

## WOKING BOROUGH COUNCIL'S STATEMENT ON THE IMPLICATIONS OF THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

### 1.0 Introduction

- 1.1 The Government's intention to simplify national planning policy guidance into one concise document has been known for sometime. It published a Draft NPPF in July 2011 for public consultation. The consultation period expired on 17 October 2011.
- 1.2 The Draft NPPF was published before the Core Strategy was approved by Council to be submitted to the Secretary of State for Examination. The requirements of the Draft NPPF were therefore taken into account before the Core Strategy was published. The Council prepared a 'self assessment of the conformity of the Core Strategy with national and regional policy, Woking and Surrey Sustainable Community Strategies and the key priorities of the Council', which was submitted to the Secretary of State as part of the Core Strategy Examination documents. The extent to which the Core Strategy meets the requirements of the Draft NPPF was comprehensively addressed in the document. Overall, the assessment concluded that if the requirements of the Draft NPPF were to be published without significant modifications, the Core Strategy would have been in general conformity with the NPPF. The Council does not intend to repeat the contents of the self assessment. However, it will be necessary for completeness for it to be read in conjunction with this statement. The self assessment is on the Council's website ([www.woking.gov.uk](http://www.woking.gov.uk)). It is also not intended to repeat the evidence submitted to the Inspector during the Core Strategy Examination.
- 1.3 The hearing part of the Core Strategy Examination took place between 20 March 2012 and 4 April 2012. The final version of the NPPF was published on 27 March 2012. In the light of this, the Inspector has asked the Council to provide a statement about the implications of the NPPF on the Core Strategy. The Council's statement is set out below and is structured in the order of the broad headings as they appear in the NPPF. For each of the broad headings, there is a short summary of the main requirements, an assessment of whether the requirements are satisfied by the Core Strategy and whether it should lead to further modification.
- 1.4 The Council at its meeting on 16 April 2012 considered the implications of the NPPF on development management and other planning decisions. It resolved to give significant weight to a number of the emerging policies of the Core Strategy. The entire Council report on this matter is included in Appendix 2. It should be emphasised that the Council agreed to all the recommendations set out in the report.

### 2.0 Delivering sustainable development

- 2.1 The section emphasises the three dimensions of sustainable development to be economic, social and environmental. It requires the planning system to contribute towards achieving sustainable development.
- 2.2 The principles of sustainable development underpin the entire Core Strategy. A Sustainability Appraisal (SA) has been carried out to assess the social, economic and environmental implications of the policies of the Core Strategy. Overall, the SA concluded that the Core Strategy will make a positive contribution towards achieving sustainable development in the area.

**No further modification to the Core Strategy is proposed.**

**3.0 Presumption in favour of sustainable development**

3.1 The NPPF introduces a presumption in favour of sustainable development. It commits to a plan-led system and does not change the status of the development plan as the starting point for decision making. It requires local planning authorities to positively seek opportunities to meet the objectively assessed development needs of their area. Development proposals that accord with the development should be approved without delay. Where the development plan is absent or relevant policies are out of date, local planning authorities are required to grant permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
- specific policies in the NPPF indicate development should be restricted.

3.2 The Core Strategy is very clear about the scale of growth that will be promoted in the area between 2010 and 2027 to meet local need. This is summarized in Policy CS1 of the Core Strategy. The growth requirements are objectively assessed and justified by robust and up-to-date evidence base. In the Council's opinion, this requirement has been satisfied by the Core Strategy. Generally, the Council takes a positive approach to development by ensuring that opportunities are fully explored to make development acceptable. Proposals are only refused if nothing could reasonably be done to make it acceptable. In the light of this, a further modification is proposed to include a new Policy CS25 to emphasise the Council's positive approach to development management and to meet the requirements of this aspect of the NPPF.

**Policy CS25: Presumption in favour of sustainable development**

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Core Strategy and/or other development plans for the area (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

**Reasoned justification**

The NPPF was published and took effect on 27 March 2012. Consequently, its requirements are a material consideration for the purposes of development management and other planning decisions. The NPPF introduces a new presumption in favour of sustainable development that requires local planning authorities to take a positive approach to development management by working in partnership with applicants to explore opportunities for making development proposals acceptable. It reiterates the Government's commitment to a plan-led system and expects development to be determined in accordance with the development plan.

Partnership working is already a key principle that underpins the work of the Council. It will therefore work with applicants to ensure that development makes a positive contribution towards the sustainable development of the area and are in accordance with the development plan of the area.

The Council has an up to date Core Strategy, which is in general conformity with the NPPF to provide a robust planning policy framework for the considerations of planning applications. However, in circumstances where there are no policies in the development plan relevant to the consideration of a particular development proposal or the relevant policies are out of date, the requirements of the NPPF as a whole will be used to judge the acceptability of the development proposal.

The Council will always consider whether there is anything that could be done to make a development proposal acceptable. It will only be when it is satisfied that nothing could be done within the context of the development plan and the NPPF to make it acceptable that planning permission will be refused.

**4.0 Core planning principles**

- 4.1 The NPPF sets out a number of core planning principles to underpin both plan-making and decision taking. These core principles also underpin the policies of the Core Strategy.  
**No further modification to the Core Strategy is proposed**

**5.0 Building a strong, competitive economy**

- 5.1 The Government's commitment to economic growth is emphasised. It requires the planning system to do everything to support sustainable economic growth by proactively planning to meet the development needs of businesses. It cautions about the need to ensure that investment in business is not over burdened by the combined requirements of policy expectations. It sets out six factors to be taken into account in drawing up local plans.
- 5.2 The Core Strategy sets out growth requirements to meet the needs of businesses (Policies CS1, CS2, CS3, CS4, CS5 and CS15). A viability assessment has been carried out to ensure that the combined requirements of the policies of the Core Strategy will not undermine the likely prospect of development coming forward.  
**No further modification to the Core Strategy is proposed**

**6.0 Ensuring the vitality of town centres**

- 6.1 The NPPF requires planning policies to promote competitive town centre environment. Town centres are recognised as the heart of local communities and their viability and

vitality should be promoted. It also requires local planning authorities to define their hierarchy of centres, the extent of the town centre and primary shopping areas, retain/enhance existing markets and allocate a range of suitable sites to meet the scale and type of economic growth. Sequential tests for main town centre uses will be applied.

- 6.2 The overall spatial strategy of the Core Strategy seeks to concentrate most new development in the main centres. There is a clear definition of the hierarchy of centres and the scale of development proposed in these centres reflects their hierarchy and function. The Council has carried out an Employment Land Review and a Strategic Housing Land Availability Assessment to demonstrate that there is sufficient capacity within the main centres to meet a significant part of the identified growth. A Site Allocations Development Plan Document (DPD) will be prepared to allocate specific sites for development. The Council believes that the requirements of this section of the NPPF have been fully met.  
**No further modification to the Core Strategy is proposed**

**7.0 Supporting a prosperous rural economy**

- 7.1 Woking Borough is predominantly urban in character with green belt land beyond. The implications of this section of the NPPF are not significant as far as the policies of the Core Strategy are concerned.  
**No further modification to the Core Strategy is proposed.**

**8.0 Promoting sustainable transport**

- 8.1 The role of transport policies in facilitating sustainable development is emphasised. It promotes sustainable transport modes to give people a real choice in the mode of travel. Planning policies should support patterns of development, which facilitate the use of sustainable transport modes and minimises the need to travel. Transport Assessments and Transport Statements are required for developments that generate significant amounts of movement. Mix use development is encouraged for large scale developments. It sets a list of criteria to be taken into account in setting parking standards.
- 8.2 The Core Strategy directs most new development towards the main centres where key services and facilities are located to minimize the need to travel. It promotes walking, cycling and public transport to ensure a real choice in the mode of travel and has an Infrastructure Delivery plan to demonstrate how transport infrastructure will be delivered. The Core Strategy also requires Transport Assessment and Transport Statement for development that generates significant amount of movement. It has a policy to ensure that adequate provision of parking is provided to support development (Policy CS18). The policy also emphasizes the role of parking in managing congestion in the area. The Council is satisfied that the requirements of this section of the NPPF are met by the policies of the Core Strategy.  
**No further modification to the Core Strategy is proposed.**

**9.0 Supporting high quality communication infrastructure**

- 9.1 The NPPF emphasises the role of high quality communication infrastructure such as high speed broadband technology in delivering sustainable economic growth. It encourages the use of existing infrastructure such as masts unless the need for new sites can be justified.
- 9.2 The Core Strategy includes policies that promote communication infrastructure and to ensure that if they are provided, they will be sympathetically designed to be compatible with the character of the area (Policies CS15, CS21).  
**No further modification to the Core Strategy is proposed**

**10.0 Delivering a wide choice of high quality homes**

- 10.1 The NPPF requires local planning authorities to use an evidence base to ensure that their local plans meet the full, objectively assessed needs for market and affordable housing in the market housing area and to identify key sites which are critical to the delivery of housing during the plan period.
- 10.2 Local planning authorities should also identify:
- and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirement with additional buffer of 5% to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, the buffer should be increased to 20%;
  - a supply of specific, deliverable sites or broad locations for growth, for years 6 – 10 and, where possible, for years 11 – 15.
  - their own approach to housing density to reflect local circumstances.
- 10.3 Local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.
- 10.4 The Council maintains the case presented to the Examination that the level of housing provision specified in the Core Strategy should remain at 292 dwellings per year because it is objectively assessed and justified by robust and credible evidence base. It is also in general conformity with the housing requirement of the South East. The Council does not believe that there is anything significantly different in the NPPF that should cause it to change the annual provision of 292 net additional dwellings for the Borough.
- 10.5 The Council has identified sufficient deliverable sites to meet its five year housing land supply. It has sufficient housing land supply to deliver 1,803 new dwellings. This represents an over supply of 270 dwellings (about 23%) over the 292 requirement. It has also identified sufficient deliverable sites to meet housing land supply for years 6 – 10. Overall, the Council has identified about 13 year's supply of deliverable sites that will contribute towards housing delivery in the first 10 years of the plan period. Furthermore, the Council has identified the Green Belt and the Town Centre as broad locations to identify specific deliverable sites to meet housing land supply for years 11 – 15. In this regard, the Council is satisfied that the Core Strategy is in general conformity with the NPPF and is therefore not proposing to make any modification to the main approach to housing provision and distribution set out in Policy CS10: Housing Provision and Distribution, including the date for the review of the Green Belt boundary (2016/17) and the date that Green Belt land will be needed to meet housing land supply (2022 – 2027).
- 10.6 It is relevant to note that the NPPF states that broad locations for housing growth in the 11 – 15 year timeframe should be identified where possible. The Core Strategy already does this.
- 10.7 The NPPF introduces a new requirement for an additional 5% buffer to be added to the five year housing land supply to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, it is required that the buffer be increased to 20%. The Council has provided evidence to the Inspector to demonstrate that between 2006 and 2011 there has been an over-supply of housing against its housing requirement of 292 per year. The average provision of housing during this period was about 300 net additional dwellings. Consequently, the Council proposes that the 5% buffer should apply based on the evidence provided. Furthermore, the Council has provided the Inspector with evidence to demonstrate that it has a surplus of 23% over

and above its five years housing land supply. In this regard, the requirement for the 5% buffer has also been met.

10.8 Unlike PPS3 and the Draft NPPF, the NPPF allow scope for local planning authorities to make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. It requires any allowance to be realistic having regard to the Strategic Housing Land Availability Assessment (SHLAA), historic windfall delivery rates and expected future trends. This should not include residential gardens.

10.9 The Council has provided the Inspector with evidence of SHLAA and historic windfall rates over the past 10 years to demonstrate why windfall sites will be a reliable source of housing land supply and consequently, why it should apply to the five year housing land supply. The evidence provided indicates that an allowance of 43 dwellings per year can be applied to the five year housing land supply. Whilst the Council is not intending to change its approach to the Green Belt with respect to its identification as broad location for growth, the date of the Green Belt boundary review and the date for the release of Green Belt land, the scope to make allowance for windfall sites should strengthen the Core Strategy's approach to the Green Belt by providing sufficient contingency for any non implementation of sites identified in the SHLAA. If the Inspector is minded to accept the Council's evidence to make an allowance for windfall sites as part of the five year housing land supply, the Council would have identified a supply of land to make provision for the delivery of 1945 dwellings against the required 1460. This will be an over supply of 485 dwellings.

**It is proposed that an annual windfall allowance of 43 dwellings be applied to the five year housing land supply. This is equivalent to 215 dwellings over the five year period.**

### **11.0 Requiring good design**

11.1 The NPPF emphasises the importance of good design as a key aspect of sustainable development. It requires planning policies to ensure that development functions well, create a sense of place to live, work and visit, optimise the potential of a site to accommodate development, respond to local character and history, create safe and accessible environment where crime and disorder and fear of crime do not undermine quality of life, create a visually attractive development as a result of good architecture and appropriate landscaping.

11.2 The Core Strategy includes a comprehensive design policy to address the requirements of the NPPF (Policy CS21). The Council has also carried out a Character Assessment to further understanding of the character of the various parts of the Borough and to ensure that development respect the distinctive character of these areas. The Core Strategy commits to the preparation of a Design SPD, which will provide further guidance on detail design matters.

**No further modification to the Core Strategy is proposed**

### **12.0 Promoting healthy communities**

12.1 It emphasises the role of the planning system in facilitating social interaction and creating healthy and inclusive communities. To achieve this, local planning authorities should aim to involve all sections of the community in the development of local plans. Planning policies should plan positively for the provision of shared space, community facilities and ensure that established shops, facilities and services are able to develop and modernise.

- 12.2 One of the key principles that underpinned the preparation of the Core Strategy is community involvement. The Council has prepared a Consultation Statement to demonstrate the extent of community involvement in the Core Strategy process. This clearly shows that the Council has consulted more extensively than it is required to do so.
- 12.3 The Council has prepared an Infrastructure Delivery Plan (IDP) to ensure that adequate infrastructure, including social and community facilities is provided to support the Core Strategy. The Core Strategy also includes policies to protect local shops and also make provision to meet the retail needs of the Borough. The Council is satisfied that the Core Strategy meets the requirements of the NPPF in this regard.

### 13.0 Protecting Green Belt Land

- 13.1 The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The NPPF reiterates the purposes of the Green Belt that were established in PPG 2. The beneficial use of the Green Belt should be enhanced. Once established, Green Belt boundaries should only be altered in exceptional circumstances. It sets out the factors to consider when altering the extent of the Green Belt. It lists a number of developments that are deemed acceptable in principle within the Green Belt and requires local planning authorities to resist inappropriate development that could be harmful to the purpose and the overall aim of the Green Belt. Elements of many renewable energy projects will comprise inappropriate development in the Green Belt. Development of such projects will have to demonstrate very special circumstances if they are to proceed.
- 13.2 The Core Strategy has a clear objective to protect the purpose and integrity of the Green Belt. The Village of Mayford is within the Green Belt, and in accordance with the NPPF, the Core Strategy sets out criteria to assess the suitability of any infill development within the village. The Core Strategy also identifies two Major Developed Sites in the Green Belt – Broadoaks, Parvis Road and the Thames Water Sewage Treatment Works, Carters Lane. The policy basis for the definition of the sites was PPG 2. The NPPF is silent about the concept of Major Developed Sites in the Green Belt. The Council proposes that the identification of the two sites as Major Developed Sites in the Green Belt should continue as an essential part of Policy CS6. However, a modification is being proposed to include in the Glossary of the Core Strategy the definition of 'Major Developed Sites in the Green Belt' to give clarity about the expectations of the designation.
- 13.3 The Council is satisfied that the principle of identifying the Green Belt as a broad location for meeting housing growth between 2022 and 2027 is justified by exceptional circumstances. It is also supported in principle by the South East Plan. The timing for the release of sites from the Green Belt for development should be an essential pre-requisite for demonstrating the exceptional circumstance for doing so. Consequently, the Council is of the view that sites should not be released from the Green Belt until 2022. The Council believes that the combined application of the policies of the Core Strategy and the NPPF will provide sufficient protection to the purpose and integrity of the Green Belt.  
**It is proposed that the Glossary of the Core Strategy be modified to include the definition of 'Major Developed Sites in the Green Belt'. For the avoidance of doubt, the definition of Major Developed Sites in the Green Belt is attached as Appendix 1 of this statement.**

### 14.0 Meeting the challenge of climate change, flooding and coastal change

- 14.1 The role of planning in shaping places to secure radical reductions in greenhouse gas emissions and providing resilience to the impacts of climate change is emphasised by the NPPF. The NPPF requires local planning authorities to adopt proactive strategies to

mitigate and adapt to climate change. Specific requirements are set for supporting a move to low carbon future, help increase the use and supply of renewable energy and low carbon energy and for considering planning applications. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency. Local plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property.

14.2 The Core Strategy is supported by a robust Climate Change Study. It includes a specific and comprehensive climate change policies (CS22 and CS23) to minimise the impacts of development on climate change and encourage the use and development of renewable energy and low carbon energy. The Core Strategy sets high standards for sustainable construction and promotes a design and construction approach that maximise the efficient use of energy. It also ensures the efficient use of water. The Council has carried out an Economic Viability Assessment to ensure that the requirements of its climate change policies will not undermine the viability of schemes coming forward.

14.3 The Core Strategy is also supported by a Strategic Flood Risk Assessment and includes a flooding policy (CS9) that directs development away from areas at risk of flooding. The policy applies the sequential risk based approach to the location of development as required by the NPPF. The Core Strategy also addresses the implications of flooding on biodiversity. The Council has worked in partnership with the Environment Agency in developing the flooding and climate change policies of the Core Strategy and has agreed a Statement of Common Ground to demonstrate the Environment Agency's satisfaction with the flooding policy. The Council is satisfied that the Climate Change and Flooding policies of the Core Strategy satisfy the requirements of the NPPF.

**No further modification to the Core Strategy is proposed.**

## **15.0 Conserving and enhancing the natural environment**

15.1 The NPPF requires the planning system to protect and enhance valued landscapes and geological conservation interests, recognise the wider benefits of ecosystems and minimise impacts on biodiversity. Local plans should aim to minimise pollution and other effects on the local and natural environments. Plans should allocate land for development with the least environmental or amenity value. Planning policies should encourage the effective use of land by re-using land that has been previously developed, provided that it is not of high environmental value. Local plans should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. To minimise impacts on biodiversity and geodiversity, it sets out a number of factors for planning policies to take into account.

15.2 The NPPF gives the following wildlife sites the same protection as European sites:

- Potential Special Protection Areas (SPA) and possible Special Areas of Conservation (SAC);
- Listed or proposed Ramsar sites; and
- Sites identified, or required, as complementary measures for adverse effects on European sites, potential SPA, possible SAC and listed or proposed Ramsar sites.

15.3 The presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.



- 15.4 Planning policies should also give significant consideration to the impacts of noise and other sources of pollution as a result of development, in particular, their impacts of health and quality of life.
- 15.5 The Core Strategy includes policies to protect the landscape and townscape character of the area (Policies CS24, CS21). The policies are underpinned by a comprehensive Character Assessment to further understanding of the distinctive character of the various parts of the Borough. The Core Strategy also has a biodiversity and nature conservation policy (CS7) that creates a hierarchy of international, national and locally designated sites so that protection is commensurate with their specified status. There is a specific policy (CS8) to protect the habitat and wildlife integrity of the Thames Basin Heaths Special Protection Area. Policies CS7 and CS8 has been prepared with significant input from Natural England, who have expressed their satisfaction of the adequacy of the policies to protect the biodiversity of the area and for their compliance with national planning policy. The Council also has an avoidance strategy in place (Thames Basin Heaths SPA Avoidance Strategy) to identify sufficient Suitable Alternative Natural Greenspace (SANGs) to mitigate the impacts of development on the SPA. The Council is satisfied that its policies to protect and enhance biodiversity and European designated sites meets the requirements of the NPPF.
- 15.6 Policy CS21 of the Core Strategy seeks to ensure that consideration is given to the impacts of noise and other sources of pollution in determining the suitability of development proposals in their respective locations.
- No further modification to the Core Strategy is proposed.**

#### **16.0 Conserving and enhancing the historic environment**

- 16.1 The NPPF requires local plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. It should recognise that heritage assets are irreplaceable resource that should be conserved in a manner appropriate to their significance. The NPPF also sets out a number of factors to take into account when determining the suitability of development proposals. The NPPF requires local planning authorities to make information about the significance of the historic environment gathered as part of plan making or development management publicly accessible.
- 16.2 Policy CS20: Heritage and Conservation of the Core Strategy seeks to protect the heritage assets of the Borough. A modification is proposed to include in the Glossary a definition of what comprise the heritage assets of the Borough. A Character Assessment and Heritage of Woking Study provide the necessary evidence base to ensure the effective implementation of the policy. A Statement of Common Ground has been agreed with English Heritage to ensure that the Core Strategy reflects the objectives of national planning policy. The Council is satisfied the Core Strategy meets the requirements of the NPPF.
- It is proposed that paragraph 5.185 and the first two paragraphs of Policy CS20 be modified to reflect the terminology used in the NPPF. This modification will not change the substance of the policy.**
- 16.3 Paragraph 5.185 should now read:  
*“The heritage assets of the Borough are diverse and unique. It includes historic buildings and places such as Woking Palace, Sutton Place, the Shah Jahan Mosque and Brookwood Cemetery. There are 180 listed Buildings in the Borough, including four that are Grade 1 listed and 25 Conservation Areas”.*
- 16.4 The first two paragraphs of the policy box should be modified to read:

*“New development must respect and enhance the character and appearance of the area in which it is proposed whilst making the best use of the land available. New development should also make a positive contribution to the character, distinctiveness and significance of the historic environment, including heritage assets at risk through neglect, decay or other threats.*

*The heritage assets of the Borough will be protected and enhanced in accordance with relevant legislation and national guidance as set out in the National Planning Policy Framework. The definition of what comprises the heritage assets of the Borough is included in the Glossary and also where relevant identified on the Proposals Map”.*

**16.5 A further modification is proposed to include the definition of heritage assets in the Glossary. For the avoidance of doubt, the heritage assets of the Borough comprise:**

- **Listed Buildings (statutory and non-statutory);**
- **Conservation Areas;**
- **Areas of historic or architectural importance;**
- **Ancient monument;**
- **Historic Gardens and landscape;**
- **Sites of Archaeological significance;**
- **Ancient woodland.**

**17.0 Facilitating the sustainable use of minerals**

17.1 The County Council is responsible for the preparation of the Surrey Minerals Plan. However, the Core Strategy and its accompanied Proposals Map makes appropriate reference to the requirements of the Surrey Minerals Plan.

**No further modification to the Core Strategy is proposed.**

**18.0 Plan-making**

18.1 This section of the NPPF sets out the requirements to be taken into account in plan making. It requires local plans to be consistent with the principles and policies of the NPPF, in particular, the presumption in favour of sustainable development. It emphasises the importance of early engagement and collaboration with all key stakeholders, local community groups and businesses in setting the vision and agreed priorities for the sustainable development of the area.

18.2 Local plans should set strategic priorities to deliver homes and jobs for their area, provide retail, leisure and other commercial development, provide infrastructure to support development and to mitigate and adapt to the effects of climate change. Local plans should take a long term perspective, preferably 15 years. It should indicate broad location for strategic development and also identify land where development would be inappropriate, for instance because of its environmental or historic significance.

18.3 Local plans should be based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

18.4 The NPPF introduces a new duty to cooperate in planning strategically across local boundaries. They will be required to demonstrate evidence of having effectively cooperated to plan for issues with cross boundary impacts when their local plans are submitted for examination.

18.5 The NPPF also sets out clearly how local plans will be examined. It will be examined by an independent Inspector whose role is to assess whether the plan has been prepared in

accordance with the duty to cooperate, legal and procedural requirements and whether it is sound.

- 18.6 The requirements for the preparation of Neighbourhood Plans are also clearly set out in the NPPF. In particular, Neighbourhood Plans should be in general conformity and support the strategic policies of the local plan and should not promote less development than set out in the local plan.
- 18.7 The Core Strategy makes provision for the appropriate level of growth to meet housing, retail, office, warehousing and other commercial needs of the Borough. Policy CS1 summarises the overall level of growth promoted by the Core strategy. All the growth requirements are justified by up to date evidence base.
- 18.8 The Council has prepared a self assessment of how the Core Strategy meets the legal and procedural requirements and the tests of soundness. It has also prepared a self assessment of how the duty to cooperate has been satisfied. Furthermore, it has prepared a Consultation Statement to demonstrate the extent of community and public involvement in preparing the Core Strategy. Overall, the Council submitted its Core Strategy to the Secretary of State for examination on the basis that it is sound and is satisfied that its preparation meets the plan making requirements set out in the NPPF.
- 18.9 It should be emphasised that whilst the Core Strategy offers an in-principle support for Neighbourhood Plans, there has not been any firm expression of interests from local neighbourhood to prepare Neighbourhood Plans.

**No further modification to the Core Strategy is proposed.**

## **19.0 General comments**

- 19.1 The Core Strategy makes a number of references to Planning Policy Statements (PPS), Planning Policy Guidance Notes (PPG), and Circulars etc. that are now superseded by the NPPF. The full list of previous guidance that is superseded is included in Annex 3 of the NPPF. It is proposed that the Core Strategy be modified by deleting all references to superseded PPGs, PPSs and Circulars and where relevant be replaced with references to the NPPF. In a number of instances, the NPPF uses different terminology from previous guidance. It is therefore proposed to modify the Core Strategy where relevant to ensure that the terminology used is consistent with the NPPF. Further modification is proposed by deleting references to the Decriminalisation and the Localism Bill and replacing them with the Localism Act to bring the Core Strategy up to date. A schedule of these modifications is attached and will be published on the website ([www.woking.gov.uk](http://www.woking.gov.uk)).

## **20.0 Annex 1: Implementation**

- 20.1 Paragraphs 208 to 219 of the NPPF deals with the implementation of its requirements. Paragraph 214 is clear to emphasise that for 12 months from the day of publication, decision takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with the framework. The Woking Local Plan was adopted in 1999 and therefore this transitional period will not apply. The consequence of this is that a policy vacuum could be created that is likely to be exploited by applicants seeking to propose development in the area.
- 20.2 Paragraph 216 of the NPPF suggests that from the day of publication, decision takers may also give weight to relevant policies in emerging plans according to:
- The stage of preparation of the emerging plan (the more advance the preparation, the greater the weight that may be given);

- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency with the relevant policies in the emerging plan to the policies in the NPPF (the closer the policies in the emerging plan are to the policies in the NPPF, the greater the weight that may be given).

20.3 The Council at its meeting on 16 April 2012 resolved that:

- significant weight be given to the following policies of the Core Strategy for the purposes of development management and any other planning decisions – policies CS1, CS2, CS3, CS4, CS5, CS7, CS8, CS9, CS11, CS13, CS14, CS15, CS16, CS17, CS18, CS19, CS20, CS21, CS22, CS23 and CS24 (not CV6, CS10 and CS12);
- the policies in Woking Local Plan (1999) that will not be superseded by the Core Strategy when it is adopted should be given due weight for the purposes of development management and other planning decisions.

20.4 The reason for the Council's decision is set out in the Council's report, which is attached as Appendix 2.

## **21.0 Conclusion**

21.1 The NPPF took effect from 27 March 2012. A significant number of its requirements were already set out in the Draft version and had been taken into account before the Core Strategy was submitted to the Secretary of State for examination. The Council is satisfied that the Core Strategy is consistent with and in general conformity with the requirements of the NPPF. This is demonstrated by the self assessment of how the Core Strategy has met national planning policies and by this statement. Some modifications are proposed. However, they are all of minor nature, which will not undermine the main thrust of the Core Strategy and/or will not require a sustainability appraisal to be carried out.

**Appendix 1: Definition of Major developed sites (MDS) in the Green Belt**

Green Belts contain some major developed sites such as factories, collieries, power stations, water and sewage treatment works, military establishments, civil airfields, hospitals, and research and education establishments. These substantial sites may be in continuing use or be redundant. They often pre-date the town and country planning system and the Green Belt designation.

These sites remain subject to development control policies for Green Belts, and the Green Belt notation should be carried across them, however, infilling or redevelopment is not inappropriate development in sites allocated as major developed sites in DPDs.

**Infilling of major developed sites**

Limited infilling at major developed sites in continuing use may help to secure jobs and prosperity without further prejudicing the Green Belt. Where this is so, local planning authorities may in their development plans identify the site, defining the boundary of the present extent of development and setting out a policy for limited infilling for the continuing use within this boundary. Such infilling should:

- (a) have no greater impact on the purposes of including land in the Green Belt than the existing development;
- (b) not exceed the height of the existing buildings; and
- (c) not lead to a major increase in the developed proportion of the site.

**Redevelopment of major developed sites**

Whether they are redundant or in continuing use, the complete or partial redevelopment of major developed sites may offer the opportunity for environmental improvement without adding to their impact on the openness of the Green Belt and the purposes of including land within it. Where this is the case, local planning authorities may in their development plans identify the site, setting out a policy for its future redevelopment. They should consider preparing a site brief. Redevelopment should :

- (a) have no greater impact than the existing development on the openness of the Green Belt and the purposes of including land in it, and where possible have less;
- (b) contribute to the achievement of the objectives for the use of land in Green Belts
- (c) not exceed the height of the existing buildings; and
- (d) not occupy a larger area of the site than the existing buildings (unless this would achieve a reduction in height which would benefit visual amenity).

**Appendix 2: Report to Council – 16 April 2012**

**COUNCIL - 16 APRIL 2012**

**THE CORE STRATEGY IN THE CONTEXT OF THE NATIONAL PLANNING POLICY  
FRAMEWORK**

**Summary**

The purpose of the report is to seek authority to give the Core Strategy significant weight for the purposes of development.

The Government has published its National Planning Policy Framework (NPPF) to set out its planning policies for England and how it will apply to plan making and development management decisions. The NPPF takes effect from 27 March 2012 and supersedes the existing Planning Policy Statements (PPS), Planning Policy Guidance Notes (PPG), Circulars and other ministerial statements. The list of previous national planning policy guidance that are superseded by the NPPF is included in Appendix 1. Members are reminded that the NPPF is a material consideration in all planning decisions.

The publication of the NPPF raises significant technical and potentially legal issues regarding the weight to be attributed to Woking Local Plan (1999) and the emerging Core Strategy.

There is no doubt that the NPPF will render a significant number of policies in the Woking Local Plan (1999) out of date as they will not be in general conformity with its requirements. The Government expects Plans to be reviewed to take account of the policies of the NPPF. Some form of transitional arrangement has been made to allow time for plans adopted after 2004 to continue to apply for a period of 12 months or beyond depending on a set of conditions. This arrangement will not apply to the Local Plan as it was adopted prior to 2004.

The Council is at an advance stage of preparing its Core Strategy. It is presently going through an Independent Examination. When adopted, it will supersede a significant number of the policies in the Woking Local Plan. Appendix 2 is a table setting out the list of policies in the Local Plan that will be superseded by the Core Strategy and those that will be taken forward in other Local Development Documents (LDD).

The NPPF (paragraph 214) is clear to emphasise that for 12 months from the day of publication, decision takers may continue to give weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with the NPPF. The Woking Local Plan was adopted in 1999 and therefore this transitional period will not apply. The consequence of this is that a policy vacuum could be created that is likely to be exploited by applicants seeking to propose development in the area or hoping to get a planning decision from the Council. It will also make the defence of planning appeals very difficult without up to date planning policies.

The NPPF introduces a new presumption in favour of sustainable development (the presumption). It states that for decision taking purposes the presumption means:

- where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless:
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
  - specific policies in this framework indicate development should be restricted.

Paragraph 216 of the NPPF is however helpful in suggesting that from the day of publication, decision takers may also give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency with the relevant policies in the emerging plan to the policies in the NPPF (the closer the policies in the emerging plan are to the policies in the NPPF, the greater the weight that may be given).

The guidance provided above will make it difficult to defend the entire Policies of the Woking Local Plan (1999) in planning decisions and/or at appeals on the basis of them being out-of-date in the context of the NPPF. A policy vacuum could be created and exploited if some form of weight is not given to the policies of the Core Strategy to inform planning decisions. The Council is therefore requested to confirm that it wishes to give the Core Strategy with its proposed changes an 'significant' weight for the purposes of development management and other planning decisions because it is at an advanced stage of its preparation and that its provisions are in general conformity with the requirements of the NPPF, with the exception of Policies CS10 – Provision and Distribution of Housing, Policy CS12 – Affordable Housing and Policy CS6 – Green Belt because of the number and nature of representations received to these policies during the consultation on the Core Strategy Publication Document. Members should note the reference to 'increasingly significant weight' rather than 'full weight' because the Core Strategy is yet to be adopted.

For the avoidance of doubt, the proposed modifications comprise the proposed modifications approved by the Council at its meeting on 8 December 2011 and submitted to the Secretary of State as part of the Submission Documents and the minor modifications agreed during the course of the Examination Hearings, which are approved under the delegated authority of the Deputy Chief Executive in consultation with the Portfolio Holder for Planning (who is also chair of the LDF Working Group).

Members should be reminded that the Core Strategy is presently going through an Independent Examination and the Inspector's recommendations will not be known until after June 2012. Whilst this date is yet to be confirmed, the Inspector's initial view is that his report will be after June 2012. It will be very difficult to anticipate what the Inspector's recommendations will be. However, it is more likely that this could lead to further modifications to the Core Strategy. Whilst this might be the case the risk for not giving some weight to the Core Strategy to provide a policy framework for planning decisions far outweighs the risk that the policy vacuum could be created because the Local Plan is out of date.

It is stressed that the South East Plan continues to be part of the development plan for the area and a significant material consideration to inform planning decision. Its provisions should adequately provide a robust policy framework to deal with matters relating to the Green Belt, affordable housing and housing provision and distribution until the Core Strategy is adopted. It should be emphasised that the entire policies of the South East Plan should complement the Core Strategy in informing planning decisions. The NPPF also contains a number of development management principles that should also be used to complement the policies of the Core Strategy.

It is clear from Appendix 2 that not all the policies in the Woking Local Plan will be superseded by the Core Strategy. A limited number of the policies have been identified to be taken forward in other Local Development Documents. The Council is requested to give those policies some

'due weight' for the purposes of development management until such time that they are superseded by other LDDs.

The NPPF was published during the middle of the Core Strategy Hearings. Whilst the Independent Examination will not formally close until the Inspector has issued his final report, the formal Hearing sections ended on 4 April 2012. Part of the debate at the Hearings was about the NPPF and the extent to which it impacts on the policies of the Core Strategy. The Inspector has suggested that he would like to give opportunity for everyone who made representations to the Core Strategy Publication Document to comment on the NPPF. Consequently, he will be inviting all participants to make further submissions to him regarding the implications of the NPPF on their original representation. He has given the Council two weeks to provide its own response on this matter, which will inform his consultation.

Officers' initial view is that the NPPF does not include anything that is so fundamentally different from the previous PPGs, PPSs and Circulars to cause the Council to change the general thrust of the Core Strategy. In particular, officers do not think that there is anything in the NPPF to require the Council to change its current position on the level of housing provision set out in the Core Strategy (a net annual average of 292 dwellings) and the approach taken on the Green Belt. However, it might be necessary to make a number of minor modifications to reflect its requirements. For example, the Council will have to edit the entire Core Strategy by deleting references to Planning Policy Statements, Planning Policy Guidance Notes and Circulars that are superseded by the NPPF and replace them where relevant with the NPPF. At this stage, it will be difficult to speculate on what those minor modifications might be and/or provide a comprehensive assessment of that for Council to consider as the Inspector's request was made on 4 April 2012 and the deadline for Council papers is due on 5 April 2012. Consequently, the Council is requested to delegate authority to the Deputy Chief Executive in consultation with the Portfolio Holder for Planning and the LDF Working Group to agree and send to the Inspector a statement of any minor modifications that the Council may wish to make to reflect the NPPF.

Members are reminded that the Council considered how the Core Strategy is in general conformity with the requirements of the DRAFT NPPF at its meeting on 8 December 2011. The Council's assessment at the time was that the Core Strategy was in general conformity with the requirements of the DRAFT NPPF. The changes between the Draft and the final version are not significant enough and, therefore a major modification to the Core Strategy is not required. However, officers have already asked the Inspector to consider taking into account housing delivery from windfall sources, when considering his report. Officers have provided the Inspector with evidence to justify this request. This is something that he has noted to take into account. It has to be emphasised that the request to count windfall allowance will not change the Council's overall approach to housing provision. It might significantly strengthen the Council's case against the request to include in the overall level of housing provision some allowance for non-implementation.



**Reasons for Decision**

To provide up to date policy basis for the purposes of planning decisions in the light of the publication of the NPPF.

**Recommendations**

The Council is requested to:

**RESOLVE That**

1. **significant weight be given to the following policies of the Core Strategy for the purposes of development management and any other planning decision - Policies CS1, CS2, CS3, CS4, CS5, CS7, CS8, CS9, CS11, CS13, CS14, CS15, CS16, CS17, CS18, CS19, CS20, CS21, CS22, CS23 and CS24;**
2. **the policies in Appendix 2 that will not be superseded by the Core Strategy should be given due weight for the purposes of development management and other planning decisions.**
3. **delegated authority be given to the Deputy Chief Executive in consultation with the Portfolio Holder for Planning and the LDF Working Group to ensure that a statement is sent to the Inspector setting out the Council's assessment of the implications of the NPPF for the Core Strategy, including any minor modifications to the Core Strategy that may be necessary to reflect the requirements of the NPPF.**

**The Council has authority to determine the recommendations above,.**

**Background Papers:**

National Planning Policy Framework  
Sustainability Impact Assessment  
Equalities Impact Assessment

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**Date Published:**

5 April 2012

**Equality Impact Assessment**

The purpose of this assessment is to improve the work of the Council by making sure that it does not discriminate against any individual or group and that, where possible, it promotes equality. The Council has a legal duty to comply with equalities legislation and this template enables you to consider the impact (positive or negative) a strategy, policy, project or service may have upon the protected groups.

		Positive impact?			Negative impact?	No specific impact	What will the impact be? If the impact is negative how can it be mitigated? (action) <b>THIS SECTION NEEDS TO BE COMPLETED AS EVIDENCE OF WHAT THE POSITIVE IMPACT IS OR WHAT ACTIONS ARE BEING TAKEN TO MITIGATE ANY NEGATIVE IMPACTS</b>
		Eliminate discrimination	Advance equality	Good relations			
<b>Gender</b>	Men					+	
	Women					+	
	Gender Reassignment					+	
<b>Race</b>	White					+	
	Mixed/Multiple ethnic groups					+	
	Asian/Asian British					+	
	Black/African/Caribbean/Black British					+	
	Gypsies / travellers	+					
	Other ethnic group					+	

		Positive impact?	Negative impact?	No specific impact	What will the impact be? If the impact is negative how can it be mitigated? (action) <b>THIS SECTION NEEDS TO BE COMPLETED AS EVIDENCE OF WHAT THE POSITIVE IMPACT IS OR WHAT ACTIONS ARE BEING TAKEN TO MITIGATE ANY NEGATIVE IMPACTS</b>
<b>Disability</b>	Physical	+			
	Sensory	+			
	Learning Difficulties	+			
	Mental Health	+			
<b>Sexual Orientation</b>	Lesbian, gay men, bisexual				
<b>Age</b>	Older people (50+)	+			
	Younger people (16 - 25)	+			
<b>Religion or Belief</b>	Faith Groups			+	
<b>Pregnancy &amp; maternity</b>				+	
Marriage & Civil Partnership				+	
Socio-economic Background		+			

The purpose of the Equality Impact Assessment is to improve the work of the Council by making sure it does not discriminate against any individual or group and that, where possible, it promotes equality. The assessment is quick and straightforward to undertake but it is an important step to make sure that individuals and teams think carefully about the likely impact of their work on people in Woking and take action to improve strategies, policies, services and projects, where appropriate. Further details and guidance on completing the form are [available](#).

### Sustainability Impact Assessment

Officers preparing a committee report are required to complete a Sustainability Impact Assessment. Sustainability is one of the Council's 'cross-cutting themes' and the Council has made a corporate commitment to address the social, economic and environmental effects of activities across Business Units. The purpose of this Impact Assessment is to record any positive or negative impacts this decision, project or programme is likely to have on each of the Council's Sustainability Themes. For assistance with completing the Impact Assessment, please refer to the instructions below. Further details and guidance on completing the form are [available](#).

Theme (Potential impacts of the project)	Positive Impact	Negative Impact	No specific impact	What will the impact be? If the impact is negative, how can it be mitigated? (action)
Use of energy, water, minerals and materials	+			
Waste generation / sustainable waste management	+			
Pollution to air, land and water	+			
Factors that contribute to Climate Change	+			
Protection of and access to the natural environment	+			
Travel choices that do not rely on the car	+			
A strong, diverse and sustainable local economy	+			
Meet local needs locally	+			
Opportunities for education and information			+	
Provision of appropriate and sustainable housing	+			
Personal safety and reduced fear of crime	+			
Equality in health and good health			+	
Access to cultural and leisure facilities	+			
Social inclusion / engage and consult communities	+			
Equal opportunities for the whole community	+			
Contribute to Woking's pride of place	+			

**Appendix 1 of the Report to Council – 16 April 2012**

**National Planning Policy Framework (NPPF) Annex 3: Documents replaced by this Framework**

1. Planning Policy Statement: *Delivering Sustainable Development*(31 January 2005)
2. Planning Policy Statement: *Planning and Climate Change – Supplement to Planning Policy Statement 1* (17 December 2007)
3. Planning Policy Guidance 2: *Green Belts* (24 January 1995)
4. Planning Policy Statement 3: *Housing* (9 June 2011)
5. Planning Policy Statement 4: *Planning for Sustainable Economic Growth* (29 December 2009)
6. Planning Policy Statement 5: *Planning for the Historic Environment*(23 March 2010)
7. Planning Policy Statement 7: *Sustainable Development in Rural Areas*(3 August 2004)
8. Planning Policy Guidance 8: *Telecommunications* (23 August 2001)
9. Planning Policy Statement 9: *Biodiversity and Geological Conservation*(16 August 2005)
10. Planning Policy Statement 12: *Local Spatial Planning* (4 June 2008)
11. Planning Policy Guidance 13: *Transport* (3 January 2011)
12. Planning Policy Guidance 14: *Development on Unstable Land* (30 April 1990)
13. Planning Policy Guidance 17: *Planning for Open Space, Sport and Recreation* (24 July 2002)
14. Planning Policy Guidance 18: *Enforcing Planning Control* (20 December 1991)
15. Planning Policy Guidance 19: *Outdoor Advertisement Control* (23 March 1992)
16. Planning Policy Guidance 20: *Coastal Planning* (1 October 1992)
17. Planning Policy Statement 22: *Renewable Energy* (10 August 2004)
18. Planning Policy Statement 23: *Planning and Pollution Control*(3 November 2004)
19. Planning Policy Guidance 24: *Planning and Noise* (3 October 1994)
20. Planning Policy Statement 25: *Development and Flood Risk* (29 March 2010)
21. Planning Policy Statement 25 Supplement: *Development and Coastal Change* (9 March 2010)
22. Minerals Policy Statement 1: *Planning and Minerals* (13 November 2006)
23. Minerals Policy Statement 2: *Controlling and Mitigating the Environmental Effects of Minerals Extraction In England*. This includes its Annex 1: *Dust* and Annex 2: *Noise* (23 March 2005 - Annex 1: 23 March 2005 and Annex 2: 23 May 2005)
24. Minerals Planning Guidance 2: *Applications, permissions and conditions*(10 July 1998)
25. Minerals Planning Guidance 3: *Coal Mining and Colliery Spoil Disposal*(30 March 1999)
26. Minerals Planning Guidance 5: *Stability in surface mineral workings and tips* (28 January 2000)
27. Minerals Planning Guidance 7: *Reclamation of minerals workings*(29 November 1996)
- Minerals Planning Guidance 10: *Provision of raw material for the cement industry* (20 November 1991)
29. Minerals Planning Guidance 13: *Guidance for peat provision in England*(13 July 1995)
30. Minerals Planning Guidance 15: *Provision of silica sand in England*(23 September 1996)
31. Circular 05/2005: *Planning Obligations* (18 July 2005)
32. Government Office London Circular 1/2008: *Strategic Planning in London*(4 April 2008)
33. Letter to Chief Planning Officers: *Town and Country Planning (Electronic Communications) (England) Order 2003* (2 April 2003)
34. Letter to Chief Planning Officers: *Planning Obligations and Planning Registers* (3 April 2002)
35. Letter to Chief Planning Officers: *Model Planning Conditions for development on land affected by contamination* (30 May 2008)

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36. Letter to Chief Planning Officers: *Planning for Housing and Economic Recovery* (12 May 2009)
37. Letter to Chief Planning Officers: *Development and Flood Risk – Update to the Practice Guide to Planning Policy Statement 25* (14 December 2009)
38. Letter to Chief Planning Officers: *Implementation of Planning Policy Statement 25 (PPS25) – Development and Flood Risk* (7 May 2009)
39. Letter to Chief Planning Officers: *The Planning Bill – delivering well designed homes and high quality places* (23 February 2009)
40. Letter to Chief Planning Officers: *Planning and Climate Change – Update* (20 January 2009)
41. Letter to Chief Planning Officers: *New powers for local authorities to stop ‘garden- grabbing’* (15 June 2010)
42. Letter to Chief Planning Officer: *Area Based Grant: Climate Change New Burdens* (14 January 2010)
43. Letter to Chief Planning Officers: *The Localism Bill* (15 December 2010)
44. Letter to Chief Planning Officers: *Planning policy on residential parking standards, parking charges, and electric vehicle charging infrastructure* (14 January 2011)

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### Appendix 2 of the Report to Council – 16 April 2012

#### WBC/4: List of Saved (and Superseded) Development Plan Policies

WBLP 1999 Policies	Saved Local Plan Policies	Policies to Supersede Local Plan Policies
<b>Key Objectives</b>		CS1
<b>Natural Environment Policies</b>		
NE1		CS7, CS8
NE2		CS7
NE3		CS7, CS17, CS21, CS24
NE4		CS7, CS17, CS24
NE5		CS7
NE6		CS17
NE7		CS24
NE8	NE8	
NE9	NE9	
NE10		CS21, CS24
NE11		CS9
<b>Built Environment Policies</b>		
BE1		CS21
BE2		CS21
BE3		CS21
BE4		CS21 (proposed changes)
BE5	BE5	
BE6		CS22, CS23
BE7		CS17
BE8		CS20
BE9	BE9	
BE10	BE10	
BE11		CS20
BE12		CS20
BE13		CS20
BE14		CS20
BE15		CS20
BE16		CS20
BE17		CS20
BE18	BE18	
BE19	BE19	
BE20	BE20	
BE21	BE21	
BE22	BE22	
<b>Green Belt Policies</b>		
GRB1		CS6
GRB4		CS6, CS10
GRB6	GRB6 (to be deleted after implementation of proposals)	

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<b>WBLP 1999 Policies</b>	<b>Saved Local Plan Policies</b>	<b>Policies to Supersede Local Plan Policies</b>
<b>Housing Policies</b>		
HSG2		To be deleted
HSG5		CS10
HSG6		CS10
HSG8		CS10
HSG9		CS11
HSG10		CS12
HSG11	HSG11	
HSG12		CS1, CS2, CS10
HSG13		CS13
HSG14		CS13
HSG15	HSG15	
HSG16	HSG16	
HSG18		CS10, CS17, CS20
HSG19		CS10, CS21
HSG20		To be deleted
HSG21		CS21
HSG22	HSG22	
HSG23	HSG23	
HSG24	HSG24	
<b>Employment and Economic Development</b>		
EMP1		CS15
EMP2		CS3, CS4
EMP3		CS15
EMP4		CS15
EMP5		CS15
EMP6		CS15
EMP7		CS3, CS4, CS15
EMP8		CS15
EMP9		CS2, CS15
EMP10	EMP10	
<b>Shopping</b>		
SHP1		CS1
SHP2		CS1, CS2, CS3, CS4, CS15
SHP3		CS3, CS15
SHP4		CS3
SHP5		CS3
SHP6		CS4, CS15
SHP7	SHP7	
SHP8		CS2, CS3, CS4
SHP9		CS21 (proposed changes)
SHP10	SHP10	
<b>Leisure, Recreation and the Arts</b>		
REC1		CS17



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<b>WBLP 1999 Policies</b>	<b>Saved Local Plan Policies</b>	<b>Policies to Supersede Local Plan Policies</b>
REC2		CS17
REC3		CS17
REC4		CS17
REC5		CS19
REC6		CS19
REC7	REC7	
REC8	REC8	
REC9	REC9	
REC10	REC10	
REC11		CS17, CS19
REC12		CS17
REC13		CS17
REC14	REC14	
REC15		To be deleted
REC16	REC16	
REC17	REC17	
<b>Community and Utility Services</b>		
CUS1		CS19
CUS2		CS19
CUS3		To be deleted
CUS4		To be deleted
CUS5		To be deleted
CUS6	CUS6	
CUS7	CUS7	
CUS8		CS23
CUS9		CS23
CUS10		CS19
CUS11	CUS11	
CUS12	CUS12	
<b>Movement</b>		
MV1		CS18
MV2		CS16, CS18
MV3		CS18
MV4		CS16, CS18
MV5		CS18
MV6	MV6	
MV7	MV7	
MV8		To be deleted
MV9		CS18
MV10		To be deleted
MV11		To be deleted
MV12	MV12	
MV13		To be deleted
MV14		CS18
MV15		CS2, CS18
MV16	MV16	

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<b>WBLP 1999 Policies</b>	<b>Saved Local Plan Policies</b>	<b>Policies to Supersede Local Plan Policies</b>
MV17		CS18
MV18		CS18
MV19		CS18
MV20		CS18
MV21		CS18
MV22	MV22	
MV23		CS18
MV24		To be deleted
MV25		CS18
MV26		CS18, (schemes may be deleted after review by Surrey County Council)
MV27		CS18
<b>Woking Town Centre</b>		
WTC1		CS2, CS21
WTC2		CS21
WTC3		CS21
WTC4		CS21
WTC5		CS21
WTC6	WTC6	
WTC7		CS2
WTC8		CS2, CS10
WTC9		CS2
WTC10		CS2
WTC11		To be deleted
WTC12		CS2
WTC13		CS2
WTC14		CS2
WTC15		CS2
WTC16		To be deleted
WTC17		To be deleted
WTC18		CS18
WTC19		CS1, CS2, CS18
WTC20		CS1, CS2, CS18
WTC21		CS18
WTC22		CS18
WTC23		To be deleted
WTC24		Proposals Map
<b>Village Centres</b>		
VCN1		CS4
VCN2		CS4
VCN3		CS21
VCN4		CS18
<b>Resources and Implementation</b>		
IMP1 (site assembly)		Section 6 - Implementation and monitoring

**WBC/37**

<b>WBLP 1999 Policies</b>	<b>Saved Local Plan Policies</b>	<b>Policies to Supersede Local Plan Policies</b>
IMP2		Section 6 – Implementation and monitoring
IMP3		CS16, Section 6 – Implementation and Monitoring