement justified?

31.3 The Council is satisfied that the requirement for 10 net additional pitches between 2007 and 2016 is robust, based on the findings of the GTAA.

32 Is the Council's approach consistent with the SEP and Circular 1/06?

32.1 The Council is satisfied that the approach to Gypsy/Traveller pitch provision is consistent with that which was in progress through the Partial Review of the SEP. The GTAA which covers Woking Borough was prepared by independent consultants and done so in accordance with Circular 1/06.

Hearing 5: Delivery and Monitoring

Whole CS, inc. Sections 5 and 6

Matter 8: Does the CS address adequately the provision of necessary infrastructure to support the delivery of the strategic objectives? Are the Core Strategy's monitoring targets justified adequately and of a level of detail that is appropriate to a Core Strategy? How will the effectiveness of the CS be managed?

- 1 **To what extent is the content of PPS1, 4, 12, 25 et al satisfied by the Core Strategy with regard to implementation and monitoring? Are the arrangements for managing and monitoring the delivery of the Core Strategy clear and will they be effective?**

To what extent is the content of PPS1, 4, 12 and 25 et al satisfied by the Core Strategy with regard to implementation and monitoring?

- 1.1 The Council considers that the contents of PPS1, 4, 12 and 25 are satisfied by the CS with regard to implementation and monitoring. Collectively, PPS1, PPS4, PPS12 and others, expects the effective monitoring of the CS and to report the outcomes in an Annual Monitoring Report (AMR). The AMR will be published on the website for public scrutiny. In particular, the monitoring should report progress on how the CS is achieving its milestones, how policies are delivering against their objectives and how infrastructure is being delivered to support growth. PPS25 lists some indicators to be taken into account in monitoring the performance of the CS that are taken into account in Policy CS9. Section 6 of the CS has a clear statement about how the CS will be delivered and monitored. Each policy has a statement about how it will be delivered, monitored and reviewed. Furthermore, the Council has prepared a topic paper 'Woking Borough Council's approach to monitoring and delivery with particular emphasis on infrastructure delivery' (WBC/9) which clarifies further how the CS will be delivered and monitored.

- 1.2 The CS also builds in sufficient contingency measures to overcome uncertainties and its comprehensive delivery. Each policy includes a set of indicators that reflect the objectives that they seek to achieve. Annual monitoring will be undertaken to assess the performance of each policy using the indicators as a measure of assessment. This commitment is emphasised in Section 6 of the CS. The CS also commits to a comprehensive monitoring of housing and employment delivery that will look at cumulative delivery against specified targets at the end of three years after its adoption. It sets out specific actions to deal with risk and uncertainties. These actions are set out in paragraph 6.20 of the CS.

Are the arrangements for managing and monitoring the delivery of the Core Strategy clear and will they be effective?

- 1.3 The topic paper 'Woking Borough Council's approach to Delivery and Monitoring with particular emphasis on infrastructure delivery' (WBC/9) demonstrates that arrangements for managing and monitoring the delivery of the CS are clear.

- 1.4 PPS12 at paragraph 4.44 defines effectiveness of the CS as being deliverable, flexible and able to be monitored. The CS is supported by evidence such as the SHLAA (CD/31), IDP (CD/11), ELR (CD/13) and Economic Viability Assessment (CD/12) to demonstrate its deliverability. The topic paper (WBC/9) demonstrates that it is able to be monitored and that there is a mechanism to ensure effective monitoring and reporting of the monitoring outcomes.
- 1.5 The CS builds in sufficient flexibility to cope with changing circumstances. Examples of such flexibility are:
- Policy CS2 – whilst the policy expects delivery of its provisions to be managed according to the indicative timescales, it allows scope for proposals which bring forward the redevelopment of the Town and District Centres in a comprehensive manner to be considered on its merits. Also, whilst it secures specific sites through its evidence base to meet identified need, it directs town centre uses to the Town and District Centres as preferred locations for such developments. These include a broad range of uses that will be determined on their own merits;
 - Policy CS6 – the policy ensures a comprehensive review of the Green Belt boundary without limiting the geographical scope of the study. This will help secure the long term permanency of the boundary;
 - Policy CS8 – whilst the policy seeks developer contributions towards the avoidance strategy, it allows scope for developers to make their own provision if they wish to do so;
 - CS9 – the policy expects development to be in flood zone 1, but accepts that development may occur in flood zone 2 if it can be demonstrated that there are no suitable alternative sites in areas at lower risk;
 - Policy CS10 – whilst the policy sets out indicative density ranges, it accepts that density could also be influenced by the nature of the site and the design solution that achieves the most efficient use of land;
 - CS11 – the policy provides guidance on the mix of dwelling types that will be expected of a proposal. However, it accepts that this can depend on the type and size of the site and the established character and density of the neighbourhood where the development is situated;
 - Policy CS12 – specifies the level of affordable housing contribution that will be secured on the back of market housing. At the same time, it allows scope for a case to be made based on viability if an applicant feels that this will make a scheme unviable. Furthermore, the preference is for the affordable housing to be provided in-situ. However, in exceptional circumstances, the policy would allow off-site provision to be made if it will ensure even distribution of affordable housing across the Borough;
 - Policy CS15 – a market appraisal carried out to underpin the policy has recommended the re-use of some existing employment land for alternative uses;
 - Policy CS18 – the policy aims to provide real choice in the mode of travel to allow flexibility of movement across the Borough;
 - Policy CS22 – the policy requires development where relevant to connect to the existing network of CHPs. However, it also allows for alternative means to achieve the policy objectives, if it can be demonstrated that it can achieve greater benefits. Furthermore, the policy expects development to achieve a specified code for sustainable homes within a specific timescale. The policy builds in sufficient flexibility to allow compensatory measures to be provided off-site if the entire requirement cannot be met on-site.

1.6 Based on the above, the Council is satisfied that monitoring and delivery of the CS will be effective.

2 Are the targets and monitoring proposed related adequately to the Policy objectives? How will the effectiveness of the CS and its individual policies be measured/assessed? What are the monitoring indicators for each policy; do these relate to the policy content and objectives? How will the effective delivery of the CS be managed?

Are the targets and monitoring proposed related adequately to policy objectives?

2.1 The targets and monitoring set out in the CS are directly and adequately related to the objectives that they seek to achieve. The Council has prepared a topic paper 'how the policies of the CS links to the key objectives' (WBC/11). The paper clearly demonstrates the clear relationship between the spatial portrait, the issues facing the area, the vision and objectives, the policies and the targets and indicators against which the policies will be measured. Each policy lists the targets and indicators against which their performance will be measured. The targets and indicators directly relate to the objectives that the policies are seeking to achieve and they are presented as part of each policy for easy identification of that link. These targets and indicators will continue to be expanded as new technology and methodology for measurements emerges.

How will the effectiveness of the CS and the individual policies be measured/assessed?

2.2 The Council's response to Matter 8 – Issue 1 above demonstrates the effectiveness of the CS. The topic paper (WBC/9) demonstrates the Council's overall approach to delivery and monitoring of the CS. The effectiveness of the CS and the individual policies will be measured annually by assessing how they are performing against the list of targets and indicators. This will be reported in an Annual Monitoring Report to be based on the period 1 April to 31 March. Section 6 of the CS sets out in detail how this will be achieved. The CS also builds in sufficient contingencies to overcome risk and uncertainties. Furthermore, the Council is committed to undertake a comprehensive monitoring of the performance of the housing and employment floorspace delivery at the end of three years after the adoption of the CS. This will look at cumulative delivery of housing and employment floorspace. If delivery is significantly behind the projected cumulative target and the available evidence is not providing any information that this will be addressed in subsequent years, the Council will take specific action to address the situation. Details of the actions that the Council may take are listed in paragraph 6.20 of the CS.

What are the monitoring indicators for each policy; do these relate to the policy content and objectives?

2.3 The monitoring indicators are listed as part of each policy under the heading 'monitoring and review'. The decision to set out the indicators as part of each policy is deliberate to establish a direct and easy linkage between the policies and the indicators against which their performance will be measured. The Council decided against having a separate section/chapter that lists all the indicators together. The extent to which the indicators relate to the policy content and objectives is addressed above, with clarification set out in the topic paper as to how the policies link to the key objectives (WBC/09).

How will the effective delivery of the Core Strategy be managed?

- 2.4 The Council has prepared a topic paper 'Woking Borough Council's approach to monitoring and delivery with particular emphasis on infrastructure delivery' (WBC/9). The paper sets out clearly how the effective delivery of the CS will be managed. It also includes an Infrastructure Schedule that clearly identifies the infrastructure that will be necessary to support the delivery of the CS, who will be delivering it, when it will be delivered and at what cost, and the funding sources identified for delivery. Each policy of the CS also includes a section on delivery strategy that explains how the policy will be delivered. Overall, the CS will be delivered through the development management process and by partnership working with the private, public and voluntary sectors. The development management process will ensure that quality standards expected of development are achieved. The CS has a monitoring system in place for the annual monitoring of its performance. It also builds in contingencies to overcome risk and uncertainties. Above all, the Council will take a proactive approach to ensure the comprehensive delivery of the CS. It has the track record to demonstrate its capability to work proactively with partners to achieve desirable outcomes. A key example is partnership work with Moyallen to deliver the town centre improvements and acquiring Wolsey Place to facilitate the regeneration of the Town Centre. Further evidence of the Council's capacity to be proactive is set out in the topic paper (WBC/9).

3 Is there sufficient clarity regarding how, when and where necessary infrastructure will be provided (and by whom)?

- 3.1 The CS provides sufficient clarity regarding what, how, when and where necessary infrastructure will be provided and by whom. Policy CS16 provides an overarching policy context for infrastructure delivery to support the CS. It makes specific and clear reference to the preparation of an Infrastructure Delivery Plan (IDP) (CD/11) to set out details of the infrastructure provision. An IDP has been published providing comprehensive details of infrastructure provision. Part of this is an Infrastructure Schedule (WBC/9) which summarises the type of infrastructure that is necessary to support the CS, how it will be provided, when it will be provided, where and by whom. It also provides information about the estimated cost of schemes where costing information is available, and the sources of funding to deliver them. Furthermore, it gives an indication of the primary policies and objectives that the infrastructure will help to deliver. The Infrastructure Schedule will be reviewed regularly to bring it up-to-date. The Inspector's attention is drawn to the fact that the Council considered including the Infrastructure Schedule in the CS but decided against that because of its changing nature and the need to regularly update it as schemes are delivered and new ones are identified.

4 Should the CS include clearer timescales to assist monitoring, thereby providing milestones to assess policy effectiveness?

- 4.1 The CS includes a clear mechanism for monitoring its effectiveness. This has been highlighted in the topic paper WBC/9. In particular, the effectiveness of the CS will be measured against its clear set of indicators, which are linked to its objectives. It should be emphasised that the CS already sets out clear timescales for the delivery of some of its policies and for the monitoring of its performance where relevant. Examples are the housing trajectory, the Town, District Centre policies (CS2, CS3), and Policy CS22 – Sustainable Construction. The extent to which these timescales are met will be reviewed in the annual monitoring of the CS, and reported in an Annual Monitoring Report.

It should also be emphasised that the entire CS has been prepared in accordance with the Local Development Scheme (LDS) and the extent to which its preparation is meeting timescales set out in the LDS has been monitored. The Council does not think that there is any further need to introduce further timescales in the CS.

5 How will the Community Infrastructure Levy be managed within the Borough and what implications does it have for the delivery of the Core Strategy?

5.1 The Council has already committed to implement the Community Infrastructure Levy (CIL). The determination of the charging tariff will follow the statutory process, and community involvement will be an essential part of the process in accordance with the Statement of Community Involvement (CD/5). A Charging Schedule will be prepared to reflect the Infrastructure Schedule and the IDP to guide the use of CIL contributions to implement infrastructure to support the CS. The overall aim will be to use the CIL contributions to implement identified infrastructure in the Infrastructure Schedule. Where resources are limited, the Council will prioritise its infrastructure delivery programme to achieve maximum benefits to the community. The process for securing the CIL contributions will be managed through the development management process. The Council is fully aware that whilst it is the collection authority for CIL, the delivery of many of the infrastructure schemes will be managed by other delivery agents and key stakeholders. Consequently, it is committed to work in partnership with others to ensure that the CIL contributions are used effectively and efficiently. It should be emphasised that CIL contributions are only one source of infrastructure funding, and that public sector funding of infrastructure projects will continue to play a significant role in infrastructure delivery. The Council is considering the implications of the Localism Act regarding Neighbourhood Planning. The relationship between CIL and Neighbourhood Planning will be explored as part of this debate. A decision will be made in due course regarding this matter. It should be noted that at this stage no neighbourhood has expressed a firm commitment to prepare a Neighbourhood Plan.

5.2 The Council believes that the introduction of CIL will have positive implications for the delivery of the CS. CIL will secure a significant additional funding stream to provide necessary infrastructure to support the delivery of the CS. This is because CIL will apply to most types and scale of development and will enable the Council to mitigate the cumulative impacts on infrastructure arising from small scale developments that are often exempted from planning obligations. It will provide certainty to developers to plan ahead because it will allow scope for development cost to be considered at the beginning of the development process. This will help with the speedy delivery of the CS. It will also allow flexibility for contributions to be pooled and to align funding to specific priorities. This will enable the Council to fund schemes that will have maximum positive benefits to the local community. Where and if resources are limited, there is flexibility by CIL to enable prioritisation of schemes to focus resources to provide critical schemes that will achieve maximum benefit to the local community.

6 Does the CS provide adequate clarity upon the issue of water and wastewater infrastructure delivery?

6.1 The Council considers that the CS provides adequate clarity upon the issue of water and waste water infrastructure delivery. This includes the efficient

management of potent water, the discharge of waste water and treatment and the management of development impacts on the risk of flooding. Policy CS22 is proactive and has robust measures to reduce domestic water usage in the area in advance of the proposed national programme. Consequently, developers are required to meet the energy and Carbon Dioxide and Water components of the Code for Sustainable Homes. The Council has taken this approach because of the importance that it attaches to water management and has the evidence base (CD/10 and CD/12)) to justify this requirement.

- 6.2 Policy CS16 identifies water supply and waste water treatment as necessary infrastructure to support the CS. It makes reference to the Infrastructure Delivery Plan (CD/11) to set the details of how water supply and waste water treatment will be managed. An IDP has been published. Paragraph 13.38 to 13.50 deals with water supply and waste water treatment. Veolia who is responsible for the supply of potable water in the area has confirmed that no further investment will be required for the security of water supply until 2025 at average and 2026 at peak. An Infrastructure Schedule has been prepared setting out clearly how waste water treatment infrastructure will be delivered, when it will be delivered and by whom.
- 6.3 The CS includes a robust policy on flooding (CS9). The policy directs development away from areas at risk of flooding. The Council has carried out a Strategic Flood Risk Assessment to inform decisions about the location of development and other planning decisions. The policy requires all forms of significant development to incorporate an appropriate sustainable drainage system (SUDs) to help manage drainage.
- 6.4 The Council is presently working with the County Council to prepare a Surface Water Management Plan for Woking and West Byfleet. A draft of the Plan has been published and it is likely to be finalised by the summer of 2012. The Plan will inform decisions about where to target resources in addressing surface run off.

7 How are matters relating to waste intended to be resolved?

- 7.1 The CS and its Proposals Map adequately covers matters relating to waste (paragraph 1.33 and 1.37 of the CS). Surrey County Council is the waste authority for this area. The current Waste Plan was adopted in 2008 and has a lifespan up to 2018. This expiry date is before the period of the CS. The County Council is committed to review the Waste Plan after the National Waste Management Plan is published in May 2012. Any implications of the review after 2018 will be taken into account by future review of the CS and its accompanied Proposals Map. A Statement of Common Ground between Woking Borough Council and Surrey County Council (WBC/6) has been prepared with a clear position about how waste matters are intended to be resolved and confirmation of the County Council's satisfaction with the approach taken by the CS on matters of waste. The Statement of Common Ground forms part of the Examination documents.

8 Have risks and contingency been robustly addressed in the production of the CS? (evidence?)

- 8.1 The Council is satisfied that risk and contingency has been robustly addressed in the production of the CS. The Council has an adopted Local Development Scheme (LDS) (CD/75) which sets out a timetable for the production of the CS.

Paragraph 3.8 of the LDS sets out the risks involved in the production of the CS and measures that have been and will continue to be applied to overcome them. The CS itself includes risk and contingency measures to overcome uncertainties and to ensure its comprehensive delivery. Evidence of how this is addressed is set out in paragraph 6.19 to 6.20 of the CS and the topic paper WBC/9.

9 Impact of spending review and reduction in public expenditure? How has reduction in govt expenditure been reflected within the CS?

- 9.1 The Council has been fully aware of the current economic downturn and reduction in government expenditure when preparing the CS. Consequently, the Council has been concerned to ensure that the CS is underpinned by robust evidence of economic viability assessments that take into account current economic conditions. This includes the economic viability assessment of the CS (CD/12) and the viability assessment of the SHLAA sites (CD/31). The outcome of these assessments demonstrates the deliverability of the proposals in the CS.
- 9.2 The Council has begun the process of setting its CIL tariff. An economic viability assessment will be an important part of this process. The tariff will be scrutinised at an Examination to ensure that it is set at a reasonable level in order not to compromise the viability of development proposals. This will take into account the economic circumstances at the time.
- 9.3 The CS has sufficient flexibility (CS16) for applicants to make a case based on viability if they consider that the requirements of the CS will make their development unviable. This will enable the delivery of the CS to be adapted to changing economic circumstances. It should be emphasised that funding for some of the identified infrastructure to support the CS has already been secured.
- 9.4 The Council will intensify its partnership working to maximise the efficient use of resources to deliver the CS. For example, the Council is working with the County Council, the other Surrey authorities and other public bodies to undertake a review of public sector assets to maximise their efficient use and free up surplus assets for alternative uses. This could make a significant contribution to the delivery of the CS. The Council is also working in partnership with others, in particular the County Council to invest in infrastructure and create a conducive environment for businesses to function and invest. An example is the commitment by the County Council to deliver 100% broadband coverage across the County.
- 9.5 The CS is a long term strategy. Whilst the current economic downturn is fully acknowledged, most economic experts and the Government do agree that the situation will stabilise and improve in the medium to long term. Overall, the Council is confident that the CS is deliverable.

10 Where is there a list of relevant 'saved' development plan policies?

- 10.1 The list of relevant 'saved' development plan policies is contained in the following development plans for the area:
- Woking Borough Local Plan (1999);

- The South East Plan: Regional Spatial Strategy for the South East of England (May 2009);
- Surrey Waste Plan (2008); and
- Surrey Minerals Plan CS and Primary Aggregates Development Plan Documents (2011).

10.2 The Inspector's attention is drawn to the fact that the Council has prepared a list of the Woking Borough Local Plan policies that will be superseded when the CS is adopted. This is contained in the Council's topic paper 'List of saved and superseded policies' (WBC/04).

Proposals Map (PM)

11 Do the changes to the proposals map reflect the CS adequately? Are the changes proposed to the PM sufficiently clear and comprehensive?

11.1 The PM reflects the proposals in the CS and takes into account the Local Plan 1999 PM. A number of proposed changes have been made in response to representations received and subject to these changes being incorporated it is felt that the PM accurately reflects the CS.

11.2 The Council has been fully aware about whether or not to include the flood zones on the PM and on balance, and subject to advice from the EA, has decided to make reference to the SFRA to avoid the need to review the PM regularly. The flood zones are likely to change and it will be easier to bring them up-to-date by regularly reviewing the SFRA rather than the PM.

11.3 The changes proposed to the PM have been recorded as part of Council's published proposed changes document, which clearly sets out the justification for and proposed changes for the CS PM. Subject to the inspector's approval, these changes will be incorporated and published on the PM.

12 Is the PM a Submissions Proposal Map – compliant with Regulation 30?

12.1 The PM should reflect policies in the CS and should only be reviewed if policies in the CS have implications on the PM. The Council have submitted a Submission PM to reflect changes that have occurred as a result of the CS, prepared in accordance with Regulation 30 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

13 Is the site to rear of 103/109A High St to be included on PM as a result of CS?

13.1 This site has not been included on the PM as a result of changes in the CS, this has been included as it is an extant transport proposal in the Woking Borough Local Plan 1999 (Policy MV11: Proposed village car park in Horsell). This scheme is being taken forward from the previous PM as it important that the land continues to be safeguarded for this purpose.

14 Should the PM reflect issues of flood risk? Is the submitted approach compliant with the advice of PPS12?

14.1 The Council is aware of the importance of showing areas at risk of flooding to guide planning decisions however information regarding flood risk is regularly

updated and zone definitions keep changing. Consequently it has been agreed with the EA that this should not be represented on the PM but the CS should make a firm cross-reference to the use of the SFRA to inform planning application decisions; the Council is committed to regularly update this information, and will be working in partnership with EA to ensure that flood risk information is up-to-date.

15 How will the PM be altered to reflect Highway Improvement Schemes that will not be pursued?

15.1 Highway Improvement Schemes not pursued will be removed from the PM. These are currently shown on the Submission PM as black dashed lines titled 'Major Highway Improvement Scheme'. Confirmation of schemes that are not being pursued by the County Council will follow a formal process. Once confirmed, this will become a statement of fact that will have to be taken into account and reflected on the Proposals Map.

16 Is 63-75 Commercial Way a primary or secondary retail frontage?

16.1 63 – 75 Commercial Way is a primary retail frontage.

17 Is the Woking town centre boundary shown accurately upon the proposals map and justified by the evidence base

17.1 The town centre boundary is shown accurately on the proposals map. CD/40 reviewed the town centre boundary, and considered the 1999 Local Plan boundary to be extensive, including large areas to the south and west occupied by non town centre uses. The study recommended two options for consideration for the CS. Option 1 is a tightly drawn boundary around existing town centre uses and option 2 adopted the 1999 town centre boundary to allow for potential expansion. The boundary defined on the CS proposals map differs from these options, but reflects elements of both. The boundary has been more tightly drawn to the west than the 1999 proposals map, and also to the south, albeit to a lesser degree than in option 1 to allow inclusion of the 'New Central' mixed use development and commercial sites along Guildford Road.