

# Core Strategy Issues and Options Consultation

(26 October – 7 December 2009)

## Key Issues Raised, Officer Response and Officer Recommendations

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## 1.0 Spatial vision

Overall, the majority of respondents agreed with the spatial vision set out in the Issues and Options document. However, a significant number of people disagreed on specific aspects of the vision.

#### Key issues raised:

- Increasing overdevelopment of the Borough There have been a number of concerns about the vision, in particular on its emphasis on promoting growth in the Borough. Many respondents are resistant to further growth in the Borough. They certainly disagree with any further growth within the Green Belt. Many people thought that if there should be growth, it should be controlled and be sustainable. Others claimed that the Issues and Options document did not provide any evidence to suggest that growth will be sustainable. The impact of development on flooding was a significant concern to many.
- 2. Infrastructure Lack of infrastructure to support growth. Existing infrastructure in many areas is poor and disintegrated.
- 3. Woking Borough is unattractive and new development could exacerbate that.
- 4. There should be no further office development. Effort should be concentrated on bringing vacant land to productive use.
- 5. Matters raised that are beyond the remit of spatial planning and/or the Core Strategy – more emphasis should be given to the management of Council finances, street cleaning and waste control should be properly managed, immigrant population and their effective integration into the wider community should be a priority, the Canopy at the station has been a waste of money.
- 6. Vision should emphasise Woking's role as a transport hub.

#### Officers' Response

1 A vision for the Core Strategy will encapsulate the aspirations of the local community and provide a sense of focus for the policies and proposals of the Core Strategy. In this regard, the principle of having a vision in the Core Strategy that sets out how the Borough and the places within it should be develop is a sound one to have. Planning Policy Statement 12 recommends that the vision for an area should be informed by an analysis of the characteristics of the area and the key issues and challenges facing it. Furthermore, a vision should be in general conformity with the aspirations of the community as expressed in the Sustainable Community Strategy. An attempt has been made to ensure that the vision reflects these points.

There is enough evidence to confirm that growth will occur in the Borough during the period of the Core Strategy. The population of the Borough is predicted to increase from 92,200 in 2008 to 94,488 by 2026. Household formation will continue to change. There is also evidence through the Strategic Housing Market Assessment that there will continue to be significant need for affordable housing. Furthermore, the Government through the South East Plan require the Council to make provision for 5840 net additional dwellings between 2006 and 2026. The Employment Land Review carried out by the Council identifies a projected need for office, retail and industrial floorspace. Based on this evidence, it is clear that growth is needed and the right framework should be established to enable that to be delivered in a sustainable manner.

The Council accepts that growth should be sustainable and should be effectively controlled. In this regard, it seeks to locate most new development in sustainable locations where keys services are readily available and accessible by all modes of transport, in particular, public transport, walking and cycling. Views have been sought about how best to spatially distribute development and comments received will inform the preferred approach to the overall development strategy of the Core Strategy.

When development occurs, the Core Strategy will include robust and sufficiently comprehensive set of policies to ensure that they are well integrated into the existing character of the area and are of high quality.

The protection of the Green Belt will be an essential objective of the Core Strategy in accordance with national planning policy. The Council is carrying out a Green Belt Study. The outcome of the study will determining whether there are any areas of the Green Belt that can be released for development without undermining its overall objective of protecting its openness.

The Council has already carried out a Strategic Flood Risk Assessment to inform its spatial distribution of development. Together with further controls that will be imposed through development management, the Council is confident that the impacts of development on flooding can be minimised.

- 2 The Council recognises the importance of infrastructure provision to support growth that will be identified in the Core Strategy. It is a requirement for the Council to prepare an Infrastructure Delivery Plan setting out what, how, where, how and when specific infrastructure will be provided. This will be key evidence to support the Core Strategy at an Examination in Public. There is no doubt that there are existing deficiencies in infrastructure provision and the Council will continue to work with its partners to bridge this gap. There is an on-going debate about the mechanism for securing funding towards infrastructure provision in the Borough and the Council will make a decision on this matter when the Government's Community Infrastructure Levy is finally introduced. Views had been sought on various options for securing developer contributions. Majority of respondents has expressed preference for the introduction of Community Infrastructure Levy as the mechanism for securing developer contributions towards funding infrastructure provision in the Borough. This will be taken into account at the preferred options stage.
- 3 Many people do not share the view that Woking Borough is an unattractive place to live, work and visit. It is therefore helpful for the vision to emphasise that the Core Strategy will seek to promote and facilitate an attractive environment in the Borough. It will seek to do so through well designed development and regeneration of redundant and outmoded areas, better integration of development and transport infrastructure and high standards of sustainable construction.
- 4 The Council will continue to provide positive framework to bring back vacant properties into effective use. The Employment Land Review carried

out by the Council has done a market assessment of vacant employment land in the Borough to facilitate this process. However, the requirements of modern businesses and the need for buildings to meet high environmental quality standards might mean that in certain circumstances, new office development might be the most appropriate option. Where this is the case, the Council will seek to ensure that its location and quality meets all required standards.

- 5 These matters are beyond the remit of spatial planning and the Core Strategy in particular. However, the comments will be passed on to the appropriate Business Managers of the Council for their consideration.
- 6 Woking's role as a Regional Hub is already established by the weight accorded it in the South East Plan. No doubt, the Station and its environs is one of Woking's key assets. The current Local Plan identifies it as area for redevelopment. It is therefore reasonable to refine the vision to include aspirations for the redevelopment of the area. Transport for Woking is working to establish this aspiration and the outcome of its work should feed into the Core Strategy process in refining the vision.

#### Recommendation

- The development of the vision is work in progress. In particular, the Council should continue to refine it to ensure that it is locally distinctive and provides a visionary portrait of how the area should look like by 2026. This should include how it wants the station and its approach to be developed.
- There is no doubt that growth will occur during the life of the Core Strategy. However, the vision could further be refined to include the nature and type of growth that is envisaged. A number of evidence based studies are on-going, which when completed will inform any changes to the vision. For example, the Character Assessment will provide a clear idea about what is in the Borough that should be protected. Any further refinement to the vision will be reported to the Working Group at the preferred options stage of the process.

## 2.0 Objectives

A number of objectives have been suggested as missing from the list identified in the document. Many of these suggestions are beyond the remit of the LDF, and certainly the Core Strategy. Appropriate sections of the Council will be notified of relevant comments for their consideration.

## 2.0.1 Key issues raised:

- 1. Need for optimal integration of cars, cycles and pedestrians with the aim to minimise delay and pollution and improve air quality. Car use has its benefits and provision should be made to facilitate that, including improvements to the existing road network. Need to reduce congestion.
- 2. Lack of public transport and its implications on social exclusion.
- 3. Need for high quality railway.
- 4. There should be homes to meet all needs of the community.
- 5. Consideration should be given to flood alleviation and low density development.
- 6. Need to maintain and enhance the green infrastructure of the area.
- 7. Objective 4 should be reworded to emphasise enough new homes should be built to meet local need and demand.
- 8. The objective of promoting growth is inconsistent with the quality of environment and 'Green' objectives. Growth should not be the expense of existing residents.
- 9. Objective should include how to meet the needs of people with learning disability and the handicapped.
- 10. Protection and enhancement of the historic environment should be included.
- 11. Lack of infrastructure and basic services. Railway station and roads are in poor condition.
- 12. Objective 12 should refer to 'community facilities' rather than 'community centres'.
- 13. Culture and leisure facilities should be included in the list of objectives.
- 14. Green Belt land should not be built on at all.
- 15. Poor Green Belt land should be sacrificed for development build out rather than up. Encourage low density development; Greenfield development in certain instances may be necessary. Infilling in the Green Belt should be allowed.
- 16. Encourage walking and cycling and provide the necessary infrastructure to enable that to happen safely.
- 17. There should be limited development at the town centre, in particular, less dense development.
- 18. Renewable energy is not always sustainable.
- 19. Redevelop outmoded buildings/areas.
- 20. Partnership working with key stakeholders should be encouraged.
- 21. Definition of vibrant should be given.
- 22. LDF should be flexible to accommodate change and be an accountable action plan for short to long term.
- 23. Basingstoke Canal should be included as a feature of the town centre and visitors should be encouraged to come to the centre by water.
- 24. Re-use empty homes for housing.
- 25. Brewery Road Car Park should not be included in the town centre boundary.
- 26. The objectives should be delivered.

## 2.0.2 Officers' Response

- 1 Transport and Accessibility is recognised and covered as a key objective in the Issues and Options document (objective 10). A key aim will be how to promote effective integration of all modes of travel. It is expected that by delivering this objective it will also help to reduce congestion and consequently improve air quality. Options for addressing traffic congestion, improving Woking Station and parking at the various other stations have identified for people to comment on. Comments received will inform preferred options for this topic. Also see response under Transport and Accessibility.
- 2 See 1 above.
- 3 Woking Station is a key asset for the borough and its improvement could have significant strategic implications. It is therefore reasonable to emphasise that within the text of objective 10.
- 4 This is already covered in the list of objectives.
- 5 Flooding and density of development has already been identified as key issues to be considered in the Core Strategy. The comments received during the consultation exercise will assist in identifying preferred options for addressing these issues.
- 6 This matter is already covered in the list of objectives.
- 7 An assessment will be carried out to determine whether the Council should plan to meet need or need plus demand. A decision will be made at the preferred options stage.
- 8 Growth will be managed to the benefit of local residents. In particular, the Core Strategy will seek to manage growth to provide good quality housing to meet local need, create jobs and ensure that development is well integrated into the character of the area.
- 9 The Core Strategy is intended to meet the needs of all sections of the community. Groups representing people with a disability will be consulted about how best the provisions of the Core Strategy can meet their specific needs.
- 10 Protection and/or enhancement of the historic environment are what define the heritage of an area. It is therefore reasonable for this to be reflected in the objectives. The objectives should be refined to include this, but it is suggested that this be informed by the Character Assessment study when it is completed.
- 11 An Infrastructure Delivery Plan is being prepared to determine the level of infrastructure requirement that will be necessary to support the implementation of the Core Strategy.
- 12 See 11 above.
- 13 See 11 above.
- 14 Growth within the Green Belt is adequately covered under the vision section (questions 4 and 5) and the Green Infrastructure and the Environment section.
- 15 See 14 above.
- 16 See 1 and 11 above.
- 17 Development at the town centre is adequately covered under the economy and retail topics.
- 18 The contribution of renewable energy to mitigating the effects of climate change is well documented. The Council will continue to encourage this where it is appropriate to do so and it is recommended that this should remain a key objective.
- 19 An Employment Land Review and Strategic Housing Land Availability Assessment have been carried out to appraise existing buildings and

their potential for development. In particular, the nature and type of uses that they can be put to. This will inform future allocations of land for development and a better understanding of the supply of land for development. The preferred options stage and/or the site allocations Development Plan Document (DPD) will take this issue further.

- 20 The Council has a good track record of working in partnership with its stakeholders. Woking Partnership is a classic example. It will continue strengthen this in all areas of its work where relevant.
- 21 The definition of 'vibrant' will be included in the glossary section of the document.
- 22 One of the key requirements of the Core Strategy is its flexibility to accommodate potential future changes. The Council will be concerned to ensure that Core Strategy has in-built flexibility to accommodate change.
- 23 The Basingstoke Canal is a feature of the town centre. Its potential will continue to be explored as we progress the Core Strategy. All appropriate organisations with interest in the use of the canal will be consulted to identify options to maximise its full potential.
- 24 See 19 above.
- 25 This has been addressed under the retail topic.
- 26 The Core Strategy will include an implementation plan to demonstrate how its provisions will be delivered. An Infrastructure Delivery Plan is also being prepared to demonstrate how infrastructure support for the Core Strategy will be delivered.

#### 2.0.3 Officer recommendations

- The objectives should be refined to emphasise the significance of Woking Railway Station as an important asset of the Borough.
- The protection and enhancement of the historic environment and character should be emphasised in the objectives.
- The value and potential use of the Canal as a key feature of the town centre should be explored. Interested organisations should be consulted on this matter before a final decision is made.

## 3.0 Key Issues Not Covered in Issues and Options

People were asked about whether there are any other issues that are not covered in the list identified in the Issues and Options document that they wish to add.

## 3.0.1 Key issues raised:

- 1 How to provide facilities that can be more efficiently shared with neighbouring boroughs.
- 2 Lack of everyday shops for food.
- 3 Leisure facilities for the economically inactive.
- 4 Free monorail system for bringing people to Woking.
- 5 Attract more shops and work in the town centre to provide better choice.
- 6 Crime.
- 7 Local resilience to energy supply reductions as fossil fuel becomes scarce.
- 8 Wellbeing should be measured using indicators from New Economic Foundation. A local authority in Wales has introduced this methodology.
- 9 Education vocational training.
- 10 A safe, caring and supportive environment for all.
- 11 Ineffectiveness of infrastructure.
- 12 Culture and Leisure.
- 13 Issues have to be implemented to give local people trust in their town.
- 14 Full use of agricultural land for local food.
- 15 Lack of public spaces.
- 16 Social inequalities and health issues.
- 17 Green Infrastructure and environment should have a specific objective.
- 18 Preserve the Green Belt.
- 19 Climate change should be combined with Green Infrastructure.
- 20 Effective use of the Green Belt. Some Green Belt land does not contribute to its overall objectives in any real positive way. They should be identified for development.
- 21 Better relationship between built and natural environment.
- 22 Core Strategy should be robust against economic downturn.
- 23 Hotel and catering.
- 24 Public transport.
- 25 Attractiveness of the town centre.
- 26 Set out a clear strategy to re-order land use and movement.

#### 3.0.2 Officer response

The Document lists seven broad category of issues including housing, green infrastructure and the environment, economy, climate change, buildings and public spaces, infrastructure and services and transport and accessibility. Under this broad category of issues are sub issues that define their detailed aspects. This response analyses the comments and determine whether they are already covered by the broad category of issues and/or the sub issues, and if not, how they should be addressed.

1 As a matter of course, the Council will continue to work with neighbouring authorities and its stakeholders to explore possibilities of shared working, including co-location to maximise □ efficiency in the delivery of its services and use of resources. There are existing structures such as Transport for Woking, Woking Partnership, Planning Working Group etc. that are designed to facilitate effective partnership working and to share good

practice. The Council will continue to build on this.

- 2 This is covered under Economy. The Economy issue deals with retail, in particular how to attract a vibrant retail economy at the various retail centres.
- 3 Infrastructure and services as well as the Green Infrastructure and the Environment section adequately covers the provision of leisure facilities. The provision of leisure facilities will be designed to benefit all sections of the community including the economically inactive. There is no overriding reason given to justify singling out the economically inactive when it comes to the provision of leisure facilities.
- 4 This is a matter which will be considered under transport and accessibility and does not merit being identified as a separate category of issue.
- 5 See 2 above.
- 6 The Core Strategy's role in dealing with crime will be through setting appropriate design framework to reduce the fear of crime and design out crime. This will be covered by the Building and Public Spaces section.
- 7 This covered under climate change.
- 8 An important and integral part of the Core Strategy will be monitoring its delivery to ensure that its policies are achieving their objectives. The outcome of the monitoring process will be reported in an Annual Monitoring Report that will be produced at the end of each year. The appropriateness of this methodology will be explored as part of this monitoring process.
- 9 This is covered under Infrastructure and Services. Furthermore, an Infrastructure Delivery Plan will be prepared and this will set out how necessary infrastructure will be provided to support growth in the Core Strategy.
- 10 The totality of the Core Strategy will seek to achieve this goal.
- 11 See 9 above.
- 12 The provision of leisure facilities is already covered. However, further work will need to be done to assess the merit of highlighting culture as an issue for Woking.
- 13 The Core Strategy will include an Implementation Plan which will set out how various policies will be implemented. An Infrastructure Delivery Plan will also be prepared as a key evidence base to support the delivery of the Core Strategy.
- 14 This is beyond the remit of the Core Strategy. What the Local Development Framework can do is to ensure that the best and most versatile agricultural land is not used for alternative uses.
- 15 This is covered under Building and Public Spaces and the Green Infrastructure and the Environment.

- 16 The Policies and proposals of the Core Strategy will be designed to meet the needs of all sections of the community, including affordable housing for the young and low paid, provisions of housing for the elderly and Gypsies etc.
- 17 This is already recognised as a key issue.
- 18 Issues about the Green Belt are comprehensively covered under Green Infrastructure and the Environment. Furthermore, a Green Belt study is being carried out to assess how well the Green Belt can be protected. Other sections such as the vision and objectives also address this matter comprehensively.
- 19 It is believed that the two issues are distinct in their nature and should be kept separate. Climate change is a cross cutting issue that affects all the other issues covered by the Issues and Options document and should be treated as a distinct topic. If it were to be combined with one topic area as suggested, then a case can be made for it to be combined with the rest of the other topics and, which could lead to unnecessary repetitions across the document.
- 20 See 18 above.
- 21 The Core Strategy will seek to strike a good balance between the two.
- 22 This is addressed under Economy. However, the Core Strategy will have an in-built flexibility to adapt to changing circumstances.
- 23 See 22 above.
- 24 Covered under Transport and Accessibility.
- 25 This is comprehensively addressed under Economy. The town centre is identified as a specific issue for consideration under this category.
- 26 The allocation of development in the Core Strategy will be made in the context of an overall spatial distribution strategy that will sustainable and encourages the use of public transport, reduce the need to travel and facilitate easy movement of people and goods and services to and from the Borough.

## 4.0 Housing

#### 4.1 Location of new housing

This Issues and Options consultation proposed three broad options for the location of new housing in the Borough.

**Option A** was based on past housing completion rates since the adoption of the Local Plan in 1999, and adjusted to take into account developments at Brookwood Farm and Moor Lane.

**Option B** was based on a higher proportion of development in the town, district and local centres. This is based on evidence from the Strategic Housing Land Availability Assessment (SHLAA) and is also in line with the approach set out in the Council's first Core Strategy. This option would have implications on the levels of family housing provided.

**Option C** was based on the assumption that 10% of our housing allocation will be provided in the form of a small urban extension, which may be on one larger or several smaller sites. This option would enable us to secure more affordable family housing. A higher percentage of affordable housing would be secured on former Green Belt land.

Of the 362 who responded to this question, 46% preferred Option B, with 27% favouring Options A and C. Respondents were invited to explain the reasons behind their choice of option. Respondents' preferred options varied depending on a range of factors. In general terms, however, it can be seen that those who stated a preference for Option B are split between those who wish to see the protection of the Green Belt and those who wish to retain the character of the existing residential areas.

## 4.1.1 Key issues raised:

- 1. The Green Belt and open spaces should be protected at all costs to protect biodiversity.
- 2. The Green Belt should be protected to retain the separation between Woking and Guildford.
- 3. Infill development/ expansion of the villages may lead to them 'joining up'.
- 4. The town centre is already developed at a high density and may not be able to cope with significant additional development.
- 5. There was concern that development in the urban area would compromise the existing character of neighbourhoods.
- 6. Infill development should be sympathetic to the existing character.
- 7. Development in the town centre would not provide the family housing needed.
- 8. Development should be focussed in the town centre to reduce the number of car journeys.
- 9. Development in the town centre will increase traffic congestion within and around it.
- 10. Acknowledgment that some areas of land designated as Green Belt in the Borough is of low value.
- 11. Developing on the Green Belt is likely to deliver more affordable housing.

- 12. Green spaces should be preserved for leisure uses.
- 13. There is a need to protect employment land.
- 14. Development focussed in the town centre would make it a more vibrant place.
- 15. Development in the Boroughs centres will increase vitality of those centres and reduce reliance on the car.
- 16. Perception that there are too many flats in the town centre.
- 17. There was a concern that the necessary infrastructure would not be in place to support the additional development.
- 18. Housing need may have changed due to the recession.
- 19. High density town centre development may lead to the creation of 'ghettos'.
- 20. It is more difficult to plan for the additional infrastructure required to support small, piecemeal development than it is on larger, greenfield sites.
- 21. Over crowding in the existing urban area will lead to increased social issues.
- 22. Concern over whether the Council consider the allocation of 292 dwellings per annum as a maximum target or if there are plans to over provide in order to meet identified need and the implications of this.

Respondents were also asked to suggest alternative options for the location of new housing. Suggestions included:

- 23. Developing on some of the Borough's golf courses.
- 24. Building houses on land currently used for retail and industrial space.
- 25. Redevelopment of existing residential and other brownfield areas.
- 26. Increase number of houseboats on the canal.
- 27. Consider de-designation of low value Conservation Areas and low density residential areas and allow redevelopment and the permission of higher density infill development in those areas.
- 28. Consider expansion of the town centre.
- 29. Maximise the potential to re-use existing residential and office buildings, e.g. through conversion to flats.
- 30. Allow taller buildings in some town and edge of town locations, dependant on character.
- 31. Bring empty homes back in to use.
- 32. Consider building mobile home parks.
- 33. MOD land (n.b. Officers are not aware that there is any MOD land in Woking Borough).

#### 4.1.2 Officer response

The case for growth in the Borough, including residential development, is clearly made under the vision and objective section of the report. It is accepted as a matter of principle that residential development should be located at sustainable locations where facilities and services are in close proximity and are readily accessible by sustainable modes of travel such as walking, cycling and public transport. The specific allocation of sites for residential development will be influenced by a number of factors, including the SHLAA and SHMA, the spatial vision and objectives and other Council policies such as the Sustainable Community Strategy and the Housing Strategy. The suggested options will be considered against the entire evidence base before preferred options are selected.

There are obvious pros and cons for each of the three options presented and the opinion of those residents responding to the questionnaire is generally split depending on their location in the Borough. These comments will be taken into account in the assessment of the options.

The potential for development in the Green Belt is comprehensively covered under the vision and objectives and Green Infrastructure and the Environment sections of this report. The Council is carrying out a Green Belt Study to assess the likelihood of development on specific parcels of Green Belt land without undermining its overall integrity. There is nothing further to add which will not be a repetition of what has been said elsewhere in the report.

## 4.1.3 Officer Recommendation

The Council's Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment (SHMA) will be updated after 1 April 2010. This will provide an up to date picture of housing land supply and housing need in the Borough. Further analysis of the sites identified in the SHLAA will be undertaken to identify the likely size, type and tenure that will be achievable and an assessment will be made about the extent to which the sites will meet identified need.

It is likely that Option B will not provide the level of affordable family housing needed in the Borough and the Council will need to consider alternative options for the provision of affordable housing if it is not be provided through the new development planned for in the Core Strategy.

## 4.2 Size and type of housing

Two options were presented for consideration concerning how to plan for an appropriate mix of housing in terms of size and type of unit:

- Option A: Allow market forces to dictate the size and type of new homes delivered, but ensure that larger sites provide an appropriate mix.
- Option B: Plan and provide for a mix of dwellings to meet local need and demand (19% 1 bed, 40% 2 bed, 27% 3 bed, 14% 4+ bed).

Of the 371 who responded, 63% preferred Option B with 37% preferring Option A.

#### 4.2.1 Key issues raised:

Issues raised listed under para 4.1.1 location of new housing.

#### 4.2.2 Officer response

Providing an appropriate mix of housing is important to meet the needs of existing residents and for providing choice to attract new residents to the Borough. The dwelling mix for market housing presented in Option B is evidenced through the SHMA, which is to be updated regularly. A policy for housing mix which is based on a SHMA will allow a flexible approach to provision over the lifetime of the Plan. Allowing market forces to dictate provision may mean that evidenced need is not met.

## 4.2.3 Officer recommendation

That the Council develop a housing policy that takes into consideration the provision of new housing which meets identified need as evidenced through the SHMA.

## 4.3 Density of housing

Two options were presented for consideration concerning how to plan for the efficient use of land through the prescription of housing densities. Option A was to allow market forces to dictate density. Option B was to set targets for specified densities by location based on sustainability factors, Government targets and local character. Of 369 responses, 83% said they favoured a policy based on Option B.

#### 4.3.1 Key issues raised:

Issues raised listed under para 4.1.1 location of new housing.

#### 4.3.2 Officer response

The Council's policy on density will be linked to the choices made regarding the location of new housing development. For example, if Option B is chosen for the location of new residential development, it may require a policy that dictates higher densities in the town centre.

The approach set out in Option B is in line with that pursued by the Council in the first submission Core Strategy.

#### 4.3.3 Officer recommendation

That the Council develop a policy based on specifying indicative densities dependant on location, sustainability factors, Government targets and local character.

#### 4.4 Affordable housing

Four questions were asked about how the Council should seek to provide affordable housing through the planning system. The key findings from the survey are presented below.

- 58% of respondents agreed that the best option was to set different affordable housing **thresholds** for different parts of the Borough, linked to economic viability and local need. All of the other three options were supported by between 13% to 15%.
- 68% said that the **percentage** of new housing that should be provided as affordable should be set by adopting a range depending on location, economic viability and local need. Of the other two options listed in the survey, 19% said that the Council should continue to seek 40% on qualifying sites in line with the regional target.

- The consultation also asked what should the proportion between different types of affordable housing be on sites that meet the site size threshold. Four options were listed in the survey. Two thirds of respondents (66%) favoured a policy where the split should be determined on a case by case basis, dependent on location linked to economic viability and local need. The next highest option was 16% preferring to retain the current policy of 85:15 split between social rented and intermediate housing.
- 43% said that affordable housing should only be sought through residential developments. This was the preferred option by a small margin as 36% supported the idea that developments for all new commercial land uses should be required to provide affordable housing. A further 21% said that developments for additional office and industrial floor space should be required to provide affordable housing.

#### 4.4.1 Key issues raised:

Issues raised listed under para 4.1.1 location of new housing.

## 4.4.2 Officer response

The South East Plan provides the strategic policy context for a substantial increase in the amount of affordable housing to be delivered in the region. The SHMA also identifies significant unmet need for affordable housing in the Borough. The findings of the SHMA are vital local information that cannot be ignored. Furthermore, the provision of affordable housing is one of the key priorities of the Council.

The South East Plan requires local authorities to set targets for the provision of affordable housing, taken into account evidence of local need. This is a view supported by PPS3. PPS3 is clear that affordable housing targets should reflect an assessment of the likely economic viability of land for housing within the area, taking into account risk of delivery. The Council is in the process of carrying out an Economic Viability Assessment. The outcome of this study will inform the policy approach and targets that will be promoted in the Core Strategy.

The delivery of affordable housing is a key issue to be considered as part of the Core Strategy. The conventional approach has been that the majority of affordable housing has been secured on the back of market housing. It is likely that the current funding streams alone will not be enough to deliver the affordable housing needed in the area. Alternative arrangements for securing additional funding have therefore been consulted on. The statistical analysis of the comments made will be a useful basis for further consultation and investigation, in particular, with development interests.

#### 4.4.3 Officer recommendation

That the Council updates the evidence base on housing need through the SHMA and considers the implications of policy options in terms of financial viability of sites through the Economic Viability Assessment. Further engagement with key stakeholders will take place over the coming months to

develop the preferred approach, particularly in liaison with the update of the Council's Housing Strategy.

## 4.5 Gypsies and Travellers

There was a more or less equal split between the two options presented for the provision of accommodation to meet the needs of Gypsies and Travellers. Of 368 respondents, 51% preferred to identify broad locations in the Core Strategy and 49% preferred not to identify broad locations through the Core Strategy.

#### 4.5.1 Key issues raised:

Issues raised listed under para 4.1.1 location of new housing.

## 4.5.2 Officer response

The Council is required to address the specific accommodation needs of Gypsies and Travellers through the LDF. The allocation of pitches is set at the regional level and the number for Woking will be determined through the Partial Review of the South East Plan, the outcome of which is expected in summer 2010, following the Examination in Public which is being held in February 2010. Until the allocation is known, it is difficult to plan for provision.

## 4.5.3 Officer recommendation

That the Council work with key partners including the Gypsy and Traveller community to identify sites with potential for Gypsy and Traveller accommodation through the review of the SHLAA. Officers will report developments on the Partial Review of the South East Plan to the next LDF Working Group.

## 4.6 Older people and other vulnerable groups

The final housing question was concerned with how the Council should plan for the specific needs of the elderly and other vulnerable groups and whether specific criteria should be set out in policy through the LDF. Views were split between those who considered that broad locations should be identified to meet specific needs (59%) and those who did not (41%). The need to provide housing for specific groups, particularly the elderly was raised as an issue by a number of respondents through the free text comments box in the consultation.

#### 4.6.1 Key issues raised:

Issues raised listed under para 4.1.1 location of new housing.

## 4.6.2 Officer response

Officers consider that there is currently insufficient information within the SHMA to provide adequate evidence for policy development in this area. Officers are currently considering ways in which the SHMA can be updated to include more comprehensive information on this topic. This is linked to work currently being undertaken to update the Council's Housing Strategy.

## 4.6.3 Officer recommendation

That further research is undertaken, in conjunction with key stakeholders, in to the specific requirements of older people and other vulnerable groups.

## 5.0 Green Infrastructure and the Environment

#### 5.1 Green Belt Boundary

#### 5.1.1 Key Issues raised:

- 1. Concerns about encroachment into the Green Belt and buildings being constructed on Green Belt land. Prevent the merger of Woking and Guildford. Consider the potential of non-residential development on released Green Belt land.
- 2. There is a risk of allocating Green Belt land for development in the urban fringe, due to perceived poor environmental quality, rather than recognising that such land can provide a 'buffer' between urban fringe and the wider Green Belt and countryside.
- 3. Green Belt in flood risk areas should not be released for development where it is identified that there are sufficient alternative sites with a low probability of flooding. Releasing Green Belt land to the east of the Borough is not supported due to the controlled waters.
- 4. Woking Sewage Treatment Works should be identified as a Major Developed Site in the Green Belt.

#### 5.1.2 Officers response

1-4. The Council strictly applies national planning policy and refuses new built form in the Green Belt unless it meets the criteria set out in national guidance PPG2 Green Belts.

PPG2 sets out five purposes of including land in Green Belts:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and

• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Core Strategy seeks to protect and preserve these various purposes.

Policy SP5 of the South East Plan states that '....However, in order to meet regional development needs in the most sustainable locations, selective reviews of Green Belt boundaries are required in the metropolitan Green Belt to the north east of Guildford, and possibly to the south of Woking'. A Green Belt Study is being carried out as part of the Evidence Base for the Local Development Framework, this will assess whether any part of the Green Belt can potentially be released for development without undermining its purpose. The Green Belt Study will also assess if any Major Developed Sites in the Green Belt should be identified to be given that status. If the study were to identify parcels of the Green Belt that can be released for development it will recommend the

most appropriate use. Other constraints within the Green Belt such as flood risk and SPA have been taken into account within the study. The study will be completed at the end of January 2010 and its outcome will inform the next stage of the process.

The Green Belt designation ensures that Woking and Guildford's towns and suburbs will not merge, Green Belt policy is robustly applied in both Boroughs. The preference for several small Green Belt land releases is noted.

## 5.2 Biodiversity

## 5.2.1 Key Issues raised:

Should explain what biodiversity is. There should be a policy on the protection of biodiversity and geodiversity. This should include local aspects such as Special Protection Areas, Ancient Woodland and Biodiversity Action Plan habitats and species. Should identify ways to link habitats, open spaces and Suitable Accessible Natural Greenspace. Previously developed land is often valuable for wildlife.

## 5.2.2 Officer response

The importance of biodiversity is recognised in the issues and options document by identifying it as an issue. Clarifying its meaning is noted. The Council will continue to reflect biodiversity needs in policy formulation; consideration will be given to giving this topic a specific policy. Reference to geodiversity, brownfield biodiversity and linking biodiversity habitats will be included. The Planning Policy Team will liaise with relevant organisations about biodiversity requirements in Woking Borough to inform the next stages of the process.

## 5.3 Areas at risk of fluvial flooding

## 5.3.1 Key Issues raised:

- 1. Not enough is done about flooding. No building on the flood plain. Should consider the need to increase waste flow. Policies should consider how to deal with outdated or inadequate drainage facilities. Drainage channels should be regularly inspected and maintained.
- 2. Establish off-river corridor wetland areas, where possible, that would promote and enhance biodiversity aims and objectives. Seek opportunities to reduce flood risk. Policy should strengthen consideration for measures that will reduce run-off and promote water storage and better ground permeability. This could include SUDS, green roofs, domestic water storage, permeable surface treatments, and new water features.
- 3. Flood zone 2 should also be included on the key diagram, rather than just flood zone 3. Further maps should be included to show locations of Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest, Sites of Nature Conservation Importance, geology and hydrology of the Borough.

- 4. Only fluvial flooding is considered, all potential sources of flooding should be considered, there should be a reference to sewer flooding.
- 5. Policies should ensure that flood risk is adequately covered, including change of use planning applications.
- 6. The Basingstoke Canal and banks needs to be cleaned up. Continue to support the Basingstoke Canal. Include information about the protection and enhancement of the historic, landscape, biodiversity and amenity value of canals and river corridors and their role in the future development of the Borough. Waterways should be highlighted more in the chapter.

#### 5.3.2 Officer response

4.0 Ways to reduce flood risk will be included in the text; it will emphasise measures that reduce run-off and promote water storage and better ground permeability. Drainage channels are not a Planning Policy matter; they are the responsibility of Surrey County Council, this information will be passed on to the County Council. The Council will discuss a flooding policy with the Environment Agency, and decide if information should be included about drainage facilities and waste flow.

The SFRA sets out that building is not appropriate in flood zone 3 of the flood plain. Will examine whether to include flood zone 2 and other environmental designations on the key diagram, or add further maps specifically for flooding and to illustrate the range of environmental designations in Woking Borough. A proposals map will be prepared as part of the LDF, all designations will be included on this.

When producing the flooding policy or supporting text, it should be made clear that it does not just relate to fluvial flooding. Planning applications relating to a change of use will be considered as one of the issues to be included in the emerging policy.

6. The cleanliness of the Basingstoke Canal and its banks is not a matter for the Core Strategy to deal with. The Council is supportive of the aims and objectives of the Basingstoke Canal and Wey Navigation.

#### 5.4 Open Space Provision

#### 5.4.1 Key Issues raised:

- Open spaces including some heathlands should be better managed and maintained. Maintain the status of Local Nature Reserves. Ensure there are green corridors between any small sites. Tree and woodland strategy documents should be produced. Improve urban fringe sites, where they are considered for release from the Green Belt allowing greater public access. Refer to the Accessible Natural Greenspace Standards by Natural England.
- 2. Where there is a watercourse on-site, preference should be made for providing some open space by the river, rather than a financial contribution

off-site. Open space requirements and financial contributions should be dealt with on a scheme by scheme basis.

- 3. Core Strategy fails to mention the formal role of sport. The role of sport and playing field land should be included in the Vision. An additional key objective should be added which recognises the role of sport in contributing to a wide range of spatial planning issues such as regeneration, health promotion, crime reduction, quality of life etc. Indoor sports provision is not mentioned. Consider a section on indoor and outdoor sports. The PPG17 Audit, part of the Evidence Base may need to be updated.
- 4. There should be a specific policy to address the cumulative recreation effects of residential development on the Thames Basin Heaths Special Protection Area (SPA). The Council need to review the Interim Strategy.
- 5. Add to paragraph 2.3 Special Areas of Conservation. The Hoe Valley crosses the Borough from west to east and much is designated as a Site of Nature Conservation Importance. The most important Biodiversity Action Plan habitats should be included; the lowland heathland and floodplain meadows. Should also be acknowledged that the main source of groundwater is the Lower Wey Chalk, an unconfined aquifer that is often directly linked to local surface waters.
- 6. Green Infrastructure. Networks of multi-functional greenspace should be identified. There should be a net gain in green infrastructure. Existing greenspace should be mapped. There should be a specific policy.
- 7. Landscapes. There should be a specific policy on landscapes, based on a Landscape Character Assessment.

#### 5.4.2 Officer response

- 1. The Council owns some of the heathland within the Borough, management plans are produced, in some cases they have to be agreed by Natural England. The Core Strategy cannot stipulate that management plans should be undertaken, however the Council will work with its partners regarding heathland issues. There are no plans to alter the status of Local Nature Reserves. A Tree Strategy is currently being produced by the Council.
- 2. Open space requirements and financial contributions will be examined in greater detail before a policy is drafted. An Infrastructure Delivery Plan is being prepared to assess need and delivery. Also methods for securing developer contributions are addressed under the Infrastructure Section.

- 3. Consideration will be given to including a reference to indoor sports provision in the Core Strategy. A review of the PPG17 Audit is being considered as part of the evidence base to support the Core Strategy.
- 4. There will be a specific policy relating to SPA matters, the Council will liaise with Natural England to ensure that it is robust. The Council acknowledges that the SPA Interim Strategy 2006 needs to be updated. However there are two additional pieces of Suitable Accessible Natural Greenspace that the Council hopes to acquire. When this has been agreed the Interim Strategy will be updated.
- 5. Special Areas of Conservation can be added to the description of the Borough. Will review whether the additional information on this topic should be included.
- 6. Further information relating to Green Infrastructure will be included. Will evaluate if a Green Infrastructure Strategy should be undertaken and which appropriate LDF document it should be. A map of Green Infrastructure will require clear geographical definition of the extent of Green Infrastructure in the Borough. This matter will have to be explored further to assess the merits of such mapping. Consideration will be given to whether the Core Strategy and/or the proposals map is the appropriate document to add any such mapping.
- 7. The need for a Landscape Character Assessment will be evaluated in the overall context of the development strategy of the Core Strategy. This assessment will determine the relevance of a specific landscape policy in the Core Strategy. Decisions about this will be made at the preferred options stage of the process.

## 5.4.3 Officer recommendation

Green infrastructure and environmental matters are a key element of the emerging Core Strategy. Consideration will be given if a Green Infrastructure Strategy is required as part of the Evidence Base. Some pieces of the Evidence Base need to be completed or reviewed, before final choices can be made.

## 6.0 Economy

#### 6.1 Location of new employment floorspace

64% respondents said they preferred option B to encourage redevelopment of outmoded and outdated office space in industrial estates to alternative employment uses, such as industrial and warehousing space rather than retaining office space within the industrial areas and encouraging redevelopment of outmoded and outdated office space here to cater for future needs.

#### 6.2 Loss of employment land to other uses

59% favoured option B outmoded and outdated employment premises in district and local centres and residential areas should be permitted to change to alternative uses, such as housing. 34% favoured option C of considering for release to alternative uses a limited number of under-utilised employment sites and allowing intensification of employment floorspace in existing industrial estates, with only 7% preferring option A to retain all land currently in employment use.

#### 6.3 Supporting Small Businesses and Business Start Ups

70% of people supported option B to encourage redevelopment of sites within the existing industrial areas to provide start-up space and small business units. This was by far the most popular option. 26% favoured the approach of encouraging the provision of serviced office accommodation in the town and district centres and only 5% supported option C to allocate additional land for start up units.

#### 6.4 Status of Existing Unallocated Employment Sites within the Green Belt

The views of respondents were fairly evenly split when it came to selecting the best approach to take to existing employment sites in the Green Belt. A slight preference for option B was shown with 54% of respondents seeking redevelopment of existing employment sites in the Green Belt for alternative uses whereas 46% supported option A to consider the formal allocation of existing employment sites in the Green Belt for employment use.

#### 6.5.1 Key issues raised:

- 1 The Core strategy will need to apportion any growth/potential for additional floorspace for main town centre uses to meet needs and when it is intended to happen, reflecting recent studies.
- 2 The Core Strategy will need to clarify how the PPS6 plan-making requirements on need and the sequential approach have been met in relation to any potential B1 (a) office allocations on sites outside town centres.
- 3 The need for, and type of, employment land and floorspace should be considered having regard to the role of 'smart economic growth'. Policy references to achieving smart growth to reflect Policy RE5 of the South East Plan should be made and that the supporting text should explain what the achievement of smart growth in the district requires and how it will be encouraged in terms of the six key principles: employment; enterprise; innovation and creativity; skills; competition; and investment in infrastructure, including transport and physical development. In order to promote smart growth and help reduce future transport demands, policy should actively encourage the development of communications technology infrastructure in accordance with Policies RE5 and T6 of the South East

Plan and set out how opportunities to promote advances in ICT and new ways of working through the development of ICT-enabled sites, premises and facilities and the support of home-based businesses will be realised.

- 4 With regards to the use of land for economic growth, there should be proposals, schemes and policies to ensure that flood risk, biodiversity and conservation, water resource efficiency and groundwater protection associated with the use of the land is considered and managed.
- 5 Policies should ensure that proposed uses surrounding existing employment sites be designed and managed so that they are both cognisant and sensitive to existing employment users.
- 6 Changes of outmoded and outdated employment premises in district and local centres and residential areas should be permitted on a case by case basis where the benefits and local need for the new use as compared to the benefits of retaining the employment use having respect to economic viability and deliverability is assessed.
- 7 The Core strategy should reinforce the suitability of underused employment sites for residential development particularly where it can be demonstrated that:
  - Existing use is incompatible with character of the area
  - Site makes limited local economic contribution
  - Unsuitability of the site for continued employment use can be demonstrated (poor letting history)

## 6.5.2 Officer response

- 1 Point noted and agreed. Both the Retail Study and draft Employment Land Review will provide details of floorspace requirements over the plan period for the main town centre uses (retail, leisure and office) and include information on the timing of provision.
- 2 In the event of any B1 (A) allocations being made on sites outside the town centres the Core Strategy will clarify how need and the sequential approach have been met in relation to any potential B1 (a) office allocations on sites outside town centres in line with guidance in new PPS4.
- 3 The draft ELR has considered the impact of smart economic growth on the need for employment floorspace for the Borough for the plan period. The impact of smart economic growth will be fully assessed in the final ELR. Policies in the core strategy will need to ensure regard is given to the role of smart growth to increase the region's prosperity while reducing its ecological footprint. In particular policies will need to ensure the promotion of the development of ICT enabled sites, premises and facilities suitable to support changing and flexible working practices and home based businesses.
- 4 Development of any proposed economic development sites will be covered by strategic environmental protection policies.
- 5 See above response
- 6 The draft market appraisal which forms part of the ELR provides an assessment of all the Borough's existing employment areas/sites and has considered the continued suitability for employment use based on a wide variety of factors including letting history and compatibility with surrounding uses, in line with Government Guidance on the production of ELR's.

## 6.5.3 Officer recommendation

An Employment Land Review is being carried out. This is due to be completed by the end of January. The findings of this study will assist in addressing many of the concerns raised and will be used to inform the next stages of the Core Strategy.

### 6.6 Extent of the Town Centre Boundary

Over a half of respondents (54%) said they wanted to retain the existing town centre boundary set out in the Local Plan 1999 with the second most popular option (37%) being to revise the town centre boundary outwards to the east and/or west which will provide a larger area for town centre development. Just 9% of respondents supported the idea of revising the boundary inwards, which was the proposal of consultants Roger Tym and Partners who wrote the Town, District and Local Centres Study.

30 respondents provided additional comments. Opinions varied a great deal with five respondents wanting the existing boundary to be retained, 12 supporting expansion and three supporting the idea of inward revisions. Expansions were proposed in almost all directions including east, west, NE and north over the canal. There was no consensus from the consultation and some respondents' demonstrated a lack of knowledge of the current boundary.

#### 6.6.1 Key issues raised:

- 1. Make centre more compact allowing more green space or space for housing. Allow other district areas to grow so less travel is required for shopping.
- 2. Revise and extend in all directions.
- 3. Various suggestions of specific boundary extensions including extending the boundary west to include Goldsworth Road, Morrisons, Cherry Street and Surrey History Centre. Suggestions of taking the eastern edge up to Portugal Road or to the NE to include Maybury and other suggestions extending down Maybury Road and Walton Road. A suggestion to extend the boundary south down Guildford Road.
- 4. The Town should not be constrained by artificial boundaries, consideration should be given to expansion by squaring of some of the boundaries, especially NE & NW.
- 5. Expansion would hopefully stop too much crowding and make the town more interesting if centre was spread.
- 6. Various suggestions of specific boundary inwards including removal of Brewery Road car park from inside the boundary, residential housing on, Oriental Road and general inward revision of the northern boundary revised inward.
- 7. Lack of available space means eastward expansion virtually impossible. Whilst limited westward expansion seems possible, the lack of open or convertible land seems to point to "A" being the only viable option (retain existing boundary).
- 8. Consider any changes only if supported by impact studies justifying needs and the corresponding benefits that arise.
- 9. Please do not spoil our semi rural villages by extending the town centre, people have chosen to live outside Woking for its semi rural feel.
- 10. The question is not, where should the boundary lie, but how can we ensure that the quality of what exists within the town centre is maximised and can develop in line with future needs and circumstances.

11. The streets East of Victoria Way should be redeveloped so that Woking centre is better balanced and gives the market area an improved sense of community, rather than feeling like a corridor.

## 6.6.2 Officer response

1-9 National policy states that development should be focused in the town centre first, followed by edge of centre, then out of centre locations. Therefore the boundary of the town centre is important.

The town centre boundary was last revised over 10 years ago. The town centre has changed a lot since then so the boundary may no longer be the most appropriate. When determining planning applications, proximity to the town centre is a consideration so it is important the boundary is up to date.

Consultants Roger Tym & Partners who conducted the Town, District and Local Centres Study proposed revisions to the boundary so that it was in line with current national policy. Officers propose to look at evidence from this study along with the ELR and other studies and consult with the Town Centre Management Group and other key players before any proposed boundary revisions are set out in the preferred option.

10 – 11 The issue of the quality of development in the town centre has links to the boundary but best considered within the issue of the level of development and the issue of design and Woking's image.

## 6.6.3 Officer recommendation

Defining a revised boundary is work in progress. In particular, the Council should continue consider evidence and consult with key stakeholders before a revised boundary is put forward in the preferred options.

## 6.7 Extent of the Shopping Area Boundary

The survey asked whether people thought the boundary of the shopping area should be revised. Of the two options offered, 71% selected the approach of implementing minor revisions put forward by consultants Roger Tym & Partners, to the shopping area boundaries so that it includes the cinema and theatre complex and Woking Town Square and combining the Primary and Secondary Shopping Areas in line with national policy. The alternative option of retaining the existing shopping area boundary but was supported by 29% of people.

#### 6.7.1 Key issues raised:

- 1 Property consultants Drivers Jonas (responding on behalf of Asda) supported implementing minor revisions to the shopping area boundary to provide opportunity for future retail growth. They also supported the amalgamation of the Primary and Secondary shopping areas in line with PPS6.
- 2 The Government Office for the South East (GOSE) provided an informal response to the consultation and in this highlights paragraph 6 of draft PPS4: Planning for Prosperous Economies (May 2009) which requires the extent of the primary shopping area to the defined on the proposals map.

## 6.7.2 Officer response

 1 – 2 Further advice on this issue will be sought from both GOSE and Roger Tym & Partners before the revised boundary is put forward in the preferred option consultation document.

## 6.7.3 Officer recommendation

Defining a revised boundary is work in progress. In particular, the Council should continue consider evidence and consult with key stakeholders before a revised boundary is put forward in the preferred option.

## 6.8 Level of Town Centre Redevelopment

The consultation asked how much new retail floor space the Council should plan for Woking Town Centre. Two possible options were provided and the views of respondents were divided almost equally. 57% of respondents supported the option of a modest expansion of the town centre (up to 38,000m<sup>2</sup>) and 43% supported the alternative option of major growth and major remodelling of the town centre (up to 75,000 m<sup>2</sup>)

Only 41% of residents supported major remodelling of the town centre however 62% of those who work in the Borough, 53% of those of represented a group or organisation and 100% of planning agents and developers supported this option.

## 6.8.1 Key issues raised:

- 1. Property consultants Drivers Jonas (responding on behalf of Asda) supported major growth and remodelling, commenting that the Town, District and Local Centres Study identified a capacity for significant convenience floorspace.
- 2. The Theatres Trust has concerns that the evening economy had not been considered and that the existing infrastructure of leisure faculties in the town should be protected and enhanced. Retail was not the only element needed for a healthy town centre.

#### 6.8.2 Officer response

1 Consultants Roger Tym & Partners looked at the level of growth that they believed the town needed to ensure it retained and enhanced its retail offer in order to remain competitive. The town is identified as a Regional Hub in the South East Plan and a Centre for Significant Change. It is considered that there is significant scope for retail growth and redevelopment in the future which will increase the choice available to shoppers and also bring opportunities to improve the image of the town. Woking Town Centre is the largest town in the Borough and it dominates shopping patterns. Although the town centre does not have the same range of shops as Guildford, it is a successful centre and its retail ranking has increased in recent years. Other nearby centres are expanding. Significant retail development is proposed in Guildford, Kingston upon Thames and Bracknell, and Camberley has recently undergone some major redevelopment with the opening of the Atrium complex. In order to stay competitive, taking no action is not seen as a viable option. Some level of retail development will be needed.

2 The two theatres in Woking, along with the cinema complex are important leisure facilities to the town and encourage visitors to the town in the evening. The night-time economy is important to the town and will be considered in the preferred option.

## 6.8.3 Officer recommendation

The level of development required in Woking to 2026 was considered in detail by the consultants and it is considered that there is significant scope for retail growth and redevelopment in the future to meet the expectations of the South East Plan. Significant retail development is proposed in nearby centres and in order to stay competitive development will be needed in Woking. The Council needs to carefully consider the evidence put forward and in conjunction with internal and external stakeholders, decide on the future level of development.

## 6.9 Hierarchy of Centres

81% of respondents agreed that the Council should implement the revised hierarchy of centres put forward by consultants Roger Tym & Partners, to keep West Byfleet as a District Centre and reclassify the other district centres to Local Centres, in line with national planning policy. Former Local Centres will be reclassified to Neighbourhood Centres/Shopping Parades, with the exception of Kingfield.

56 respondents provided additional comments about the hierarchy.

## 6.9.1 Key issues raised:

- 1 Concern that the revision would mean less support for shops in District and Local Centres and less local shops and services for residents would be provided locally. Belief that local centres need to be protected.
- 2 Arguments that more shops should be provided in District and Local Centres to reduce the need to travel. Allow more district centres, rather than reduce the existing number. Let the economy be spread out. Pulling people into the Woking town centre, which is really not fit for purpose rail, bus, parking, roads are all too expensive and of poor quality.
- 3 Concern about over-development in smaller centres.
- 4 Concern that downgrading a number of the District Centres will potentially restrict the opportunity for locating new retail floorspace within these centres. The hierarchy should remain unchanged.
- 5 Requests for specific Centres to be kept as District Centres (Byfleet, Knaphill, Goldsworth Park) or Local Centres (Horsell, Brookwood, Pyrford, St Johns).
- 6 Inevitable that West Byfleet will decline as a retail centre. Can not see why it should be classified differently to other centres.
- 7 Existing centres are an essential part of local community.
- 8 Lack of understanding about the need for a retail hierarchy.
- 9 West Byfleet is hemmed in by the railway and A245 one of the busiest roads in Surrey. Unless some way can be found of reducing volume of traffic I can see no benefit in upgrading the shopping area. There is nowhere to park at present.
- 10 The 60's development in West Byfleet is an eyesore and some redesigning is necessary.
- 11 Table 3 of the Issues and Options document shows Kingfield as an existing Local Centres. Table 3.8 of the Retail Study shows it as a District Centre.

12 Why does the council consider that food outlets are necessary?

## 6.9.2 Officer response

1 The hierarchy of centres is important as it determines the level of retail development that will be permitted in a centre. An up-to-date hierarchy which is in line with national planning policy will enable the Council to allow the most appropriate levels of development in District and Local Centres.

The revised hierarchy will encourage appropriate development in Local and District centres, providing the types of shops and services people need close to home, but will discourage inappropriate levels of development which are likely to generate large amounts of traffic into District and Local Centres.

The revised hierarchy has been put forward by the consultants who have considered the type of shops and service available in each centre.

- 2 8 As above
- 9 Covered in transport section.
- 10 Redevelopment of West Byfleet (considered by Q35 below) may allow for redevelopment of the 1960s architecture and improvement in the general character of the shopping area.
- 11 Kingfield is an existing Local Centre, as set out in policy SHP1 of the Woking Borough Local Plan 1999. Table 3.8 of the Town, District and Local Centres Study 2009 is incorrect.
- 12 Restaurants benefit the general economy and encourage visitors to centres at different times of the day.

#### 6.9.3 Officer recommendation

The hierarchy of centres put forward by Consultants Roger Tym and Partners should be implemented as it considered in detail the current and future development of the centres.

## 6.10 Future Development in West Byfleet

The consultation asked how the Council should plan for future development in West Byfleet. Two possible options were outlined in the consultation. 61% of respondents supported redevelopment in West Byfleet with 39% favouring the option of no significant change in West Byfleet.

Property consultants Drivers Jonas (on behalf of Asda) stated that the area of West Byfleet should be redeveloped in order to accommodate further retail and leisure development.

#### 6.11 The Role and Function of Local Centres

The final question in this section asked what level of growth should the Council plan for in the Local Centres and two possible scenarios were given as options. 77% of respondents favoured an approach where modest growth should be allowed in the Local Centres, allowing a few additional shops and current shops

to extend. 23% supported the other strategy where a lower level of growth should be allowed in the Local Centres.

Property consultants Drivers Jonas (on behalf of Asda) stated that modest growth should be allowed in Local Centres and they may benefit from being anchored by food superstores.

## 7.0 Climate Change

#### 7.1 General issues

#### 7.1.1 Key issues raised:

- 1 Climate change theme should run through the document, rather than be isolated as an issue. Concern that the section focuses solely on carbon reduction measures and does not make any links with section 5 (Green Infrastructure and the environment) and the effects of climate change on the natural environment. Should have an overarching policy within the Core Strategy which sets out how climate change can be tackled at a local level, both in terms of carbon reduction and increasing the ability of the Borough to adapt to the coming changes.
- 2 Commends the Council's intention to remain a leading local authority on climate change and desire to go further than the minimum requirements at a national and regional level.
- 3 Urge the Council to include a policy which includes the following points:
  - All development will be expected to incorporate sound sustainable design and construction principles and should incorporate a high quality of design and materials, local distinctiveness and identity.
  - Opportunities for biodiversity conservation and enhancement should be an integral part of development.
  - Ensuring building design reduces energy consumption by appropriate methods.
  - Supporting development that minimises the consumption and extraction of minerals by using recycled materials in new construction and by making best use of existing buildings.

#### 7.1.2 Officer response

1 Reflecting our residents' concerns, the Council have long been committed to protecting the environment. Our commitment to tackling climate change was recently recognised by the Government when the Council was awarded the Beacon Award for Tackling Climate Change (2008 – 2009). There has been significant progress since our Climate Change Strategy was first adopted in 2002, both in terms of local activities and national policy development. The revised strategy (2008) builds upon the achievements made and reflects the wish to expand and strengthen the Council's approach to mitigation and adaptation.

Sustainability is a key element of the spatial vision for the Borough and is key to objectives six and seven. The inclusion of an overarching policy within the Core Strategy will be considered when the Preferred Option is prepared and sustainability will be a key theme throughout the document.

- 2 Support is noted.
- 3 The points raised will be considered carefully and incorporated where appropriate in the preparation of the Preferred Option.

## 7.1.3 Officer recommendation

Consideration needs to be given to the inclusion of an over-arching policy on sustainability when the Preferred Option is prepared. Sustainability is a key theme in the spatial vision and will be a strong theme throughout the document but the specific nature and format of policies within the Preferred Options is yet to be decided.

The points raised seem to be in line with the vision and objectives and need to be considered carefully and incorporated where appropriate in the preparation of the Preferred Option.

## 7.2 Climate Change: Code for Sustainable Homes

This question asked whether or not WBC should push ahead of the national timetable in requiring all housing developments to comply with the Code for Sustainable Homes, for example we should require all homes to meet Code level 4 by 2012 and Code level 6 by 2014. Only two options were offered, yes or no. 61% of respondents supported the approach of WBC pushing ahead of the national timetable, 39% thought the Council should stick to the national timetable.

## 7.2.1 Key issues raised:

- 1 Woking Borough Homes, the Council's own housing company, is building new homes to CSH L5. The council is seeking to demonstrate its commitment to delivering new homes of a high environmental standard, and it is appropriate that its example should be followed by other developers.
- 2 Paras 31 and 33 of PPS1 Supplement make it clear that in circumstances where higher Code standards are to be sought it must be based on clear evidence.
- 3 The Council should adopt a flexible approach and compliance with the Code for Sustainable Homes, renewable and low carbon energy and sustainable urban drainage systems (SuDS) should be considered on a case by case basis.
- 4 Support for a policy approach that sets standards according to the Code for Sustainable Homes. However, if local circumstances warrant it, higher levels of the Code can be specified on strategic sites if there are opportunities to deliver on site renewable energy generation.
- 5 Support the aim of pushing ahead of the national timetable in requiring all new housing developments to comply with the Code for Sustainable Homes.
- 6 The Core Strategy should ensure that developers meet level <sup>3</sup>/<sub>4</sub> for other categories too, specifically water efficiency (level <sup>3</sup>/<sub>4</sub> is equivalent to 105 litres per person per day) (Environment Agency).
- 7 Rainwater harvesting and grey water recycling systems are required to meet the higher Code Level of water efficiency. There is some debate about grey water recycling as this can be very carbon intensive and we would like to see this considered further within the core strategy (Environment Agency).
- 8 Other ways of achieving a reduction in water use in the Borough include extending the Code for Sustainable Homes level 3 to refurbishments and extensions where planning permission is sought, and for the council/housing association to carry out retrofitting programmes to social

housing (perhaps through the decent homes programme) (Environment Agency).

- 9 The council should acknowledge that where water savings are made in fixtures/fittings/appliances that are for hot water, carbon and emissions savings will also be made (Environment Agency).
- 10 If the Council set standard higher than those set nationally, the costs of implementing these may affect the competitiveness of Woking Borough and development may go to other Boroughs.

## 7.2.2 Officer response

- 1. The Council's development of homes to Code Level 5 at Brookwood Farm in Knaphill will hopefully provide an exemplar scheme for other developers to learn from.
- 2. The supporting evidence for the Council's climate change policy is still to be updated by ecsc but will be published before consultation on the Preferred Options document. The previous evidence was produced in 2006 and since then a great deal on new national guidance has been produced. If the Council does decide to push ahead of the national timetable this will not be done without a clear evidence base to support the decision.
- 3. The Council is committed to protecting the environment. The South East Plan already sets of regional targets and the Government are setting national ones, so total flexibility is not an option. A flexible approach does have advantages but it does not provide any degree of certainty to developers. A clear, consistent approach (not necessarily uniform requirements across the Borough but with the requirements for each area) set out in the Core Strategy will mean that all stakeholders will know what is expected of them. Policy SE2 of the Surrey Structure Plan was applied to all developments of one additional dwelling or greater and was applied consistently.
- 4. The evidence base will determine if local circumstances warrant higher levels of the Code for Sustainable Homes. No decision will be made by the Council until this evidence has been produced.
- 5. Support is noted.
- 6. The wider context of the Code for Sustainable Homes, including water efficiency, and not just energy efficiency is appreciated. Once the evidence base is produced the Code Levels which can be required in locations and by which times, will be known. National policy will only require energy efficiency, equivalent to Code Level 3 by 2010 (25% reduction against 2006 Part L Building Regulations) and Code Level 4 by 2013 (44% reduction). Consideration will be given to if the Council can require full compliance with the Code and not just the national targets of equivalent energy efficiency requirements by the Government.
- 7. The pros and cons on grey water recycling will be considered and advice will be taken from the Environment Agency, ecsc and any other appropriate body during the preparation of the Preferred Options document.
- 8. The evidence base will consider if it is practical and viable to extend the Code to refurbishments and extensions where planning permission has been sought. The Council is aware of other authorities who have applied similar approaches, requesting that energy efficiency/renewable energy generation is applied to refurbishments and extensions.
- 9. Comments are noted. The Council acknowledges that water savings can be made from simple measures such as fixtures/fittings/appliances and

that if these include savings to the amount of hot water used there will also be carbon savings.

10. The Economic Viability Assessment will consider the economics of development including affordable housing and the Code for Sustainable Homes. This piece of evidence will assess different requirements that the Council may set and look at the impact this would have on viability.

#### 7.2.3 Officer recommendation

The supporting evidence for the Council's climate change policy is still to be updated by ecsc but will be published before consultation on the Preferred Options document. No decisions can be made without a clear evidence base to support the decision. The evidence base will determine if local circumstances warrant higher levels of energy efficiency/renewable energy can be set locally that regional/national targets.

Advice will be taken from the Environment Agency, ecsc and any other appropriate body during the preparation of the Preferred Options document.

The Economic Viability Assessment will also be used as supporting evidence as this will consider the economics of development and any impacts on viability.

#### 7.3 Renewable and Low Carbon Energy

The Council can place different requirements on developers in terms of energy efficiency and renewable energy. 79% overall agreed (46% agreed strongly) that large-scale development must meet higher levels of energy efficiency and/or produce more of their energy from low carbon sources than other development in the Borough. 7% overall, disagreed with this approach.

#### 7.3.1 Key issues raised:

- 1. Requirements should be shared by all developments no matter what their size. This approach would be more open and consistent and would best reduce carbon emissions.
- 2. Whilst the opportunities to absorb additional costs for providing decentralised power may be greater in some large schemes, it is also the case that some small schemes can achieve high levels of renewable or low carbon energy more easily than large, high density developments, particularly where these schemes have had a high energy demand and small building or site footprint.
- 3. The use of the building will have an impact on the ability to self-generate a given percentage of energy. For example, buildings with high electrical/low heat demand (such as modern offices and shops) will struggle to meet a given percentage of energy through LZC selfgeneration when the only technologies available are PV (requiring a very large surface area) or wind turbines (requiring high wind speeds and subject to other constraints).
- 4. Consideration should be given to defining the policy objective on the basis of net change in energy or carbon emissions arising from the development proposals, compared with current use of the site.
- 5. The definition of zero carbon homes also proposed offsetting of carbon emissions from new development via allowable solutions. Consideration should be given to the allowable solutions that will be appropriate in Woking.

- 6. The submission Core Strategy should also set out a policy approach to encourage renewable energy development in Woking, including CHP, and a set of criteria to assess proposed developments (NRM15 and NRM16 of SE Plan). Targets for CO<sup>2</sup> emissions reduction and renewable energy will also need to be set out in policy.
- 7. The need to adapt to the changing climate.
- 8. Government should raise standards nationally.
- 9. Market forces should be allowed to decide if higher levels of energy efficiency and the cost of them can be supported.
- 10. Concerns over which sources of renewable energy may be used and that wind energy may not be viable in the Borough.
- 11. Question over the contribution that low carbon schemes make to the overall reduction in carbon output.
- 12. Concern over the use of new technology in developments when the longevity of the technology has not been proven. Concern about the cost of renewable and low carbon energy to the developer.
- 13. Do not see the need for large scale development.
- 14. Lack of understanding about the role of Planning in energy efficiency.
- 15. Three comments stating that the respondent disagreed with the use of green field or green belt land.

#### 7.3.2 Officer Response

- 1-4. The Renewable Energy/Low Carbon Development evidence base will consider if requirements should be shared by all developments or if certain sizes, types or locations would be able to provide a greater levels of energy efficiency/renewable energy generation. Simple criteria such as scale of development may not be the most appropriate way forward in determining requirements. Considering the location of development, including proximity to CHP, energy demand of the building, ability to self-generate and even the change in energy demand from current land use all need to be considered.
  - 5. The issue of allowable solutions will be considered by the Renewable Energy/Low Carbon Development evidence base and may also be an issue for the Infrastructure evidence. The Council is aware of the need for allowable solutions to be provided.
  - Targets for CO<sup>2</sup> emissions reduction and renewable energy will be set out in policy once the evidence base has been produced to support policy.
  - PPS1 Supplement Planning and Climate Change highlights the need for both mitigation and adaptation to be considered independently of each other and the need for new development should be planned with both in mind. Adaptation will certainly be included in the Preferred Options document.
  - 8. The Government is raising standards nationally with the Code for Sustainable Homes and by making improvements to Building Regulations. However the Renewable Energy/Low Carbon Development evidence base will consider if there are local circumstances which would warrant raising the national standards locally.
  - 9. Raising standards of energy efficiency or provision of renewable energy, above minimum standards will always cost more, even if this cost is small. Although awareness of climate change and issues of energy efficiency has risen considerably with the general public, developers are not thought to be confident enough that they will be able to make back the money spent on measures. As both the Government and Local

Authorities place more stringent requirements on developers, demand for carbon saving measures will increase and the cost will fall.

"Tackling climate change is a key Government priority for the planning system" (PPS1 supplement, p1). It can not be left up to the market to determine.

- 10. The Renewable Energy/Low Carbon Development evidence base will consider the best sources of renewable/low carbon energy that can be used in the Borough.
- 11. Currently "low carbon" developments, such as the Bed Zed development do make a relatively small contribution to overall carbon output, this is why the Council has historically applied policy SE2 of the Surrey Structure Plan to all developments of one new dwelling or greater, so the largest number were captured. Policy NRM11 of the South East Plan only applies to new developments of more than 10 dwellings or 1000m<sup>2</sup> of non-residential floorspace, which is a step-down from policy SE2 of the Surrey Structure Plan. If the highest demands which are practical and viable are placed on developers, on the greatest number of developments, this will make the greatest carbon savings.
- 12. The Council's development of 12 homes at Brookwood Farm is being built to Code Level 5. This is ahead of the national targets and so economies of scale are not involved. The final figures have not been produced but it is estimated that the homes cost around 10% more than homes built to standard building regulations. Whilst some renewable and low-carbon technology is new to the UK, some of it has been used abroad for many years.
- 13. The Borough housing target, equivalent to 292 additional dwellings per year is set in the South East Plan. In order to meet this all scales of development will need to be considered by the Council, on their own merits.
- 14. "Tackling climate change is a key Government priority for the planning system" (PPS1 supplement, p1).
- 15. These comments will be dealt with in the next section.

## 7.3.3 Officer recommendation

No decisions can be taken on this issue until the Renewable Energy/Low Carbon Development evidence base has been produced. The Council is committed to protecting the environment and the Core Strategy needs to be in line with the Council's Climate Change Strategy, however no policy decisions can be make without a sound evidence base to support them.

## 7.4 Higher energy efficiency on greenfield sites?

The statement read "it is cheaper to build new development on land, which has not been previously developed. If housing targets cannot be met within the existing urban area, we **may** have to allow development on greenfield sites. If this happens, should we require development on these sites to meet higher levels of energy efficiency and/or produce more of their energy from low carbon sources than other development in the Borough?"

69% of respondents said 'yes', the Council should require development on these sites to meet higher levels of energy efficiency and or produce more of their energy from low carbon sources than other development in the Borough. 15% disagreed with this view and a further 16% were 'neutral'.

240 comments were received on this question, one of the highest numbers for the whole questionnaire. Many respondents agreed with the proposal

## 7.4.1 Key issues raised:

- 1. Respondent disagreed with the use of green field or green belt land.
- 2. Concern that the proposal may mean lower standards are acceptable on expensive brownfield sites.
- 3. Agree with the proposal because it may deter developers from building on greenfield sites.
- 4. Requirements should be the same for all developments. This would be the most fair and consistent approach.
- 5. Concern that the costs to developers might raise housing costs, when housing is already expensive in the Borough.
- 6. Housing built on greenfield sites should be zero carbon.
- 7. General comments in favour of energy efficiency and installing technology at the time of construction rather than retro-fitting.
- 8. Standards should also be applied to all EXISTING development which is the larger proportion of the stock, and needs improvement. Various instruments (both DC and fiscal, etc.) should be used to implement this.
- 9. Should be examined on a site by site basis, having regard to site constraints and viability considerations.
- 10. The Council should focus on other ways of reducing carbon emissions across the Borough such an encouraging cycling.

## 7.4.2 Officer response

- 1. The location of new housing is dealt with elsewhere in the document.
- 2. If standards of energy efficiency/renewable energy are raised on greenfield sites, this does not mean that lower standards will be acceptable elsewhere. If the evidence base produced finds that higher standards would be viable on greenfield sites, then higher standards will be applied here but standards will not be lowered on other sites.
- 3. Support is noted.
- 4. The Renewable Energy/Low Carbon Development evidence base will consider if requirements should be shared by all developments or if certain sizes, types or locations would be able to provide a greater levels of energy efficiency/renewable energy generation. Considering the location of development, including proximity to CHP, energy demand of the building, ability to self-generate and even the change in energy demand from current land use all need to be considered.
- 5. If building costs are raised, the knock-on impacts tend to be on land values rather than house prices, which are impacted but other variables. Developers may charge a slightly higher price for a very energy efficient homes but this will be off-set by the long-term running costs.
- 6. See response to 4 above.
- 7. Support is noted.
- 8. The evidence base will consider if it is practical and viable to extend the Code to refurbishments and extensions where planning permission has been sought. The Council is aware of other authorities who have applied similar approaches, requesting that energy efficiency/renewable energy generation is applied to refurbishments and extensions.
- 9. See response to 4 above.
- 10. In June 2008, Woking Borough Council and Surrey County Council were successful in securing £1.82 million from Cycling England to be spent on improving cycling facilities in the area. Woking was one of only ten

towns, plus one city, to have successfully achieved the funding and the title of Cycling Town for the next three years. The funding, together with the money that the two councils have ear-marked for this project, will now be used to push forward with a range of cycling schemes. The top priorities are: to further improve the Woking Cycle Network to make it even more cycle friendly, to upgrade the Basingstoke Canal towpath, to expand further activities with local schools, including more cycle clubs and cycle storage, and to improve cycle storage at the rail stations.

## 7.4.3 Officer recommendation

No decisions can be taken on this issue until the Renewable Energy/Low Carbon Development evidence base has been produced which will assess if there are any local circumstance, such as certain sizes, types or locations would be able to provide a greater levels of energy efficiency/renewable energy generation. Considering the location of development, including proximity to CHP, energy demand of the building, ability to self-generate and even the change in energy demand from current land use all need to be considered.

The evidence base will consider if it is practical and viable to extend the Code to refurbishments and extensions where planning permission has been sought.

## 7.5 Development of the CHP (Combined Heat and Power) Network

67% of respondents (27% agree strongly) agreed that the Council should require development, which is close to the combined Heat and Power Network to connect to it. 9% disagreed with this statement.

## 7.5.1 Key issues raised:

- 1. Comments were raised about the competitiveness of the CHP network mentioning that the environmental and economic arguments for connecting to the CHP network should be persuasive enough. If connection was a requirement perhaps it was not competitive enough.
- 2. Strongly agree that the Council should require development which is close to the CHP network to connect to it wherever possible.
- 3. It is not clear whether what is intended is to establish more combined heat power (CHP) and the link developments to it. It will be helpful if this is explained clearly. We however agree with use of CHP because it seams to be more carbon efficient (Environment Agency).
- 4. I disagree with the statement as drafted as it is predicated on developments being located close to the small part of the town centre currently served by its energy centre and sites close to Woking Park. A much more ambitious approach to decentralised energy is required if carbon reduction trajectories are to be met, and ©CHP will play a major role in contributing to this. This requires a strategy based on the establishment of a 'network of networks' of © CHP energy stations, with interconnections providing network resilience. The Core Strategy should seek to stimulate investment in low carbon energy infrastructure.
- 5. Puts too much development pressure on a specific area.
- 6. Concern over the costs associated with CHP and that the low capacity gas turbines do not offer good value for money in terms of capital cost / KwHr. Concern over the costs to end users. Developers may themselves have better and cheaper approaches.

- 7. CHP is becoming outdated and inefficient. Concern about maintenance requirements.
- 8. Concern about whether this would result in commercial development in residential areas.
- 9. Houses should be built where it is most practical and not be constrained by CHP.
- 10. Should only apply to social housing because it is likely to be disruptive in application and ongoing maintenance.
- 11. Development should be market led but should be required to adhere to the current best practices in energy efficiency and sustainable building developments.

## 7.5.2 Officer response

- 1. Development of high density flats have traditionally used electricity to provide heating because of the risks associated with gas. This is understandable but electricity produces much more carbon emissions that the equivalent output from gas because of the loses during transmission. At the moment developers can not be forced to connect to the CHP network, even if they are located adjacent to it, which means an opportunity to significantly reduce emissions from the development is lost. The Renewable Energy/Low Carbon Development evidence base will consider if it is practical or viable to include a policy like this in the Core Strategy.
- 2. Support is noted.
- 3. The Renewable Energy/Low Carbon Development evidence base will consider the options for expanding the CHP network. Until this evidence is produced along with information about the capacity of the existing CHP network, no decisions on policy can be made.
- 4. See response to 3 above.
- 5. If this proposed policy is implemented then development which is proposed close to a CHP station would be required to connect to it. This does not mean that development will be encouraged close to the CHP network.
- 6. It is recognised that if this policy is put in place then it would have to be carefully worded so that it would allow developers to use solutions which would increase carbon reductions further. Energy from CHP is lower carbon than from traditional power stations because of heat recovery but a high level of use of renewable technology may produce even greater carbon savings. The issue will be considered in the Renewable Energy/Low Carbon Development evidence base.
- 7. The Council will seek advice from Thameswey regarding the lifespan and efficiencies of the CHP.
- 8. See response to 5 above.
- 9. See response to 5 above.
- 10. During constructions ground works will be required for foundations and connections to the sewage network and power providers. Connection to the CHP network will not necessarily create any more disruption than normal building works.
- 11. The Renewable Energy/Low Carbon Development evidence base will consider if there are local circumstances which warrant higher levels of energy efficiency/renewable energy. No decision will be made by the Council until this evidence has been produced.

## 7.5.3 Officer recommendation

The Renewable Energy/Low Carbon Development evidence base will consider if it is practical or viable to include a policy like this in the Core Strategy along with considering the options for expanding the CHP network. Until this evidence is produced along with information about the capacity of the existing CHP network, no decisions on policy can be made.

It is recognised that if this policy is put in place then it would have to be carefully worded so that it would allow developers to use solutions which would increase carbon reductions further.

## 7.6 Sustainable Drainage (SuDS)

The survey highlighted that in accordance with the South East Plan; the incorporation of SuDS will be required on new development. Respondents were asked what level of development should require this. 74% said this should apply to any developments involving one additional dwelling or greater with 67% suggesting that this should apply to commercial development exceeding 100 sqm. 65% said this should be enacted to commercial extensions and 64% to any commercial development over 500 sqm. 39% believed this should apply to domestic extensions.

## 7.6.1 Key issues raised:

- 1. Support the use of SuDS in appropriate circumstances; however they are not appropriate for use in all areas, for example areas with high ground water levels or clay soils (Thames Water).
- 2. Support the incorporation of SuDS wherever possible and appropriate.
- 3. Sustainable drainage systems should be used where possible. There can be limitations to what is achievable from smaller sites. However that does not mean there is no benefit in seeking to minimise the risks from these developments, as the cumulative impact can in some instances be significant. We would be pleased to work with you to identify and agree criteria for the drainage of sites of different sizes (Environment Agency).
- 4. Many types of SuDS can also be valuable components in a green infrastructure network (Natural England).
- 5. SuDS should not be discussed as the 'issue'; rather they are part of the solution. The 'issue' should be acknowledging an increased risk of flooding within the Borough, as identified within the Woking SFRA. SuDS can play a valuable role in reducing potential impacts; they can not overcome all flood risk issues that could arise from a changing climate. It is important that other measures, identified within the Woking SFRA, are taken forward where necessary into local policy (Environment Agency).
- 6. Rather than focusing on the means, greater attention should be given to the objective. The policy framework should be set on the basis of nil net increase in surface water runoff.
- 7. True sustainable drainage is about seeking to mimic the natural predeveloped site drainage patterns, as well as seeking to remove pollutants before they reach watercourses and providing habitat and amenity benefits. Doing this requires good design based upon proper assessment of the site and the impacts of the proposed development. It is important that any local policies reflect this by seeking demonstration that a hierarchical approach to the selection of sustainable drainage systems has been undertaken (Environment Agency).

- 8. SuDS are an important tool now for managing flood risk and pollution, regardless of whether our climate changes (Environment Agency).
- 9. Woking Borough will need to consider and define clearly how the potential impacts of climate change for flood risk will be taken into account in the allocation of broad and specific locations for development as well as Development Control decisions. For example, the climate change maps within the Woking SFRA could be adopted for applying the Sequential Test (Environment Agency).
- 10. The Woking SFRA and forthcoming surface water management plan should be used as an evidence base to inform the answer to this question.
- 11. Detailed comments have been provided on soakaways.

# 7.6.2 Officer response

- 1. Advice will be sought from the Environment Agency, Natural England and other appropriate bodies to check the suitability of the Borough for SuDs.
- 2. Support noted.
- 3. The limitations of SuDs are appreciated and the offer from the Environment Agency to work with the Council to identify and agree criteria for the drainage of sites of different sizes will be taken up.
- 4. Support for SuDs is noted.
- 5. Comments are taken on board. The approach taken in the Core Strategy will be to focus on the increased risk of flooding within the Borough and the potential for SuDS as part of the solution in reducing potential impacts.
- 6. Advice will be sought from the Environment Agency, Natural England and other appropriate bodies to check the practicality and viability of a nil net increase in surface water runoff as a policy.
- 7. Advice will be sought from the Environment Agency and other appropriate body when policy is written regarding a hierarchical approach to the selection of SuDs.
- 8. Support is noted.
- 9. Comments are noted and will be brought forward in the preparation of the Preferred Options document.
- 10. The SFRA will be used as evidence when policy is formulated on SuDs.
- 11. Detailed comments have been noted and will be used appropriately.

# 7.6.3 Officer recommendation

Advice will be sought from the Environment Agency, Natural England and other appropriate bodies to check the suitability of the Borough for SuDs and to check the practicality and viability of a nil net increase in surface water runoff as a policy. The Council needs to take up the offer to work with the Environment Agency to identify and agree criteria for the drainage of sites of different sizes and regarding a hierarchical approach to the selection of SuDs.

## 8.0 Building and Public Spaces

## 8.1 Protection of Woking's Heritage

## 8.1.1 Key issues raised:

Woking has few historic buildings and these must be retained to maintain some interesting features. Emphasis should be given to especially historically significant public spaces, including Woking Palace. The section would benefit from renaming it 'The Historic Environment and Public Spaces' rather than the present 'Buildings and Public Spaces'.

# 8.1.2 Officer Response

Historic buildings of significance are Listed. There are also buildings that are 'Locally Listed' because they form an integral part of the character of the area. There will always be a presumption against any development that will have an adverse impact on these buildings and the Core Strategy will provide the appropriate framework for their protection. It is accepted that buildings of historic significance contribute to the heritage of the area and this will be emphasised in the next stages of the Core Strategy.

National policy requires periodic reviews of Conservation Areas. The Council will assess the appropriate timing for carrying out this review. The presentation of the Core Strategy will be reviewed until adoption. The proposed change of the heading of the section will be considered as part of this work.

# 8.2 Design and Quality of New Development

## 8.2.1 Key issues raised:

- 1. The historic environment should be treated positively as an opportunity which can be harnessed to facilitate good design and can assist in the creation of a place of greater distinctiveness and identity.
- 2. Good design can incorporate green technologies whilst respecting the historic environment. Green roofs should be considered. Biodiversity enhancements can be made in new developments such as bird nesting boxes, bat bricks etc.
- 3. Woking Borough Council should produce a Design Guide for Woking and decide on a character or theme which at present is lacking since the town has been developed on a piecemeal basis over the years and in parts lacks any cohesive thread running through the more modern designs.

# 8.2.2 Officer Response

1. There is a Surrey Design Guide which is fully applicable to development in Woking Borough, in this regard a specific Design Guide for Woking may merely duplicate this. However, the Council will work in partnership with Surrey County Council and other authorities in a review of the guide.

- 2. Design has been acknowledged as a key issue for the Core Strategy to address. It is also recognised that the historic environment contributes in defining the heritage of the area. The manner in which the historic environment could influence design will be fully explored as the Core Strategy progresses.
- 3. The issues and options document seeks to identify the need for a high standard of sustainable construction. This includes technologies for maximising energy efficiency and reducing carbon emissions of buildings. At this stage it will not be appropriate to be prescriptive about specific examples of technology. The Core Strategy will ensure that stringent standards are set for quality development in the Borough and the appropriate technologies used and depend on a number of factors such as the location of the development.
  - 4. It is not intended to give the impression that the Borough's heritage may hinder growth. The text will be reviewed to ensure that this is not the case.

## 8.3 Woking's Image

## 8.3.1 Key issues raised:

- The streets east of Victoria Way should be redeveloped so that Woking centre is better balanced and gives the market area an improved sense of community, rather than feeling like a corridor. Poor environmental quality in Woking Town Centre. Establishment, or additional, or improved open spaces, trees in roadsides, greening of neighbourhoods, replacement of degraded housing stock, betterment of green spaces between buildings and better access corridors.
- 2. The section gives undue emphasis to economic growth within the Borough. Section 8.5 suggests that the heritage of the Borough can be a problem that may hinder growth.

## 8.3.2 Officer response

- 1. Woking Town Centre has been identified in the South East Plan as a 'centre for significant change.' The Core Strategy will seek to identify what these changes ought to be and set the framework for it to be delivered. Issues such as the redevelopment of Woking train station area, the Gateway project, changes to the town centre shopping area boundaries are being consulted on as part of this issues and options consultation.
- 5.0 All the comments received will be collated to inform preferred options for the enhancement of the environment of the town centre. Consideration will also be given to identifying the town centre as an area for specific attention.

## 8.3.3 Officer recommendation

The outcome of the Borough wide Character Assessment is awaited. This will inform the forthcoming policies in the Core Strategy. Points raised about the Borough's heritage, design and image will be taken into account as the Core Strategy is prepared.

## 9.0 Infrastructure and services

# 9.1 Preferred method for securing infrastructure9.1.1 General issues raised:

Of the 363 that responded to this issue, over half of respondents (52%) favoured Option A (the introduction of a Community Infrastructure Levy). 28% of respondents preferred Option C (to continue to use planning obligations, but with more use of standard formulae). 20% of respondents preferred Option B (to continue to negotiate planning obligations on a case by case basis).

Six of the respondents to this issue were developers and planning agents. Two preferred the introduction of a CIL (A), One preferred to continue with the current approach (B) and three preferred to continue to use planning obligations but with greater use of standard formulae (C).

## 9.1.2 Officer response

It is acknowledged that responding to this question requires some technical understanding of infrastructure funding and planning obligations. The Planning Act 2008 introduced the CIL and detailed Regulations and accompanying policy are expected to be published in April 2010. It is considered that until the detail of the CIL is understood, the Council are unable to make a decision regarding the CIL.

The sample of developers and planning agents who took part in the Issues and Options consultation is small and it is considered that further investigation is required to understand their preferences in this matter. An Economic Viability Assessment is to be commissioned in February 2010 which will consider in detail the viability of development, including the requirements for affordable housing, infrastructure and the Code for Sustainable Homes.

## 9.1.3 Officer recommendation

The Council's approach to funding infrastructure cannot be decided until the Government's detailed proposals for the introduction of the CIL are known in April 2010.

#### 9.2 Specific infrastructure issues 9.2.1 Key issues raised:

The Issues and Options consultation did not seek to identify specific issues relating to individual aspects of infrastructure provision, however, concern was raised by a number of respondents that development would impact negatively on the existing infrastructure network and that additional infrastructure would be required to support new development.

## 9.2.2 Officer response

It is essential that the necessary social, physical and green infrastructure is put in place to support the level of growth proposed through the Core Strategy and to serve the changes in the Borough's demographic make-up expected over the Plan period. The Council is required to demonstrate how this will be achieved in order that the Core Strategy is considered Sound upon Examination. The definition of infrastructure is wide and it would not have been appropriate or desirable to address the issues in detail through the Issues and Options consultation.

An Infrastructure Delivery Plan (IDP) to support the LDF (and any future planning obligations tariff/ CIL) is currently being prepared. The first stage in preparing the IDP is to establish the existing capacity of infrastructure services and facilities and to predict the likely impact of development and population changes on that infrastructure.

The IDP will look in detail at all forms of social, physical and green infrastructure, and how that infrastructure will be funded. The IDP has strong links to the Economic Viability Assessment discussed above.

## 9.2.3 Officer recommendation

Work on the IDP and Economic Viability Assessment is in progress and likely to complete in May 2010. Officers will report on progress on these studies and on any developments on CIL at the next meeting of the LDF Working Group.

# 10.0 Transport and Accessibility 10.0.1 Key issues raised:

- 1. Public sector transport - The core strategy should emphasise the importance of Woking as a transport hub and outline how the document might help deliver necessary infrastructure. Access to the countryside via public transport should be maximised. The bus service should be improved by: increasing the number of buses and bus routes; provide express routes to places not served by the railway line: increase school bus provision; reduce fares; improve reliability; make bus shelters safer; implement a monorail; a new bus station is essential; liaise with Surrey County Council to improve accessibility for everyone by bus. The rail network should be improved via measures including – better rail stations: new rail station at St Johns; increase use at Worplesdon and Byfleet and New Haw stations: create new platforms at Woking rail station: provide services to Chertsey, Heathrow, Clapham Junction and Bristol. It is unclear what exact areas for major development in and around Woking station are and any proposed development around the station should undertake a preliminary risk assessment.
- 2. Cycle and pedestrian routes Cycle and pedestrian routes should be improved network including, separate cycle lanes, more pedestrian crossings, more footpaths, increase the number of cycle and walking routes to schools. Opportunities to cycle and walk should be maximised, including providing cycle parking at local shops and ensuring all new developments have cycle parking provisions. The identification of walking and cycling as a key transport and accessibility issue is supported.
- 3. **Parking** More car parks should be provided, particularly at rail stations and West Byfleet. The Borough should be made more car-friendly. A park and ride system should be implemented for Woking town centre which is attractively priced; located at major access points into Woking to intercept existing traffic; and, avoids generating additional trips and pressure in areas where the park and ride stations are located. The Core Strategy should set out policies identifying the Council's approach to parking. Any additional parking would have to be controlled to ensure it doesn't increase the risk of flooding as a result of the increase in surface water run-off generated. New developments, including flats, should have adequate parking provision for both residents and visitors, to avoid onstreet road parking. However, it also felt that car use should be discouraged in all new developments.
- 4. New development Town centre development is supported in principle as it has the potential to be accessible by sustainable modes of transport. Development located outside of the urban area/ in rural areas could potentially result in development in areas with limited access to sustainable transport modes, raising concern regarding the possible impact on the strategic road network. New development should not be built in areas at known traffic bottlenecks. Development should not be determined by the present structure of the public transport. New development should not be constrained by inadequate/ inappropriate transport development – transport provision should be reactive to the need created by new development. Transport infrastructure levies on

developers should be raised. There should be a lower rate of growth – the town should grow within its limits, there should be no more office development in centre and the number of new houses built should be restricted. Better use should be made of the land surrounding Old Woking.

- 5. Travel plans Travel plans should also be focussed on residential areas and the Council should consider including coaches and HGV movements. Travel plans should be reactive to development rather than dictate development. All travel plans should be prepared in line with PPG13, Guidance on Transport Assessment and Circular 02/2007. The core strategy should include policies as to when travel plans will be required.
- 6. **North-south divide** Uncertainty as to how tunnels through Victoria Arch will influence the divide.
- 7. **Working in partnership** The Council should liaise with Surrey County Council on matters relating to the conclusions of the GWITS Study (Guildford and Woking Integrated Transport Study) and the later – Surrey County Council Sintram model. The Core Strategy should include reference to the need to work in partnership with the Highway Agency, Surrey County Council and neighbouring authorities when identifying policies and strategies.
- Matters raised that can best be dealt with by other LDDs or the Local 8. Transport Plan include - road works should be co-ordinated and completed quicker; road signs should be improved; re-examine the sequencing of traffic lights; improve the roads; introduce a congestion charge; car parking charging; encourage employers and schools to stagger their working/ opening hours; improve the local transport plan; restrict the movement of lorries/ deliveries; increase the number of mini roundabouts; improve road safety; strengthen traffic violation enforcement; the one way system is not working effectively; consider use of red line routes on all main roads to restrict parking; remove traffic lights; implement a grid system; introduce a charge for children dropped off to school by car; ban 4x4's for the school run: create small, localised one-way systems around schools during school start and closing times; the Council should be cautious when instigating major schemes such as tunnels at Victoria Arch due to previous poor project management record; require all commercial properties in the town centre to open their parking during the weekends/ bank holidays; subsidise public transport; increase road parking; remove traffic calming/ safety measures of which encourage people to use similar routes thereby increasing congestion; acquire property to widen roads and separate traffic and pedestrians; install left hand filter lanes at traffic lights; do not provide more road space for cars; create a by-pass; encourage local delivery schemes; improve coordination between different modes of public transport, for example, introduce a oyster card system; traffic congestion in the town centre may be reduced through bus only lanes; the construction of the station canopy was a fiasco; parking spaces should created at an angle to reduce the time it takes to park; implement a car sharing scheme for Woking.

#### 10.0.2 Officer response

- 1.0 Woking's role as transport hub is outlined in the South East Plan and Woking rail station is a key part of this. The Core Strategy, in particular the vision, could be refined to include the redevelopment of Woking rail station.
- 1.1 Improving the public transport network has been highlighted as an issue for many respondents. The Council recognises the importance of infrastructure provision to support growth that will be identified in the Core Strategy. The Council is currently undertaking an Infrastructure Delivery Plan which will outline the level of contributions required to improve transport environment and services. Any transport related planning obligations will be obtained at the planning application stage based on the merits of each individual proposal and the assessment of its impacts. It is however outside to remit of planning policy and the Core Strategy in particular, to manage fares and the bus, rail, cycle and pedestrian networks. However through the Transport for Woking forum the Council meets with all interested transport stakeholders and the issues brought forward will be put forward to the relevant parties via this partnership.
- 1.2 No formal plans have been proposed regarding the redevelopment of Woking rail station. Any plans that are submitted will have to be conformity with local and national validation lists for planning permissions. Planning officers will provide a screening opinion for the need to undertake an Environmental Impact Assessment (EIA) on a case-by-case basis, in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
- 2.0 Please see 1.1 response above.
- 3.0 The Council recognises the importance of achieving an appropriate balance of parking in the Borough to support growth that will be outlined in the Core Strategy and to encourage the use of alternative modes of transport. The Council is undertaking a Transport Assessment which will calculate the rise in trips generated from different development scenarios in the Borough and the impact they will have on the road network. If the impact is determined to be unacceptable, the Council will work with Surrey County Council to determine appropriate mitigation measures. Depending on the impact a park and ride system or changes to parking in the Borough will be considered and if required will be outlined in the Core Strategy or within a later Local Development Framework document.
  - Any additional parking would be assessed on a case-by-case basis, in accordance with PPS25: Development and flood risk.
  - The Council prepared a Parking Standards Supplementary Planning Document (SPD) in July 2006 which will form part of the Local Development Framework (LDF). This document adopts restraint-based maximum levels of parking provision for developments in line with PPG13: Transport and the South East Plan Policy T4: Parking.

Core Strategy Issues and Options Consultation: Key Issues Raised, Officer Response and Officer Recommendations

- 4.0 The Council accepts that growth should be sustainable and managed effectively. The Council aims to locate most new development in sustainable locations that provide good access to local services and public transport, such as town centres.
- 4.1 Please see 3.0 response above regarding the Council's Transport Assessment and its consideration of the impact of development on the strategic road network.
- 4.2 Please see 1.1 response above regarding the Council's Infrastructure Delivery Plan document and transport planning obligation payments.
- 4.3 The population of the Borough is projected to grow and household formation is going to continue to change as households grow smaller between now and 2026 the time period of the Core Strategy. The Council's Strategic Housing Market Assessment has also outlined there will continue to be significant need for affordable housing. Furthermore the South East Plan has set out that the Council should make provision for about 5,840 net additional dwellings between 2006 2026. The Council has also carried out an Employment Land Review (ELR) which identified a projected need for office and industrial development across the Borough. Specifically, the ELR has identified that overall the employment sites around Old Woking are of significant importance due to low vacancy rates and should be retained. Based on this evidence it is clear that growth is required in Woking, however growth should be delivered in a sustainable manner.
- 5.0 The principle of travel plans is something that the Council accepts and will consider as part of the transport policy in the Core Strategy. Specific details of travel plans are best addressed in the form of an SPD. This is something that the Council will consider after the principle of travel plans have been established and approved in the Core Strategy. It is generally accepted that the application of travel plans to address the traffic impacts of industrial development are easy to implement. In contrast because of the freedom of choice for individuals to own and use private cars in their private residences, it has often been very difficult to apply the principle of travel plans to residential development. However it is an area that the council would wish to investigate further to see how best a travel plan can be applied and the Council will consult with the appropriate stakeholders, such as Surrey County Council, to assess the feasibility of this suggestion. There are schemes such as car-free zones, residential car share clubs etc as examples to look at.
  - Additional tunnels through Victoria Arch would create an improved passageway for pedestrians which would encourage a greater flow of people from north to south via the pedestrian tunnel. This would also allow for the pavements to be removed in the current tunnel and create a third traffic lane which would improve the current bottleneck and the flow of traffic across the railway line. The impact of this will be fully assessed to inform the preferred options.
- **7.0** The Council has consulted closely with the appropriate stakeholders with regards to the Core Strategy. Through the Transport for Woking the

Council will work in partnership in identifying appropriate policies to resolve the transport issues of the Borough. The strategies and the conclusions of wider studies, such as the results of the GWITS Study will also help inform the process.

8.0 These matters are detailed transport that can best be dealt with by other appropriate Local Development Documents, the Local Transport Plan and other Council departments. These comments will be passed on to the appropriate services of the Council and Surrey County Council for their consideration.

## 10.0.3 Officer recommendation

The development of transport policies in the Core Strategy is a work in progress. In particular the Council should continue to refine its transport policies to take into consideration the forthcoming conclusions of the Transport Assessment and the Infrastructure Delivery Plan. The Council should also work with appropriate stakeholders to assess the potential extent of travel plans that are required from developments.

## **11.0 Telecommunications**

#### Key issue raised

The Local Development Framework (LDF) should set out concise and flexible criteria based policies to guide telecommunications development.

#### **Officer response**

Modern telecommunication systems is a key infrastructure requirement of individual lifestyles. modern businesses and Demand for new telecommunications infrastructure is growing as the sector continues to develop. Through the Infrastructure Delivery Plan the Council will be working with key infrastructure providers to assess the likely future demand and capacity of key infrastructure services and facilities, including telecommunications. The findings of the Infrastructure Delivery Plan will feed into the Core Strategy, which will outline a framework the future level of infrastructure required. It is likely that criteria based telecommunications policies will be included in a Local Development Document.

#### Recommendation

Criteria based telecommunication policies should be included within a Local Development Document. The Council should continue to consult with key stakeholders regarding telecommunication issues. Conclusions drawn from the forthcoming Infrastructure Delivery Plan should be fed into any Core Strategy infrastructure policies.

## **12.0** Any Other Comments

This particular section of the questionnaire allowed scope for respondents to provide any additional comments that they wish to make.

## 12.0.1 Key issues raised:

- 1 A number of concerns were raised about the contents of the document. This include - The contents of the document were complex to understand and difficult to interpret. Document lacked clarity and language used are often authoritarian. Options are pre-selected to lead respondents to answer in a certain way. Evidence based work to help make informed decisions are mainly left out of the document and often difficult to find. Others thought that the document is not visionary enough and are still relying on current indicators rather than look into the future. Further concerns relate to having a version of the document for people with learning disability. The need for the Council to strive to reduce cost, including the cost of the consultation document was expressed by a number of people.
- 2 Some people were concerned that the consultation process was poorly organised and does not address real issues facing local residents. They thought that the consultation exercise should have been more extensive than it was with a lot more seminars to allow people to revisit them when they needed. They considered the real issues that the Council should be consulting of to be waste of money on pointless projects such as Lightbox, fortnightly collection of rubbish and its associated problems, pointless desire to lead on environmental issues, need to reduce Council tax etc. They thought the consultation exercise was a whitewash with predesigned questions to derive pre-determined answers. The length of time given for people to respond to the questionnaire was also questioned; in particular, it was thought that not enough time was given for the consultation exercise. There is absence of financial scenario modelling of the potential consequences of the Core Strategy.
- 3 The town centre is considered unattractive and unsafe to visit in the night. It lacks a range of shops and pedestrian/cyclists conflict should be managed. Height of buildings should be controlled. The town centre should be redeveloped to create an attractive environment, which will attract more stores such as John Lewis. There should be better use of space between Wolsey Centre and Peacock Centre.
- 4 Parking at Worplesdon Train Station is over capacity and should be improved. Improvement should include encouraging other transport hubs to take the strain. Also parking at Byfleet and New Haw Station should be improved.
- 5 The Council should work with other authorities and organisations to improved services such as education, health and roads.
- 6 Development should not be extended into the Green Belt.
- 7 Woking Train Station and its environs and the quality of the train services should be improved.
- 8 Woking risk being over developed and this could undermine its status as an international community.

- 9 There should be control of immigration into the area because of the perceived impacts it has on further housing provision.
- 10 Conservation areas should be protected.
- 11 Transport policy should restrict car use. Congestion should be managed. Need for speed limits. Need to improve transport links to and from Woking.
- 12 There should be adequate infrastructure provision to support new development.
- 13 There should be variation of affordable housing targets based on the size and location of development. Gypsy sites should be in or near urban environment.
- 14 The word vibrant should be explained.
- 15 Combined Heat and Power (CHP) network should be extended.
- 16 The public should have been asked of their views about what makes Woking a distinctive place rather than be given pre-determined questions to answer.
- 17 West Byfleet should be developed as a cultural and administrative centre (a South Bank type of development).
- 18 Development should fit into a long term vision and be cohesive.
- 19 There should be transparency in the Gateway project. It is a large project that needs effective coordination of its various phases.
- 20 The Strategy should be resilient against economic downturn.
- 21 The canal as an asset should be emphasised.
- 22 Instead of the rush to provide more development, the Council should protect existing facilities.
- 23 Another Goldsworth Park type development but with a shopping parade should be encouraged.
- 24 Too much emphasis on retaining low value Green Belt. These types of sites should be released for development.
- 25 Drainage system should be improved in flood prone districts.
- 26 More leisure facilities should be provided.
- 27 There should be planned intensification of development at the centre rather than encroaching into the countryside. Better integration of transport and development.
- 28 Car parking and bus services should be made affordable. Others feel that there should be no more additional parking.

- 29 The impact of development on wildlife should be acknowledged.
- 30 Developer contributions should be clearly defined to provide certainty to developers.
- 31 Facilities such as allotments, hospice, and scout should be recognised.
- 32 There should be improvement to existing infrastructure.
- 33 A number of comments relating to the Community Strategy have been forwarded to the Corporate Policy Team of the Council to consider.

#### 12.0.2 Officer's Response

1. There is always a challenge to be faced when preparing a Core Strategy in striking a good balance between producing what is mainly a technical document that should be able to stand up to technical scrutiny and a document that is user friendly to appeal to a wide range of users with varying understanding of the planning system. In this regard, it cannot be claimed that the document is perfect in all its aspects. However, officers will continue to explore all possible means of achieving a good balance between the two and these comments will be a useful reminder to that challenge. The document was not intended to seek pre-determined answers. The Council is genuinely concerned to ensure that the views of the public are taken into account as it proceeds with the preparation of the Core Strategy. Indeed, this section of the questionnaire was designed to allow scope for respondents to express any additional views that they may have without restricting them to the questions and answers section.

The document is founded on a wide range of evidence based studies. It would not be appropriate to include all of them in the body of the document. Officers will continue to explore how best these studies could be sign posted. Also, it will continue to explore possibilities to ensure that the next stages of the document are easily accessible to all sections of the community, including people with learning difficulties. Furthermore, the Council will continue to find ways of minimising the cost of its consultation exercises.

2. The Council will continue to improve upon its methods for disseminating information to reach as many people as possible within the resources available to it. With this particular consultation exercise, it did the best that it could within the time limits and the available resources to each as many people as it could.

Many of the issues raised as real issues facing local residents are beyond the scope of spatial planning and the Core Strategy in particular. However, relevant sections of the Council will be informed of these comments for their consideration.

The Council has been concerned to give local people the opportunity to be involved right from the beginning of the Core Strategy process. However, it has an obligation to prepare the Core Strategy in an efficient and expeditious manner. More importantly, it has to prepare the Core Strategy in accordance with timescales set out in its Local Development Scheme. A six week period given for the public to respond was considered adequate and is in compliance with national guidelines for the preparation of Local Development Framework documents. It also meets the requirements of the Council's Statement of Community Involvement. There will be further opportunities for the public to comment on the next stages of the Core Strategy process.

It will be difficult at this stage to model the financial consequences of the policies and proposals of the Core Strategy.

Also see 1 above

3. Issues about the town centre, in particular, making it attractive for visitors and new businesses to thrive is comprehensively addressed under various sections of the report, in particular under Economy and Transport and Accessibility. Other proposals such as improvements to the railway Station and the Gateway project will all assist.

Walking and cycling is also comprehensively addressed under Transport and Accessibility.

- 4. Parking at the various rail stations mentioned has been identified as important issues to be addressed and these comments will be taken into account when considering preferred options. Detailed comments to this issue are also provided under Transport and Accessibility.
- 5. The Council values partnership working and will continue to work with its partners to improve services in the Borough.
- 6. The protection of the Green Belt will be an important aim of the Core Strategy. The Green Belt is a national environmental designation that is protected by national planning policy. The Council is carrying out a Green Belt Study to assess how best it can be protected, in particular, whether there are any parts of it that could be released for development without undermining its overall integrity. The outcome of the study will inform future decisions about how the Green Belt should be treated.
- 7. Woking Station is recognised as an important asset of the Borough. Woking is identified as a Regional Hub in the South East Plan. Improvement to the Station and the redevelopment of its environs, including the Gateway project is a matter of continuous investigation by the Council and its partners. Transport for Woking is a partnership working Group tasked with the responsibility to enable this objective to be achieved. The Group works in close partnership with the Planning Policy Team and the outcome of their work will inform the next stages of the Core Strategy.
- 8. There is clear evidence to justify the need for development in Woking. There are also strategic requirements for development that the Council has an obligation to meet. In doing so, the Core Strategy will seek to ensure that the location and quality of future development are sustainable. It is expected that any development that is approved will be sympathetic to the overall character and appearance of the area.
- 9. It is not the responsibility of the Core Strategy to control immigration.

- 10. It is expected that the Local Development Framework will include robust policies to ensure that Conservation Areas and buildings of significant architectural interest are protected. National planning policies require the Council to ensure the protection of conservation areas.
- 11. Matters regarding options for transport policy are comprehensively addressed elsewhere in the report, in particular under Transport and Accessibility. A number of suggestions are made about how to resolve congestion in the Borough. These options will be tested with the view to identify preferred options that can best address the problem. It needs to be emphasised that it might be the case that a 'one size fix all' solution might not be appropriate. A combination of solutions applied in a coherent manner might be the right way forward in this particular situation and the Planning Policy Team are open minded at this stage to that possibility.
- 12. An Infrastructure Delivery Plan is being prepared to establish the level of infrastructure that will be needed to support growth identified in the Core Strategy and how it will be delivered. This will be key evidence base to support the Core Strategy and will be tested at an Examination in Public.
- 13. These are matters addressed elsewhere in the report. Options have been identified to be tested. This assessment will inform a preferred target/threshold for affordable housing provision. A viability Assessment is being carried out to justify any target that will be set.

The location of sites for the provision of housing for Gypsies and Travellers will be considered as an important element of the spatial distribution of housing in the Borough. The key consideration is whether the Core Strategy should identify broad locations or set criteria to determine the appropriateness of specific sites in due course. Information received through the consultation will assist in deciding on a preferred option. Groups representing Gypsies and Travellers will be consulted as the next stages of the Core Strategy are being developed.

- 14. It is proposed that the definition of 'vibrant' will be included in the glossary section of the document.
- 15. The Council is presently carrying out a climate change study to inform its policies on climate change. The potential for CHP is one of the subjects being considered by the study. The outcome of the study will inform policies on energy use and reduction of CO2 emissions. Issues regarding climate change are also covered under climate change.
- 16. There was scope within the questionnaire for respondents to express their views about what makes Woking distinctive.
- 17. This response will be carefully considered as the role of West Byfleet is defined in the Core Strategy. No doubt, West Byfleet is recognised as an important centre to be enhanced. Its hierarchy as a centre is being considered in other sections of the report, in particular under Hierarchy of Centres. All comments will be taken into account as the Core Strategy is progressed and preferred options are determined.
- 18. This is an important comment to note as the overall development strategy is

formulated.

- 19. Comment is noted and will be passed on to the partnership coordinating the Gateway project.
- 20. It is anticipated that the Core Strategy will have an in-built flexibility to adapt to changing economic circumstances. This is one of the requirements to be met when preparing LDF documents. It will also seek to create the necessary framework for local businesses to thrive as well as attracting inward investment.
- 21. This value of the canal as an asset has been noted to be explored. It is reasonable to acknowledge its potential for further investigation. Relevant organisations with interest in the matter will be consulted for further advice.
- 22. The point is noted and other sections of the Council will also be notified. It needs to be emphasised that the Council will continue to do the best that it can to work in partnership with others to improve upon existing services in the Borough. At the same time the future infrastructure and service needs of residents, workers and visitors cannot be ignored.
- 23. The Council will seek to ensure that development that is approved is appropriate within its context
- 24. See 6 above.
- 25. The introduction of Sustainable Drainage Systems (SuDS) into development is identified as a key issue for consultation because the Council recognises its contribution towards reducing incidence of flooding. Detailed response on SuDS is also provided under climate change. The Council is gathering information to justify its policies on climate change. The outcome of this work will inform policies on climate change.
- 26. See 12 above.
- 27. Different scenarios are being consulted on, including the intensification of development at the centre. The impacts of these scenarios are also being tested to inform a preferred option. Clearly, there are significant merits in concentrating development at the centre. However, it should also be recognised that different types of development will have different locational requirements, which should be taken into account. For example, the requirements for family homes or housing for the elderly will be different from those of affordable housing for the young.

A transport assessment of the various scenarios is being carried out to assess their impacts and to inform a preferred option.

- 28. The pricing of parking and bus services is beyond the scope of the Core Strategy. The provision of additional parking facilities has been dealt with under Transport and Accessibility.
- 29. The impact of policies and proposals on the Core Strategy on wildlife and important habitats is an important consideration. Appropriate Assessment of SPAs and SAC has been carried out to ensure that important habitats and species are not adversely affected by the proposals of the Local

Development Framework. The Council is also working in partnership with the Wildlife Trust to review its locally significant sites to ensure that they are up to date and are protected.

- 30. A key issue of the Local Development Framework is to develop a model for securing developer contributions that provides certainty to developers. The model should also be transparent, easy to apply and realistic in ensuring the economic viability of development proposals. Various options including the introduction of the proposed Community Infrastructure Levy (CIL) are being considered and are part of the issues being consulted on. Which ever option that is adopted, the key principles of certainty, transparency, ease of application and reasonableness will continue to apply. Decisions about this will be made when the CIL provisions are introduced.
- 31. See 12 above.
- 32. The Council will work with its partners to improve existing infrastructure. Also see 12 above.
- 33. A number of comments relating to the Community Strategy has been forwarded to the Corporate Policy Team of the Council to consider.