

# Draft Core Strategy Consultation (November 2010 – January 2011)

## Summary of Representations Received and Officer Responses



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### **Section 1: Introduction - summary of issues**

- 1 It is a bold claim that the Core Strategy is for everybody. The whole Core Strategy is flawed.
- 2 There is discrepancy between projected population increase and the projected growth in housing. Based on the population increase from 2008 (92200) to 2026 (94488) 10474 houses should be provided.
- 3 A question is raised as to whether the growth assumptions are an extrapolation from past trends or aspiration.
- 4 Other plans and programmes in the introductory chapter should refer to the Minerals and Waste Development Framework (MWDF). The paragraph should also explain the County Council's role as the minerals and waste planning authority. Safeguarded sites and allocations once adopted should be shown on the Core Strategy Proposals Map. Paragraph 1.27 and 1.28 should refer to safeguarding areas and site allocations contained within the MWDF once adopted. In terms of the adopted Waste Plan 2008, the Proposals Map will need to be amended to include Martyr's Lane Community Recycling Centre (Policy WD1), Martyr's Lane and the existing waste sites listed in Appendix 2 of the County Council's Minerals and Waste Annual Monitoring Report, which are safeguarded under Policy DC1 and Woking Rail Aggregate Depot (safeguarded under Policy 28 of the SMLP).

### **Section 1: Introduction - Officer's response**

- 1 The aim of the Core Strategy is to address the key challenges facing the Borough. An Issues and Options paper has been published for extensive public consultation to establish the basis for the policies of the Draft Core Strategy. It is hoped that the delivery of the Core Strategy will help address the needs of all sections of the community. It is acknowledged that various people will be affected differently by the Core Strategy. However, overall, officers are convinced that it will help improve the well-being of the community. This is confirmed by the SA of the Draft Core Strategy.
- 2 Concerns about the population assumptions used in the Draft Core Strategy have been addressed under the Policy CS1. The purpose for preparing the Core Strategy is also highlighted under Policy CS1. There is nothing further to add in this regard.
- 3 The growth requirements in the Draft Core Strategy are based on robust evidence, taking into account a range of factors including past trends. The vision is to meet the needs of all sections of the community.
- 4 National policy guidance requires the Core Strategy and its Proposal's Map to take account of the Minerals and Waste Development Framework. New paragraphs covering the Surrey Waste Plan (2008) and Surrey Minerals Plan (2011) will be inserted before the paragraph about "Other Plans and Programmes". The County Council's role in preparing these documents will be emphasised. Paragraphs 1.27 and 1.28 (which discuss the Proposals Map) will also be amended. The Proposal's Map will be amended to reflect the provision of the Minerals and Waste Development Framework, in particular, any safeguarded site that has been identified in the adopted versions of these documents.
- 5 This proposed amendment is not in response to comments raised at the consultation. It is in response to changes to national planning policy. There have been a number of proposed changes to the planning system since the publication of the Draft Core Strategy. Consequently, it is proposed that the section on the emerging changes to the planning system should be radically revised as set out in the box below.

## **Introduction - Officer Recommendation**

- 1 The introductory section will be amended. New paragraphs covering the Surrey Waste Plan (2008) and Surrey Minerals Plan (2011) will be inserted before the paragraph about "Other Plans and Programmes". The County Council's role in preparing these documents will be emphasised. The paragraphs which discuss the Proposals Map (currently paragraphs 1.27 and 1.28) will also be amended.
- 2 Paragraph 1.27 (which discusses the Proposals Map) will also be amended accordingly by including the wording 'safeguarded sites identified in the adopted Mineral and Waste Development Framework' to the list. The Proposals Map will also be amended to include safeguarded sites in the adopted Minerals and Waste Development Framework.
- 3 It is proposed that the section on the "Emerging changes to the planning system" (paragraphs 1.15 to 1.17) be radically revised to reflect the changing planning system nationally, as set out in the box below. Other consequential amendments as a result of the emerging changes to the planning system are highlighted throughout the revised Draft Core Strategy.
- 4 The Core Strategy be amended by including a section on Neighbourhood Plans as set out below.

### **Emerging changes to the planning system**

The Government has proposed a number of changes to the planning system. These are either set out in the Decentralisation and the Localism Bill (the Bill) or by ministerial statements. The Decentralisation and Localism Bill is going through its parliamentary procedure and is anticipated to be enacted by the end 2011 to be effective from April 2012. The Bill is driven by six key actions, which are to:

- Lift the burden of bureaucracy;
- Empower communities to do things their way;
- Increase local control of public finance;
- Diversify the supply of public services;
- Open government to public scrutiny; and
- Strengthen accountability to local people.

The relevant aspects of the Bill that has significant implications for the Core Strategy are:

- The abolition of Regional Strategies;
- The duty to co-operate in relation to planning of sustainable development;
- Introduction of Neighbourhood Planning;
- Endorsement of the use of Community Infrastructure Levy (CIL) to secure developer contributions towards infrastructure provisions.

Since the publication of the Bill, there have been a number of ministerial statements, which Local Authorities are required to take into account as material consideration. These have been taken into account in the proposed revision to the Draft Core Strategy. A summary of the key proposals are:

- Local Authorities should prioritise growth and jobs. In this regard, the Secretary of State has written to Local Authorities setting out clear expectations to prioritise growth and jobs;
- There is going to be a powerful new presumption in favour of sustainable development. This will be set out in the emerging National Planning Policy

Framework (guidance will be provided about the definition of sustainable development);

- There will be a legal requirement to carry out an economic viability assessment to justify the rate at which CIL tariff is set;
- Businesses will be able to bring forward neighbourhood plans and neighbourhood development orders;
- National target on development on previously developed land is removed;
- A review of the Use Classes Order to make it easier to convert commercial premises to residential is now a subject of public consultation; and
- The duty to co-operate has been strengthened.

There is no doubt about the Government's commitment to promote growth. It is also committed to the plan-led system and expects Local Authorities to set out their growth targets in their Local Development Documents (LDD). Local Authorities are encouraged to speed up the preparation of their LDDs to provide the necessary framework to deliver the Government's objectives for growth. The policies of the Draft Core Strategy reflects the above national context and is prepared expeditiously to provide the framework for the delivery of locally generated growth in the context of national planning objectives.

### **Neighbourhood Plans**

The Decentralisation and the Localism Bill is clear to emphasise the Government's commitment to Neighbourhood Plans. A number of ministerial statements have been made regarding this matter. The Government has offered £3.2M grant to Royal Town Planning Institute, Locality, the Prince's Foundation and the National Association of Local Council's in Partnership with the Campaign to Protect Rural England to provide free advice to local community groups about how they plan for their neighbourhoods. Once adopted, Neighbourhood Plans will form part of the development plan for the area. It is therefore proposed that the Core Strategy be amended to include a section on Neighbourhood Plans. The text set out below is proposed:

### **Neighbourhood Plans**

'The Decentralisation and the Localism Bill makes provision for Neighbourhood Development Plans. Neighbourhood Plans are designed to empower local communities to take control in shaping the places they live and work. There is no statutory duty for communities to prepare Neighbourhood Plans, only a right to do so if they wish. Designated bodies such as Parishes, Wards, and Neighbourhood Forums may decide to prepare Neighbourhood Plans for their area. It is also proposed that businesses will be able to bring forward Neighbourhood Plans. It is a permissive regime and for that matter, Local Authorities are required to consider any request from local neighbourhoods who wish to prepare Neighbourhood Plans. Once adopted, Neighbourhood Plans will form part of the statutory development plan for the area.

The Core Strategy offers in-principle support for Neighbourhood Plans that meets the following requirements:

- Have regard to national planning policy;
- Have regard to the other development plan documents in the area;
- Be in general conformity with the strategic policies and proposals in the Core Strategy;
- Be compatible with European Union Directives and obligations; and
- There should be a clear definition of the geographical coverage to be covered by the Neighbourhood Plan.

Furthermore, the Bill sets out detailed requirements such as the number of people that can comprise a Neighbourhood Forum. These requirements will also have to be met.

The preparation of Neighbourhood Plans follows a process that is defined by the Bill. This will include:

- A geographical definition of the neighbourhood. The Local Authority will help with this;
- The neighbourhood will have to apply to the Local Authority to prepare a Neighbourhood Plan and there should be pre-application consultation preceding the application;
- Neighbourhood Plans will have to be submitted for Independent Examination and the Examiner will have to issue its report with recommendations;
- If judged to be sound, a referendum will have to be carried out and the plan will be adopted if 50% or more of those voting are in favour.

The Council will help to define the geographical scope of neighbourhoods, provide advice on the preparation of the plans throughout its key stages and validate plans to ensure that they meet all the necessary requirements'.

## **Section 2: Spatial Portrait - summary of key issues**

- 1 The reasons for the town's prosperity should be documented. This includes easy access to London, main railway line, retention of the Green Belt and council estates in Sheerwater and Maybury. Similarly, there are negative aspects that need to be mentioned including many buildings that are eyesore, congested network.
- 2 Reference to average salaries in Section 2.0 should be deleted. Delete 'higher' in paragraph 2.14 and replace with 'lower'.
- 3 Paragraph 2.27 should include routes 34/35.
- 4 There should be modest increase in town centre parking charges to reduce car usage.
- 5 The transport section of the Spatial Portrait should make reference to Woking as a cycle town.
- 6 Figures quoted in paragraph 2.31 relating the Guildford and Woking Integrated Transport Study will be out of date and should be deleted.

## **Section 2: Spatial Portrait - Officer's response**

- 1 The spatial portrait and the SWOT analysis combine to provide the strengths and weakness of the existing characteristics of the area. The specific strengths and weaknesses mentioned are all listed in these sections. However, the Spatial Portrait will be recast to emphasise its spatial linkages and draw out its keys issues to make it easily readable.
- 2 The mention of average earnings is necessary to put the relationship between house prices and average earnings into context, in particular, it gives an indication about the affordability of housing in the area. It is recognised that the information is only a snap shot in time, which will be updated as part of the monitoring of the Draft Core Strategy. Its significance cannot be underplayed in this regard. Also, paragraph 2.14 will be amended by deleting higher and replacing it with lower. This change is factually correct.
- 3 Paragraph 2.27 will be amended by taking out reference to specific bus routes as information on services frequently changes.
- 4 The setting of specific town centre parking charges is outside the scope of the Core Strategy. The comment will be passed on to the appropriate section of the Council for consideration. The Core Strategy however emphasises the use of parking as a demand management tool to manage traffic.
- 5 Cycle Woking is a significant transport project to highlight in the Spatial Portrait because of its importance in contributing towards addressing transport problems in the Borough.
- 6 Some of the information in the Guildford and Woking Integrated Transport Study has been superseded by the Transport Assessment carried out to support the Core Strategy. It is therefore reasonable to delete the reference to this study as suggested.

## **Section 2: Spatial Portrait - Recommendation**

- 1 Amend paragraph 2.14 by deleting 'higher' and replacing it with 'less than'.
- 2 Amend paragraph 2.27 by removing any reference to specific bus routes.
- 3 Recast the Spatial Portrait to emphasise the spatial distinction and relationships of the various parts of the Borough and highlight the key issues that emerges from the Analysis (see revised spatial portrait).
- 4 The transport section of the Spatial Portrait should be amended by making reference to Woking as a Cycle Town.
- 5 Reference to the Guildford and Woking Integrated Transport Study in paragraph 2.31 should be deleted.
- 6 The Section should be amended to emphasise the various areas that make up the Borough.

### **Section 3: Key issues and challenges for Woking to 2027 - summary of key issues**

- 1 The full name for Special Area of Conservation should be given in paragraph 3.3.
- 2 Lack of resources to maintain heritage assets should be identified in the SWOT analysis as threat. Lack of dependable public transport service in SWOT analysis should be qualified by 'in some areas'.
- 3 The Council is required to maintain and preserve the Woking Palace moated site, the structure on it and the integrity of the buried archaeological deposits. It has a statutory duty to make the site accessible/available to the public and should acquire a neighbouring site to enable that to happen. The Council should complete a Conservation Management Plan for the site. Furthermore, the Council should provide annual grant to Friends towards signboards, displays etc.
- 4 This section should be modified to emphasise that the proposed Airtrack rail link to Heathrow would complement the existing public transport services significantly.
- 5 Paragraph 3.20 should make reference to work already carried out by the Council, in partnership with Surrey County Council, developers, bus operators in the form of the Gateway project.

### **Section 3: Key issues and challenges for Woking to 2027 - Officer's response**

- 1 Paragraph 3.3 will be amended to include the full name of the Special Area of Conservation to make it consistent with other sections of the document. For the avoidance of doubt the full name of the Special Area of Conservation is 'Thursley, Ash, Pirbright and Chobham Special Area of Conservation'.
- 2 The SWOT Analysis will be amended by adding 'in some areas' to lack of dependable public transport services. This change will be consistent with other statement of the Draft Core Strategy. Global economic circumstances and implications on investment have already been identified as a threat to the delivery of the Core Strategy. It is therefore not intended to single out threat to heritage assets. Doing so could be misleading by suggesting that it is the only assets that are under threat (see changes to the SWOT Analysis in Table 2).
- 3 The Council's specific role in providing grant and preserving Woking Palace is not a matter for the Core Strategy to deal with and the comment will be passed on to the appropriate sections of the Council and the County Council for consideration. However, the Draft Core Strategy has specific commitment in the form of Policy CS19 and objective 12 to preserve and enhance the heritage of the area.
- 4 Reference to Airtrack Rail Link should be deleted entirely. Heathrow has decided to withdraw its Transport and Works Act Order application for the proposed Airtrack link to Staines. It is unlikely that this scheme as proposed will happen during the period of the Core Strategy.
- 5 The Gateway project will be required to improve the transport interchange facility in the vicinity of the Rail Station. Pre-application discussions are on-going. The project has delayed due to the current economic circumstances. However, it is likely that planning application will be submitted in the near future. Reference to the scheme in paragraph 3.20 is therefore reasonable.

### **Section 3: Key issues and challenges for Woking to 2027 - Recommendation**

- 1 Amend paragraph 3.3 (which became paragraph 2.3 of Core Strategy Publication Document) by referring to the full name of the Special Area of Conservation, which is 'Thursley, Ash, Pirbright and Chobham Special Area of Conservation'.



- 2 Amend SWOT Analysis by adding 'in some areas' to lack of dependable public transport services.
- 3 Delete all reference to Airtrack Rail Link in the Draft Core Strategy.
- 4 Paragraph 3.20 (which has evolved into para 2.29 in the Core Strategy Publication Document) should be amended by inserting the following sentence after town centre 'The Council is already working in partnership with the County Council and other stakeholders as part of Transport for Woking and with promoters of the Gateway project to ensure the development of an integrated interchange facility in the vicinity of the Rail Station'.

## **Section 4: Spatial Vision and Objectives**

### Spatial Vision - summary of key issues

- 1 The spatial vision is unclear with no attempt made to present a picture of what the vision will look like on the ground. The vision will lead to high rise buildings, urbanised suburbs and cramped. Furthermore, Green Belt will have shrunk considerably.
- 2 The wording of the vision after 'visit' should be deleted. The wording of the vision should be stronger so that people can understand how the area will look like in 15 – 20 years and also demonstrate how Woking will start to transform itself and compete with other nearby towns. The strategy should acknowledge past mistakes such as poor quality development, poor quality pedestrian, vehicular and cycle access across the railway line, lack of quality landscaping, fear of crime etc.
- 3 The vision does not place much emphasis on the need to increase the supply of decent affordable homes, which will offer a choice to those who cannot afford Market housing. Home ownership should not be the preserve of the wealthy.
- 4 The Council should set out clearly its vision for a sustainable community.
- 5 Who provided the rationale for Woking to change its character to that envisaged in the 2027 Report?
- 6 Regard to the character of the area as stated in the vision should not only be related to housing development but all types of development.
- 7 The vision fails to recognise that there are pockets of deprivation within the Borough.

### Spatial Vision - Officer's response

- 1 Officers do not see any ambiguity in the wording of the vision. There is nothing in the vision to suggest that it will lead to undesirable high rise buildings in the area. There is a place for high rise building in seeking to maximise the efficient use of land. But it will have to be appropriate to its context, taken into account the character of the area. There is a design policy to ensure that development is considered in its context.
- 2 Deleting everything in the vision after 'visit' will undermine its purpose and intent. The wording should be retained. The SWOT Analysis in Table 2 acknowledges the strength and weaknesses of the area and no purpose will be served by repeating them in the vision.
- 3 The vision should be achievable and realistic. The wording attempts to strike a balance between aspiration and reality. It is forward looking whilst recognising that previous mistakes should be avoided. It emphasises the need to provide well designed housing to meet the needs of all sections of the community. This will include affordable housing.
- 4 See above
- 5 The Council is required by Government to prepare Development Plan Documents. The Core Strategy is key amongst these documents. Its provisions are all justified by evidence and the evidence base is listed in Appendix 1 of the Draft Core Strategy.
- 6 The comment is accepted because all form of development should respect the character of the area. The vision will be amended accordingly.
- 7 The vision seeks to address pockets of deprivation by ensuring that the benefits of growth and prosperity are shared throughout the Borough. This is specifically highlighted. It is therefore incorrect to suggest that the vision does not recognise deprivation as an issue.

### Spatial Vision - Recommendation

The vision will be amended so that all forms of development should respect the character of the area and not just new housing.

#### Objectives - summary of key issues

- 1 Objective 10 should be recast to include – most people who live further away from Woking Town Centre can get to it by good, frequent public transport and using the car is a choice not a necessity.
- 2 The word 'provide' in objectives 1 and 3 should be replaced with 'enable'.
- 3 The word relative deprivation should be clearly defined.

#### Objectives - Officer's response

- 1 It will not be for the Core Strategy to dictate the specific type of mode of transport that individual people should use. It rather creates opportunities and a sound framework for development to be served by all relevant modes of transport to create real choice for people. Furthermore, it encourages the use of public transport as a means of addressing congestion and air pollution in the area by putting in place positive policies to provide investment in public transport infrastructure.
- 2 The suggestion to change the word 'provide' in objectives 1 and 3 to 'enable' is acceptable and the Draft Core Strategy will be amended accordingly.
- 3 The Glossary will be amended to explain a definition of deprivation. This will further the understanding of terminologies used in the Core Strategy. Deprivation is explained as: Deprivation covers a broad range of issues and refers to unmet needs caused by lack of resources of all kinds, not just financial. The Council uses the indices of Deprivation produced by the Department of Communities and Local Government (DCLG) to identify areas of deprivation. The English Indices of Deprivation attempt to measure a broader concept of multiple deprivation, made up of several distinct dimensions, or domains of deprivation.

#### Objectives - Recommendation

- 1 Amend objective 1 by replacing the word 'provide' with 'enable' and amend objective 3 by replacing the word 'provide' with 'enable the provision of'.
- 2 Amend the Glossary by including the definition of deprivation.

## **Policy CS1 – A Spatial Strategy for Woking**

The purpose of Policy CS1 is to set out the overall quantity of development projected to be provided in the Borough until 2027, how they will be distributed and the standard of quality that they are expected to achieve. Furthermore, it sets the framework to protect both the natural and the built environment, including designated sites such as the Thames Basin Heaths Special Protection Area (SPA) and the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC).

Whilst this analysis and responses relate to specific comments made to Policy CS1, members are reminded that Policy CS1 is a contextual policy that provides broad framework for detailed policies in the document. Members are therefore advised to read this section in conjunction with the rest of the responses to fully appreciate the scope of changes being recommended and how the overall responses to the Draft Core Strategy have been addressed.

Since the publication of the Draft Core Strategy, the Government have announced a number of changes to the planning system. In particular, it has emphasised that its top priority in reforming the planning system is to promote growth and jobs. It has clear expectation that the answer to development and growth should whenever possible be 'yes' except where this would compromise key sustainable development principles. The Chancellor in March 2011 set out further detail on the Government's commitment to ensure that Local Authorities plan positively for new development and speed up their preparation of Local Development Documents. Subsequently, the Minister of State for Decentralisation has written to Local Authorities emphasising that the Government's announcements about promoting growth are a material consideration that should be taken into account in planning decisions. This has been taken into account in reviewing the Draft Core Strategy. As a result, there are some proposed changes that are not borne out of the consultation responses, but in response to the emerging changes to the planning system. There are also changes that are proposed as a result of new evidence that has emerged since the publication of the first Draft of the document.

Policy CS1 broadly covers a number of issues and topic areas. Responses received are therefore grouped and dealt with under the following broad headings.

### **Overall scale of growth (comments made in relation to policy CS1) - summary of key issues**

- 1 There is lack of intellectual framework to justify growth and this diminishes confidence in the document. The Core Strategy takes little account of foreseen global changes, political and power shift that will occur up to 2027. The overall growth requirements have no basis, are not justified and no evidence to support them. The strategic assumption on future housing needs (4964 additional dwellings) is unsound. Planners should take account of the Commission for Sustainable Development publication 'Prosperity without Growth, March 2009' or provide an alternative intellectual case to underpin the Core Strategy.
- 2 The housing target is based on the requirements of the South East Plan, which is now defunct. The 292 target has no basis. Furthermore, no provision has been made to limit growth to this target. An alternative approach would be to identify areas within the Borough where housing of varying densities could be accommodated. The argument that sustainability can only be achieved by expansion is unbalanced. Limited and controlled growth should be the central focus.

- 3 The affordable housing target is not ambitious enough. Whilst support is expressed for the housing target, it will not be enough to meet the need for both market and affordable housing.
- 4 There is insufficient justification for a radical departure from what has been identified as a need for new homes.
- 5 The high demand for affordable housing is surprising given the existing mix of housing types – 90% market housing and 10% affordable. It is also at odds with the evidence in SHMA which states that future demand is likely to be 81% for market housing and 19% for affordable housing. The methodology used to justify need for affordable housing is not revealed. The affordable housing requirement will lead a higher proportion of affordable homes in the Borough than the current ratio.
- 6 There should be even spread of affordable homes across the Borough
- 7 Recent Government policies such as the new affordable rent model will change the pattern of demand significantly
- 8 The target for Woking Borough Homes to provide 50 new affordable homes may be unrealistic in the context of the current economic climate.
- 9 There is no justification for employment growth.
- 10 Population growth projections that inform the housing target are unreliable. Furthermore, Woking population needs are heavily influenced by London. Change is inevitable, but has to be organic and natural and not imposed for commercial reasons. There should be a target for population. The Core Strategy represents a deliberate attempt to expand the population through immigration. It is deliberate social engineering with more social housing to destroy the area. The Draft Core Strategy will turn Woking into a giant Low Cost Build Estate with all its inherent problems. The misconception that expansion is the way to ensure growth is mis-guided.
- 11 Woking cannot afford to grow at the rate proposed in the Draft Core Strategy, in particular, without commensurate infrastructure to support the growth.
- 12 The Council should not allow the population to grow by 41% based on 594 houses per year for the next 16 years with an average family size of 4 persons
- 13 No alternative development options considered. The plan rules out consideration of potential viable alternatives. This amounts to denying local citizens the chance to judge for themselves in an informed way other potential futures. There is a misconception that the only way forward for the Borough is growth. Any opposing view to the Council's growth strategy is not genuinely considered. This is demonstrated by how such comments are disseminated to the public and councillors. The robustness of the evidence base is questioned. In particular, there is no basis for the 292 housing target. In an earlier document of the Council, the projected increase in population was given as 2.5%. At the same period the Office for National Statistics' projection was 12%. The Council was unable to reconcile the disparity. Confidence is therefore lost of the robustness of the evidence base upon which the housing target is based.
- 14 The concept of Woking as a regional, economic superpower is fanciful and egotistical. Woking needs infrastructure not further growth.
- 15 The revocation of Regional Strategies and the emerging emphasis on localism brings into question the basis of the Draft Core Strategy. Residents are empowered to determine what is best for Woking. The Draft Core Strategy therefore requires a root and branch review.

## Overall scale of growth (comments made in relation to policy CS1) - officer response

- 1 The strategic policy and intellectual basis for preparing the Core Strategy and making provision to meet the needs of the community is rooted in the Planning and Compulsory Purchase Act 2004 (as amended) and national planning policy as expressed in Planning Policy Statements/Guidance Notes, Regulations and Circulars etc. A key objective of national planning policy is to ensure the provision of sufficient, good quality new homes in suitable locations to meet the needs of all sections of the community and to identify opportunities for future investment to deliver economic objectives. This aim is highlighted by the New Coalition Government in their localism agenda, in particular, their White Paper on Local Growth – Realising every place’s potential. Woking Borough Council therefore has a clear statutory duty to set realistic targets for meeting the housing and employment needs of the area and to identify sufficient suitable and deliverable sites to meet those targets. In meeting this responsibility, it also needs to ensure that the proposed development are delivered in a sustainable manner, including making sure that the needs of all sections of the community are met, that the development are located at sustainable locations and are of high quality of design and environmental standards. The policies of the Draft Core Strategy ensure that this is the case. Furthermore, it needs to ensure that adequate infrastructure is put in place to support the identified growth. The Government have stressed that growth targets must be justified by evidence and this will be one of the tests of soundness against which the Core Strategy will be measured. The Council have carried out a number of studies to justify each aspect of its growth projections. The assertion that the growth requirements of the Draft Core Strategy have no intellectual basis or clear evidence to support them is incorrect.

In preparing the Core Strategy, officers have done a lot of investigation into alternative ways of addressing the challenges facing the Borough, including considering the Commission for Sustainable Development publication ‘Prosperity without Growth, March 2009. The contents of this publication are noted. However, they do not represent Government policy and neither does its principles considered suitable for addressing the challenges facing the Borough as a whole.

The Council published an Issues and Options document for consultation in November 2009. This document provided an opportunity for the public to comment on the alternative options identified to address the key issues facing the Borough. The need for housing and local job creation was supported. Concerns expressed as part of the consultation were taken into account before the Draft Core Strategy was published.

There is robust local evidence to support the following overall level of growth: 4,964 net additional dwellings (292 new homes per year). About 35% will be new affordable homes; 28,000sq.m of office floorspace, 20,000sq.m of warehousing floorspace; and 93,000sq.m of additional retail

- 2 The overall target of housing provision is in line with the South East Plan target set out for Woking. There is no doubt that the SHMA provides evidence for housing need over and above what is being provided by the Core Strategy. The case for the Core Strategy housing target is covered under the options for the scale of housing growth and it is not intended to repeat that. It should be noted

that the South East Plan continue to be part of the development plan for the area, despite acknowledging that the Secretary of State's intention to revoke it is a material consideration. In setting the housing target for the Core Strategy, the Council have taken a number of factors into account. This includes:

- \* current and future housing need and demand;
- \* housing land supply;
- \* household projections;
- \* the need for affordable housing;
- \* economic growth projections;
- \* sustainability appraisal; and
- \* infrastructure requirements.

The target is considered to be the most feasible and realistic target to provide without significantly undermining the environmental quality of the area when compared with other options.

3. There is significant unmet need for affordable housing. This is demonstrated by the Strategic Housing Market Assessment carried out by the Council. This information is published on the Council's website and is therefore in the public domain. The Council accepts that it is unlikely that the affordable housing target proposed in the Draft Core Strategy in the context of the overall housing supply will be enough to meet all the need identified in the SHMA. The proposal in the Draft Core Strategy is for about 35% of the overall housing target of 4,964, which is about 1,737, to be new affordable homes. This is significantly short of the 499 new homes identified in the SHMA. At the moment the most realistic approach for delivering affordable housing in the Borough is on the back of market housing. This approach to delivery is unlikely to change in the near future, in particular in the context of the current economic climate and the Government's new approach to affordable housing provision. The implications of the New Affordable Model are taken account of in the affordable housing policy (Policy CS11). Taking this into account as well as evidence provided by the Economic Viability Assessment and SHLAA, officers take the view that the affordable housing targets set out in the Draft Core Strategy presents the most likely and realistic targets that can be achieved without undermining the likely prospect of development coming forward. An Economic Viability Assessment has been carried out to justify the requirements of the affordable housing policy and to ensure that a good balance is struck between the need for affordable housing and the economic viability of development schemes. The Council is ambitious in its affordable housing programme and has made it one of its key priorities. It has even set up an independent company to deliver affordable housing. However, it is pragmatic enough to balance its ambitions with realism for delivery. Overall, the housing policies of the Core Strategy will help promote a balance community. Most of the housing provision will be concentrated in the urban area, as set out in the table below which is an extract from the Housing Provision and Distribution Policy. This will ensure a spread of affordable housing across the Borough.



	<b>Indicative number of dwellings*</b>	<b>Indicative density range**</b>
Woking Town Centre	2,300	In excess of 200dph
West Byfleet District Centre	170	50 – 100dph
Infill development in the Local Centres	250	30 – 60dph
Infill development in the rest of urban area	750	30 – 40dph
Moor Lane site, Westfield	440	30 – 50dph
Brookwood Farm, Brookwood	300	30 – 50dph
Green Belt (site(s) to be released after 2021/22)	550	30 – 50dph
Woking Town Centre – as a broad location	200	In excess of 200dph
<b>Total</b>	<b>4,964</b>	

\*rounded

\*\*densities are pro rata where part of a mixed use scheme.

Since the publication of the Draft Core Strategy, the Government has proposed changes to the definition of affordable housing to include the new affordable rent model. The implications of this on the affordable housing policy are fully addressed under Policy CS11 – Affordable Housing.

- 4 See point 3 above
- 5 See point 3 above
- 6 See point 3 above
- 7 See point 3 above
- 8 One of the identified delivery agents for affordable housing is Woking Borough Homes. It is an independent organisation owned by Woking Borough Council. There is no doubt that the economy is experiencing a downturn. However, there is optimism for significant economic growth in the medium to long term.
- 9 Regarding growth of commercial development, a proposed target of 93,900sq.m of additional retail floorspace, 28,000sq.m of office floorspace and 20,000sq.m of warehousing floorspace has been set. A Town, District and Local Centre study and an Employment Land Review has been carried out respectively to justify the proposed scale of growth and officers believe that its spatial distribution strategy will enable that to be delivered in a sustainable manner to the benefit of the whole of the Borough. In particular, most of the employment provision will be met on previously developed land in Woking Town Centre, West Byfleet District Centre and in the Employment Areas, as designated on the Proposals Map.

A comprehensive list of studies has been carried out to justify the proposed housing and employment targets and as well as the standards to ensure their sustainable development. These are listed in Appendix 1 of the Draft Core Strategy and full details are on the Council's website [www.woking.gov.uk](http://www.woking.gov.uk). Officers take the view that the studies are robust, up-to-date and provide adequate justification for the proposed growth identified in the Draft Core Strategy. So far, the Council have not received any direct and substantive critique of any of its evidence base that questions their validity. They have also not received any alternative evidence from respondents for consideration.

- 10 Much has been said by some respondents about the population figures used to inform the Draft Core Strategy and the influence of population migration of the proposed development in the Draft Core Strategy. In particular, it is claimed that the population figures upon which the Draft Core Strategy growth projections are based is flawed. The primary population figures used to underpin the Draft Core Strategy are derived from the Office of National Statistics (ONS) population census data. They are officially recognised to be credible and have been accepted at Independent Examinations. The Council has no reason to doubt its accuracy. Also, the population projections used to estimate projected development are based on recognised methodology and clear assumptions. A Population Topic paper has been prepared as evidence base to support the Core Strategy. This will be published on the Council's website. Officers are therefore convinced of the reliability of the population data used to inform the Core Strategy.

There is nothing that the Council can do on its own to control natural population growth or indeed, the movement of people to and from the Borough. A significant proportion of the population growth is generated from within the community through natural population growth. It also needs to be emphasised that the use of population data to underpin growth assumptions is not only based on total/absolute population figures but also the nature and composition of the population and the changes within them such as new household formation (such as divorce rate, length of time it takes for people to co-habit), rate of change of different age groupings and how they cohort from one to another etc. Furthermore, it is emphasised that the proposed development in the Draft Core Strategy is mainly designed to meet locally generated need that is supported by evidence. The assertion that the Core Strategy is a deliberate attempt to engineer an expansion of the population, in particular, through social housing provision and in-migration is therefore incorrect. Whilst it is accepted that there is movement of people between the Borough and London, the impact of this on population growth have been over-exaggerated.

The housing target is set at 292 new dwellings per year. A target for 594 per year was only one of three options that were considered.

The proposed development being promoted in the Core Strategy will be supported by adequate infrastructure. Evidence of this is demonstrated by the Infrastructure Delivery Plan. This is an evidence base to the Core Strategy.

- 11 See point 10 above
- 12 See point 10 above
- 13 The Draft Core Strategy had followed a clear process, which is set out in the approved Local Development Schemes (LDS). The LDS is on the Council's

website and has been in the public domain for sometime. Central to the process has been community involvement and the Council has ensured that the public and all key stakeholders are involved at each state of the process. A consultation statement will be prepared as part of the evidence base. This will set out all the consultation that has been carried out to involve the public in the process. A key stage of the process was the Issues and Options stage, which gave the public the opportunity to comment on available options for addressing the key issues facing the Borough. The consultation period for this stage of the process was between October and November 2009. The alternative options were also sustainability appraised before preferred options were selected. Details of this are included in the SA of Options Report. The claim that the public were not given the opportunity to consider potential alternatives is therefore incorrect. All representations received were carefully analysed and considered by the appropriate committees of the Council. The recommendations of the analysis were used to inform the Draft Core Strategy. Again, the claim that any opposing views to the Council's strategy are not genuinely considered is also incorrect. The robustness of the evidence base to justify each stage of the process is demonstrated by the list of evidence base set out in Appendix 1.

- 14 There is no doubt that Woking has a significant status and a role to play in the regional economy by reason of its existing economic activity and its good transport links with the rest of the region and beyond. These attributes can sustainably be harnessed to the benefit of the local area. All the available statistical indicators points to the fact that Woking is an area of regional significance. It should be emphasised that the Core Strategy mainly aims to address the challenges of the community without compromising the needs of future generation. The growth that is identified will be supported by adequate and appropriate infrastructure provision.
- 15 In preparing the Draft Core Strategy, the Council has been fully aware and has taken into account the potential revocation of Regional Strategies and other emerging changes to the planning system, including those contained in the Decentralisation and the Localism Bill. Consequently, all the growth targets set out in the Draft Core Strategy are justified by locally derived evidence base. In stating its intention to revoke Regional Strategies, the Secretary of State has said that the evidence that were used to prepare Regional Strategies can be used by Local Authorities to support planning decisions in their local area where it is relevant and necessary to do so. The Council has used some regional evidence collected to support the South East Plan to justify its housing target, and this is a reasonable position to take.

The plan, manage and monitor approach will be adopted to manage the delivery of housing to ensure that there is no significant under-provision or over-provision which will undermine the overall objectives of the Core Strategy.

#### **Options for the scale and distribution of housing growth (comments made in relation to policy CS1) - summary of key issues**

- 1 There has not been clear analysis for alternative development options and their locational distribution. There should be minimum density standards, which will have impact on the scale of development. Green Belt land should not be released.

#### **Options for the scale and distribution of housing growth (comments made in relation to policy CS1) - Officer's response**

- 1 The Council tested three different options for housing growth. These are net additional dwellings for 292, 499 and 594 per year. Each of these growth options has an element of affordable housing. The assessment and its outcome are included as part of the Sustainability Appraisal Report (SA). Further explanation is provided in the Council's Housing Topic Paper and the SHLAA. The SA is on the Council's website. The Council has concluded that the most sustainable option will be to make provision for 292 dwellings per year. This target is therefore the Council's own specified target, which is in general conformity with the South East Plan requirement. The Council accepts that there is evidence contained in its Strategic Housing Market Assessment to confirm a need for 499 new affordable homes per year. The current mechanism by which affordable housing is secured is on the back of market housing. Consequently, to deliver 499 new affordable homes, it is estimated that it will require about 1,500 market dwellings per year. This will be unsustainable and unrealistic to achieve and will be environmentally damaging as highlighted by the SA Report. The same view is taken regarding the 594 option of which 499 is new affordable homes. Similarly, the level of infrastructure that will be needed to support such level of growth will be too expensive and unrealistic to deliver. As a result, there is no proposal to provide 594 dwellings per year as claimed by some respondents. The 292 target will be delivered in a sustainable manner, ensuring that they are located at sustainable location and are of varying densities to reflect the character of the area.

National guidance set out in Planning Policy Statement 3 require the Council to identify sufficient, suitable and available sites to meet fifteen years housing land supply. The Council has carried out its Strategic Housing Land Availability Assessment to inform the identification of sites to meet its housing target. The approach taken by the council, which is clearly demonstrated in the Draft Core Strategy, is to maximise the efficient use of land by concentrating most development on previously developed land. A sequential approach to site determination which prioritises development on previously developed land has been applied. More focus is given to development on previously developed land situated within the existing main centres - the Town, District and Local centres whilst recognising the specific locational needs of some groups and uses. This approach would facilitate sustainable development by locating development close to key services and facilities and minimising the need to travel, especially by car. It also helps to emphasise the functional role of the centres in providing services and facilities to local residents, in particular, those leaving in nearby villages. The main centres are well spread across the Borough and consequently will ensure that there is even spread of affordable housing across the Borough. The Council will prepare a Site Allocations DPD. It will bear in mind the comment to spread affordable homes across the Borough during that process.

In preparing the Draft Core Strategy, the Council has been concerned to ensure that there is an effective balance between the need to identify sufficient land to meet the local needs of all sections of the community and the need to protect/enhance the built and natural environment, including the protection of the Green Belt, the SPA, SAC and other biodiversity. Furthermore, an Infrastructure Delivery Plan has been prepared to ensure that there is adequate infrastructure to support the proposed development. This will contribute towards the sustainable delivery of the strategy. The Council have approved the introduction of Community Infrastructure Levy (CIL) as the mechanism for securing developer contributions towards infrastructure provision to support proposed development in the Core Strategy. It now has the flexibility to align

CIL funding to deliver priority infrastructure that will achieve maximum benefits to the community. The risk of infrastructure delivery lagging behind development is significantly reduced with the preparation of the Infrastructure Delivery Plan and the introduction of CIL.

It is clear from analysis of the Strategic Housing Land Availability Assessment that there will not be enough previously developed land to deliver a fifteen year housing land supply to meet the projected target housing, in particular, the need for family homes. Green Belt land will therefore be needed to meet housing land requirement between 2022/25 and also to address some of the need for family homes, including affordable family homes. At this stage it is estimated that Green Belt land to provide 550 new homes will be needed. Policy CS9 (Housing provision and distribution) sets out how this residual figure is derived. Officers are confident that this amount of land can be released from the Green Belt without undermining its purpose.

The Council is committed to protecting the integrity of the Green Belt. This is one of the key objectives of the Draft Core Strategy (Objective 4). One means of achieving this objective will be for the Council to be able to demonstrate that it has taken all necessary steps to make adequate provision to meet its housing target and land supply. Failure to do so could lead to a situation where planning decisions are determined on appeal rather than be planned by the Council. It is likely that developers could win planning appeals to develop in the Green Belt if the Council has not identified sufficient land to meet its target. Furthermore, not all types of the housing need can be met by high density high rise accommodation, in particular, the need for some types of family homes. The Council is committed to carry out a comprehensive Green Belt boundary review, which will seek to ensure that only sites whose release from the Green Belt will not undermine its purpose and integrity are identified for development. The review is scheduled for 2016/17 to allow extensive community participation and adequate time to inform housing development from 2022. The review will include landscape, ecological and transport assessment of identified sites. At this stage the Council has not sought to limit the geographical scope of the review to any particular part of the Green Belt. It intends to ensure that the review is comprehensive to consider all realistic pockets of sites that could be released without undermining the purpose of the Green Belt.

Whilst the SHLAA includes indicative densities, they reflect the current character of the area. The Council is fully aware and recognises that actual densities on specific sites will be determined when specific schemes come forward for consideration, taken into account the character of the area and all other development impacts. It should be emphasised that the national requirement for minimum residential densities has been removed by the Government.

Officers believe that the overall growth projections and the evidence base to support them are defensible and well tailored to meet the needs of the area. A Plan, Manage and Monitor approach is embedded in the spirit of the delivery process. The Council will seek to ensure that there is not significant under-provision or over-provision which will undermine the overall vision and objectives of the Core Strategy.

**Provision of Employment land (comments made in relation to policy CS1) - summary of key issues**

- 1 There is no basis for the employment projections.

- 2 The Strategy misses the important role that District and Local Centres can play in providing local employment. It also fails to recognise the role of business parks, which are outside the designated centres.
- 3 With an office accommodation vacancy rate of 22%, and a growing number of vacant retail units, there is an argument to rebalance development opportunities in favour of new homes.

**Provision of Employment land (comments made in relation to policy CS1) - Officer's response**

- 1 An Employment Land Review, which include employment land appraisal has been carried out to inform the employment projections of the Draft Core Strategy and the contribution that the existing stock of employment land can make in meeting the future employments projections. The employment projections take into account vacancy rate of the existing employment stock. The Council is confident with the available evidence that all its employment projections can be met on previously developed land of the existing employment stock. The Town Centre will be the main focus of economic activity, including the location of new town centre uses. The Local and District centres are also identified to provide commercial development to meet the day to day needs of local residents. The employment policies of the Draft Core Strategy also acknowledges the important role of the other Employment Estates outside the main centres and safeguard them for employment purposes because of their contribution to the economic strategy of the area. The economic strategy has in-built flexibility to adapt to changing economic circumstances.

The Draft Core Strategy strikes a good balance in identifying land to meet both housing and employment land requirements. This is underpinned by robust evidence in the form of the Employment Land Review and the SHLAA. The ELR identifies existing employment land that is capable and suitable for alternative uses, including new homes. This flexibility would the delivery of the Core Strategy to be sensitive to local economic circumstances.

- 2 See point 1 above
- 3 See point 1 above

### **Development in the Green Belt (comments made in relation to policy CS1) - summary of key issues**

- 1 The Green Belt should be protected from development. The countryside and the Green Belt should not be sacrificed to meet a need which is based on unreliable data. The strategy is obsessed with growth and expansion.
- 2 No provision is made for Green Belt boundary review to release sites as and when they are needed for development. The date set for the review is restrictive. Simply claiming that development needs will be met within the urban areas and that the position will be reviewed if necessary in the future is not likely to be acceptable unless there is evidence that the 'urban area only' approach is likely to be realistic. Where the scale of land needed for development is such that Greenfield allocations are likely to be required the strategy should make that clear. In this regard, the Core Strategy should identify strategic allocations or give guidance for subsequent site allocations DPD to readily identify the needed land without having to re-visit strategic considerations. A revised wording that takes out the specified review date is suggested to overcome some of these concerns. The Core Strategy should provide a target approach to the distribution and delivery of housing by specifying the area south of Woking as the area of search for the Green Belt review. It should also have an absolute quantifiable limit for the release of Green Belt land for housing. Concerned is expressed that Green Belt is only used where there is no alternative.
- 3 The sewage works site at Carter's Lane is unsuitable for residential development.
- 4 Mayford lacks key facilities, infrastructure and services. Furthermore, the roads are already congested. Properties are predominantly large detached houses. Any high density development will detract from the character of the area and will be unsightly and eyesore.
- 5 Any release of Green Belt land should be informed by full transport assessment to assess their suitability in reducing the impact of private car travel.
- 6 The Meadows adjacent to Mayford Grange Retirement Village is a precious Green Belt land and should not be developed.
- 7 The document is misrepresented. The Spatial Strategy gives a different impression to the detail contents of the document. For example, the Spatial Strategy seeks to protect the integrity of the Green Belt giving the impression that it will be sacrosanct. However, in other sections, the Green Belt is identified as broad location for future direction of growth.

### **Development in the Green Belt (comments made in relation to policy CS1) - Officer's response**

- 1 Officers do not see any apparent conflict between the protection of the Green Belt and releasing part of it to meet its development needs. The Green Belt boundary review will be informed by a comprehensive study to ensure that the parcels of land that will be released will not compromise its integrity and purpose. Furthermore, the Green Belt will be under significant pressure and risk from development interests if the Council cannot demonstrate that it has identified sufficient sites to meet its own housing target. If the Council could not do so, it is likely that planning decisions relating to development in the Green Belt could be determined on appeal rather than be plan-led. That is something that the Council will wish to avoid.
- 2 The Council has a clear objective of protecting the Green Belt. This is clearly emphasised in both the vision and objectives of the Draft Core Strategy. Furthermore, Policy CS6 (Green Belt) of the Draft Core Strategy and Planning

Policy Guidance Note 2 put strict controls over inappropriate development in the Green Belt. The Council is aware of the Government's intention to simplify the current Planning Policy Guidance Notes and Planning Policy Statements into a National Policy Framework. If the emerging National Policy Framework is not of sufficient detail to provide clear guidance for controlling inappropriate development in the Green Belt, the Council will put in place detailed policies as part of the Development Management Policies DPD to ensure that its objective to protect the integrity of the Green Belt is delivered. This section should be read in conjunction with response set out under Policy CS6.

The Draft Core Strategy proposes to review the Green Belt boundary to release land for housing development between 2022 and 2027. It intends to undertake this review in 2016/17. Officers are of the view that the SHLAA identifies sufficient deliverable sites for housing development until this period and there will be no imperative to release Green Belt land prior to the specified review date. There is significant flexibility built into the plan to deal with contingency that will arise from lack of specific sites coming forward. Consequently, there is no need to amend the policy to allow flexibility to enable the Green Belt boundary review to be undertaken earlier than 2016. The Housing Position Statement, the SHLAA and the assessment of housing need provides sufficient justification for the need to release Green Belt land for housing development between 2022 and 2027.

- 3 The Draft Core Strategy does not earmark the Sewage Works site at Carter's Lane for residential development as suggested by some respondents. Policy CS6 has now been amended to make this point clear to avoid any ambiguity. The site is identified as a Major Developed Site in the Green Belt for its continuous use for the purpose of Sewage Works. What this designation does is to allow in principle some limited infilling and redevelopment within the defined boundary of the designation for the purposes of Sewage Works. Furthermore, any such development will have to comply with the general Green Belt policies of the Core Strategy and PPG2.
- 4 There is nothing in the Draft Core Strategy to justify concern expressed about proposed development of specific Green Belt sites in Mayford and land in and around Hook Heath. The Draft Core Strategy does not identify specific sites in the Green Belt for development. The Site Allocations DPD will be the appropriate document to identify specific sites for development. The Green Belt boundary review will inform this process. The Council has been clear about the timing table of the review and the justification for it. It is therefore incorrect for residents of Mayford to assume that the Council has already identified about 14 or more different sites in the village for development and has a hidden agenda to implement them.
- 5 Any release of Green Belt land will be informed by a number of impact assessments including transport assessment. Policy CS6 has been amended to emphasise this point.
- 6 See point 4 above
- 7 See point 1 above



### **Infrastructure (comments made in relation to policy CS1) - summary of key issues**

- 1 Woking is already congested with struggling infrastructure. Building more houses will only exacerbate the situation.
- 2 Need to invest in infrastructure to improve quality of life.
- 3 There should be improvement of existing infrastructure.
- 4 There is a need to provide adequate infrastructure including health and education.
- 5 Proposed infrastructure to support the Core Strategy should be fit for purpose and should be subject to extensive consultation.
- 6 There is existing deficiency in infrastructure provision that will be exacerbated by further development.
- 7 There should be consistent approach to maintenance of infrastructure, in particular, road maintenance.
- 8 Maybourne Rise – The existing estate road layout and associated infrastructure is inappropriate to accommodate proposed development traffic.
- 9 There needs to be full consultation on infrastructure delivery before the strategy can be sound.
- 10 There should be car clubs to enable people to borrow cars. There should be better cycle connectivity across the town.
- 11 The proposed shared space at the town centre is dangerous and a limit on motorised wheel chairs.

### **Infrastructure (comments made in relation to policy CS1) - Officer's response**

- 1 The Council is preparing an Infrastructure Delivery Plan (IDP) to provide evidence for the scale of infrastructure provision needed to support proposed development. This will include health and education infrastructure. The document will set out what the current infrastructure capacity is, the impact that the proposed development will have on the existing infrastructure, what further capacity will be needed to support the proposed development and how they will be funded. This document will be key evidence to support the delivery of the Core Strategy. Furthermore, the Council has approved the principle of introducing Community Infrastructure Levy as a mechanism to secure developer contributions towards infrastructure provision. With this mechanism, the Council has the flexibility to align available funding to deliver priority schemes that will have maximum benefit to the local community. Officers are convinced that with the introduction of CIL, the risk of infrastructure lagging behind development will be minimised. It will secure significant funding to implement infrastructure schemes and can also be aligned to priority schemes. This will ensure that infrastructure that is planned for and provided will be fit for purpose.

It needs to be emphasised that CIL is not intended to be used to address the existing deficiencies in infrastructure provision. Consequently, the Council will continue to work with infrastructure providers such as the County Council to address existing congestion in the town and other existing deficiencies in infrastructure provision. Traffic associated with specific development proposals will be full assessed through the development management process and appropriate mitigation measures put in place to address any adverse impacts.

- 2 See point 1 above
- 3 See point 1 above
- 4 See point 1 above
- 5 See point 1 above

- 6 See point 1 above
- 7 Road maintenance is the responsibility of the County Council. This comment will be passed on to the appropriate officer to consider.
- 8 The Core Strategy does not allocate specific sites for development. This is a matter for the Site Allocations DPD. The comment about Maybourne Rise will be taken into account during this process and/or when any planning application is submitted that will impact on the estate road.
- 9 It is intended that the IDP will be published as a technical document to support the final version of the Core Strategy. This will be part of the evidence base to be examined at the Independent Examination of the Core Strategy and the public will have the opportunity to scrutinise it.
- 10 The Council will work with its partners to explore the possibility of extending car clubs in the Borough in its objective to encouraging travel planning. This is a matter of specific detail that can best be dealt with outside the Core Strategy process.
- 11 The comment on the proposed shared space at the town centre is a highway matter, which is under the remit of the County Council. The scheme has recently been on trial. The County Council is promoting the scheme to encourage more links to the centre by sustainable transport modes. The comment is noted and will be passed on to the appropriate officers for consideration. It needs to be emphasised that there has been a recent consultation by the County Council on this matter.

**Climate change (comments made in relation to policy CS1) - summary of key issues**

- 1 The policy should introduce flexibility to allow the climate change standards to be applied on a site by site basis, taken into account the practicality and viability of applying the available technologies.
- 2 The climate change policy should not be confined to the less carbon intensive generation of energy or the implementation of tighter standards but also should deal with existing buildings, direct energy use of transport and the effects of transport on location decisions. It should also take account of the embedded energy and carbon in the goods and services that we consume. For example, the expansion of the shopping facilities would imply growth in purchasing and therefore impacts on climate change and resource depletion.

**Climate change (comments made in relation to policy CS1) - Officer's response**

- 1 Policy CS21 – Sustainable construction deals with climate change standards. There is already sufficient flexibility built into the policy for applicants to make a case to justify special circumstance and/or justify the unique individual merits of their particular proposal. The policy clearly allows an applicant to make provision for compensatory energy and water savings elsewhere in the Borough if it could not meet the standards on site. Furthermore, the Policy allow scope for applicants to adopt alternative energy and heat sources if they can demonstrate that it will be better than connecting to the network of CHPs.
- 2 Improvements in the energy efficiency of existing buildings are a separate objective of the Council outside the scope of the Core Strategy. There are other strategies of the Council such as the Climate Change Strategy that are best

equipped to address this particular matter. The comment will be fed into that process.

### **Environmental Protection (comments made in relation to policy CS1) - summary of key issues**

- 1 Development in Woking Town Centre should have due consideration to the stretch of the Basingstoke Canal which is not designated as SSSI. This stretch is an essential ecological link between the two halves of the SSSI. The stretch is presently designated as a Site of Nature Conservation Importance. It should also be noted that previously developed land is valuable for wildlife and development should take account of that.
- 2 The ecological footprint of the borough should be lower than the national average. The Borough should be encouraged to adopt a way of living where quality of life improves as we reduce our impact on the planet. The Core Strategy should contribute towards this aims.
- 3 The Draft Core Strategy does not appear to recognise resilience required in the face of reduced global resources such as fuel and food. Chapter 7 should acknowledge risk of vastly increased energy and food prices and supply uncertainties in the next few years.
- 4 A question is raised about the benefit to the environment for approving McLaren's sports car factory.
- 5 It is difficult to see how development that can adversely affect the SPA can be mitigated.
- 6 Housing should be built with less space for parking to maximise the efficient use of land. A change in behaviour is essential to meet the challenge of climate change. High density development near public transport centres should be encouraged to maximise efficient use of land. Walking and cycling should be encouraged with the same objective. In the long term the need for housing should be assessed against the impact of development on policy aims such as the need to protect the Green Belt and the natural environment.

### **Environmental Protection (comments made in relation to policy CS1) - Officer's response**

- 1 The Draft Core Strategy places significant emphasis in protecting and enhancing the environmental quality of the Borough. This is clearly stated as part of the vision for the Draft Core Strategy. A specific commitment to protect and enhance river valleys, waterways etc. is given in paragraph 6.28 of the Draft Core Strategy because they provide important sources of habitat and biodiversity. Consequently, the Council will ensure that development proposals take full account of their impacts on the Basingstoke canal and any other river corridor when planning applications are determined. This is also a specific matter for development management and the appropriate officers will be informed of this concern.
- 2 Woking Borough Council is renowned for its effort to minimise the adverse impacts of development on climate change and efforts to reduce its ecological footprint. The Draft Core Strategy has strong policies to enable the Council to deliver its objectives for climate change. It sets standards that are higher than national average where it is realistic to achieve and economically viable to deliver. There is no statutory requirement to achieve a specified ecological footprint. However, the Council will continue to drive up high standards of environmental quality in all of its service areas. The Core Strategy does not sit in isolation. It has strong linkages with other strategies of the Council such as

the Climate Change Strategy, which will collectively help ensure high standards of environmental protection.

- 3 The suggestion for the Draft Core Strategy (chapter 7) to acknowledge risk of vastly increased energy and food prices and supply uncertainties in the next few years is noted and considered as an acceptable comment to acknowledge as a global threat. It is proposed that this is rather acknowledged as a threat in Table 2 – SWOT analysis.
- 4 The determination and approval of the McLaren's proposal was a matter for development management. The application was determined having had regard to the development plan for the area and all other material considerations, including a full assessment of the development impacts and appropriate mitigation to address any adverse impacts.
- 5 The Council has an adopted SPA Avoidance Strategy to ensure that any potential adverse impacts on the SPA are fully addressed. The strategy was agreed by Natural England before its adoption. The Avoidance Strategy takes a precautionary approach to avoid adverse development impacts. It assumes that development within certain thresholds from an SPA could have adverse impact and secures appropriate mitigation to prevent that happening.
- 6 The Council has an adopted car and cycle parking standards and will seek to ensure that development complies with its provisions.

#### **Design (comments made in relation to policy CS1) - summary of key issues**

- 1 Development should be of good design. Existing office spaces should not be refurbished but should be redeveloped. Development that is a threat to heritage and culture should be resisted.
- 2 The Character Study should have covered Sheets Heath, Brookwood Farm or the surrounding area.
- 3 Woking should remain attractive to retain commuters who live within it but travel elsewhere for business.
- 4 Development sited near the train station should not compromise loss of conservation areas.
- 5 The Core Strategy is full of contradictory aims such as the desire for high density development and the preservation of the area's character.
- 6 Variation between different parts of the area should be highlighted in separate documents to provide guidance to developers and planners.
- 7 The Draft Core Strategy has no regard to preserving the quality of life of local residents. There is the real risk of Woking becoming the ugliest town in South of England because of rapid expansion.
- 8 What Woking need is a positive approach to the management of change rather than growth. This should include sustaining the character of Woking as a series of well defined and distinctive village communities, recognising the value of diversity of these areas, ensuring that adequate resources are applied to these areas and to see the Town Centre develop as a better and more diverse shopping centre.

#### **Design (comments made in relation to policy CS1) - Officer's response**

- 1 The Core Strategy includes a policy on design – Policy CS20, which will seek to ensure a high quality of design with respect to aesthetic quality and high environmental standards. This will help create a sense of place where people would like to live, visit and work.

The provision of land to meet employment land requirements will comprise of both redevelopment and refurbishment of existing employment land. The delivery of the Core Strategy will be undermined if refurbishment is ruled out completely in this regard. There is a strong policy in the Draft Core Strategy to ensure that development takes account of the heritage and cultural assets of the area. Any development that undermines this objective will be resisted.

- 2 The Character Study is an independent consultant's report to inform the Core Strategy. It is not part of the provisions of the Draft Core Strategy that could be subject to change. The suggestion to include other areas will be taken into account in any future review of the study. The Core Strategy includes robust policies to ensure that development is sympathetic to the character of the area that they are situated. This will apply to development at Sheets Heath and Brookwood Farm. The Heritage of Woking Study will also be taken into account.
- 3 It is a clear vision of the Core Strategy to ensure that Woking continue to be an attractive place where people would choose to live, work and visit. The Council is committed to ensure that this vision is delivered.
- 4 The importance of ensuring that development does not adversely impact on the integrity of conservation areas is well expressed by Policy CS19 (Heritage and conservation). Consequently, the Council will ensure that the Gateway project to redevelop the station environs is sensitive to the conservation area and enhances the general character of the area.
- 5 Officers do not see any apparent contradiction in the aims of the Core Strategy. In particular, development will always be considered in its context to ensure that high density development does not detract from the general character of the area where it is situated.
- 6 The Council intends to prepare a series of Supplementary Planning Documents (SPD), including consideration for the preparation of specific design guide for Woking. This could also consider the various distinctive parts of the Borough. The suggestion for a guidance note for the different parts of the Borough can therefore be considered as part of this process. Such an exercise will require significant resources that will also need to be considered. The covering report to the Working Group includes a section setting out a programme for the preparation of SPDs. The actual timing for the preparation of the various SPDs will be set out in respective project plans to be agreed by the Deputy Chief Executive in due course. The Council already has published Local Area Summaries, which are material consideration when planning applications are determined. Furthermore, the Character Study includes detailed description of the distinctive character of the various areas that make up the Borough. This information will continue to inform planning decisions on planning applications. The Heritage of Woking Study will also be taken into account.
- 7 It is an objective of the Core Strategy to enhance the character and appearance of the area. Any development that will turn the place into the ugliest town in South England will be resisted.
- 8 See point 6 above

### **Scope and presentation of Policy – summary of key issues**

There is no doubt that all the various parts of the policy are important in setting the context for the Core Strategy and this confirmed by the number of support that it received from the consultation. However, it is thought that the policy will be more effective in achieving its intended purpose if it is recast to focus on the overall scale of development, its distribution and how the general environment will be protected and seek. The rest of the details of the policy will be covered by the other policies of the Draft Core Strategy to avoid any obvious repetition.

**A Spatial Strategy for Woking - Recommendation**

- 1 Policy CS1 is recast to focus on the overall scale and distribution of development and how the general environment will be protected see revised policy below:

### **CS1: A spatial strategy for Woking**

The Core Strategy will make provision for the delivery of the following scale of uses between 2010 and 2027:

- 4,964 net additional dwellings, with an overall affordable housing provision target of 35%.
- 28,000m<sup>2</sup> of office floorspace and 20,000m<sup>2</sup> of warehousing floorspace within the same period.
- 93,900 m<sup>2</sup> of additional retail floorspace.

Most of the new development will be directed to previously developed land in the town, district and local centres, which offers the best access to a range of services and facilities. The scale of development that will be encouraged in these centres will reflect their respective functions and nature. The hierarchy of centres is defined in Table 3. The impacts of developments will be fully assessed to ensure that they do not adversely impact on sensitive environmental designations such as the Thames Basin Heaths Special Protection Areas, Special Areas of Conservation and the Green Belt and other important built and natural features such as Listed Buildings, Conservation Areas and Ancient Monuments. It is a clear objective of the Core Strategy to protect and/or enhance these assets. Development will be located to take full account of the relative risk of flooding in the Borough.

Woking Town Centre will be the primary focus of sustainable growth to maintain its status as an economic hub with a flourishing, diverse and innovative economy and a transport hub which provides transport services, links and communication linking people to jobs, services and facilities. The town centre is designated as a centre to undergo significant change and the provision of a range of shops, cultural facilities, jobs and housing to meet locally identified needs and the needs of modern businesses will be encouraged. Town centre uses as defined in PPS4: Planning for sustainable economic growth, will be acceptable in principle, subject to the requirements of the policies of the Core Strategy.

In the town centre, well designed, high density development that could include tall buildings and which enhances its image will be encouraged, but without compromising on its character and appearance and that of nearby areas.

Development located in the District, Local and Neighbourhood Centres to provide housing, jobs and convenient access to everyday shops, services and local community facilities will also be encouraged. This must be well designed to enhance their unique and distinctive characters and attractiveness. Uses that will provide convenient access to the everyday needs of the community, including jobs and housing will be encouraged at the District and Local Centres but at a scale that will not compromise its character and/or functionality.

Whilst the preference is for the location of most new development to be in the main centres, infill development and/or redevelopment of previously development land in the built-up area of the Borough will be acceptable in principle, subject to a full assessment of impacts where relevant and appropriate mitigation measures introduced to make the proposal acceptable. The Strategic Housing Land Availability Assessment (SHLAA) and the Strategic Housing Market Assessment (SHMA) provide the evidence of the existence of such sites.

The ward of Maybury and Sheerwater and Lakeview Estate of Goldsworth Park are identified as Priority Places for specific actions to address pockets of deprivation in the areas.

A Site Allocations Development Plan Document will be prepared to allocate specific deliverable sites for the proposed development.

The Green Belt and Woking Town Centre are identified as broad locations for the future direction of growth. A review of the Green Belt boundary will be carried out to ensure that the release of Green Belt land for development does not undermine its purpose and integrity.

Details of how the overall strategy will be delivered are set out by the rest of the policies of the Draft Core Strategy.

The Council will work proactively with its partners to seek the comprehensive delivery of all elements of the Core Strategy and the infrastructure requirements to support it.

Figure XXX is a diagram showing areas identified for growth.

- 2 Consequential amendments are proposed to the reasoned justification to Policy CS1 to reflect changes to the policy (see revised Draft Core Strategy).
- 3 Table 2 – SWOT Analysis should be amended to acknowledge the risk of vastly increased energy and food prices and supply uncertainties in the next few years.



## **Policy CS2 Woking Town Centre**

Thirty six responses were received regarding policy CS2 (Woking Town Centre), all of which were duly made.

### **Woking Town Centre - Key Issues Raised**

#### Key supporting issues:

1. Welcome principle of mixed-use high density development within Woking Town Centre (WTC).
2. Development should make best use of sites close to public transport nodes in town centre.
3. The more homes provided close to existing transport links, the less pressure will be placed on the existing network and need for parking.
4. Support WTC as preferred location for hotels.
5. Welcome housing target of 2,500 new dwellings, but note that even if target is achieved the identified need for both market and affordable will not be met.
6. Development of new homes in the town centre has the potential to make centre more vibrant and interesting place to live and spend time.
7. Support extension of the primary shopping frontage to include High Street/Chapel Street/Commercial Way.
8. Support enhancement of WTC to accommodate additional retail floorspace, including convenience retailing, through the redevelopment and expansion of existing provision.
9. Support the encouragement of better ICT infrastructure and 'social' infrastructure to serve commercial development.

#### Key objecting issues:

1. Inclusion of part of Butts Road/Poole Road employment area within the town centre boundary is inconsistent with national policy and the Council's intention to maintain a focused town centre, and would steer people away from the core shopping area. Mixed use development should be provided within the town centre core area only.
2. How will it be possible to capitalise on the railway station as a transport hub of regional significance if there are already capacity issues with overcrowding? No mention is made of increased car parking. Oriental road needs to be designated a major access road to the station and be kept clear of on-street parking.
3. Section 5.7 refers to Map 2. This includes areas described as 'Urban Areas of Special Residential Character', but there is no definition of what these are and how they will be protected.
4. Object to blanket presumption against loss of office floorspace due to inconsistency with the principle of mixed development with office above ground floor units and there will be some locations where alternative uses (residential) are more appropriate than office.
5. Town centre environment is inferior to Guildford. Some good retailers taken space in Peacocks, but Wolsey Place has a lot of inferior retailers selling poor quality overpriced goods and a lot of vacant units near station. Council needs to think more about quality and a bit less about quantity. Current experience is disjointed. Concentrate on getting existing retail area right before seeking to expand. Priority should be to attract another quality department store as well as a decent furniture retailer.
6. Do not accept either the need for or desirability of high rise developments within the town centre. Previous high rise development does not augur well for the future. Other major Surrey towns appear to have rejected this approach. Lower rise development is capable of achieving similar densities

- but requires a more integrated and a comprehensive approach to planning which only the LPA can facilitate, plus imagination. The piecemeal development of large parts of the centre does not inspire confidence the Council is able to undertake this role.
7. Market for good shops in Woking is decreasing and given the population projections is likely to aim in future at the youth and ethnic minority markets. Commuters (both in and out) will shop in centres more suited to their requirements. Character has been destroyed by allowing shops in Chertsey Road and the High Street to become fast food outlets.
  8. Objection to the reactive approach to housing delivery and omission of a non-implementation allowance to be factored into the achievement of the significant housing allocation for WTC. It is understood a proportion of the 2,500 requirement is yet to be identified. A reasonable non-implementation allowance should be factored in and added to the residual allowance to be secured from green belt allocations, to give greater certainty of the plans provisions being delivered within the plan period. The current approach would incur costly delays and could further exacerbate backlogs of unmet need.
  9. Expansion to the area designated as town centre will also lead to more traffic.
  10. Policy CS2 does not protect existing cultural facilities that provide a vibrant evening economy for Woking.
  11. Although para 5.4 states that the cultural and entertainment offer will be increased, delivery of social, community and transport infrastructure is deferred following completion of the infrastructure delivery plan. This is inadequate advice for a CS. Policy CS2 could include additional bullet points under the sub-heading 'The Council will support:' which refer to the promotion and enhancement of town centre leisure and cultural facilities that support a thriving evening economy.
  12. Object to policy as drafted on basis that:
    - It has yet to be demonstrated that developments in excess of 200dph are deliverable and/or developable.
    - The SHMA shows that the majority of unmet housing need is in the form of family housing, but the annual monitoring of completion trends identifies the general trend for large, high density flatted development.
    - A further consideration in relying upon the delivery of a material amount of housing completions from flatted schemes is the ability to provide commensurate levels of supporting infrastructure, which can be provided as integral parts of strategic site releases, planned for at the Masterplan stage.
    - None of the sites relied upon by the Council in delivering the 2,500 dwellings have been identified in the SHLAA. Site schedules will need to be available in order for conclusions to be made upon the anticipated delivery rates of the components of supply relied upon.
    - On the above basis there is no certainty with which the LPA can rely upon the delivery of 2,500 dwellings from sites within the town centre. Moreover, need is for family housing – the qualitative need is unlikely to be met.
    - CS2 must be informed by a robust assessment of site delivery – details of which are yet to be made available.
  13. Is there a better use for the current market site?
  14. How will office and retail increases impact on parking and the road network, particularly the pinch points across the railway lines and canal?
  15. Green travel plans are good in theory but useless in practice. The key evidence base is lacking in this area.

16. Policy lacks flexibility and is inconsistent with national policy by failing to recognise that other considerations should be taken into account in the town centre which while they may reduce office floorspace could contribute town centre uses which have other benefits. Suggested amendment: *'The Council will support: redevelopment or refurbishment of office floorspace in the town centre where development does not result in an overall loss of office floorspace unless it contributes to wider town centre objectives.'*
17. Given the importance attached to development in the town centre and the recognition that it will undergo significant change, the Council should not be considering an Area Action Plan which does not form part of the LDS. Policies for the town centre should be part of a DPD.
18. More space in the town centre should be given over to new housing.
19. Need to ensure that the Core Strategy is robust in its approach to protecting viability of local centres. A growth in the town centre cannot be at the expense of local centres.
20. Need guidance to ensure residential units in the town centre are well designed and laid out, with generous space standards and suitably located to protect amenity.
21. WTC is unattractive, with badly designed and integrated buildings and poor quality open space. The importance of a comprehensive and strategic approach to the redevelopment of the town centre should not be underestimated.
22. Urge Council to adopt a separate and detailed local development document/action plan.
23. A better quality retail space is required in the town centre for the town's market traders. The current proposal to 'support improvements to the market' is wholly inadequate. An action plan for the town centre must identify a suitable site for a dedicated market with amenities for traders and market traders.
24. Core Strategy has not considered how new homes built in Woking can be adapted to flexible and home working practices.
25. Central places served by sustainable transport and local service centres accessible by walking are more efficient in terms of land and energy than car-based out of centre sites, except for a limited range of bulky goods. The impact of out of centre is not addressed in the draft plan – a serious deficiency in the argument.
26. Woking Town Centre needs to be improved as it is fragmented and there is poor delineation between cars, pedestrians and cycles, not helped by trees in brick planters in pedestrian/cycle areas.

Key general comments:

1. In order to accommodate a substantial increase in population and business in the town, a radical redevelopment of the low density housing area to either side of Walton Road and bounded by the town centre, railway and canal should be proposed providing high density housing, business and retail facilities, schools and health facilities. Older housing in this area is being progressively replaced but a coordinated and comprehensive approach is required by the LPA. Redevelopment will assist the revitalisation of the town centre and avoid traffic congestion from in commuting.
2. 'Out of town' developments (refers to development in the Green Belt) will require residents to commute into and out of the town centre.
3. Wider range of shops should be encouraged.
4. Retailers have left the town centre because it is simply not good enough to keep them. Conversely retailers, businesses and shoppers will be attracted if

the town centre is made attractive. Comment has included following proposals to enhance the centre:

- New large scale development should be of the highest quality (especially important for large scale private residential schemes which will be expensive to redevelop in future).
  - In addition to main redevelopment sites, need a policy to replace poor infill developments as opportunities arise.
  - Provide better adult education facilities for residents.
  - Give air track go-ahead. Air track is a must for the economic prospects of Woking and will provide a competitive edge when attracting business.
  - Qualitative change can only be brought about by replacement.
  - Affluence created by large commuter population and its reliance on financial services is a strength which should be encouraged to the same extent as local business.
5. Following sites suggested for demolition and redevelopment by 2027:
- Wolsey Centre including Alexander House. Replacement of this building is the single biggest opportunity to change the look and feel of the town centre heart and is central to any meaningful qualitative improvement. Retail development should not be restricted to single storey provision and should accommodate a department store to become the primary shopping centre for the town. Part of this site should become a much needed park, providing an extension to the Town Square.
  - Office blocks and terrace development to the rear of St Andrew House. Landscaping in this area is very poor.
  - Toys R Us, fire station, Premier House, market square and Bandstand area.
  - Gateway site, with exception that the conservation area is preserved as it has great value to great visitors arriving at the station and could be of merit to the townscape as a 'boutique' corner of the old quarter.
  - Albion House – redevelopment is essential regardless of the outcome of the Gateway project.
  - Victoria Way car park
  - Site 4M of the local plan
  - Elizabeth House
  - Trizancia House and surrounding office blocks
  - Telephone Exchange, White Rose Court triangle and Magistrates Court – the entire site should be redeveloped and a piece-meal development avoided
  - BHS building and area to rear of Christ Church.
  - Jubilee and Lynton House. It is questionable whether the period houses on Guildford Road be incorporated as they are of some merit and add interest to the townscape.
  - The Centrum – is of poor quality materials and lacks landscaping, which severely compromises what is arguably a good design
6. To realise the ultimate aim of WTC's transformation, the CS needs to go much further than it currently does. The CS is explicit in intent but short on specific actions to bring about the change – there is no overall spatial proposal for the town centre explicitly expressed in physical terms.
7. Renovating existing buildings will not achieve the aims of the CS. The only way to achieve the aims is through major demolition to enable radical remodelling.
8. Litter problems should be improved by heightened image and self-image from redevelopment.

9. WTC does not give an accurate impression of the Borough as a whole. The residents of Woking want a vibrant, cultured and aesthetically pleasing town centre.
10. The definition of 'sustainable' should not act as a brake to improving Woking's appearance and fortunes.
11. WTC is within 5km of the SPA. There is no analysis in the CS as to whether this will compromise development. View of the author is that it should not.
12. Area Action Plan is not mentioned in the policy itself or as a DPD.
13. Support principle of policy and in particular encouragement of mixed-use, high density development' and intention of the following element of the policy – 'residential and office development being provided above ground floor level in order to retain active frontages' but seek inclusion that this will be sought 'where appropriate'.
14. If development proposals are to be achieved within WTC and green belt protected a reasonable amount of development must be high rise. Part of the resistance to high rise development is a concern over quality in terms of materials and appropriateness of location. Quality high rise development in WTC would provide a stylistic improvement to the whole town and help attract young professionals.
15. Tall buildings are proving to be a problem, especially outside the 'ring of steel' created by the railway and A320.
16. New development for vulnerable sections of the community should take place in the town centre.
17. The quantity of development proposed for WTC could impact on the SRN, and the traffic impact of development across the area should be assessed, in line with PPS12.
18. Expect to see mixed use high density development in accessible areas such as town centre.
19. Further measures required to assess employee travel patterns and develop tailored demand management measures to reduce potential impact on SRN. Developer contributions will be required for mitigation. Contribution levels should be established before adoption to ensure all sites are deliverable.
20. Policies should come forward to encourage an improved balance of employment land to support needs of local population, reducing the need, as far as possible for out-commuting.
21. Supports the general intention to increase development in town centre, subject to stringent conditions on the design of development and ability of the rail and bus networks to sustain the high level of growth. However, the present policy is totally infeasible without being properly integrated with transport and infrastructure. There is no evidence provided of its deliverability.
22. The CS avoids many key decisions. It sets overall quantities of growth, but is deficient on the core issues affecting the future of the centre and does not demonstrate a clear design vision.
23. Woking Town Centre needs to be improved as it is fragmented and there is poor delineation between cars, pedestrians and cycles, not helped by trees in brick planters in pedestrian/cycle areas.
24. Strongly recommend that the town centre boundary is amended to include the Morrison's store which currently lies just beyond the Town Centre boundary. The store provides the principle main food shopping facility for the town centre and assists in enhancing the vitality and viability of the centre through linked trips. Note that the town centre boundary has been extended in this area to include part of the Poole Road site.
25. With regard to the section on non A1 uses within secondary frontages, mention needs to be made to issues relating to crime and disorder.

26. Town centre boundary should be redrawn to exclude properties bounded by Oriental Road/Heathside Crescent/White Rose Lane. This area should never have been defined within the town centre boundary. It is a resident transition area between the more intensively developed two storey properties on Oriental road and the larger properties within the urban area of special residential character on Park Road. There is scope on other sites south of the rail station for the limited range of uses which are appropriate.

## **Woking Town Centre - Officers' Response**

### Key supporting issues:

Support noted

### Key objecting issues:

1. Given the conformity of uses within the Butts Road/Poole Road employment area it is considered inappropriate that the town centre boundary bisects the site and thus it is recommended that the town centre boundary in this location revert to the alignment shown in the Local Plan. Given the areas location adjacent to the town centre and the identified need for further office development in the Borough, it is recommended that support remain for redevelopment within the employment area for mixed office and residential use and that the policy approach be set out in Policy CS14.
2. Woking station is currently the second most important station in Surrey in terms of throughput, and given the importance of the Surrey economy to the country is already of regional significance as a transport hub. Woking station presently performs a significant interchange function to various destinations in the region and London. Over the lifetime of the Core Strategy a number of improvements are proposed that will enhance the interchange function of the station, and its connectivity to the national rail network. Proposals include the Gateway redevelopment, ongoing maintenance and improvements by S.W. Trains. Maximum car parking standards are a means of restricting the number of cars on the road and influencing a shift in behaviour towards other sustainable forms of transport, particularly in urban centres with high accessibility. The Council produced a Parking SPD in 2006 which sets appropriate car parking and cycle parking standards for all forms of development. The SPD will be reviewed after the adoption of the CS and at regular intervals to ensure that the standards set are the most appropriate. In order to support the overall sustainable objectives of the Core Strategy at any given time, it is not considered necessary to increase stand alone parking provision in the vicinity of the station. The designation of local roads and on-street parking is a matter for consideration by the Highways Authority (Surrey County Council), and issues raised will be forwarded for consideration.
3. It is recommended that references to 'Urban Areas of Special Residential Character' on maps within the Draft Core Strategy be removed as this designation is not taken forward in the Core Strategy. However, this aspect of the policy will be taken forward as part of the Development Management Policies DPD, which will deal with detail policies for specific areas of the Borough. It is considered that each area of the Borough has their own intrinsic character that should be taken into account when development is proposed.
4. The market appraisal, undertaken as part of the Employment Land Review, considered the suitability of office sites within the town centre for office use over the period of the Core Strategy. Apart from a limited number of small outmoded offices above ground floor, the majority of sites were considered suitable for retention for office use. Safeguarding these sites and

encouraging their redevelopment to provide modern office premises is considered key to enabling economic growth and delivering forecast office floorspace requirements over the period of the Core Strategy. The policy has been amended to state that office floorspace will be safeguarded where there is evidence to justify that, and footnote 11 removed as the information is contained in the evidence base.

5. The vacancy rate in WTC has remained low, particularly within the primary shopping frontage, despite the impact of the recession. However, the Council recognise the need for improvements to the town centre environment and retail offer and investments have already been made to start a process of improvement. The proposed Area Action Plan will assist this process by ensuring comprehensive redevelopment that creates an attractive and integrated centre. Policy CS2 clearly states the Council's support for development of the town centre's role as the primary comparison shopping destination of the Borough and as a primary centre in the south east. The indicative amount of retail development set out in the policy is based on evidence set out in the Town, District and Local Centres study, produced by Roger Tym and Partners. To address the objection, the policy has been amended to remove the proposed extension to the primary frontage. This extension was not put forward in the evidence base and is not considered necessary to achieve delivery of forecast retail requirements.
6. It is considered that high rise development is appropriate within the town centre where it is well designed, makes use of good quality materials and respects the character of its surroundings. To prevent against piecemeal redevelopment of the town centre and ensure delivery of well designed, high quality developments, the Core Strategy proposes the production of a town centre Area Action Plan.
7. The retail floorspace forecasts for the period of the Core Strategy are considered achievable/deliverable given current expenditure leakage out of the Borough and forecast increases in population. Justification for the forecasts is provided in evidence contained in the Town, District and Local Centres Study produced by Roger Tym and Partners. Investment and improvements in the town centre will encourage provision of a broader retail offer. It should be noted that the largest increase in population is forecast in the over 65 year age group.
8. It is not considered necessary to provide a non-implementation allowance as the Strategic Housing Land Availability Assessment (SHLAA) demonstrates a rolling five year housing land supply and identifies sites that are likely to come forward for residential development over the lifetime of the Core Strategy. The 2010 SHLAA identifies sites within the town centre capable of accommodating approximately 92% of the 2,500 requirement for the town centre set out in policy CS2. It is considered that there is additional housing potential in WTC that will arise in the latter part of the plan period from sites that have not yet been specifically identified, which can contribute to the housing land supply in the last five years of the plan period. WTC is therefore identified as one of the broad locations for long-term residential development. Both PPS3 and SHLAA Practice Guidance allow for the identification of sites from broad locations as an option available to the Council.
9. The town centre boundary is more tightly drawn in the Core Strategy than the current Local Plan.
10. The following amendment to the policy wording is proposed in response to the objection: *'The loss of existing cultural and entertainment facilities within the town centre will be resisted unless there is no demand for such facilities or demand can be met from alternative provision within the town centre either through new or co-located facilities.'*

11. Planning policy for social and community facilities is set out in policy CS18 (Social and Community Infrastructure). This policy recognises the importance of community facilities and social and community infrastructure to the well-being of the Borough's population. Given the importance the Council places on the provision of such facilities it is recommended that the following wording be included either in policy CS2 itself, or the policy introduction: *'The Council recognise the importance to the well-being of the community of adequate community facilities and social and community infrastructure and will seek to safeguard existing facilities and promote new ones where appropriate, as set out in policy CS18'*.
12. Response to points as follows:
- Several developments have been successfully completed at densities in excess of 200dph.
  - All properties of two beds and over are considered suitable for use as family housing, thus larger two and three bed flats located within the town centre, high density residential areas, and district and local centres could be appropriate for families. The five year housing land supply provides a mix of sites including Brookwood Farm and Moor Lane which together have the capacity to provide approximately 740 houses of a variety of sizes.
  - Provision of infrastructure will be addressed in the Infrastructure Delivery Plan.
  - See point eight above.
  - The site allocations DPD and town centre Area Action Plan will assess development proposals for individual sites.
13. Policy CS2 supports improvements to the market, rather than the market site. The site allocations DPD and proposed area action plan will review all sites within the town centre, including the existing market site, in order to identify major sites for redevelopment. The suitability of the site for continued market use will be considered at this point.
14. The floorspace projections within the CS have been considered in the transport assessment, which has been carried out by the Highways Authority (Surrey County Council). It is recommended that the transport assessment (2010) be included in the key evidence base for the policy.
15. Many green/company travel plans have been implemented successfully throughout Surrey, with more than 45,000 employees receiving information on sustainable travel. Promotion of travel plans is supported in Surrey's Second Local Transport Plan.
16. The Government's overarching objective is sustainable economic growth. The importance of job creation was emphasised in the recently published 'Plan for Growth' which set out proposed radical changes to the planning system to support job creation. PPS4 states that the Government's overarching objective is sustainable economic growth and proposes a plan led approach to economic development. The ELR set out labour demand projections and floorspace requirements for the period of the CS, which identified a need for approximately 28,000m<sup>2</sup> of additional office floorspace of which approximately 27,000m<sup>2</sup>, is to be provided within Woking Town Centre. Given the current weak demand in commercial development due to the short term downturn in the economy, it is imperative that existing office sites are safeguarded to protect their loss to other uses which may not provide the same long term economic benefits. To enable greater flexibility as proposed by PPS4 and 'The Plan for Growth' the policy has been amended to allow sufficient flexibility for town centre uses to be considered within the town centre if a case can be made to justify need and scale. However, it is also important that certain sites are safeguarded to meet projected need as



identified in the evidence base. Beyond that the Council will consider favourably all town centre uses which meet its economic objectives. One of the key elements of the new planning system is to enable the selective review of policies in the Core Strategy and the policy has an inbuilt mechanism for monitoring and review to ensure it is updated to reflect any future change in circumstances.

17. Planning regulations specify which documents must be DPD's. Area action plans are listed as one such document. The Council has proposed as part of policy CS2 of the draft CS to prepare an area action plan. If a final decision is made to take forward the proposal the Council will review its LDS to include a commitment to prepare an area action plan and specify a time frame for each stage of preparation and all other governance arrangements. The CS itself, which provides the strategic basis for the preparation of all other LDD's will give that 'in principle' support for the preparation of the area action plan set out in policy CS2.
18. The Core Strategy proposes provision of approximately 2,500 homes within the town centre over the plan period.
19. It is considered that the Core Strategy is robust in its approach to protecting the viability of local centres, and that the Core Strategy policies for the town, district and local centres are in conformity with PPS4. Policies CS2, CS3 and CS4 set out indicative floorspace figures for comparison and convenience retail provision within Woking Town Centre, West Byfleet District Centre and the Local and Neighbourhood Centres based on evidence set out in the Town, District and Local Centres Study. Although the majority of retail growth is planned for WTC, given the centre's importance as a regional hub and sustainable location, policies CS3 and CS4 seek to protect facilities within the district centre and local centres and encourage further development to cater for day to day needs.
20. A development management DPD will be produced covering the issues raised.
21. The proposed area action plan will enable a comprehensive and strategic approach to the redevelopment of the town centre.
22. An area action plan is proposed in the Core Strategy.
23. The suitability of the current market will be addressed in the proposed area action plan and site allocations DPD.
24. Both policies CS14 and CS20 encourage the development of facilities for home working in new residential developments.
25. The Core Strategy does not propose out of centre retail development. Any such proposals will be subject to guidance within PPS4.
26. The proposed area action plan will consider integration of the centre and the functionality of public open spaces.

Key General Comments:

1. Given the importance of certain areas adjacent to the town centre on its functioning, the scope of the proposed area action plan will consider such areas, including the Walton Road area. The area is designated in the CS as a high density residential area and contains within it the Walton Road Neighbourhood Centre, which enables provision for high density residential development and local retail and community facilities.
2. The Green Belt has been identified as a potential future direction for growth to meet housing need, in particular, the need for family homes between 2022 – 2027. A Green Belt review will be carried out to identify specific sites for this purpose in 2016/17. The review will consider the sustainability of potential

- sites, including accessibility to public transport, in order to minimise car usage arising from development.
3. See responses to objection five and seven.
  4. Point (1) Policy CS20: Design emphasises that development must be of the highest quality. Point (2) if infill sites come up for redevelopment, proposals will need to accord with policy CS20. Point (3) the delivery of required infrastructure over the period of the CS is covered in policy CS15. The definition of infrastructure covered by this policy includes education facilities. Point (4) Heathrow Airtrack is proposed by BAA and supported by the Council. Delivery of the project depends on Central Government funding, however Airtrack was not included in the spending review. The Transport and Works Act process to enable the acquisition of necessary land and construction remains suspended. Point (5) Comprehensive redevelopment will be encouraged however refurbishment may be suitable in certain instances. In such cases proposals will need to accord with policies in the Core Strategy including those on design. Point (6) Point noted.
  5. Points noted. Individual sites will be assessed in the site allocations DPD.
  6. The CS is a strategic policy document. The site allocations DPD and town centre area action plan will enable the strategic vision for the town centre to be expressed in physical terms.
  7. See response to point 4 (5).
  8. Point noted
  9. Point noted
  10. Point noted
  11. The appropriate assessment will consider the impact of proposed development on the environment.
  12. Recommend amending policy wording to include wording from paragraph 5.6 on the area action plan and the importance of change in the town centre to the Borough as a whole.
  13. See response to objection four.
  14. Point noted.
  15. Point noted.
  16. Residential development within the town centre and in the adjacent high density residential areas will provide a range of accommodation to cater for a variety of need.
  17. A transport assessment (2010) has been carried out to assess the traffic impact of the projected growth in the Core Strategy. The Highways Agency has inputted into this process and is satisfied of its outcomes.
  18. Policy encourages this.
  19. Suitable mitigation measures are covered by policy CS17: Transport and accessibility, and policy CS15 sets out the Council approach to infrastructure delivery including a tariff based system for contributions towards infrastructure.
  20. The policies in the Core Strategy seek to ensure provision of a range of employment sites capable of supporting a variety of businesses. Policy CS2 encourages redevelopment of existing office floorspace, which is considered vital to accommodate modern business needs and both retain and attract quality jobs to the Borough.
  21. A transport assessment has been carried out to assess the impact on the transport network of the proposed growth figures. The policy will be amended to ensure reference to the assessment is contained in the key evidence base. Additional infrastructure requirements resulting from new developments will be financed from the proposed tariff based system set out in policy CS15.
  22. Design guidelines are set out in policy CS20: Design.
  23. Point noted. Issues raised will be considered in the area action plan.

24. The recommendation to objection 1 seeks to realign the town centre boundary in this location to that of the Local Plan. This does not encompass the Morrison's Store which is not considered to occupy a town centre site.
25. Recommend insertion of words '*crime and disorder*', after .... *significant harmful effects on the frontage*.
26. This area is in a very sustainable location and is already designated as part of the town centre in the Local Plan. Any development coming forward in this area would need to accord with Design policy CS20 which states that developments should achieve a satisfactory relationship to adjoining properties.

### **Woking Town Centre - Recommendation**

Minor amendments are made to policy CS2 as set out above.

### **Policy CS3: West Byfleet**

Five responses were received regarding West Byfleet, of which all of were duly made. Of the five West Byfleet responses, one supported, two objected and two made general comments.

### **West Byfleet -Key Issues Raised**

Key issues raised include:

1. Concerns regarding access to the bus stop and roads around West Byfleet station due to poorly parked vehicles. Request that the third paragraph is expanded to add "and accessibility of buses to West Byfleet Station" to the end of the sentence (from Arriva bus company).
2. It is a great pity that the former Woolworths store has been split into 2 units. To be a sustainable district centre West Byfleet needs a large retail unit in addition to Waitrose. I hope a new large unit will be provided in "any redevelopment of the Sheer house site". This along with increased provision for parking would attract people to shop here.
3. There is absolutely no need for increased office/retail space in West Byfleet. There is already vacant office accommodation and the demand for office space will continue to fall as firms cut costs by making staff work from home, 'hot desk' or even transfer work out of the UK. The existing shops in West Byfleet already struggle (e.g. the greengrocer has closed since the document was prepared) and will continue to do so as internet shopping increases and shoppers continue to travel to the major retailers for all their purchases. The wording should be amended to remove the reference to increased retail and office floor space.
4. On a detailed point - the map of West Byfleet (Map 3) shows a Post Office (PO) in Station Road - this closed many years ago.
5. West Byfleet will find it very difficult to prosper unless the main road crossing is resolved. Bridge, tunnel, traffic diversion? We would remind you of the recent disgraceful mis-management by SCC of road openings by the statutory undertakers and others.

### **West Byfleet - Officers' Response**

1. The issue of poorly parked vehicles is not within the scope of the Core Strategy. The current policy seeks to ensure access to and within the area for public transport users, therefore it is not considered necessary to include the suggested additional wording for accessibility of buses to West Byfleet Station. Concerns raised about on-street parking will be passed to the appropriate officer at Surrey County Council.
2. Policy CS3 states that West Byfleet can accommodate around 13,000m<sup>2</sup> of retail floorspace in the plan period. West Byfleet has a large supermarket with around 1,600 m<sup>2</sup> (net) of floorspace. It is unlikely that another store of that size would be appropriate in the centre; however the former Woolworths store was around 400m<sup>2</sup> gross which is a reasonable size for a district centre location. The Council will encourage a mix of unit sizes in any new development to encourage a range of new businesses to locate here in order to create a sustainable district centre.
3. There is a high level of vacancy in the office floorspace in West Byfleet. This is because much of the floorspace is out-moded and out-dated and is not considered to meet the modern needs and standards or those requiring office accommodation, for example up to date IT connections. An Employment Land Review (ELR) forms part of the evidence base to support the Core Strategy. This took into account changes to modern working

patterns such as working from home and hot-desking. The study is made up of an Employment Position Paper and Market Appraisal and sets out the need for office floorspace during the plan period. The need for good IT and communications is considered key for economic development. Most of the vacant stock is ageing stock which does not satisfy occupier demand for modern energy efficient office space.

The retail floorspace figures are based on detailed evidence produced by Roger Tim and Partners. The consultants took into account changing trends in retailing such as online shopping. The greengrocer in West Byfleet may have closed since the document was published but that is a normal part of any cycle. A barber has now replaced it. If some new well designed, attractive retail floorspace is developed in West Byfleet new businesses will be attracted to the centre which will increase the vitality and viability of the centre.

4. The Post Office (PO) annotation is on the “base map” which is produced by Ordnance Survey. The Council is reliant on Ordnance Survey to update the map.
5. Surrey County Council deals with highway issues rather than Woking Borough Council. A tunnel or bridge over the main road would certainly make moving around the centre easier for pedestrians. The Council would support such a scheme however the Council recognises the significant cost of such a project.

#### **West Byfleet – Recommendation**

No changes to the policy are considered necessary as a result of the representations made.

## **Policy CS4: Local and Neighbourhood Centres and shopping parades**

14 responses were received regarding the Local Centres policy. Of the 14 Local Centre responses, 4 objected, 5 supported and 4 made general comments

### **Local and Neighbourhood Centres and shopping parades - Key Issues Raised**

Key issues raised include:

1. Apparent omissions in the evidence and justification for the policies for local centres, and by extension the lack of policy for out of town centres.

In particular, page 18 of the SA notes that the establishment of out of town stores are described as having a local convenience function.

It is well known that there are competition issues between out of town stores and centres but the draft plan totally ignores the effects of the many out of town stores, either in the Borough or within reasonable driving distance outside, on the fortunes of district, local, or neighbourhood centres.

In the absence of clear analysis and policies, presumably out of town stores will be able to continue to grow in size and range of goods provided. What will the effects be on local and neighbourhood centres? Evidence from various impact studies elsewhere suggests a loss of viability over time, especially affecting the poorer and less mobile members of the community.

In addition, travel to out of town stores is often unsustainable, dependent on cars, and their sites use large areas of land (especially for parking) that could be put to better use in areas of the country where land resources are precious and where the alternative sites for development are largely "green field".

How can policies for the more local centres be presented in this draft without explicit consideration of the total range of retailing and ancillary services? Two possibilities at least are likely, either a dwindling of the importance of the more local centres (perhaps recognised by changes of use out of retail), or greater emphasis on local facilities accessible to all members of the community, and restrictions on out of centre facilities. The plan should present policies for examination.

2. CS4 - Living in Westfield I am concerned that the Neighbourhood Centre focuses on the "as is" and not the "To Be". With an addition of 440 plus homes at the Moor Lane site the Neighbourhood Centre needs to move further south to take in part or all of Westfield Common (which perhaps should be more appropriately classified as Westfield Village Green).
3. Outside the town centre Woking suffers from a degree of poor development that does not increase its sense of place or identity. To help remedy this and improve the appearance of the whole local area proposals should focus on enhancing the appeal and character of village centres e.g. Horsell High Street.
4. I fully endorse the need for neighbourhood centres and shopping parades and how although they only provide limited services they can be essential for meeting everyday local needs. The local council will seek to protect local shops and uses such as post offices.
5. On map 5 shopping parade 5 is Oriental Road and is the only small parade covering a large area south of the station. In this parade there is really only one

shop and this used to include a Post Office which recently closed although was always busy. This has now forced the local community to by pass the parade and go into the centre of town to use the Post Office beneath WH Smiths. This decision should be reconsidered in order to avoid undue pressure in the Town centre, especially as the strategy designates post offices as 'anchor units' (5.26).

6. If Oriental Road counts as a shopping parade, I would have thought the shops in Lovelace Drive/Coldharbour Road Pyrford would also have qualified.
7. Development of Knaphill is specific in terms of size of development but does not say where this will be or for what purpose. There has been significant local objection to the Sainsbury's plans, and I am concerned here that Sainsbury's/Homebase area be over-developed and not sufficient consideration given to Knaphill village centre.
8. Monitoring and review of local centres should include quality of local centres and meeting the needs of the local community. Not just targets of 'floorspace'.
9. The dominance of the Sainsbury's 'Superstore' which has been allowed to grow and prosper at the expense of the small retailers in the village. Shopping habits and lifestyles change, but I am very concerned that the Council should do more to support and encourage small, local shops and businesses to maintain diversity.
10. Local policy should be geared to supporting the local Knaphill Library and the Knaphill Post Office as these are vital community services. Sadly central government policy is often not in tune with local needs. "Localism" and "Big Society" are talked about in one breath and conflicting policies (e.g. to put Post Offices in Supermarkets, to change the services on offer at Post Offices; to cut Library opening times, to imply that Libraries could be run by Volunteers) are put forward by Central Government, which could undermine the very local communities and services they claim to value.
11. Maintain public transport through all neighbourhood centres listed.
12. Ensure shops in shopping parade have daily access and are varied.
13. Policy CS4 and the reasoned justification, includes a number of phrases which indicates that the Local and Neighbourhood Centres are either incapable of accommodating any significant retail growth or are not required to do so. For example local centres are only considered appropriate for a "low level of retail growth" appropriate for a "small amount of retail growth" and finally, at paragraph 5.24, "the Council does not consider that the local centres have the physical capacity or catchment to achieve significant retail development". As a result of these conclusions any new floor space is only expected to "meet the needs of those living locally and not a wider catchment".

It is unclear what evidence this is based upon. It is well established in PPS4 that retail development, on a large scale, should be directed towards the larger centres. However, beyond that initial stance consideration needs to be given to whether such sites exist and therefore whether alternative edge of centre or out of centre sites can be appropriate. Moreover, new retail development can bring about significant regeneration and employment benefits and may well be perfectly suited to a location within or adjoining one of the local or

neighbourhood centres meeting not only the needs of that immediate centre but also preventing journeys away from that centre to other retail destinations. It is already recognised in paragraph 5.22 that a majority of Local and Neighbourhood Centres do not have a train station and journeys by private car predominate; a situation which could be dramatically eased by providing retail uses to stem that leakage.

We therefore consider that the policy needs to be amended to reflect the fact that retail development does not have to be within the Retail Centre but can, in accordance with PPS4, adjoin it or be out of centre. This would require an amendment to paragraph 5.24.

14. It is also unclear what evidence base has been relied upon for the Council to claim that additional floor space is only expected to meet local needs and not that of the wider catchment. Such a statement cannot be relied upon when it is clear that there is a considerable need for further retail development within the Borough (evidence based study) provision for which can be made throughout the Borough in accordance with PPS4.
15. Indicative additional capacities are given, could there be any restriction to the size of the units that could accommodate this additional floor area to prevent very large units being allowed as this could change the nature of the local centre. There was a similar policy to reflect this in the Local Plan. Without restrictions this could prove very difficult to control how additional retail floorspace is accommodated in these areas.
16. It is pleasing to see the importance of public houses recognised in Policy CS4 of the Core Strategy, where the Council indicates that it will, 'seek to protect and retain local shops, services and other small scale economic uses such as..... public houses'.
17. It is disappointing that this excellent local neighbourhood policy isn't reflected elsewhere in the Strategy, when considering Woking Town Centre, West Byfleet District Centre or the borough-wide policies relating to community infrastructure and heritage and conservation. As acknowledged in Policy CS4 pubs have a high value as community focal points and meeting places, bases for sporting activities, facilities for community activities and so forth and their protection is therefore consistent with many of the other policies in the plan. Nationally the current national pub loss rate is around 40 each month; 80% of these losses are urban or suburban, where there are important community needs.

I therefore consider the Strategy is unsound as it fails to provide sufficient explicit protection of pubs as community facilities, outside of neighbourhood areas or in the more general policies in the Strategy. My preference would be to see a new policy included in the Plan to afford more protection to pubs as detailed below. In addition I would also like to see a number of the existing policies strengthened and amended, details of these are also given below.

18. I would like to see specific policies included in the plan to protect pubs, in both the Urban & rural parts of the Borough. My preference would be to see them incorporated in amended policies along the lines suggested below.



### General Policy – Rural and Suburban

The Council supports retention of existing community facilities such as schools, post offices, public houses, shops, doctors' surgeries, branch libraries, village halls and other meeting rooms, and petrol stations and garages. Before granting planning permission for a change of use which would result in the loss of any of these facilities, the Council will require supporting evidence that the facility is no longer needed by the local community or is no longer commercially viable.

### Specific Policy – Rural

The Council strongly supports retaining public houses, particularly in rural areas where the availability of other premises is limited. Applications for changes of use will be resisted, unless convincing evidence can be provided to show that the public house is not economically viable. If permission is granted for a change of use, preference will be given to the premises remaining in some form of community or employment use; as long as there are no traffic, amenity, environmental or conservation problems as a result. If applications for a change of use of a public house are received the Council will require evidence that:

- a comprehensive and sustained marketing campaign (agreed in advance by the Council) offering the public house for sale as a going concern, has been undertaken, using an agreed valuation of the premises;
- the marketing campaign has run for a period of at least twelve months before the planning application is submitted;
- if marketing has been based wholly or partially on an alternative community or employment use, there has been prior discussion with the Council on the principle of the proposal; and
- the public house has been offered for sale locally, and in the region, in appropriate publications.

### Policy – Urban

The Council supports retention of public houses and will oppose their conversion or redevelopment where they contribute to the liveliness and vitality of the street scene, where they provide a service of particular local value, or where a consequence would be the loss of important historic features.

## **Local and Neighbourhood Centres and shopping parades - Officers' Response**

1. It is acknowledged that page 18 of the SA is not as clearly worded as it might be. It states:

*“Out of town retail parks are relatively limited in Woking. There are small retail parks at Byfleet, and Oriental Road Woking, and a larger retail park just outside the Borough at Brooklands. Superstores at West Byfleet, Goldsworth Park and Knaphill provide for local convenience shopping. Knaphill and West Byfleet also have a range of other shops”.*

The first two sentences relate to out of town retail parks and the third sentence which begins “Superstores at West Byfleet” is a change of topic and relates to the Waitrose supermarkets in West Byfleet and Goldsworth Park and the Sainsbury's in Knaphill. These supermarkets (along with Morrisons on Goldsworth Road, Woking) are where the majority of residents do their weekly convenience food shopping, hence “provide for local convenience shopping”.

Competition issues between out-of-town locations and town/district/local centres and the effect of out-of-town centres in terms of revenue lost was considered in detail by the Town, District and Local Centres Study. The Core Strategy is an over-arching document setting out the strategic plan for the Borough. It would not be appropriate to include detailed discussion and analysis of the impact of out-of-town centres which is set out in the evidence base. The evidence base studies are all on the Council's website as background documents to the Core Strategy.

There is clear guidance for Local Authorities when producing LDF documents. A key criteria is that local policy does not repeat national (or regional) guidance. Planning Policy Statement 4 (PPS4) contains guidance and 10 specific development management policies (EC10 to 19). PPS4 states:

*“promote the vitality and viability of town and other centres as important places for communities. To do this, the Government wants:*

- new economic growth and development of main town centre uses to be focused in existing centres, with the aim of offering a wide range of services to communities in an attractive and safe environment and remedying deficiencies in provision in areas with poor access to facilities”.*

The Council has followed the guidance in PPS when preparing the Draft Core Strategy and set out a hierarchy of centres where it expects development to take place. Policy CS1: A spatial strategy for Woking sets out the hierarchy and paragraphs 4.15 and 4.16 and table 3.

The policy does not plan for more Local Centres, simply the re-classification of centres from the Local Plan 1999 (see table below).

	<b>Existing hierarchy defined in Local Plan 1999</b>	<b>Hierarchy defined in Draft Core Strategy</b>
<b>Town Centre</b>	Woking Town Centre	Woking Town Centre
<b>District Centres</b>	Byfleet, Goldsworth Park, Horsell, Knaphill, St Johns, Sheerwater, West Byfleet	West Byfleet
<b>Local Centres</b>	Anchor Hill, Barnsbury, Brookwood, Gorsewood Road, Guildford Road, Hermitage Road, Kingfield, Maybury, Mayford, Old Woking, Oriental Road, Pyrford, Rydens Way, Walton Road Area, Westfield, Wych Hill	Byfleet, Goldsworth Park, Horsell, Knaphill, Kingfield, St Johns, Sheerwater
<b>Neighbourhood Centres/ Shopping Parades</b>		Brookwood, Pyrford, Westfield, Mayford, Old Woking, Walton Road, Anchor Hill, Barnsbury, Gorsewood Road, Guildford Road, Hermitage Road, Maybury, Oriental Road, Rydens Way, Wych Hill

The overarching objective of PPS4 which is taken through into the Core Strategy is sustainable economic growth. In order to achieve this, the retail hierarchy has been put in place to encourage a sustainable pattern of

development, which will reduce the need to travel, especially by car and to promote the vitality and viability of town and other centres as important places for communities. New shops and offices need to be located in existing centres (such as Woking Town Centre) in order that a wide range of services are available to communities in one place that has good transport links.

2. The centre boundaries have been designated to show where the Council expects new retail and office development (and all 'economic development' as defined in PPS4) to be located. As Urban Open Space, designated Common Lane and a Site of Nature Conservation importance, it is not considered that Westfield Common (so named because it is designated Common Land) is an appropriate location for development.

The boundary of Westfield Neighbourhood Centre has been designated to include the small parade of shops, the doctor's surgery, social club and attached bowling green, Moorcroft day centre and the Cricketers pub. Although a significant level of housing development is expected on the Moor Lane site, it is not anticipated that Westfield will expand significantly as a result. The Town, district and Local Centres study did not consider this location was appropriate for anything other than a very small level of retail development.

3. Policy CS20: Design sets out that all forms of development should make a positive contribution to the environment and strengthen the character and distinct identity of the area. Any new development in the Borough will be expected to meet these policy criteria.
4. Support noted. In writing this policy and CS1 which designated the hierarchy of centres in the Borough the Council is supporting and seeking to protect local and neighbourhood centres and shopping parades.

Individual shops and businesses, such as post offices, are run as commercial businesses. The Council can not protect individual businesses; policy can simply resist the loss of retail uses, particularly anchor units in designated centres.

5. As set out above post offices are run as commercial businesses. The Council does not have the financial resources to provide financial support for post offices. However the Local Centres policy does classify them as anchor units and seek to retain anchor units as A1 retail units because they are key to the vitality and viability of local and neighbourhood centres and shopping parades.
6. The shopping parade at Oriental Road was designated as a Local Centre in the Local Plan 1999. It was felt it was more appropriate to designate it as a shopping parade, as it contains a butcher, takeaway pizza, convenience store, hairdresser/beautician and a small restaurant/takeaway. The retail and service units on Coldharbour Road/Lovelace Drive in Pyrford are identified as a Neighbourhood Centre. A consistent approach has been applied to the designation of the hierarchy of centres.
7. An indicative amount of retail floorspace is set out for Knaphill for the plan period. This development is expected to occur within the Knaphill Local Centre boundary defined on map 4 (p45 of the Draft Core Strategy). The Sainsbury's and Homebase stores lie outside the centre boundary and are considered to be in an out-of-centre location (as defined by PPS4).

The current Sainsbury's application will be determined on its own merits and it is not considered appropriate to comment on it in this context.

8. The Town, District and Local Centres study provided analysis of the centres in the Borough in a Local Service Provision Audit. The audit (graphs shown on page 32 and 35 of the Study) weighted services that Roger Tym & Partners deemed to have more importance, namely superstore/supermarkets, banks, chemists and post offices. The details of the approach and weighting are shown in appendix 4 of the study. This approach and comparison of the weighted and un-weighted scores of each centre does provide interesting information about the health of each centre. It may not be possible for retail monitoring of each Centre to be undertaken every year but resources should allow for this every other year. The Local Service Provision Audit can then be updated.
9. By designating a hierarchy of town, district, local and neighbourhood centres in the Borough and setting out what it considers to be an appropriate level of retail development for the centres over the plan period the Council is demonstrating its support and commitment to businesses in the centres. Policy CS4 is worded to try and support and encourage economic development in the Boroughs' smaller centres. However the Council does not have the financial resources to provide financial support to small local businesses.
10. Policy CS4 seeks to protect and retain post offices as far as possible through planning policy however the Council does not have the financial resources to provide financial support for post offices.

The Council has no control over central Government policies such as Localism and the Big Society.

11. Comments noted, the Council will continue to work with key public transport stakeholders through the Transport for Woking partnership.
12. Through planning permissions the Council has some control over the Use Class of outlets in centres. As set out in the policy:  
*"The Council will seek to protect and retain local shops, services and other small scale economic uses such as post offices, petrol stations and public houses, in local and neighbourhood centres and shopping parades because of the importance of these uses for meeting the everyday needs of those living locally".*  
Conditions applied to planning permissions can set maximum trading hours however the Council can not control the hours which individual businesses choose to open, so can not control if they will provide "daily access".
13. Policy CS4 is evidenced by the Town, District and Local Centres Study produced by Roger Tym and Partners. There is no doubt that the scale of retail development in the Local Centres should be appropriate to their size and character. This is necessary to ensure effective synergy between the centres and minimise any adverse impacts that they could have on one another. The wording of the policy is crafted to reflect this.

Policy CS1: A spatial strategy for Woking, stresses the importance of concentrating development in the main centres. The Council believes that there is capacity in these centres to accommodate the projected growth during the plan period. The Town, District and Local Centres Study identified a

number of sites in the town centre likely to be available for development during the plan period. Similarly sites have been identified which are considered the most appropriate for employment development.

If significant retail or employment development were permitted in any of the district or local centres it would be likely to generate a significant amount of traffic to that centre. There is a mainline train station in Brookwood but apart from that the only public transport to all of the Local and Neighbourhood Centres is via bus.

Policy EC5 of PPS4 states that local authorities should:

*“identify the appropriate scale of development, ensuring that the scale of the sites identified and the level of travel they generate, are in keeping with the role and function of the centre within the hierarchy of centres and the catchment served”* (PPS4, EC5.1b).

It is felt that Local and Neighbourhood Centres are essential to provide easily accessible shopping to meet people’s day-to-day needs, but any significant level of development within them is not appropriate because it would generate significant traffic and change the nature of the centre. The only exception would be Sheerwater which is one of the Priority Places. Separate guidance is set out in the priority place policy.

14. Policy CS4 is evidenced by the Town, District and Local Centres Study produced by Roger Tym and Partners. The study identified considerable need for further retail development but considered that the majority of this could and should be accommodated within Woking Town Centre. The bulk of the remaining floorspace can be accommodated in West Byfleet district centre. The Local Centres provide retail, facilities and services to meet the day to day needs of the community.

The Town, District and Local Centres Study identified a number of sites in the town centre likely to be available for development during the plan period. Similarly sites have been identified which are considered the most appropriate for employment development.

If significant retail or employment development were permitted in any of the district or local centres it would be likely to generate a significant amount of traffic to that centre. There is a mainline train station in Brookwood but apart from that the only public transport is via bus.

15. It is felt that restricting the size of units in a Local Centre may be too prescriptive for the purpose of the Core Strategy. This is considered to be a more appropriate policy to be included in the Development Management Policies. Policies within the Core Strategy are supposed to be over-arching and strategic.
16. Support noted.
17. The Core Strategy is a strategic document that sets out the over-arching policy framework for the Borough until 2027. Policy CS4 has recognised the importance of pubs in smaller Local and Neighbourhood Centres where it is recognised they can serve as community facilities. In the town centre the role of pubs and bars is that of leisure.

18. The detailed policies suggested are not considered to be appropriate for an over-arching strategic policy framework. The issue of specific policies to protect pubs will be given further consideration and if it is deemed to be necessary and appropriate will be included in the Development Management policy document.

**Local and Neighbourhood Centres and shopping parades - Recommendation**

Amend the relevant paragraph on page 18 of the SA to make its meaning clearer. Also amend paragraph 2.21 of the Core Strategy Spatial Portrait which is similarly worded.

Amend the monitoring section of the policy to include "Local Service Provision Audit" to be undertaken at 2 yearly intervals. This was originally undertaken by Roger Tym and Partners in summer 2009. The Audit can be undertaken by the Council when the retail monitoring update has been undertaken. This is scheduled for April 2011.

## **Policy CS5: Priority Places**

The purpose of Policy CS5: Priority Places is to address the underlying issues causing deprivation in the Ward of Maybury and Sheerwater and in the Lakeview Estate of Goldsworth Park.

A total of six individuals and organisations made representations on this policy. The key issues raised are summarised below.

### **Priority Places - Summary of comments of support**

1. We broadly support the designation of Maybury and Sheerwater and the Lakeview estate as priority places and the approach taken. We urge the Council however to reconsider its view that Lakeview is unlikely to see no significant new development, and to consider what redevelopment opportunities might be feasible, given the relatively good quality transport links enjoyed by the estate and its proximity to the Town and other local centres.
2. Woking Chamber fully support the proposals for employment provision in Maybury and Sheerwater and consider that more light industrial work needs to be made available. WBC should consider flatted factory schemes or some other type of starter/industrial units should be facilitated. Jobs close to home suit part-timers and save on transport.
3. Woking Chamber support plans for a further access road into the Sheerwater estate and consider it urgent.
4. Broad support should be given to policy CS5 which recognises the priority which needs to be given to alleviating the deprivation within the wards of Maybury, Sheerwater and the Lake View Estate area of Goldsworth Park.
5. In relation to retail provision within Maybury and Sheerwater we support that element of Policy CS5 and paragraph 5.41 which recognises that benefits can be derived from additional retail development within Sheerwater enhancing the attractiveness of the local shopping parade and provide a wider choice for the local community avoiding unnecessary car borne trips.

### Officer response

1. Comments of support for the approach are noted. The Lakeview Estate is a small geographical area, with relatively high density housing, much of which is social-rented. The area has specific socio-economic issues. Officers are not aware of any areas within the Lakeview Estate which might be suitable for development. It is unlikely that redevelopment would be achievable from an economic viability point of view. Officers will consider the area again through the 2011 SHLAA review.
2. Comments noted. Redevelopment of vacant sites, especially office premises within the Forsyth Road area will enable opportunities to provide further industrial space if required.
3. Comments noted.
4. Support noted.
5. Support noted.

### **Priority Places: Objections – summary of issues raised**

1. This looks at the current "as is" and not the "to be". With the creation of the planned single access Moor Lane Estate based on the information provided by the Joseph Roundtree Foundation this will very quickly (inside 5years) move into a similar situation to Sheerwater and Maybury. It is therefore important that this new estate is listed on the "at risk" register particularly from

a crime and anti social behaviour standpoint. Unfortunately going down a "single access" route solely via Balfour Avenue will quickly turn this area into a "no go" area without a lot of help from Social Services!

#### Officer response

1. The comment regarding Moor Lane is noted. There is no evidence to justify the inclusion of Moor Lane as a Priority Place either in the national indices or the county or local community strategies. It is expected that the policies of the Core Strategy will improve the future environment of the area. The policies will be reviewed from time to time if in the future it is proven that specific actions are needed for the area, measures will be taken to address them.

#### **General comments on the Priority Places policy**

1. Paragraph 5.31 – clarification and explanation needed.
2. Surrey County Council support the general policy approach of seeking to direct resources to bring about positive changes to Maybury and Sheerwater to address current issues, which is consistent with the county council's policy objectives for the area. However, we are concerned that we have insufficient up to date information about the proposed new access road through Monument Road West and Monument Road East, which is referred to in this policy. The borough council will need to liaise with Surrey County Council as the Local Highway Authority at the earliest opportunity to consider this proposal and ensure that it represents a sound approach to problems on the local network.
3. Surrey County Council has concerns about including a list of priority infrastructure items within the Core Strategy and suggest that the bulleted items are deleted.
4. On Lakeview, it is suggested that a statement is added to this section of the policy to indicate that, "The Council will work with Surrey County Council to improve the existing cycle network through Lakeview including the provision of secure cycle parking at key locations".
5. In the supporting text to the policy (paras 5.50 to 5.55), we would like to see the following wording added: "Lakeview is within easy cycling distance of the town centre if the necessary infrastructure is provided. The cycling Woking programme will enable the council to increase the connectivity of the borough's cycle network by extending existing cycle routes and providing additional secure cycle parking at key locations in Lakeview to encourage cycle use. This will offer an alternative and more sustainable mode of transport to the car and increase accessibility to key local services."
6. As with Maybury and Sheerwater, we would also suggest that the bulleted items are deleted from paragraph 5.50 and the last sentence amended to read, "Priority infrastructure items are described in detail in the Infrastructure Delivery Plan, which will be updated bi-annually".
7. Paragraph 5.42 highlights that the low level of car ownership and limited public transport at Maybury and Sheerwater needs to be addressed. The document then outlines the proposal of a new access road through Monument Way East combined with the borough's Cycling Woking programme, which encourages the use of bicycles for travel. We support the sustainable transport initiatives being put in place to help reduce the need to travel by private car. Other measures such as Travel Plans can also assist in helping increase sustainable travel.
8. It is stated in CS5 that developer contributions, where necessary, will help improve the infrastructure in these areas. If potential sites are deemed to have limited transport access, all potential funding sources and gaps for



additional infrastructure and facilities required in transport terms should be explored prior to the Core Strategy being adopted.

9. New development can act as a catalyst to the regeneration of these areas and can bring about opportunities for new jobs and infrastructure and therefore should be seen positively in the light of the benefits they can bring. This approach is consistent with Policy EC3.1 (b) (i) of PPS4 which requires the economic vision for an area to “give priority to deprived areas which are experiencing significant levels of multiple deprivation, where there is a need for better access to services, facilities and employment by socially excluded groups”
10. In relation to Maybury and Sheerwater the policy seeks to encourage “new opportunities for local employment within the established industrial areas in Maybury and Sheerwater.” In line with our objection to the Spatial Vision we would seek clarification that such employment benefits can be derived from the range of employment uses defined in paragraph 4 of PPS4, that is to say not just the B use classes but a fuller range including, for example, retail, leisure and tourism.
11. It is noted that part of the Forsyth Road Industrial Estate is identified for more flexible mixed B class uses, however only the western part of the estate is identified. The boundary for this particular part of the industrial estate to be designated appears arbitrary and we can see no reason why the entire Forsyth Road Industrial Estate should not be identified as an area where flexible employment uses can be accommodated. This is the case because:-
  - a. The estate should be treated in a comprehensive manner;
  - b. There are a number of existing sites at the eastern end of the estate (and elsewhere) which tend to contain older buildings and offer the opportunity for redevelopment. Those at the western end tend to be newer and therefore less likely to be developed;

The western end lies closer to the housing and Local Centre of Sheerwater and hence provides better opportunity for jobs for local people given its proximity. We therefore consider that a more flexible approach should be applied to the entire Forsyth Road Industrial Estate in hand with our recommended change to the range of Economic Development Uses set out in PPS4. Such an approach would provide a much better chance of sites coming forward for redevelopment to provide a range of employment opportunities and hence a diverse range of jobs which would benefit the local priority area of Sheerwater and Maybury. This would provide the flexible approach to economic development to accommodate sectors not anticipated in the plan and allow a quick response to economic changes. (Policy EC2.1 (b) PPS4).

#### Officer response

1. Officers acknowledge that the ranking of indices of deprivation is complex and technical. Officers will therefore seek to provide further explanation and clarity.
2. Support for the approach is noted. The proposed road scheme would be a variation of the scheme already identified in the existing Local Plan (policy MV25) and following initial consultation with the county council no objections in principle were raised. Successful implementation of the policy will be reliant on a collaborative approach between the borough and county council. Detailed policies and safeguarding of land for the scheme will be through the Site Allocations DPD.
3. Comment noted and officers agree with this course of action.
4. Comment noted and officers agree with this course of action.

5. Comments noted, it is recommended that the supporting text includes a reference to the easy cycle distance of the Town Centre and the benefits of an improved cycle network and infrastructure. However references to Cycle Woking should not be included as this programme finished in March 2011.
6. Comment noted and officers agree with this course of action.
7. Comments noted and supported by the Council.
8. Funding schemes for specific infrastructure items will be assessed in the Infrastructure Delivery Plan.
9. Comment noted.
10. An amendment is proposed to policy CS14 and CS5 to enable greater flexibility for redevelopment of vacant sites for alternative employment generating uses. See amendment to policy CS14 for details.
11. An amendment is proposed to policy CS14 and CS5. See amendment to policy CS14 for details.

### **Priority Places - Recommendation**

A number of changes will be made:

- Paragraph 5.31 – further explanation and clarification.
- Delete lists of proposed infrastructure items from supporting text and include within Infrastructure Delivery Plan.
- "The Council will work with Surrey County Council to improve the existing cycle network through Lakeview including the provision of secure cycle parking at key locations".
- Include a reference in the supporting text about the easy cycle distance of the Town Centre and the benefits of an improved cycle network and cycling infrastructure.
- Reference to the effectiveness of travel plans will be included in the supporting text.
- The policy and supporting text will be amended to reflect the introduction of the Community Infrastructure Levy.

Officers will consider opportunities for redevelopment in the Lakeview area through the SHLAA review.

In addition, Officers will consider the latest Indices of Deprivation Data (which was released at the end of March 2011) to monitor levels of deprivation in Woking.

### **Policy CS14 – recommendation**

An amendment is proposed to policy CS14 to enable greater flexibility for redevelopment of vacant sites for alternative employment generating uses.

## Policy CS6 Green Belt

### Key issues raised

1. There appear to be 17 Green Belt sites that have been earmarked for development in Mayford and Sutton Green but not elsewhere in the Borough. Mayford is surrounded by Green Belt and the intention has always been that Woking and Guildford should be kept apart but with these plans we will see just one large town being created. We have no amenities in Mayford - no Doctor, Dentist, Health Care Centre or regular school.
2. The boundary review of the Green Belt in 2016-17, is in direct opposition to your aim to protect the Green Belt and protecting the countryside.
3. At what population size does the use of Green Belt land have to be considered?
4. Consider land south of Woking from Hook Heath Escarpment to Guildford for housing, as this was highlighted in the South East Plan.
5. Unsure if the open Green Belt housing around Woking should be developed for social housing.
6. Rather than building in the Green Belt, it would be more economically and ecologically sound to concentrate affordable housing in or close to the town centre; where there is support and reduce road travel.
7. With regards to any proposed greenfield development; I think the language needs to be strengthened and reflect a firmer stance on any intrusion into the greenbelt around the town.
8. The Green Belt is an out of date system which was designed for a past era when pressure on housing was not as high as today.
9. Have alternative options (other than the release of Green Belt) e.g. Brownfield sites been considered?
10. The exclusion of Brookwood Farm is inconsistent with other Green Belt boundaries in the locality.
11. The Green Belt is important in maintaining the divide between Woking and Guildford.
12. Carters Lane sewage works should not be included as a proposed Green Belt development site.
13. The site boundary for Carters Lane sewage works is not accurate.
14. The policy does not require a Green Belt boundary until 2016-17, this should proceed now.
15. Wildlife in the Green Belt should not be disrupted due to future development.

16. There is no reference to protect and enhance the model dairy and house at Broadoaks, which are Grade II Listed. Carters Lane sewage works is in close proximity to a number of significant heritage features, including Woking Palace.
17. A Green Belt release would create a huge strain on overstretched local resources.
18. Support the Green Belt review.
19. In line with the South East Plan a Green Belt review should be carried out.
20. Concerns about ad-hoc infilling of the Green Belt settlement, this could result in development in areas with limited access to sustainable transport modes, could result in higher car usage, impacting on the road network.
21. Moratorium on all Green Belt development.
22. Is the Council planning to dispose of the site west of Corresbrook Way, Knaphill?
23. In the short term, the Council is encouraged to be more flexible in considering housing on appropriate sites within the Green Belt. Particularly previously developed sites which are run down or derelict and which would benefit from housing development or where such sites are bounded by residential development and road networks.
24. Green Belt land can be used for the provision of allotments and other recreational facilities.
25. If Green Belt development will take place, support detailed design guidance, to ensure that development is of exceptional quality and durability and is integrated in the local environment.
26. Welcome the statement at paragraph 6.4 that the development of sites will take into account any biodiversity features.

### **Green Belt - Officer response**

1. No sites in Mayford are included for any form of development in the Draft Core Strategy. The sites referred to are within the Strategic Housing Land Availability Assessment (SHLAA) which is a separate document to the Core Strategy. The SHLAA is a piece of the LDF Evidence Base that every Council has to produce.

The SHLAA identifies specific deliverable and developable sites in order to demonstrate how the requisite level of housing supply is to be achieved.

It should be noted that the SHLAA itself will not determine whether a site will be allocated for housing development and that any conclusions reached in the study are made without prejudice to the determination of any subsequent planning applications in respect of the sites assessed.

It should be stressed that although the study must include the assessment of greenfield sites, any future strategy for housing delivery in Woking will only consider greenfield development if there are insufficient suitable brownfield sites available to meet the quality and nature of housing need. This is in line with national policy.

A Green Belt Study (which will form part of the LDF Evidence Base) will be carried out in 2016-17, to evaluate where it is necessary to release any land in the Green Belt for housing purposes and the size and scale of the release.

2. Woking's Green Belt has not been reviewed for over 20 years; some Green Belt land no longer meets the national objectives for Green Belt. It is anticipated that a small amount of land will be released from the Green Belt, in order to meet the level of housing need required in the Borough. All remaining Green Belt land will still be subject to the rigours of national policy.
3. The release of Green Belt land will not be based on exceeding a certain population size. It will primarily be determined by the findings of the Green Belt Study. It will also be based on the amount of available housing land supply; for example brownfield land that is available in the urban area to be used for housing.

The findings of the annual Strategic Housing Land Availability Assessment (SHLAA) will also contribute to this process. The Council's housing target is 4,964 units to 2027. The latest SHLAA (November, 2010) found that specific deliverable or developable sites are available to provide 4,410 new dwellings during the period 2010 – 2027, representing a potential under-supply of 554 units during that period. As a result of the lack of housing land in the Borough, small sections of land in the Green Belt will be released for housing purposes.

4. Policy SP5 of the South East Plan highlighted a selective review of the Green Belt boundary possibly to the south of Woking for a Green Belt release. The Council is committed to carrying out a review of the Green Belt boundary. However, at this stage it is not intended to define the geographical scope of the review. This will ensure that the review is comprehensive and considers all potentially suitable sites.
5. There is a significant unmet need for social housing in the Borough. The current Strategic Housing Market Assessment shows that there is a need for an additional 499 new affordable homes in the Borough every year. In order to meet this high level of need it may be considered appropriate to build both social and market housing in the Green Belt. Before any land is released detailed studies will need to take place.
6. The Core Strategy housing policies direct new housing to Woking town centre, followed by West Byfleet as a District Centre and Local and Neighbourhood Centres. The highest demand for social housing is for family housing. Sites in Woking town centre do not always have enough space to provide family housing, but tend to provide flats which are not suitable for all families.
7. The policy conforms with national guidance contained in PPG2 Green Belts, and is considered to be sufficiently robust to control harmful development in the Green Belt.

8. The latest government guidance is supportive of the role and function of the Green Belt. Therefore the Core Strategy and policy CS6 in particular reflects this.
9. The Council is proposing a review of the Green Belt in 2016-17; this will form part of the LDF Evidence Base. The objectives of the study are likely to be:
  - To provide evidence to support the policies of the Core Strategy, in particular;
  - To identify if any Green Belt land can contribute to the Borough's future development needs;
  - To ensure that policies to protect its purpose are based on up to date and robust evidence base;
  - To notice and record any change that has occurred in the areas studied, since the last review of the Green Belt.

The Core Strategy's spatial vision and objectives and policies aim that future housing growth should take place in Woking town centre. The housing policies set out that brownfield land is the first preference for new housing to be built.

10. Brookwood Farm has never been included in the Metropolitan Green Belt. It has been designated as a safeguarded site since the Woking Borough Local Plan 1999 for potential housing development. Its use for housing has therefore been established in principle by its designation in the Local Plan; it can be justified to be needed for housing development. The Draft Core Strategy makes the case for it to be released for development.
11. Part of the purpose of the Green Belt is to prevent the coalescence of urban areas such as Guildford and Woking. Paragraph 6.3 of policy CS6 refers to PPG2 national guidance, which aims to stop towns merging. Any release of Green Belt land will ensure that this purpose is retained.
12. Annex C of PPG2 has a list of examples of what could constitute a major developed site. This includes sewage treatment works. Infilling or redevelopment which meets national criteria can take place at a major developed site. Carters Lane sewage works is designated as a major developed site in the Green Belt because it meets the criteria for major developed site designation. It has a substantial footprint of development, contains some buildings and the infrastructure required for a sewage treatment works. It has been designated for the purposes of a sewage works and not for any other use.

Thames Water that runs the sewage plant requested that the site was designated as a major developed site in the Green Belt. The Council agrees with this request based on the reasons given above.

13. The site boundary for Carters Lane sewage works has been rechecked and will be amended. See Core Strategy, appendix 2 -site maps.
14. There is sufficient housing land available in the short term. However, there is a shortage of housing land in the medium term. The latest SHLAA (November, 2010) identifies specific deliverable or developable sites to provide 4,410 new dwellings during the period 2010/11 – 2026/27, representing a potential under-supply of 554 units during that period. As a result of the lack of housing land in

the Borough, small sections of land in the Green Belt will be released for housing purposes between 2022-2027.

15. The Green Belt policy sets out that studies of biodiversity and wildlife will be carried out if necessary, in order that they are not negatively affected. Any impact on Special Protection Areas and Special Areas of Conservation will be evaluated and appropriate measures put in place before development could be supported.
16. Comments noted. Policy CS19 Heritage and Conservation covers Listed Buildings and heritage features.
17. If there is a Green Belt release, it will be close to important supporting infrastructure. Alternatively the infrastructure will be provided at the location of any possible Green Belt release. The Council is preparing an Infrastructure Delivery Plan (IDP). The IDP will set out what new infrastructure is required to meet the levels of growth proposed in the Core Strategy, including details of where and when the infrastructure will be provided, who it will be provided by and how it will be funded.
18. Comments welcomed.
19. It is noted that policy SP5 Green Belts in the South East Plan states ‘...selective reviews of Green Belt boundaries are required.... possibly south of Woking.’ The Council has resolved to undertake a Green Belt review in 2016-17, based on analysis of the housing land supply. The timing of the review is informed by local evidence contained in the SHLAA and the requirements of national guidance PPS3 Housing.
20. The release of any Green Belt land as a result of the review will be underpinned by a Transport Assessment, and appropriate mitigation measures identified to address any adverse impacts.
21. National guidance in the form of PPG2 Green Belts allows certain types of development in the Green Belt for example recreation and certain other developments that would meet the needs of the community. It would be unsustainable to put a moratorium on all forms of development in the Green Belt. That would be contrary to national policy.
22. The site at Brookwood Farm is allocated as a safeguarded site, to be developed for housing.
23. The Green Belt review will determine the Council's approach to the location of housing in the Green Belt. There is sufficient housing in the short term, which is why the green Belt review is not being undertaken until 2016-17. The latest SHLAA (November, 2010) found that specific deliverable or developable sites to provide 4,410 new dwellings during the period 2010/11 – 2026/27, representing a potential under-supply of 554 units during that period. A Green Belt release/s will only be needed towards the later part of the Core Strategy 2022-2027.
24. Agreed, national guidance in the form of PPG2 states that certain types of recreational facilities are acceptable in the Green Belt.

25. For large sites the Council will produce Design Briefs or master plans. Policy CS20 Design is relevant. A Design Supplementary Planning Document will be prepared.
26. Biodiversity features will be incorporated into developments, following relevant biodiversity and wildlife surveys having taken place.

### **Green Belt - Recommendation**

It is proposed that minor amendments are made to the Core Strategy, policy CS6 Green Belt text. Including amending the map for the Major Developed Site at Carters Lane. Further information is set out in the policy box regarding Mayford Village an infill only settlement in the Green Belt. Greater detail is included about the review of the Green Belt boundary. Information about safeguarded sites has been deleted.

The policy also needs to be amended to account for the now published Localism Bill. As far as possible the whole document needs to be updated to take the Bill into account in order to “future proof” it.



## **Policy CS7 - Biodiversity**

### **Biodiversity - Key issues raised**

1. There is no mention as to what biodiversity or a protected species may be. For example the most commonly affected species are bats, badgers and newts.
2. Welcome Woking Borough's commitment to biodiversity and nature conservation.
3. Greater reference to the Biodiversity Action Plan habitats and species and the use of Biodiversity Opportunity Areas. A recognition that should not be focused solely on individual site protection, but should also aim to rebuild the fabric of the landscape in which the site sits.
4. Include in the policy a commitment to rebuilding habitat fragmentation and increasing connectivity. Green corridors, links and stepping stones for wildlife should be encouraged.
5. There should be a specific policy covering the Thames Basin Heaths SPA.
6. Provide more guidance about how new developments can be landscaped and designed to promote biodiversity.
7. Suggest including habitat restoration.
8. Policy paragraph 1 include the protection of protected and Biodiversity Action Plan species and of SNCIs.
9. Policy paragraph 2 includes Biodiversity Action Plan species.
10. Policy paragraph 5, housing developments between 400 metres to 5 kilometres of the SPA require a SANG.
11. Policy paragraph 6 includes the full name of Thursley, Ash, Pirbright and Chobham SAC.
12. In line with PPS9 include targets for the restoration and re-creation of priority habitats and the recovery of priority species populations, linked to national goals and identify suitable indicators for managing biodiversity.
13. Add the NERC Act Duty. The Natural Environment and Rural Communities (NERC) Act came into force on 1st Oct 2006. Section 40 of the Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.
14. Include National Indicator 197.
15. Explain SPAs in general (paragraph 6.15) that they are designated for their bird populations of European importance. Specific conservation objectives for Thames Basin Heaths SPA should be made e.g. the populations of the Dartford Warbler, Nightjar and Woodlark. As the birds are ground nesting there is the issue with increased recreation, especially dog walkers.

16. It should be included that an Appropriate Assessment may be required under the Habitats Regulations.
17. Paragraph 6.17 should be expanded to include and explain that SANGs are required for new housing developments between 400 metres to 5 kilometres of the SPA.
18. Thursley, Ash, Pirbright and Chobham Special Area is an Area (not Areas) of Conservation.
19. SAC's are designed for habitats and species other than birds; this should be included at paragraph 6.19. Conservation objectives for this SAC e.g. wet heath, depressions on peat substrates and dry heath.
20. There is one SAC in the Borough, a change should be made to the statement 'There will be a presumption against any development that will damage a SAC' –'a' should be changed to 'the.'
21. Happy with the points made at paragraph 6.20 relating to the SAC. They are also relevant to the SPA, so should be included under both.
22. Paragraph 6.24, include that SSSIs are of national importance and are a statutory designation. Add that apart from the heathland SSSIs, the other SSSI in the Borough is the Basingstoke Canal. Also in paragraph 6.24 include that SNCIs are of County importance and a non statutory designation, however they are protected under the planning process. LNRs are a statutory designation.
23. Paragraph 6.25 include that opportunities should be taken to link designated sites and other green open spaces through wildlife corridors.
24. Paragraph 6.27, welcome the inclusion of the requirement of prior assessment of the site, should be added that this needs to be up to date ecological surveys at the appropriate time of year, and not just desk top studies.
25. Add to paragraph 6.28 that river corridors will be protected by the incorporation of undeveloped buffer zones, details in CS16.
26. In the Monitoring and Review paragraph, in the fifth bullet point the Surrey Biodiversity Opportunity Areas should be included.
27. Key evidence base, this should include the Surrey Biodiversity Opportunity Areas.
28. Map 7: Nature Conservation Designations. The SAC should be named in full. The boundary of the SAC should be a smaller area than shown.

### **Biodiversity - Officer response**

1. In the biodiversity reasoned justification section; add the following: 'In the Woking area the most common examples of protected species are bats, badgers and newts.'
2. Comments noted.

3. The Biodiversity Action Plan habitats and species and Biodiversity Opportunity Areas were referred to under the Delivery Strategy. Under the Monitoring and Review section the enhancement and creation of Surrey Biodiversity Action Plan Habitat is highlighted.

Under the delivery strategy paragraph, biodiversity text added to refer to Biodiversity Action Plan habitats and species and the use of Biodiversity Opportunity Areas.

4. The principle of the suggested wording is acceptable. The wording of the policy has been amended to avoid habitat fragmentation and encouraging the creation of linkages between sites to create a local and regional biodiversity network of wildlife corridors and green infrastructure. Consequently there reasoned justification has been amended to reflect this policy change.
5. A separate Core Strategy policy has been developed for Special Protection Areas and Special Areas of Conservation, which both have European status, this is policy CS8 'Thames Basin Heaths Special Protection Areas and Special Areas of Conservation.' The new policy is required as there are three different SPAs in the Borough and no residential development is permitted within 400 metres of this and mitigation is required from 400 metres to 5 kilometres from the SPA, this covers the entire Borough. As the designation affects all applications for new residential units, a specific policy is considered necessary.
6. Add the following text: 'New development can promote biodiversity with sensitive design and landscaping.'
7. A reference to restoration is made in the reasoned justification, biodiversity section to restoration and that these 'schemes are based upon existing habitats and landscape features.'
8. Paragraph 1, last sentence of the policy, includes text that 'Biodiversity Action Plan species and SNCIs also need to be protected'.
9. It is not considered necessary to add a second reference to the Biodiversity Action Plan species, as they will be referred to in paragraph 1 of the policy. See comment above.
10. Paragraph 5, currently refers to development beyond the threshold of 400 metres. It would be clearer if it stated 'that housing developments between 400 metres to 5 kilometres need to pay a tariff which maintains SANGs in the Borough.' The proposed new policy for the SPA & SAC takes this into account.
11. The full name of the SAC's as 'Thursley, Ash Pirbright and Chobham' has been included in the reasoned justification'.
12. Four different indicators are set out in the monitoring and review section, which are deemed to encompass these issues.
13. It is not necessary to list the piece of legislation in the body of the policy. A wide range of European, national and regional guidance has been considered in the preparation of the Core Strategy. Singling out this particular legislation will be misleading. However, its requirements have been met by the policy as the

proposed new policy for the SPA and SAC. Appendix 1 of the Sustainability Appraisal Report will be amended to include this Act.

14. National Indicator 197 has been developed as an indicator of part of the biodiversity within the areas covered by English Local Authorities. In particular it covers sites that have been designated for their nature conservation or geological diversity. From April 2011 there will not be a national requirement for Local Authorities to monitor National Indicator 197. This is a matter to be determined at a local level. The monitoring and review section of the policy includes the following indicators relating to biodiversity habitat:
  - Number, area and condition of regionally or locally designated wildlife sites.
  - No decrease in the total area designated as of international, national and regional importance, or a decline in their condition.
  - The enhancement and creation of Surrey Biodiversity Action Plan Habitat.
  - The percentage of major applications incorporating measures to protect and enhance biodiversity.
15. A separate Special Protection Area policy has been developed with information about purpose of the SPA, including its use for the ground nesting birds.
16. The policy refers to the Appropriate Assessment. The Appropriate Assessment is included in Appendix 1 the Evidence Base section.
17. Paragraph 5 in the policy box states that 'housing developments between 400 metres to 5 kilometres need to pay a tariff which maintains SANGs in the Borough.' (See response 10.) This will form part of the SPA/SAC policy.
18. The suggested correction is noted. Amend the text so that it refers to a Special 'Area' of Conservation (SAC) not 'Areas'.
19. Add text to make clear that the SAC is designated for species other than birds. The conservation objectives for the Thursley, Ash, Pirbright and Chobham SAC is to protect and enhance wet heath, depressions on peat substrates and dry heath and this is emphasised in the reasoned justification.
20. See 18 above.
21. Comments of support welcomed. Text has been amended to refer to SPA and SAC.
22. The policy has been amended to clarify that SSSIs are of national importance. Explain that SNCIs are of County importance and a non statutory designation, but are afforded protection in the planning process. LNRs are a statutory designation. Add that SSSI's are shown on the Proposals Map.
23. Include in the reasoned justification "opportunities will be taken to link designated sites and other green spaces to create integrated wildlife corridors". This is also emphasised in response 4.
24. Comments noted. It is considered that this comment may be too detailed for the purposes of a Core Strategy policy.

25. Comments will be added, stating that river corridors will be protected by the incorporation of undeveloped buffer zones.
26. Include a reference to Surrey Biodiversity Opportunity Areas in the monitoring and review section. The following text is proposed 'Status of Surrey Biodiversity Opportunity Areas.'
27. In the key evidence base, include the Surrey Biodiversity Opportunity Areas.
28. The size of the Special Areas of Conservation designation on the Nature Conservation Designations map is too large. The SAC boundary has been checked and amended and the correct size is shown on the Proposals Map.

### **Biodiversity - Recommendation**

Minor amendments are made to the policy as set out in the section above. As a result of comments received, policy CS8 'Thames Basin Heaths Special Protection Areas and Special Areas of Conservation' will be added to draft submission Core Strategy.

The policy also needs to be amended to account for the now published Localism Bill. As far as possible the whole document needs to be updated to take the Bill into account in order to "future proof" it.

## Policy CS8 - Flooding

### Flooding - Key issues raised

1. Concerned about further flooding and await an update 'flood areas risk.'
2. Concerned with high density/high rise buildings in the town centre and their impact on the surface water drainage which already struggles in torrential rain.
3. Flooding is a serious issue in Mayford which would be exacerbated by yet more building.
4. Supports the policy requirement for new development to incorporate sustainable drainage systems to treat surface run-off. They can also serve as suitable wildlife habitat and form part of the Borough's Green Infrastructure network.
5. The policy should include a reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development.
6. Policy point 3, by specifying housing and commercial units there is a risk that some development within the Borough may not fit within these types and therefore be no requirement for them to use sustainable drainage systems.
7. The need for flood risk assessments were highlighted by the forthcoming surface water management plan.
8. Paragraph 6.34 'This document will be used to inform the allocation of sites in a decreasing probability of flood risk.' We believe that the wrong term has been used here. A decreasing probability of flood risk would mean building first in flood zone 3, which we understand is not your intention.
9. Paragraph 3.15 'Planning to avoid development in a flood zone is an important consideration of the Core Strategy.' All land within England and Wales is categorised into flood zone 1, 2,3a or 3b. The sentence should therefore be amended to: 'To avoid development in an area at risk of flooding is an important consideration....'
10. Forms of flooding other than fluvial and surface water should be within the policy wording, it is in the justification. For example there is a residual risk of flooding from the Basingstoke Canal where it is raised above natural ground level.
11. Paragraph 6.36 'Where there is potential for other sources of flooding, a Flood Risk Assessment should be considered to investigate the level and impact of the risk and propose mitigation measures in accordance with the advice in PPS25: Development and flood risk and the Council's SFRA. Applicants will be encouraged to recognise the benefits that undertaking a Flood Risk Assessment can bring to a development, even if not required.' 'Considered' sounds too weak, this should be replaced with required, as stated in policy E9 of PPS25.
12. Policy box, paragraph 3, the term 'where feasible' should be added, where it states that the Council will require all housing and commercial units to

incorporate SUDs. It is important to recognise the constraints of SUDs that may limit their use where infiltration to ground is proposed e.g. contamination or shallow water table.

13. The Core Strategy does not consider water quality management.
14. For information the main water bodies in Woking Borough are the Addlestone Bourne (West End to Mill/Hale Bourne); the Wey Navigation (Pyrford reach); Hoe Stream (Pirbright to Wey at Woking); Wey (Shalford to Thames); Addlestone Bourne (Mill/Hale Bourne to Chertsey) and Hoe Stream (Normandy to Pirbright). Of these, both reaches of the Hoe Stream are priority waterbodies, as is the Addlestone Bourne (West End to Mill/Hale Bourne).
15. *The Addlestone Bourne (West End to Mill/Hale Bourne)* is failing on Phosphate. Given this reason for failure there is the need to minimise the risk of diffuse pollution from new developments through the use of sustainable drainage systems (SUDS) and also promote sustainable water management best practice. Incorporating SUDS will help to reduce the risk of diffuse pollution which in turn will help to improve water quality in our rivers and streams and help to achieve improvements in line with the aims and actions set out in the Thames River Basin Management Plan. The above can be incorporated and implemented through the flood risk and sustainable construction policies.
16. *The Hoe Stream (Normandy to Pirbright)* is failing on Copper. Given this reason for failure again there is the need to minimise the risk of diffuse pollution from new developments through the use of sustainable drainage systems and provide for water quality infrastructure and integrate water management systems in new development and possibly existing.
17. *The Hoe Stream (Pirbright to Wey at Woking)* is failing on fish, and point source pollution is a significant issue. It is beneficial that opportunities are sought to enhance biodiversity - where this can contribute to an improved water environment good for water wildlife. Also to ensure that there is no deterioration in the waterbody water treatment infrastructure needs to be provided at appropriate stages of development. The Core Strategy includes a policy under the 'open space, green infrastructure, sport and recreation' on protection and enhancements to river corridors this is aimed to help secure improvements in water quality. These would help contribute to regional biodiversity targets and will take into account any existing regional or local habitat creation strategies and the SE Biodiversity Strategy. This will also consider river corridor protection as encouraged in Planning Policy Statement 9. The above can be incorporated and implemented through the biodiversity and conservation policy with the aim of also supporting the objectives of the Thames River Basin Management Plan.
18. The above actions should be applied to the management of these water bodies within these catchments within the Borough. With regards to the Wey Navigation (Pyrford) again the Borough should seek opportunities to minimise the risk of diffuse pollution from new developments through the use of sustainable drainage systems; ensure that there is no deterioration in the waterbody by providing adequate water treatment infrastructure at appropriate stages of development. Therefore development within this area or in close proximity to the watercourse should take into consideration the above issues and actions.

19. The point above applies to the River Wey (Shalford to Thames) and Addlestone Bourne (Mill/Hale Bourne to Chertsey Bourne) as well as the need to ensure that opportunities are sought for enhancements to river corridors aimed to help secure improvements in water quality.
20. Another issue that has not been satisfactorily considered nor covered in the document is the issue of groundwater protection. There are notable groundwater issues within Woking Borough that needs to be addressed to prevent the contamination of these groundwater sources and surface water sources. It will be useful if this is mentioned as part of the nature/portrait of the Borough.
21. With regards to the local geology of Woking Borough groundwater is present in the alluvium and gravel deposits that tend to lie alongside the watercourses across the borough. We consider these aquifers vulnerable to pollution from contaminated sites, badly constructed drainage systems and leaky sewers.
22. We consider the groundwater in these aquifers important because they supply base flow to the surface watercourses in dry weather conditions.
  - We recommend sustainable drainage systems are used wherever possible.
  - The infiltration system should conform to the Groundwater Regulations 1998 and prevent the introduction to groundwater of substances in List 1 of the regulations, such as hydrocarbons, and prevent pollution from other contaminants in List 2.
  - No soakaways shall be constructed in contaminated ground, unless an appropriate risk assessment has shown that the disposal complies with the requirements of the Environmental Permitting (England and Wales) Regulations 2010 (previously the Groundwater Regulations 2009) to prevent the entry into groundwater of hazardous substances and / or limit the entry of non-hazardous pollutants.
23. In areas where the London Clay is at the surface, discharge of drainage systems to ground will be very limited. Therefore suitable alternative methods for drainage should be considered.
24. Some of the proposed development areas are located in brown field sites which are susceptible to contamination. Development in contaminated sites should comply with Planning Policy Statement 23 (PPS23 - Planning and Pollution Control, Annex 2: Land Affected by Contamination). This will require preliminary risk assessment and pre-planning discussions prior to submission of the planning application. Land contamination is a material planning consideration. It is the Planning Authority's responsibility to make sure that it is given due consideration, and to ensure the contamination issues can feasibly be dealt with by the redevelopment plan.
25. Woking Borough is cut by many surface watercourses. We consider that locally they are fed from the groundwater present and they are the most sensitive water receptor in the Borough. We recommend following a PPS23 approach to redeveloping contaminated sites. This will help to improve groundwater quality, which in turn will improve the quality of the surface waters.
26. Point 2 of the policy, it should be made clear that a sequential approach to development will be applied for flood zones 3a and 3b.



27. Consider mentioning the emerging Surface Water Management Plan.
28. I am concerned about frequent flooding under the Prey Heath Road Bridge.

### **Flooding - Officer response**

1. Comments welcomed. The Core Strategy is trying to reduce further flooding with the approach of policy CS8, which incorporates Government guidance and advice from the Environment Agency. The Strategic Flood Risk Assessment (SFRA) will be updated shortly as there is new information for the Byfleet area.
2. Generally, development is encouraged in areas where there is minimum risk of flooding. The Environment Agency and other consultees such as the County Council are consulted on planning applications which have the potential to exacerbate or risk flooding in the town centre. Developers will be required to put in place appropriate mitigation measures where necessary or the application will be refused if the risk cannot be overcome. The policy provides a robust framework for these measures to be introduced.
3. The Draft Core Strategy does not identify specific sites for development in Mayford. The response in point 2 above will also apply to any development in the Borough, including Mayford.
4. Comments welcomed.
5. Include a reference to sewer flooding, in the second introductory paragraph. Sentence 1 ...'sewer inundation can also take place.'
6. Will change the text, so that all significant forms of development can be considered for SUDs.
7. Comments noted. Will include a reference and explanation of the emerging Surface Water Management Plan in the delivery strategy section.
8. Will reword this paragraph, so that there is no ambiguity. 'This document will be used to inform the Site Allocations DPD.'
9. Whilst this amendment does not directly relate to Policy CS8, it has relevance to flooding. The suggested wording will provide a better explanation of what the sentence is seeking to achieve. Amend text in paragraph 3.15 (which has become paragraph 2.38) to 'To avoid development in an area at risk of flooding is an important consideration....'
10. Add to the policy wording forms of flooding other than fluvial and surface water.
11. There is a reference to Flood Risk Assessments in the third paragraph of the policy. This is set out in more detail at paragraph 6.28.
12. Policy box, paragraph 3, where it states that the Council will require all housing and commercial units to incorporate SUDs. The following text will be added to paragraph 3 of the policy 'If this is not feasible, the Council will require evidence illustrating this.'

13. A reference to water quality has been added to the policy introduction (new 3<sup>rd</sup> paragraph). 'Water quality impacts on wildlife in and around water, public health and the appearance and amenity of watercourses.'
14. Comments noted.
15. Comments noted.
16. Comments noted.
17. Comments noted.
18. Comments noted.
19. Comments noted.
20. The spatial portrait is a description of the existing situation, and any issues identified from that, it is not considered that a reference to groundwater protection will be included. The issue of groundwater protection is too detailed to be contained in the Core Strategy which deals with strategic matters.
21. Comments noted. This level of information does not need to be included in the Core Strategy.
22. The policy stipulates that Sustainable Urban Drainage Systems are incorporated into development proposals. The Environment Agency deal with the Groundwater Regulations. Soakaways are under the remit of Building Control rather than the Planning Department.
23. Comments noted. This is a greater level of detail than is required in the Core Strategy.
24. Contaminated land is a detailed point, which is not appropriate to be incorporated in the Core Strategy. A reference to contaminated land may be included within the Development Management DPD.
25. Comments noted.
26. Comment supported. Text has been added to the reasoned justification which states a sequential approach to development will be applied for flood zones 3a and 3b.
27. A reference to the Surface Water Management Plan has been added to the Delivery Strategy and the purpose of it has been explained.
28. The Core Strategy does not deal with specific incidents of flooding. However the Council is committed to working in partnership with others such as the County Council and the Environment Agency to deal with such incidents and to identify measures to prevent them reoccurring. The comment will be sent to the relevant agencies to consider.

### **Flooding - Recommendation**

Minor amendments are made to the policy as set out above.

The policy also needs to be amended to account for the now published Localism Bill. As far as possible the whole document needs to be updated to take the Bill into account in order to “future proof” it.

## **Policy CS9: Housing provision and distribution**

42 individuals and organisations made representations on this policy. The key issues raised are summarised below.

This should be read in conjunction to the responses to the specific consultation question which sought views on the housing target.

It should be noted that a number of representations were made to this policy from residents of Mayford who had been mis-informed about future Green Belt releases in the Mayford area. The sites referred to are within the Strategic Housing Land Availability Assessment (SHLAA) this is a separate document to the Core Strategy.

### **Housing provision and distribution - Summary of comments of support**

1. Accept that Woking Town Centre should be identified as a strategic location.
2. The proposed level of residential development in Woking Town Centre is welcomed, and it is noted that this will not meet the level of housing need.
3. The proposed indicative density range of in excess of 200dph in the Town Centre is welcomed but it should be emphasised that even higher densities will be supported where located in highly sustainable locations.
4. In previous years there has been too much infill development in existing residential areas.
5. Woking Chamber supports the provision of new homes including affordable homes. Support for Woking Borough Council and Woking Borough Homes investment. Support for target figures.
6. General support for the policy and in particular the flexible approach to density levels, taking in to account character of the surrounding area and making best use of urban land.
7. Comment of support for working in partnership to bring sites forward in sustainable locations.
8. The housing target is considered to be robust as it was based on significant evidence and subject to independent examination in public.
9. Comment of support for the policy and the density ranges provided within it.

### **Officer response**

1. Noted.
2. Comment noted.
3. Noted, density will be discussed at the pre-application stage and determined at the planning application stage.
4. Comment noted.
5. Support welcomed.
6. Support welcomed.
7. Support welcomed.
8. Support welcomed.
9. Support welcomed.

### **Housing provision and distribution - Objections – summary of issues raised**

1. The Core Strategy has not considered the potential for more efficient use of the existing housing stock, which might include information on the number of large homes occupied by single persons and renovation of poor quality homes, for example.
2. Concerns about future housing development at Moor Lane on the grounds of flood risk and Green Belt designation. There is a significant need for affordable housing in the Borough but development at Moor Lane will not be affordable

(Bill Bocking & Paul Bocking). Land at Egley Road should be considered for development before Moor Lane and Brookwood Farm. In February 2007 the site was preferred.

3. Reference to Green Belt releases should be amended from “after 2021/22” to “Possible Green Belt sites which may need to be released in the latter period of the plan”, which would better reflect the uncertainty of the timing and necessity of the approach.
4. It is unclear if there is any estimated housing figure for the ‘broad location’ of the Town Centre – is it included within the 2,500 or a separate figure? If so, it should be listed in the table separately.
5. The SHLAA has not fully reflected the practice guidance.
6. It is not adequate to merely identify the Green Belt as a broad location – more direction is required to provide certainty.
7. All Green Belt sites should be considered in a comprehensive review.
8. Reluctantly do not accept the inclusion of a small sites estimate in the first ten years of the Plan. This is the same as a windfall allowance and should not be shown in the trajectory.
9. The proposed density of development at Brookwood Farm is too high given the context of the surrounding area.
10. Land at Brookwood Farm was purchased by the Council in 1993 for a bypass and not for the purpose of house building.
11. The proposed level of affordable housing at Brookwood Farm (50%) is higher than national policy and not in keeping with the nature of the surrounding area.
12. Challenge the assumption that Brookwood Farm is suitable for housing development. The basis for release was the development of a bypass which has since been dropped. It is currently greenfield land used for grazing, close to a SSSI and is subject to flooding and is therefore not suitable.
13. The number of new homes proposed for Brookwood Farm in the Core Strategy is specific and is not based on detailed evidence.
14. There has been no consideration of the infrastructure requirements arising from the Brookwood Farm development.
15. Objections from Mayford residents regarding the release of specific sites at Egley Road, Saunders Lane, Yarrows and Maybourne Rise.
16. Green Belt land should be released earlier in the Plan period to provide a balanced mix of homes to meet needs.
17. Land at The Mount, Knaphill is proposed for Green Belt release.
18. Object to identification of Woking Town Centre as a broad location for future development as it relies upon unidentified windfall sites.
19. Further consideration needs to be given to the recent changes in Government policy with regards to the impact of housing benefits, ending tenancies for life, and the introduction of a new social rent level.
20. Development on Green Belt land will be at the detriment of the leafy character of the Borough. Housing is needed, but should be built on brownfield land on schemes such as Hoe Valley and redevelopment of unattractive areas such as Old Woking.
21. The increase in affordable housing as a result of this policy will result in a change in the social mix of the Borough. No assessment has been made of the impact of this on the council tax payers and necessary changes to support services.
22. No consideration has been given to the quality of life of residents. Additional homes in high rise developments in the town centre and more urbanised suburbs will have a negative effect.
23. The housing target should be reviewed in light of the Government’s removal of regional targets. Growth in housing stock should be informed by a broader population target and regulated by the ability of infrastructure to support it.

24. The buffer that the Green Belt land in Mayford provides to separate Woking and Guildford should be protected.
25. In light of the revisions to PPS3 to remove density targets and the emerging localism bill greater emphasis is likely to be put on respecting and enhancing the character of the boroughs existing urban areas. It is recommend that the paragraph is re-worded as follows: 'The density ranges set out are indicative and will depend on the nature and location of the site. Density levels will be influenced by design a site's accessibility by means other than the private car, on-site constraints (i.e. trees, access, parking, relationship to adjacent uses/property etc) and the character of the surrounding area. With the Council's aim is to achieve the maximum level consistent with the design in order to make the most efficient use of land in a form that would not compromise the character of an area. Wherever possible, density should exceed 40 dwellings per hectare and will not be justified at less than 30 dwellings per hectare, unless there are significant constraints on the site or where higher densities cannot be integrated in to the existing urban form without demonstrable harm to its character. Higher densities than these guidelines will be permitted in principle where they can be justified in terms of the sustainability of the location and where the character of an area would not be compromised.
26. Paragraph 6.42 - West Estates Ltd objects to the inference in this sentence. This implies that green belt land allocations 'may' be needed, rather than proactively acknowledging the need stated elsewhere in the Core Strategy DPD (paragraph 6.43 for example). The strategic policy objective should not be to avoid green belt releases at the cost of delivering sustainable development per say. West Estates recommend the words 'the amount of land that may be' are replaced by 'the need to release additional land from the green belt over and above that already required to meet housing need.'
27. Objection on the basis that the level of growth will require the development of Green Belt land at the detriment of the environment.
28. The Strategic Housing Market Assessment (SHMA) estimates that there is a need for 499 new affordable homes in the Borough every year. This is 9,980 dwelling 2006-2026 and is almost twice the South East Plan (SEP) target figure. The demand identified in the SHMA is 594 units per annum. Equivalent to 11,880 dwellings 2006-2026, twice the SEP requirement. The planned level of growth at 292 dwellings per annum is significantly below the identified level of need as set out. The evidence base points to a need to plan for a materially higher number of dwellings than currently proposed.
29. The Strategic Housing Land Availability assessment (SHLAA) dated November 2010 lacks site specific information.
30. The Council's assessment of supply suggests a surplus of 512 dwellings in meeting the 4,964 strategic requirement to 2027. From the identified components of supply, 2,236 dwellings have the benefit of planning permission. Leaving a total of 2,728 to be identified through the LDF. The 2,728 figure could increase subject to the failure and/or delay in any of the planning permissions to come forward. The need for additional site releases is also a function of the total housing requirement to be met during the plan period.
31. The Council's approach to housing delivery relies on the delivery of housing from urban capacity sites where, given the absence of site schedules currently omitted from the SHLAA, their delivery remains unknown. This approach is contrary to the strategy in PPS3 which seeks a responsive supply of housing land founded upon the need to meet housing needs within defined housing market areas, based upon the findings of SHMAs.
32. Larger Greenfield sites adjoining the urban area can provide for a more appropriate mix of dwelling types and sizes. The release of suitably located

Greenfield sites can provide for the quantum of development necessary to provide supporting infrastructure, including inter alia affordable housing provision appropriate financial contributions toward local service and facility provision. Helps to ensure that qualitative needs in terms of housing mix and type are met.

33. Support the case for a local review of the Green Belt, with land to the south of Woking to be identified as a strategic allocation.

Officer response

1. Unfortunately the Council has limited control over the existing private housing stock. The Council's housing team ensure that any housing stock they acquire is sustainable. The SHMA found that there are a number of elderly people living alone in large dwellings. The Council's Housing Strategy includes actions to bring vacant and under-occupied homes back in to efficient use.
2. The Moor Lane site is not in the Green Belt. It is safeguarded for long-term housing provision in the Local Plan and the principle for its use for housing development is therefore long established. The boundary of the site was adopted in the 1993 Local Plan. There is a proposal for 190 homes which will be let at affordable rent to applicants on the Council's Housing Register. There will be a range of property types and sizes in line with the Borough's housing need as reflected in policy CS10. The Core Strategy does not seek to identify specific sites for development. This will be done through the Site Allocations DPD.
3. The dates of the potential Green Belt release are included to provide clear guidance about how the Council will meet its housing target. The Core Strategy is required to be as specific and accurate as possible.
4. The figure for the town centre includes the additional capacity expected to be delivered through the 'broad location' of growth in the latter part of the plan period where specific sites are not yet identified. Officers agree that this should be shown as a separate figure so a new row has been added to the table in policy CS10.
5. The SHLAA has been carried in conformity with current Government Guidance. It was also scrutinised by the LDF Working Group. It is acknowledged that the specific sites are not available; they will be added to the Council's website in the summer.
6. No specific sites or broad locations for a possible Green Belt release have been highlighted in the Core Strategy. Until the Green Belt Study is carried out, as part of the LDF Evidence Base, there is not sufficient information to determine which sites may be suitable for a Green Belt release. At this stage the Council has decided not to limit the geographical scope of the Green Belt review. A comprehensive review will be undertaken to identify all suitable sites which will not undermine the purpose and integrity of the Green Belt. Limiting the scope of the study at this stage will compromise this approach.
7. Noted. The Draft Core Strategy proposes a study to review of the Green Belt in 2016. This will be based on a comprehensive assessment of all relevant sites.
8. The small sites estimate has not been included within the calculation of capacity. It is not shown in the trajectory. It is shown in one of the trajectories in the SHLAA (a technical supporting study) as an estimate of likely future residential developments arising from small sites (of 5 or less units) as, although they cannot be counted, they do form an important part of supply which should be recognised in planning for future infrastructure requirements.
9. A development brief will be prepared for the Brookwood Farm site, the design, orientation of buildings and density of development will be considered as part of this process.

10. The land at Brookwood Farm was not purchased for the purpose of building a by-pass. The by-pass is no longer going to be constructed.
11. The level of affordable housing is 50% at Brookwood Farm, as it is in Council ownership, and land in public ownership will be required to provide 50% of dwellings to be affordable. There is no doubt about the significant unmet need for affordable housing. The 50% is justified by evidence and development will be well integrated with its surrounding areas.
12. The planning constraints on the site will be evaluated when a planning application for Brookwood Farm is considered. As stated previously the plans for the by-pass are not going ahead.
13. The estimate of the housing capacity of land at Brookwood Farm has been based on information derived from previous schemes for the site which provide a useful benchmark. It is expected that the site will be capable of accommodating the anticipated level of development as set out in the Core Strategy; however, the Council accepts that the actual number of dwellings delivered will be determined when a detailed planning application is submitted.
14. Infrastructure required at Brookwood farm will be considered as part of any application at Brookwood Farm.
15. The sites highlighted are from the SHLAA, they are not potential Green Belt releases.
16. The Council has identified sufficient sites to meet the housing target for the first ten years of the plan period. The timing of the Green Belt study is scheduled to ensure that sufficient land will be available to meet long-term housing needs.
17. The site address is noted, and will be considered as part of the Green Belt Study and/or the Site Allocations DPD.
18. The policy does not state that windfall sites will be taken into account. There is significant potential for further sites to come forward for housing development in the town centre post 2022. This is supported by historic land use trends. Consequently, the designation of the town centre as a broad location is considered to be appropriate.
19. The Council is keeping under review and then considering the wide range of new Government initiatives, and how they will affect affordable housing provision in Woking Borough.
20. The Core Strategy is clear that housing should be built on Brownfield sites as the first option. As demonstrated by the SHLAA, brownfield sites alone will not be sufficient to meet the quantity and nature of housing need. At this stage it is expected that land will be released from the Green Belt to meet need and demand for around 550 homes.
21. Comment noted. This is not typically the role and function of the planning process.
22. Comments noted.
23. The Draft Core Strategy seeks to retain the regional housing target for Woking Borough. The evidence behind the housing requirement has been subject to rigorous testing at examination in public and careful consideration by the Council through a number of research papers.
24. National guidance in the form of PPG2, states that one of the key purposes of Green Belt land is to prevent the coalescence of settlements. There is no intention to undermine this objective.
25. The densities set out in the policy are an indicative range, rather than definitive. Determination of actual density is a matter that is to be agreed at the planning pre-application advice stage and/ or through the planning application process.
26. The word 'may' will be replaced by 'will' in the last sentence of Para 6.42 so it reads "Furthermore, it will help minimise the amount of land that will be needed to be released from the Green Belt to meet housing need".



27. The release of any Green Belt land will be subject to a comprehensive assessment of sustainability criteria.
28. The 292, 499 and 594 options have been assessed as part of the SA options appraisal. It is clear from the analysis that the damage to the environment that may be caused by adopting a target significantly higher housing target would outweigh the benefits. It is concluded that the 292 target is the most realistic and deliverable.
29. It is acknowledged that the latest SHLAA is incomplete. The study will be finalised and the information published on the Council's website in the summer.
30. Due to the detailed housing assessments that the Council has undertaken, we are confident that the target can be met. The Site Allocations DPD and SHLAA will indicate where housing developments are likely to take place.
31. Unclear about the urban capacity sites referred to. It is considered that there is a responsive supply of land proposed. For example it covers a range of locations rather than one site; it is proposed these will be in Woking town centre, safeguarded sites at Moor Lane and Brookwood Farm, the centre of West Byfleet and the rest of the urban area. The full SHLAA will be published in the summer.
32. Comment noted.
33. Comment welcomed.

#### **Housing provision and distribution - General comments on the policy**

1. It is unclear where the houses will be built.
2. The Government's national policy of 30dph is out of character for low density residential areas in the Borough.
3. It should be noted that the national minimum density threshold of 30dph has since been removed by the coalition Government.
4. Natural England raise concerns regarding the proposed development at Brookwood Farm given its proximity to the SPA (although more than 400m) and stress the need to provide appropriate SANG.
5. Woking needs more homes and they must be affordable, however, they should not be built in new estates which replicate Sheerwater, Goldsworth Park or Barnsbury.
6. The policy is heavily reliant on town centre sites which will not provide for family homes with gardens. Green Belt sites should be considered.

#### Officer response

1. The Core Strategy is a strategic document that sets out broad locations for housing development. The Core Strategy will be followed by a Site Allocations DPD which will set out specific sites.
2. The Coalition Government have recently amended PPS3: Housing and removed the national minimum threshold. Local authorities must now set their own density targets. Housing density will be discussed at the pre-application and application stage to ensure that it is fitting with the surrounding area.
3. It is considered that the densities included in policy CS9 are indicative and will be useful for developers.
4. Comment noted. This is a matter that would be considered at the pre-application and application stage. It would be helpful to meet with Natural England to discuss this matter further.
5. Comments noted.
6. It is acknowledged that Woking town centre provides low numbers of family sized housing with gardens. The SHMA identified that Woking Borough needed greater numbers of affordable family units. A Green Belt Study will be carried out to see if any land should be released for housing purposes.

**Housing provision and distribution - Recommendation**

Amendments will be made to the housing provision and distribution policy as set out in the above sections.

The policy also needs to be amended to account for the now published Localism Bill.

## Policy CS10 Housing Mix

The provision of an appropriate mix of dwellings to meet local needs is essential for the achievement of a balanced and sustainable community. The purpose of the policy is to ensure that the new homes being delivered over the Plan period are of the right size and type, and in keeping with the character of the local area.

The key evidence base to support this policy is the Strategic Housing Market Assessment (SHMA). The Strategic Housing Land Availability Assessment (SHLAA) and the Housing and Population topic papers also provide useful evidence. All are available on the Council's website.

Five individuals and organisations made representations on this policy.

### Housing Mix - Summary of comments of support

1. Woking Chamber supports the housing mix, but believe the percentages should be monitored often during the period 2010-2027.

### Officer response

1. Comments noted. Monitoring will take place annually through the Annual Monitoring Report (AMR), as discussed in the supporting text of the policy.

### Housing Mix - Objections – summary of issues raised

1. Supportive of the principle of Policy CS10, however, object to the Policy in its current form as it is overly prescriptive. Formally request that the wording of the Policy is amended as follows:  
*“Where appropriate and consistent with the scale of the proposed development, residential proposals will be expected to provide a mix of dwelling types and sizes to meet local needs and to create sustainable and balanced communities.  
On large sites (greater than 0.5ha), the Council will seek to secure a mix of dwelling sizes broadly in accordance with the mix as set out below, which is in line with local evidence contained in the SHMA:*
  - 19% 1 bed
  - 28% 2 bed
  - 39% 3 bed
  - 14% 4+ bed”
2. With regards to the fourth paragraph in Policy CS10, we welcome the flexibility provided by the acknowledgement that the character and density of the area, as well as viability of the scheme, will be taken into consideration when determining the appropriate percentage of housing types and sizes. Royal Mail considers that the Policy should adopt a more design led approach to development in order to justify the form and density of proposals and demonstrate that development will respect the character and density of the area. As such, we request the wording of Policy CS10 is amended as follows:  
*“the appropriate percentage of different housing types and sizes for each site will be determined by a design-led approach to scheme proposals, which should respect the established character and density of the neighbourhood and the viability of the scheme.”*
3. West Estates object to the rigidity of the policy wording. The percentages reflect borough wide housing needs rather than local community needs. The policy should therefore be revised to make clear that these percentages are a starting point for negotiations. The appropriate percentage being dependant

- on not just character, density and viability, but the housing needs of the area at the time an application is received.
4. Concern about how the mix will be controlled in developments of less than 0.5 hectare (it's set out for larger sites) and what constitutes an 'overriding policy consideration'.
  5. Policy CS9 'Housing Provision and Distribution' outlines that in order to meet the Borough's housing target of 4,964 dwellings, 750 houses will be provided within Woking's Urban Area between 2010 and 2027 with an indicative density range of 30 to 40 dwellings per hectare. Burhill supports the indicative density range set out in the draft Core Strategy, however, would encourage the Council to adopt a flexible approach when considering housing densities for developments and consider these on a site by site basis.
  6. Housing development should reflect the appropriate range, mix and type of housing need in the Borough as justified by local evidence in the Strategic Housing Market Assessment (SHMA) and/or alternative evidence to be provided by a developer and to be agreed by the Council. Policy CS 10 'Housing Mix' sets out specific housing mix targets which are required to be achieved on sites greater than 0.5 hectares. Burhill supports the Council's approach to provide a mix of housing within residential development, however, it would encourage the Council to consider housing mix on a site by site basis, taking into account the character of the immediate local area.

#### Officer response

1. Support of principle of the policy welcomed. In recognition of the other comments made, and the practical capabilities of being able to secure the exact proportion of dwellings prescribed, will look again at the whole policy wording to ensure there is sufficient flexibility to balance need, demand, viability and efficient use of space.
2. The Council takes a strong and positive approach to design. Policy on design, including housing design, is covered in the Draft Core Strategy in policy CS20. The Council applies a design-led approach to development and considers that there is no reason why a design-led approach cannot be adopted for a scheme whilst at the same time providing guidance on specification of the expected mix of dwelling types and sizes.
3. Comments noted. Taking on board this comment, and others, raising concerns at the prescriptive nature of this policy, the wording in this policy will be changed to ensure there is flexibility where it is required, and that the mix can be discussed using these figures as a starting point.
4. It would not be practical to be prescriptive about the housing mix on sites of less than 0.5ha, for example on some really small sites, this would not equate to whole units, and would not always make the most efficient use of land. The policy does state that all residential proposals will have to provide a mix, and this will be considered on a case by case basis regarding what is practically possible on site.
5. Comments noted regarding 'over riding policy consideration'. The main aim of the sentence is to avoid the loss of suitable family housing, however, this objective may be better place in Policy CS9 Housing Provision and Distribution. This will be considered.
6. Comments noted. We plan to revisit the wording of this policy to consider how it can be less prescriptive, whilst still maintaining the general proportions of housing mix identified in the Strategic Housing Market Assessment. There will, therefore, be amendments to the wording of this policy.

#### **Housing Mix - Recommendation**

A number of changes are made:

- Revised wording to ensure sufficient flexibility.
- Consideration will be given to what will constitute an over-riding policy consideration and changes made to this policy and policy CS9 as appropriate.

## **Policy CS11 Affordable Housing**

Affordability of housing is a key issue for many people in Woking. The purpose of the policy is to ensure the delivery of new affordable homes over the Plan period.

The key evidence base to support this policy is the Strategic Housing Market Assessment (SHMA) and the Economic Viability Assessment. The Strategic Housing Land Availability Assessment (SHLAA) and the Housing and Population topic papers also provide useful evidence. All are available on the Council's website.

22 individuals and organisations made representations on this policy.

### **Affordable Housing - Summary of comments of support**

1. We generally support this Policy with its emphasis on development in the most sustainable locations in the urban area, and agree that provision should be made for additional affordable housing. However, we would suggest that the figure for the proportion of affordable provision should be amended to "40%". We understand that the regional figure is 40% and the figure in the last Surrey Structure Plan was also 40%. At least one adopted Core Strategy that of Mole Valley, has figure of 40%. For this reason we consider that the existing figure of 35% should be increased. We accept that this figure is very challenging and may not be achieved, but because of the very considerable need for affordable housing in Woking it is the correct figure to be included in the policy.
2. We generally support this Policy with its emphasis on development in the most sustainable locations in the urban area, and agree that provision should be made for additional affordable housing. However, we would suggest that the figure for the proportion of affordable provision should be amended to "40%".
3. We generally support this approach although we have already suggested that the figure of 35% should be replaced with a figure of up to 40%. However, we believe that Woking should strive only to meet local need for housing, rather than to meet any notional national requirement. In view of the uncertainties we have identified in our comments on CS6 we feel that there should be regular reviews of the need for affordable housing during the 16 year period.
4. Royal Mail notes the need for affordable homes in the Borough and generally supports the principle of Policy CS11. We particularly welcome the flexibility provided by the Policy, which identifies that, "the proportion of affordable housing to be provided by a particular site will take into account the following factors: Constraints on the development of the site imposed by other planning Objectives; The costs relating to the development; in particular the financial viability of developing the site (using an approved viability model)." We consider that this element of the Policy will ensure a sustainable delivery of housing during the continuing difficult economic climate.
5. Burhill supports the provision of affordable homes within new residential developments. Burhill encourages the Council to continue to acknowledge that there may be cases where this level of affordable housing is not viable on certain sites and that affordable housing provision may be considered on a site by site basis, even on larger sites for 10 or more dwellings.

### Officer response

2. Support is welcomed. Based on a comprehensive Economic Viability Study, the overall target for affordable housing provision is 35%. The detail of the policy sets out that on certain sites, the requirement will be higher. The Core Strategy must be deliverable and a key element of this is economic viability –

smaller sites will not be able to sustain a high requirement. It should be noted that the average of 35% is lowered here as the Council is proposing that all new sites should contribute to affordable housing, not just those over 14 units, as is current policy.

3. As above.
4. The targets and thresholds set out in the policy are indeed based on local evidence. Please see the SHMA and Economic Viability Assessment for further information.
5. Comments noted.
6. Support welcomed. Paragraph 6.76 deals with this issue.

### **Affordable Housing - objections – summary of issues raised**

1. There is no need or desire to vastly increase the amount of affordable housing. Social engineering of this scale is both dangerous and ill thought through given the inherent need for increased public services arising from such development. No doubt these will have to be paid for by the council tax payers living in non affordable housing.
2. No account has been taken of a government proposal to restrict the numbers of single parent families being allocated affordable housing.
3. The council recognises that its provision for affordable homes is not achievable with the present level of builds. The council need to release a specific number of sites now to deal with the local need for 2 bed houses with gardens. As already stated in the submitted LDF, site such as SHLAAMG009 and SHLAAMSG010 could both accommodate affordable housing schemes.
4. The aim of 50% affordable housing on public land is too high and will create the wrong type of environment. Statistics show that the optimum split is limited to 35% affordable housing.
5. The document states that in Woking 81% require market property and 19% require affordable so why would you put Brookwood Farm at 50%
6. As long term residents of Hook Heath (25 years) we are very concerned about Woking Council's vision that "sustainability" can only be achieved by expansion and that by 2027 Woking will have expanded perhaps by more than 25%. Under your plans, if approved, Hook Heath will be bounded by newly built social housing estates to the South and West. The area's much sought after location could be under threat and property values may fall.
7. We object to the requirement to provide affordable housing in developments of less than 15 units, whether on-site or via commuted payments, because of viability and practical site management issues.
8. Affordable Housing Arising from Non-Residential Development – in its current form the Policy's approach to the requirement for non-residential developments which generate a need for housing to provide a financial contribution towards the provision of new affordable housing, is uncertain. Firstly we formally request that the Council include details as to the likely uses that would generate the requirement for a contribution, to provide more clarity for landowners, developers and the public. We appreciate that this list is unlikely to be exhaustive and that further guidance may need to be provided.
9. Policy does not take into account certain scenarios such as the fact that it is a net increase of floorspace that would generate additional need. As such, the Policy should take into consideration replacement of non-residential floorspace, vacancy levels within the Borough and the levels of loss of non-residential floorspace to residential in the Borough. Further, we request that information on how the Council will establish and justify the generation of need for housing from non-residential development (i.e. criteria), is to be identified.

10. Policy has the potential to conflict with achieving the Council's Vision of enabling a "buoyant local economy". In some instances a contribution would not be appropriate, for example the development of community uses. As such, we support the Policy's acknowledgement that such contributions will be sought only as "appropriate to the scale and kind of the development and subject to an assessment of financial viability".
11. Paragraph 6.67 raises the question of the fairness of placing the burden of financing additional affordable housing on purchasers of new houses at market prices. Also the reference to financing houses on Greenfield sites in this documents would indicate an acceptance of the need for Greenfield sites to be used to achieve the higher number of houses identified under the SHMA's findings which is not what is wanted when 292 houses are what is required and can be accommodated using the future housing land supply.
12. The LDF speaks of "affordable housing" implying for occupation by low income families. A car is essential in Mayford which would mean for most families at least two cars and probably more. Low income and two or more cars is clearly incompatible. In any event the addition of a further two or more cars per new family would place an intolerable strain on local roads and other infrastructure. (2 individual residents)
13. West Estates object to the current wording. It is recommended the provisions applying to green field and brown field Council land are clarified. It is unclear why the flexibility given to green field Council land would not equally apply to other green field sites. West Estates also consider the exception site provisions of paragraph 6.77 should be embodied in this policy for avoidance of doubt. West Estates support reference to the need to consider the financial viability of developing a site as part of negotiations over the proportion, mix and form of affordable housing provided on and off-site. Recent government grant subsidy reductions may for example require revisions to the mix and the inclusion of an element of affordable rented properties within the rented mix, rather than wholly social rented. This flexibility is considered important to assist the timely delivery of much needed family and affordable housing.
14. West Estates supports the need to maintain an exceptions policy and requests this is also included within policy CS11 for added weight and avoidance of doubt. West Estates objects to inflexibility in the current wording of this paragraph. West Estates agree that the benefits secured from an exception site should be significantly over and above that which would have been secured through normal policy provisions and allocations. However, the proportion of affordable housing provided over and above normal policy requirements should be capable of being tailored if substantial community benefits can to be derived in lieu of a higher percentage. This provides the flexibility to deliver exception sites in a manner that maximises benefits for local communities. The following should be added after the words 'affordable housing' in the fourth sentence, 'or substantial community benefits in lieu of a higher percentage'.

#### Officer response

1. Comments noted.
2. Officers are not aware of such proposals.
3. Policies CS6 and CS9 set out the Council's proposals for a review of the Green Belt boundary. The Council is familiar with the sites suggested and will take them into account when the review is carried out.
4. Officers are not aware of these statistics. The policy is worded in such a way that the Council will be able to negotiate for a percentage of the provision to provided offsite. The Economic Viability Assessment provides sufficient justification that the targets proposed will be deliverable.



5. Brookwood Farm is a greenfield site. Policy CS11 requires all new residential development on greenfield land to provide 50% of dwellings to be affordable, irrespective of the site size or number of dwellings proposed. The SHMA identifies a significant need for new affordable family homes (2+ bedrooms), and greenfield sites are considered suitable for the provision of family housing.
6. Objection noted. Overall, the Core Strategy will ensure a balanced mix of accommodation across the Borough. It needs to be emphasised that the Core Strategy does not identify specific sites in Hook Heath or anywhere else.
7. The Council's Economic Viability Assessment has proven that this approach will be economically viable. The policy allows for flexibility for the applicant to make a case (with supporting evidence) if they feel that the requirement would make a scheme unviable. The Council is willing to take a flexible approach on small sites if RSLs/ Housing Associations raise specific concerns about management.
8. Noted. Officers will consider this issue further and seek to provide additional clarification within the text (see amended policy).
9. As above.
10. Noted.
11. In order to make provision for the delivery of 4,964 net additional dwellings in the Borough between 2010 and 2027 (an annual average of 292 per annum), there will be a need to identify further sites in the Green Belt in order for the Council to achieve an appropriate mix of housing types and tenures to meet local need and demand, in particular provision of affordable family housing for which a specific need is identified in the SHMA. Given the need to provide affordable family homes and the lack of suitable sites within the urban area, the proportion of affordable housing to be provided on Greenfield sites is higher than the overall Borough target. The viability of providing a higher contribution of affordable housing on Greenfield sites was tested in the economic viability assessment, and should not result in increased market housing prices due to the generally lower costs of providing housing on appropriate Greenfield sites.
12. As of the second quarter of 2007 the average property price in the Borough was £334,725, and the mean (average) gross household income for Surrey was £52,322 per annum. A household is considered able to afford to buy a home if it costs 3.5 times the gross household income for a single earner household or 2.9 times the gross household income for dual-income households. Given these figures it is clear that there is a considerable affordability issue and that affordable housing (social rented and intermediate) is required by a variety of households including key workers. Car ownership rates in Surrey are high and many of these households will have access to cars. However, residents in Mayford currently have access to both bus and train services (at nearby Worplesdon station) providing access to main employment centres including Woking, Guildford and London.
13. Clarity will be provided within the text to address this issue (see amended policy).
14. One of the key aims of Woking's Sustainable Community Strategy and one of the Council's three key priorities is access to decent affordable housing for local people and key workers. Given that the Council will not be able to deliver sufficient affordable housing to meet the level of identified need, provision of a substantially higher percentage of affordable housing is considered the primary benefit to balance policy objections on any potential future exception sites. The policy also states that 'the proportion of affordable housing should not prejudice the provision of other planning elements

necessary and reasonably related to the scheme'. Thus any proposal would be required to comply with policy CS15: Infrastructure delivery.

### **Affordable Housing - general comments – summary of issues raised**

1. Woking should increase its housing stock and should release a small amount of Green Belt land to achieve this. Woking already has a lot of affordable housing and should reduce its commitment in this area.
2. If a huge influx of social housing for Woking is what the developers want and WBC is not capable/prepared to prevent it, how will the council respond to the devaluation of higher rate tax payers' homes, and the consequent social drift from this area to more acceptable locations? It is council tax that generates the income to pay for services. If this income is reduced by drift elsewhere, how will it be compensated for? Has this been considered? I feel very strongly about the above, and this is the abridged version of my dissatisfaction. I voted for you and continue to pay a large amount of council tax. I am committed to this area and the healthy and happy living of present incumbents at every level. However, the area CANNOT cope with a huge increase in housing generally, especially social housing where needs are high and demand cannot be met. There is no plan for this and there appears to be naivety about the surrounding infrastructure needs and the fact there is no funding for them. (If you disagree with this I would be very interested to find out exactly how new schools/GP surgeries will be financed and expect a response regarding it).
3. The provision of housing is disproportionately weighted towards council/affordable dwellings rather than market led development. This will seriously skew the balance of population and move the town "downmarket" seriously jeopardising its future economic and commercial development, limiting its appeal to commercial and retail services and to the broad spectrum of residents we all wish to attract. This will in turn, inhibit the development of the town.
4. We would encourage WBC to be very flexible in allowing payment in lieu of quotas. It is not always advisable to have mixed development. Sometimes it does not suit the affluent and sometimes it does not suit the less well off. Access to schools, transport, retail outlets, as well as entertainment (pubs) could make life difficult. (chamber)
5. In its current form Policy CS11 is very long and covers different matters. For clarity, we consider that the Policy should be split into two separate policies; the first dealing with affordable housing arising from residential development and the second with that from non-residential development.
6. A key further criteria, when considering the provision of affordable housing should be accessibility to public transport. Residents of this type of housing are more likely to need to use PT and decisions on location, including detailed siting within a large development site, should take such accessibility into account.
7. We need more affordable housing to keep the younger folk here.

### Officer response

1. Comment noted. See previous comments about future review of the Green Belt boundary.
2. As set out in the response to objection (12) housing affordability remains a key problem for local residents and priority for the Council. A significant proportion of new affordable housing will be required by working households including key workers, whose demands on local services are unlikely to be different from households occupying market housing. Failure to provide for

the housing needs of key workers however, is likely to impact on the local economy and the delivery of key services to all local residents. It should be noted that Council tax is generated by all new housing, including affordable housing, and council tax and housing benefits are paid from national government. New affordable housing will thus be generating Council tax revenues to assist in funding local services. Provision of affordable housing is not only a local priority but is also a national one and all local planning authorities are required to comply with national planning policy for housing set out in PPS3 which requires provision of affordable housing. The Council will expect development to contribute to infrastructure provision. Policy CS15: Infrastructure delivery sets out the Council's proposed tariff based approach to collection of developer contributions.

3. The overall target for new affordable housing provision is 35%.
4. Comment noted.
5. The policy is lengthy, however, officers do not consider there to be a need to split it.
6. Comment noted.
7. Comment noted.

### **Affordable Housing - Recommendation**

A number of changes will be made:

- The policy will be updated to take into account recent decisions on the introduction of a CIL (see amended policy).
- Wording will be revised to take into account the changes to the definition of affordable housing in PPS3 (see revised text).
- Additional clarification regarding financial contributions from non-residential developments is provided (see amended policy).
- Wording will be revised so that there is clarity regarding the provisions applying to Greenfield sites in public ownership are the same as those applying to Greenfield sites in private ownership (see amended policy).

## **Policy CS12: Older people and vulnerable groups**

The purpose of this policy is to ensure that adequate provision is made for the needs of the elderly and other vulnerable groups over the plan period.

Eight individuals and organisations made representations on this policy.

### **Older people and vulnerable groups - Summary of issues raised**

1. Fully support the aims and ideals of the strategy. I would like to be reassured that the elderly and frail do not share the same residential blocks as social housing residents as we know from family experience this can lead to fear and distress.
2. Policy should ensure "short stay" accommodation is available to the vulnerable and those needing it in emergency situation.
3. Site specific representation re. Goldsworth House, Goldsworth Park which is considered to be suitable for redevelopment for the provision of housing for the elderly.
4. We broadly agree with the aim of CS12. However, we feel the Core Strategy focuses too heavily on accommodation, and should consider in more detail the transport and leisure infrastructure for older and vulnerable people that can be delivered through the plan.
5. What does "high quality design..." mean? This needs to be clarified as it's quite meaningless from a planning point of view unless you can enforce it? Older people should be close to Community facilities too and that means in the centre of the town and also main centres such as West Byfleet etc. It is healthy to have a mix of demographics in town centres and apartments are ok so long as there are lifts and access to green spaces too. This goes back to a clear Vision for the borough.
6. Ongoing provision of the borough's community centres - The use of words such as "seek" and "feasible" in relation to these centres is a cause for serious concern in the current and ongoing financial climate. It is evident that not only is the number of older people increasing but improved physical health has led to increasing longevity which in turn is leading to increasing numbers suffering from dementia. The virtual withdrawal of funding of residential care for these and other heavily dependant people has led to many carers reaching breaking point. The unprecedented number of one person households is likely to result in many suffering from loneliness and depression as they age in retirement. None of this is news but these factors add up to the need to retain those strategically place centres and firmly resist any moves to reduce their number. In the longer term, the need for daytime facilities to accommodate dementia sufferers may have to become a major priority. The incoming Health Authority will be bereft of premises, planning consent, acquisition and adaptations cause publicly unacceptable delays. Hiring centres (including main meal and refreshments) to the Health Authority as sole user on agreed day(s) weekly could well offer an acceptable albeit interim solution to all concerned. The words "community centres" should be followed by "and will retain them to meet foreseeable demands".

### Officer response

1. Local lettings policies (LLPs) are used where there is a mix of accommodation types such as elderly and general needs accommodation within the same housing development. LLP's will ensure that new lettings will contribute towards a balanced and sustainable community.

2. Emergency and temporary accommodation is available to those households threatened with homelessness who are considered to be vulnerable under homelessness legislation.
3. Representation and supporting comments are noted. A site submission form will be sent to the respondent so that the site may be formally considered by officers in the SHLAA review.
4. The Draft Core Strategy contains a number of policies which address future infrastructure requirements. In addition, a new Social and Community Facilities Study is to be published imminently which will go some way to address the issue raised.
5. Comments noted, however, it is not clear from the representation submitted exactly what the objection is. Detailed design requirements will be set out in a new Design Standards SPD.
6. Comments are welcomed. Reference should be made to Policy CS18: Social and Community Infrastructure which sets out in detail the Council's position on loss of community facilities.

### **Older people and vulnerable groups - Summary of general comments**

1. Support the objectives of this policy, but would query why "Lifetime Homes" standards are referred to only in the context of new specialist accommodation rather than all new housing developments.
2. The Sheltered extra care housing at Brockhill is exemplary - near bus, shops, church etc. The addition of a nursing wing where residents might be transferred when they deteriorate would be an additional bonus.

### Officer response

1. Comments noted. Officers agree that lifetime homes standards should be incorporated into all types of new accommodation.
2. Comments noted.

### **Older people and vulnerable groups - Recommendation**

The following changes will be made:

- Amendment to policy CS20: Design to include reference to lifetime homes standards.

The wording of the policy will also need to be reviewed in light of any proposed changes to the Supporting People programme.

## **Policy CS13: Gypsies, Travellers and Travelling Showpeople**

In ensuring provision of appropriate housing to meet the needs of the whole community, the Council must ensure the delivery of additional accommodation for Gypsies, Travellers and Travelling Showpeople.

The key evidence base for the policy is the Gypsy and Traveller Accommodation Assessment (GTAA).

Seven individuals and organisations made representations on this policy. One of these representations has not been addressed by officers as it was deemed not duly made due to inappropriate use of language and a lack of accurate contact details.

### **Gypsies, Travellers and Travelling Showpeople - Summary of comments of support**

1. We support the aim of CS13. We would urge the Council to consider allocating a proportion of light industrial or employment land to provide for storage facilities for travelling showpeople, to ensure residential space is maximised and used efficiently.
2. FFT and TLRP welcome the presence of a policy intended to cater for the needs of this community.
3. Welcome and support the intention to make provision in a Site Allocations DPD and to safeguard existing sites. Welcome the pragmatic approach to location which recognises the difficulties in finding sites and the exceptions approach adopted.

### Officer response

1. Support noted. The suggestion to allocate a proportion of light industrial or employment land to provide storage facilities for Travelling Show people is noted. To allocate the land, consideration would need to take place through the Site Allocations DPD process, however, we would not be looking to lose such land to other uses unless a case can be made which outweighs the economic development objectives of the Core Strategy. Travelling Show people could look to rent such facilities (such as warehouses/storage facilities) if they wished, and this would be private business matter, as long as it was within the planning regulations.
2. Noted.
3. Noted.

### **Gypsies, Travellers and Travelling Showpeople Summary of objections**

1. Reference to Ten Acre Farm as a possible Gypsy site. There is already provision within the Borough. Ten Acre Farm is not considered to be suitable for expansion as a Gypsy site (issue raised by two individuals).
2. Recognition that the Traveller community poses significant challenges particularly in the education sector. Long term efforts to encourage a more settled community will be assisted by the provision of additional pitches. Given the problems of locating new sites, additional pitches should be located on existing sites.

### Officer response

1. It is the Council's duty to identify suitable land to help meet the evidenced need for Gypsy and Traveller pitches in the borough, in accordance with the Housing Act 2004, and Planning Circular 01/2006. There is an extant planning permission for 3 pitches at Ten Acre Farm, and this is counted as

provision against the identified need in Woking Borough, based on the evidence in the North Surrey Gypsy and Traveller Accommodation Assessment (GTAA). This site has planning permission, and therefore is a suitable site in planning terms. Any further pitches on this site would require planning permission.

2. Comments welcomed. Additional pitches have in the past been located on existing sites, and where this might be a possible option in the future, it will be explored (through the Site Allocations DPD). However, it is not always wise to create large sites as they can become difficult to manage. If the update to the North Surrey Gypsy and Traveller Accommodation Assessment (scheduled to take place this year – 2011) identifies a need for further pitches, appropriate sites will be assessed through the Site Allocations DPD process. There will be opportunities for the local communities to comment on proposed allocations.

### **Gypsies, Travellers and Travelling Showpeople - Summary of general comments**

1. When identifying sites for gypsies and travellers, due consideration should be given to impacts on the environment, which has not been addressed within the existing text.
2. The third criterion is too tightly drawn in relation to various forms of impact. Any development can be held to have adverse impact and the criterion as it stands could be used to thwart development almost anywhere. It would open the door to NIMBY objections which may be racially motivated. As with all planning issues there is a balance to be struck between harm and utility and planning authorities should balance the level of impact against needs for sites. Thus if there is a requirement to examine landscape and amenity impacts then only sites which have an unacceptable impact should be excluded from consideration. Hence we suggest the addition of the word unacceptably before 'adverse impact' which will help restore balance.
3. The last criterion require sites to have safe and convenient location in respect of schools and local facilities. This criterion could conflict with the recognition in para 6.99 of the difficulty likely to be experienced in finding affordable and available locations. The available sites may be less well related than is ideal and Circular 1/2006 recognises this difficulty in para 54 where it states that in relation to rural sites local authorities should be realistic about alternatives to the car in accessing local services. Hence this criterion should in our view either be deleted or revised to states that the site has reasonable access to local services.
4. Sites for this type of development should not adversely impact on rivers and river corridors, statutory and non-statutory wildlife sites, or on protected or BAP species. This should be included in the policy section. Other environmental issues that will need to be considered in locating development include flood risk (taking the flood risk vulnerability of this development consideration) and water quality (please refer to the advice provided under groundwater and surface water protection and water quality). This site should have the adequate infrastructure required and needed to accommodate this type of development.
5. The policy relies upon the North Surrey GTAA to estimate numbers of pitches needed. It ignores the unfinished (but released under a FOI request) panel report of the Examination in Public into Policy H7 of the SE Plan. This examination was conducted in reading in February 210 and consisted of a forensic examination of the evidence base. The Panel Report was critical of levels of provision planned for Surrey and of the GTAAs. In relation to GTAAs in general - In our examination of the Partial Review we have had two

major concerns regarding the tests of soundness, namely the evidence base and the level of involvement of gypsy and traveller and travelling showpeople communities. We have found many shortcomings in the evidence base due to the different methodologies in the GTAAs and TSAAs but this is not surprising considering much of the work was undertaken in 2006 and 2007 and the methodology was not tried and tested as, for instance, in assessing other housing needs. What was more surprising is the lack of regard by some authorities of the evidence base they did have in their GTAAs. Although attempts were made to reach the communities there were some major shortcomings, particularly concerning those gypsy and travellers in housing and the New Travellers. Even taking into account these caveats, we found the overall standard of the GTAAs as a sound and credible evidence base for gypsy and traveller pitch accommodation needs to be very disappointing. (A further highly unsatisfactory approach in some cases, e.g. in the North and East Surrey GTAAs and the Advice submitted by Oxfordshire and Buckinghamshire, was in the face of unclear findings as to the different categories, or an apparently high total, to adopt an 'overcrowding figure' of 10% of authorised pitches on the basis of CLG 'Guidance'. Our overall conclusion is that none of the GTAAs, apart from that undertaken by Chichester District Council, represent a sound or credible evidence base for Draft Policy H7 and, together with the subsequent Advice figures provided by local authorities for the period up to 2016, and are insufficient to meet the need for additional gypsy and traveller pitches across South East England. We do however consider that the information they contain could be used to provide sound and credible figures for the needs arising from all local authority areas which could in turn form the basis of a sound and credible regional policy, with the requirements distributed across the Region on the basis of the principles set out in the next Chapter.

6. In relation to Surrey as a whole - The overall picture in Surrey is of a county where growth in gypsy and traveller site provision has been severely constrained over many years by minimal new site provision, extensive areas covered by protective environmental and planning designations, restrictive planning policies, high urban land values and vigorous enforcement. The GTAAs were the first quantitative assessments of need undertaken for several decades, if ever. Unsurprisingly they reveal a substantial level of unmet need arising from both within and outside the Surrey gypsy and traveller community.
7. Conclusions on the GTAA and estimate of need in North Surrey. Given the apparently good methodology, site coverage and survey techniques used by the N Surrey GTAA the decision not to use its findings with regard to the key elements of needs arising from overcrowding and concealed households on authorised sites, new household formation and need arising from housed gypsies and travellers, seemed to us to be unjustified. In order to give the local authorities an opportunity to provide this justification Additional Questions were asked by the Panel in writing and in advance of the EiP . The Responses from North Surrey provide no further information to support the approach of, in effect, not using their survey findings in most key respects but rather to assume a figure of 0, or use standard estimations from elsewhere, which produced a substantially lower figure of need.
8. Given the urgency of the need to address the shortage of sites for gypsies and travellers in Surrey, and other parts of the South East, we do not feel that it would be reasonable to recommend the rejection of the N Surrey GTAA as an evidence base entirely. Rather, we believe that the apparently robust GTAA survey findings, especially where they have been can corroborated by evidence from other sources, can be used to provide a more realistic,



minimum pitch needs figure to 2012. We have used the principles set out in Chapter 2, and earlier in this Chapter, to estimate additional locally arising need to 2016.

9. This total estimated locally arising need figure of 197, though derived from different means and using the original 2006 baseline figure, would accord with FFT's estimate of a need for 182 pitches in N Surrey over a similar period. After a detailed analysis of the GTAA and Advice FFT say that they cannot have much confidence in the allocations proposed for North Surrey and urge an increase in pitch numbers based on their own calculations.
10. This high level of need is unsurprising given the very limited growth in the number of authorised gypsy and traveller pitches in Surrey over the last 20+ years. Overall we consider it to be the lowest robust level of need arising from Surrey that could be regarded as realistic. It does not include explicit provision for household members who have had to leave the county because of a shortage of pitches, nor, except in West Surrey, any allowance for needs arising from unauthorised encampments. The Panel Report concluded that Woking has a need for 40 pitches to 2016 with planning beyond that date based on a 3% compound increase (recommended Policy H7). The recent CALA Homes judgment has meant that RSSs are reinstated and local policy should be conformable with the Regional Spatial Strategy. The panel report as part of the emerging regional policy should thus be accorded due weight and Woking should plan accordingly. Reliance on a GTAA whose deficiencies have been explored and corrected in the panel report. Failure to do so would render the Core Strategy unsound because it is not based on the most sound evidence base and does not reflect emerging regional policy. In any event whether or not Regional Spatial Strategies are abolished at some stage in the future the plans for sites should pay due regard to the totality of the evidence base which must include the conclusions of the panel at the EiP. Hence the Core Strategy should be changed to plan for 40 pitches to 2016.

#### Officer response

1. In Woking Borough, all land outside of the urban area is Green Belt land. Although Policy CS13 does not specifically mention the environment as a criterion, this consideration would be addressed through Policy CS6 Green Belt, which states that the Green Belt will be protected from harmful development.
2. Agree. Amend the third criterion to say, "the site should not have unacceptable adverse impacts on the visual amenity and character of the area."
3. Agree. There is a slight contradiction between the requirement for convenient access to schools and recognition that many sites are often unable to be provided in the urban areas due to the high cost of land due to its development potential. Agree that convenient should be changed to reasonable.
4. Comments noted. It is recognised that mobile homes are highly vulnerable to flooding (as classified in PPS25), and therefore suggest that a sentence is added into the supporting text or introduction to make this known, and that flood risk is a major determining factor when considering site allocation and the determination of planning applications for Gypsy and Traveller pitches. However, it is not thought necessary to add the suggested criteria to the policy, as these are covered by Policy CS7: Biodiversity. When considering allocating sites, regard will be had to all relevant planning policies, not just Policy CS13. See revised policy.
5. Comments noted. The Council recognises that there may be greater need than that identified in the North Surrey GTAA, and that is why it is preparing to

update the GTAA this year (2011) to ensure up to date and reliable evidence. It is a requirement of PPS12 that policies are based on 'credible and robust evidence (PPS12, p.15). It cannot be proved at present that the panel's unfinished draft report, is any more credible and robust than the North Surrey GTAA. Hence why an update to the GTAA is being carried out, which will carefully consider commentary and recommendations in the draft unfinished panel's report, and any changes in policy (expected replacement of circular 01/06) with light touch guidance. The outcome of the study will help inform the Site Allocations DPD and address any concerns raised at the South East Plan EiP.

6. Comments noted.
7. Comments noted. See response to 5, above.
8. The updated GTAA, due to be carried out in 2011, will reconsider methodologies and data collection to ensure it is a source of robust and credible evidence.
9. The assessment of need will be revisited in the updated GTAA. We thank FFT for their estimation of need, however, in keeping with the need for robust and credible evidence we cannot adopt such calculations without considering need through the due process of a GTAA. We take all comments on board and will look to work in partnership with all relevant organisations and the Gypsy and Traveller community themselves as we update the GTAA this year (2011).
10. The most recent legal judgement in relation to Regional Strategies states that the forthcoming revocation of Regional Strategies is a material planning consideration. The South East Plan is not 'emerging' regional policy, rather policy that, although a consideration, is likely not to be in place by the time the Core Strategy is adopted. Its weight, in accordance with the recent legal judgement, is reduced. The panel report is unfinished and in draft format. Although we recognise that it contains many useful comments to inform the forthcoming update of the GTAA, in itself, is not robust evidence. The original GTAA may have room for improvement too, and this will be addressed through the update, however, it is not beneficial to base future policy on a document that was not finalised. It is accepted that the need for pitches may be higher than that shown in the original GTAA and this will be explored in the updated study.

### **Gypsies, Travellers and Travelling Showpeople - Recommendation**

The following changes will be made:

- Amend the third criterion to say "the site should not have unacceptable adverse impacts on the visual amenity and character of the area."
- Agree with the second comment. There is a slight contradiction between the Amend final policy criteria wording from 'convenient' to 'reasonable'.
- Add a sentence is added into the introduction to state that "It is recognised that mobile homes are highly vulnerable to flooding (as classified in the Flood Risk Vulnerability Classification table in PPS25). As set out in policy CS9, flood risk is a major determining factor when considering all site allocations and the determination of all planning applications, including those for Gypsy and Traveller pitches".

Officers across Surrey are currently scoping options for updating the GTAA. It is anticipated that this will be complete by the end of 2011. The policy may need re-visiting on completion of more up-to-date evidence when it becomes available.

## **Policy CS14 Sustainable Economic Development**

Thirteen responses were received regarding policy CS14, all of which were duly made.

### **Sustainable Economic Development - Key Issues Raised**

#### Key supporting issues:

1. Welcome policy on sustainable economic development and support for Airtrack
2. Support the identification of Goldsworth House for future alternative use. Recommend site is considered for either housing or residential care home within core strategy and site allocations documents.
3. Support principle of CS14 to encourage Woking's economy to grow by ensuring sustainable employment development patterns and allowing flexibility for the changing needs of the economy.
4. Policy wording supported in general terms. Suggested wording to assist in providing places of worship 'The Council will in principle regard former community/public buildings and former commercial/industrial premises located outside residential areas as the most appropriate locations for places of worship and associated community activities'.

#### Officer Response

Support noted

### **Sustainable Economic Development -**

#### Key objecting issues:

1. The policy defines employment floorspace as B use classes. This is out of step with PPS4 which defines a much broader range of employment generating development.
2. Policy seeks to protect B uses without reference to other employment generating activities particularly those which might be appropriate *in a town centre* such as a hotel. The policy should recognise that other employment uses as identified in PPS4 provide sustainable economic development and are acceptable uses in the town centre – suggested revision 'existing employment floorspace in Woking Town Centre should be safeguarded and should not result in an overall loss of office floorspace unless it contributes to wider town centre objectives in line with PPS4.'
3. The policy makes no provision for the loss of any existing employment floorspace within the *employment areas*, providing absolutely no opportunity for redevelopment of existing sites within employment areas regardless of circumstances. The policy as currently worded is considered too rigid and a more flexible approach should be taken. If expanded definition of economic development in PPS4 is accepted, suggest rewording 'Safeguard existing employment floor space within Woking Town Centre, West Byfleet District Centre and the employment areas for economic development. If definition of economic development in PPS4 is not accepted suggest wording 'Employment floorspace within Woking Town Centre, West Byfleet District Centre and the employment areas will normally be protected, other non employment uses will only be considered acceptable where significant benefits can be demonstrated.'
4. Policy and paragraph 6.112 are not founded on robust and credible evidence base. National and local policy prioritises the preservation of vitality and viability of the town centre yet the policy encourages mixed use in an

employment area outside the town centre. Butts Road should be excluded from the defined town centre.

#### Key objecting issues: Office response

1. PPS4 defines economic development to include development within the B Use Classes, main town centre uses, public and community uses and development which achieves employment and/or generates wealth and/or produces or generates an economic output or product. As currently drafted, the Core Strategy considers town centre uses in place policies CS2 (Woking Town Centre), CS3 (West Byfleet District Centre) and CS4 (Local Centres) and social and community infrastructure in policy CS18. In response to the objection and to improve clarity and ease of use of the document it is recommended that policy CS14 be amended to refer to all forms of economic development set out in PPS4 and that other relevant policies are reworded to reflect this amendment
2. See response to objection 4 and 16 of policy WTC2.
3. PPS4 states that the Government's overarching objective is sustainable economic growth and proposes a plan led approach to economic development. The importance of job creation was emphasised in the recently published 'Plan for Growth', which sets out proposed radical changes to the planning system to support job creation. Given the current weak demand in commercial development due to the short term downturn in the economy, it is imperative that the employment areas are safeguarded for B uses, to protect their loss to other uses which may not provide the same long term economic benefits. The ELR sets out labour demand projections and floorspace requirements for B uses over the period of the Core Strategy, as recommended in government guidance. It also recommends sites for retention for B uses and sites for possible release or use for alternative employment purposes. It is considered that the employment floorspace requirements can be accommodated on existing sites, albeit with intensification and mixed use development to provide offices within Woking Town Centre. Although a number of stand alone employment sites were recommended for release, only two employment areas were considered as potential sites for release – Robin Hood Estate and part of the Forsyth Road area, although the latter was also considered suitable for alternative employment use. Given full occupancy within the Robin Hood estate and lower levels of employment land provision to the west of the Borough, the Council do not propose to release this site. The Forsyth Road employment area forms part of the Maybury/Sheerwater priority place. Given the high vacancy levels within this estates, its location close to the local centre, and the importance of employment creation to the regeneration of this priority area, the following policy wording amendment is proposed to enable greater flexibility *'redevelopment of vacant sites will be encouraged for B uses, unless redevelopment is for an alternative employment generating use which contributes to the aims of policy CS5 (priority places) and would not Jeopardise the B use led nature of the employment area.*
4. An amendment is proposed to policy CS2 to remove the Butts Road area from the town centre and to encourage the areas redevelopment for mixed office and residential use only.

#### Key general comments:

1. The location of employment sites is not included on Map 1. Therefore cannot accurately assess the location of these sites in relation to the strategic road network (SRN). Traffic impact of development proposals should be

considered for employment sites. Provide a balance of employment and residential development to reduce out-commuting. Should new employment sites be located in close proximity to the SRN then policies should require the development of tailored demand management measures to reduce potential impacts on SRN, and that developers will be expected to mitigate any residual impact upon the SRN whether caused by a specific site in isolation or in combination with others.

2. Prefer to see employment development located in areas that are accessible by public transport and other non car modes.
3. Suggest working group dedicated to attracting new local businesses to the area which 'sells' Woking strengths in its fantastic accessibility and closeness in time to London.
4. Core Strategy should have more emphasis on utilising empty retail and office space in the Borough for residential usage. Empty retail space can impact on the overlook of the town and with the rise of internet shopping is a feature that may increase. One alternative is more mixed residential/retail development in the town centre.
5. Revise policy to reflect the intentions of SWP Table 3.1, which lists six urban sites/industrial estates in the Borough which have potential for accommodating waste management facilities and that such facilities are increasingly being carried out within modern purpose-designed buildings that can be located in urban areas and on industrial estates.
6. Amend symbol for m<sup>2</sup> in paragraph 6.111.
7. Still need for light industrial space. Support employment paragraph CS5 Priority Places (employment paragraph) in which support is given to this and consider that more light industrial work needs to be made available in Maybury/Sheerwater. Flatted factory schemes or some other type of nursery/industrial units should be facilitated in Sheerwater.
8. Jobs close to home suit part-timers and save on transport.

#### Key General Comments: Officer response

1. The employment areas are shown on Map 1 as is the SRN. The Core Strategy proposes a balance of both additional residential and employment development. Policy CS17 (Transport and Accessibility) ensures development proposals provide appropriate infrastructure measures to mitigate the adverse effects of development traffic and other environmental and safety impacts (direct or cumulative), and that transport assessments are undertaken where necessary. The policy also requires development proposals that generate significant traffic to be accompanied by a travel plan.
2. Office development is encouraged within Woking Town Centre and West Byfleet District Centre.
3. Point Noted
4. The majority of office and retail space is required over the period of the Core Strategy to accommodate predicted growth. Although vacancy rates have increased in the town centre during the recession, the Core Strategy covers the period up to 2027, and policies should be flexible to accommodate changes in the economic cycle. Policy CS2 (WTC) encourages provision of mixed use development to provide for approximately 2,500 residential units.
5. Such uses are acceptable within industrial areas in principle, and thus no amendment is considered necessary.
6. Point noted.
7. Redevelopment of vacant sites, especially office premises within the Forsyth Road area will enable opportunities to provide further industrial space if required.
8. Point noted.

9. This particular office response does not relate to any specific representation. Footnotes 5, 13 and 14 relate to the boundaries of the employment area or centres. The references have been removed as they are site specific, but the changes are justified as follows: footnote 5 - justification to remove the site from employment use is contained in the evidence base, footnote 13 - relates to the removal of land to the north of Berry's Lane which is predominantly residential in nature and not considered appropriate for employment use and footnote 14 – despite advice in the ELR the Robin Hood Works have been retained for employment due to full vacancy and lack of employment space in this part of the Borough.

### **Sustainable Economic Development - Recommendation**

Minor amendments are made to policy CS14 as set out above.

An amendment is proposed to policy CS14 to enable greater flexibility for redevelopment of vacant sites for alternative employment generating uses (see Officer response to Priority Places responses for more details).

## **CS15 Infrastructure delivery**

The purpose of Policy CS15: Infrastructure Delivery is to ensure that there is a mechanism in place to secure delivery of the necessary social, physical and green infrastructure required to support the proposed level of growth.

The Draft Core Strategy sets out the definition of infrastructure. For consistency, this definition is that which is included in the South East Plan.

Since the preparation of the Draft Core Strategy, there have been changes to the national legal and policy framework, which have direct implications for Woking's local policy. Prior to the General Election, the Conservative Party had stated that it would introduce a new mechanism for collecting developer contributions towards infrastructure provision, and scrap the newly introduced Community Infrastructure Levy (CIL). However, the Coalition Government has in fact retained CIL, with some procedural changes to the CIL mechanisms likely to be made over the coming months through Regulation and on the back of the Localism Bill.

Importantly, following the Government's announcements, Woking Borough Council has resolved that CIL should be the mechanism for securing developer contributions for infrastructure. As a result of the above policy developments, revisions to policy CS15 will need to be made.

### **Evidence base**

The Council, with partners, has produced a number of research reports in order to support the policy

- Infrastructure Delivery Plan (forthcoming, July 2011)
- Infrastructure Requirements Study  
<http://www.woking.gov.uk/planning/policy/ldfresearch/infrastructure>
- Social and Community Facilities Study (forthcoming)  
<http://www.woking.gov.uk/planning/policy/ldfresearch/infrastructure>
- Surrey Infrastructure Capacity Study <http://www.surreyimprovement.info/sicp>
- Population Topic Paper <http://www.woking.gov.uk/planning/policy/ldfresearch/>

A total of 34 individuals and organisations made representations on this policy. Many of the responses are comments about the impact of the level of development on particular types of infrastructure such as roads and school places; however, this policy specifically seeks to set out the Council's proposed mechanism to deal with those very issues. As such, it is difficult to respond to the representations logged as objections to the policy. The fact that the mechanisms for securing additional infrastructure are complex and technical is very much appreciated by officers and efforts should be made to clarify these issues in supporting materials (i.e. the forthcoming Infrastructure Delivery Plan).

### **Infrastructure delivery - Summary of comments of support**

1. Support for policy wording and the proposal to safeguard land for new infrastructure.
2. Support for the inclusion of 'places of worship' in the definition of infrastructure.
3. Support from the Woking Chamber for the proposals to improve transport accessibility to Sheerwater.
4. General support for the policy with the comment to note that public health functions are being transferred to local authorities.

5. Support introduction of a tariff based system.

Officer response

Comments are noted.

**Infrastructure delivery - Objections – summary of issues raised**

1. In many cases, Woking Borough Council is not the infrastructure service provider. Will the Council undertake that implementation of the plan will not commence until those other authorities have agreed to make the provision and the required funding is in place?
2. It is not possible to support the policy without detailed information about the provision of new infrastructure.
3. Mayford has insufficient infrastructure to support the proposed number of additional homes there (two separate representations).
4. As the IDP is not yet published, there is no evidence that the findings have been part of the decision making process or subject to consultation.
5. Thames Water object on the basis that the policy does not adequately address the specific water and sewerage infrastructure requirements and request that in order to be in conformity with the South East Plan and adequately address the issue.
6. Flooding is an issue for Mayford and this would be exacerbated by more development in the area.

Officer response

1. Through the Infrastructure Delivery Plan, the Council will seek to engage with partners to ensure the timely delivery of infrastructure. Where appropriate, service agreements will be put in place. Woking Borough Council has a good history of partnership working with infrastructure service providers, and the Woking Partnership is a good example of this.
2. The (forthcoming) Infrastructure Delivery Plan details specific schemes where appropriate. When completed, this will form part of the evidence base for the Core Strategy.
3. The Core Strategy does not identify Mayford as an area for significant new housing development. Policy CS9: Housing provision and distribution identifies the general distribution of new residential development. The allocation of specific sites will be done through the Site Allocations DPD.
4. Over the years, the Council has undertaken much research on infrastructure requirements. These documents are all available on the internet and were referenced in the Draft Core Strategy. The requirement for a comprehensive IDP is relatively new and demands significant staff resource and liaison with infrastructure service providers, who all have different priorities and planning processes which must be aligned. This is a complex and lengthy process. Although the IDP is not published in its final form, its early findings were indeed taken into consideration. In addition, it is not normal practice to undertake public consultation on technical research. It should also be noted that it is not the intention of the policy to list specific infrastructure requirements – but to set out a mechanism for securing developer contributions to meet those needs. The IDP will be published as part of the evidence base for the Core Strategy.
5. The specific water and sewerage infrastructure requirements to support the delivery of the strategy will be addressed in the IDP. It will be mis-leading to single out this particular type of infrastructure in the text.
6. The Core Strategy does not identify Mayford as an area for significant new housing development. Policy CS9: Housing provision and distribution identifies the general distribution of development. All new residential



development proposals would also be subject to the provisions of CS8: Flooding.

#### **Infrastructure delivery - General comments on the policy**

1. Support, but note that the wording of the policy will need to be amended in view of recent Government announcements in relation to CIL.
2. Surrey County Council welcomes the proposed introduction of CIL, the preparation of an IDP.
3. The definition of infrastructure should include reference to early years education provision.
4. The policy/ supporting text should include reference to the county's Education Organisation Plan.
5. Consideration should be given to making reference to the promotion of 'bring' sites for the collection of recyclable materials where there is a local deficiency.
6. Support for the flexibility provided in CS15 for the assessment of developer contributions to be secured through s106 until such time as a tariff is introduced, however, request that the policy should specifically state that the five tests of Circular 05/05 and the three statutory tests in Regulation 122 of the CIL Regulations 2010 should be included within the text.
7. An IDP should accompany this policy and be supported by a transport assessment.

#### Officer response

1. Comment noted.
2. Comment noted.
3. Comment noted and supported.
4. The Education Organisation Plan is referenced at length in the IDP. As it is updated annually (and for example, recently had a name change), it is not proposed to make specific reference to it in the policy (as is the case of other plans and strategies of the various infrastructure service providers), but to keep reference to documents in the IDP which can be easily updated.
5. Officers will consider this issue in the IDP, however, it is considered that this does not constitute a strategic issue for the purpose of the Core Strategy and would perhaps be better dealt with through a future Development Management Policies DPD.
6. Support for flexible approach is noted. However, it is not considered necessary or appropriate to repeat what is already set out in national policy.
7. The Highways Agency's comments are noted. An IDP for Woking is imminent and it should be noted that the delay to the production of the IDP is in part due to the preparation of a transport assessment in which the HA has had involvement, alongside the County Highways Authority.

#### **Infrastructure delivery - Summary of issues raised which are general comments about infrastructure capacity**

A number of local residents made general comments about infrastructure provision which do not directly relate to the purpose of policy CS15. The key issues raised through these comments are summarised below:

1. Previously, development has not been accompanied by supporting infrastructure which has led to an existing deficit.
2. There is a lack of evidence about the capacity of existing infrastructure and future needs arising from new development.

3. The Core Strategy does not include specific plans for new infrastructure such as schools and GP surgeries.
4. Concerns about how new infrastructure will be financed, particularly in an era of public spending cuts.
5. General comment in support of not allowing a lag in infrastructure provision to halt development in the town centre 'putting the cart before the horse'.
6. Several comments were received from the National Grid regarding the development of the energy network.

#### Officer response

It is accepted that in the past, the delivery of infrastructure has often lagged behind new developments. The Draft Core Strategy seeks to rectify this situation, particularly through policy CS15, by ensuring that a mechanism is in place to secure developer contributions to bridge the funding gap.

The IDP will set out in great detail the future infrastructure requirements arising from planned development. It is not considered appropriate to include specific schemes within the Core Strategy itself as needs and priorities change over time depending on the pattern of growth and funding sources. In addition, for education provision, for example, there is parental choice to be taken in to consideration which may change over the plan period.

#### **Infrastructure delivery - Recommendation**

A number of changes will be made:

- The introductory text to policy CS15 will be expanded upon to provide clarification of exactly what the policy is setting out to achieve.
- The definition of infrastructure is amended to specifically include early year's education provision (which is already being addressed through the IDP).
- Policy to be re-worded to identify CIL as the mechanism for collecting the majority of developer contributions.

## **Policy CS16: Open Space, green infrastructure, sport and recreation**

Nine representations were received regarding policy CS16 Open Space, green infrastructure, sport and recreation, all of which were duly made.

### **Open Space, green infrastructure, sport and recreation; Key issues raised**

1. Strong support to increase the number of recreational spaces for teenagers. The current facility in Woking Park is heavily used and a population increase will make the situation worse.
2. The Surrey Countryside Access Forum (SCAF) welcomes the positive and detailed treatment of public open spaces and the Green Infrastructure.
3. There are no explicit references to the public rights of way network, the position of public open spaces or the Rights of Way Improvement Plan (ROWIP). The Core Strategy should acknowledge the public rights of way network is a heritage asset and a tool for supporting local health initiatives. Furthermore there should be a policy of protecting the public rights of way network and co-operating with the County Council to develop it under the ROWIP.
4. Specific procedures should be introduced to ensure building development does not conflict with existing and prospective public rights of way.
5. Where new provision is made for recreational green space consideration should be given to the possibility of protecting the status of such land in the long term. For example dedicating it under the relevant provisions of the CROW Act or registering it as a common or town or village green.
6. Full support given.
7. The policy should be amended to allow more flexibility, by recognising that “the provision of such space or contributions should be appropriate to the form, scale and type of development proposed.”
8. Any development that takes place on the ‘Old Library site’ in Knaphill should leave the space that was the ‘garden’ as a community garden area to be used by residents.
9. The policy does not properly engage with the concept of Green Infrastructure. The policy should have an aspiration to extend and improve the Borough’s Green Infrastructure network and where appropriate the encouragement of development proposals that improve the quality and quantity of accessible green space.
10. Pleased the policy makes reference to river corridors and SANGS, however these are only two aspects of what should be a fully comprehensive Green Infrastructure network, as listed in paragraph 6.133.
11. Would like to see a specific reference to Natural England’s Accessible Natural Greenspace Standards (ANGSt) and how they will be applied.
12. The policy fails to acknowledge that much development at high density will be built with limited private outdoor recreation space. Investment in parks and leisure facilities can only make up this deficit in a limited way.

13. The Core Strategy must make specific to the provision of new allotment sites and identifying suitable sites for cultivation across the borough. This should be done at the earliest opportunity, possibly in tandem with the Green Belt boundary review.
14. It is surprising the concept of a Country Park at Land at Carters Lane, as designated in the adopted Local Plan as a Proposal Site for Woking Palace Country Park has not been referred to in the Core Strategy. Delivering a Country Park would accord with the spatial vision and objectives of the Core Strategy. Furthermore there has been recent work to support the concept by leisure operator Burhill.
15. Support given for the requirement to provide play area and outdoor sports facilities as part of residential developments. However the Council is encouraged to adopt a flexible approach when considering the level of provision and determine this on a case by case basis.
16. Support given for the protection of sport and recreational facilities. However the Council is encouraged to consider a variety of types of recreational facilities which can be permitted on these sites such as woodland-based “high-ropes” facility as well as an adventure golf facility.
17. Provision for development for outdoor recreation has been identified as appropriate in the Green Belt, however such provision should be encouraged, particularly on fringes of the urban area where demand is anticipated to be the greatest.
18. The loss of public open spaces should also not be permitted if it impacts on biodiversity.
19. The information regarding the buffer zone in paragraph 7 is recommended to be kept in the policy text.
20. Reference should be made to PPS9 in para 6.134 of the Reasoned Justification.
21. Paragraph 6.140 is welcomed. The paragraph should also include the importance of wetland habitats for flood storage as well as for biodiversity.
22. It should be noted that open space and green infrastructure provision could have other functions such as flood storage. These areas can often be designated such that they also safely form part of a sustainable drainage system or a flood storage area for a site.
23. Leisure and recreational activities by the river should be considered by the Council as a means of providing additional recreational and leisure facilities for the local community.

## **Open Space, green infrastructure, sport and recreation - Officer's response**

1. Support and comments noted.
2. Support noted.
3. Comments noted. The policy should be amended to give an in-principle support for the protection/enhancement of physical access, including public rights of way, to open space and green infrastructure.
4. Please see response 3 above.
5. Policy CS16 protects against the long term loss of public open space. Any proposals brought forward to protect an area of recreational green space under the CROW act would be considered on their individual merits.
6. Support noted.
7. Contributions towards recreational and outdoor sports facilities from all developments are important. The framework outlined in the policy adheres to guidelines set by Fields in Trust (FIT), formerly the National Playing Fields Association (NPFSA). Furthermore the current system for securing developer contributions and the proposed Community Infrastructure Levy (CIL) reflect the scale and nature of developments and the required infrastructure to support them.
8. The Core Strategy is not a site specific document and does not identify small development sites. This is a matter for Development Management and the public will have the opportunity to comment on any scheme that will come forward.
9. Comments noted. The policy wording will be strengthened to encourage an improvement of the quality and quantity of the whole Green Infrastructure network, as identified in paragraph 6.133.
10. See response 9 above.
11. Comments noted the reasoned justification will be amended to include reference to ANGSt and how they will be applied.
12. Comments noted, this policy addresses public open space, green infrastructure and sport and recreation concerns across the Borough. It is proposed that private amenity space should be looked at within the future Development Management DPD or as part of a Design Guide SPD.
13. The Cultural and Community Development team at the Council have conducted an allotments study to identify need. Recommendations from this study have been incorporated in the Council's Green Spaces Development Plan and the forthcoming Infrastructure Delivery Plan (IDP). An in-principle support will be included in the policy for new allotments and for the protection of current borough allotment numbers. Land required for new allotment sites will be considered as part of the Sites Allocation DPD.
14. At present there is insufficient information regarding the concept of a Country Park at Land at Carters Lane. It is not suitable to include the proposal in the Core Strategy because it does not identify specific small sites. Proposal Sites

will be considered as part of the Sites Allocation DPD. The site at Carter's Lane will be considered if there is sufficient information available at that stage.

15. Support noted. Please see response 7 above.
16. The policy does not specify permitted sport and recreational facilities. Consideration will be given to all proposed facilities, including those suggested.
17. Comments noted.
18. Comments noted. The policy should be amended accordingly.
19. The reasoned justification forms part of the overall policy, and it is considered to be the appropriate section to include this information.
20. Comments noted, the policy will be reviewed to take this into consideration.
21. Comments noted. The policy should consider the importance of wetland habitats.
22. Comments noted. The policy will be reviewed to take this into consideration.
23. Comments noted. Specific areas for development will be considered in a Sites Allocation DPD.

#### **Open Space, green infrastructure, sport and recreation - Recommendation**

Minor amendments should be made to the policy as explained above. This includes:

- Providing an in-principle support for the protection/enhancement of physical access, including public rights of way, to open space and green infrastructure.
- A reference should be included to encourage the improvement of the quality and quantity of the Green Infrastructure network in the Borough.
- Paragraph 5 of the policy regarding the loss of open space should be amended to include a further requirement to ensure the loss of public open spaces will not be permitted where there are adverse impacts on biodiversity.
- A reference should be included in paragraph 6.140 to the importance of wetland habitats, open space and green infrastructure for flood storage and biodiversity.
- References should also be included in the policy to the Natural England's Accessible Natural Greenspace Standards (ANGSt) and PPS9.
- An in-principle support should be incorporated for new allotments and the protection of current borough allotment numbers.

## **Policy CS17: Transport and Accessibility**

37 representations were received regarding policy CS17 Transport and Accessibility, all of which were duly made.

### **Key issues raised:**

#### **Public transport**

1. Three representations gave their support for Airtrack, two of which strongly supported the scheme.
2. Joint action for Airtrack is required with neighbouring and transport authorities to overcome the problems of level crossings and of capacity at Woking, as one train an hour at peak times is unlikely to be sufficient to engender the change needed in mode choice to Heathrow and the M25 corridor.
3. There should be more trains at peak times than at other times.
4. Concern that Airtrack will not deliver as the service will be less frequent than the bus.
5. One train per hour at peak times should be considered on a cost benefit basis.
6. If Airtrack was extended beyond Heathrow it could form the basis of a major orbital route around West London.
7. The proposed improvements in access to the station and the population increase will lead to even worse overcrowding on the station platforms and on the trains at peak times.
8. The Council should work with South West Trains (SWT) to monitor and improve the service. As SWT appear to be reducing the length of trains and increase the number of people standing which will not encourage businesses and people to choose to move to Woking.
9. The bus service in areas such as Pyrford needs to be improved to achieve the aim of reduced car use.
10. Woking has awful public transport via buses and crowded platforms/trains which need addressing.
11. Bus stations should be located near to shops and railway station (on new shopping sites?) to enable those with mobility problems easier access.
12. Public transport to outlying areas in the Borough is not good and most people need a car.
13. It is good the document recognises the importance of setting future transport priorities. The encouragement of public transport is vital for the future development of the commuter town of Woking, although there is a strong risk of public spending cuts having the opposite effect.

#### **Sustainable modes of transport**

14. The Highways Agency strongly supports sustainable travel measures and is content developers will be required to submit a Transport Assessment and Travel Plan as part of the planning application process for future developments. They will help identify any transport infrastructure issues that need to be addressed and help manage sustainable transport alternative – reducing private vehicles and reduce the impact on the SRN. However the Highways Agency expects all sites that increase trips to the SRN should be accompanied by a Travel Plan (agreed at the planning application stage), not just sites that generate significant traffic.
15. A longer term vision is needed for sustainable transport in the future. This must include positive measures for a modal shift away from cars to viable alternatives.
16. Carbon and emissions strategies need to be referred to reflect transports direct significant contribution to global warming.
17. The penultimate paragraph should have the words “and encourage use of more sustainable transport”. Working in partnership should include the benefits of

working to achieve an improved bus network, with equal prominence to cycling (paragraph 6.156).

18. Why not provide electric charging points for cars and also team up with Streetcar or others to facilitate more electric vehicles throughout WBC?
19. Natural England is pleased with the recognition and inclusion within policies that with Woking's Rail Station and Cycle Town status there is scope to influence a modal shift from car to more sustainable forms of transport.

### **Cycle and pedestrian routes**

20. Encouragement to cyclists should continue to accommodate the rise in car usage.
21. Cycle Woking brings many benefits, however more is needed – including reduced vehicle speeds.
22. Towns which have adopted reduced car access and improved pedestrian and cycle use have been able to control growth in car use.
23. Concern raised to the lack of footpath on Prey Heath Road which has speeding traffic.
24. The supporting text should make the links between footpaths and cycleways, green infrastructure (Policy CS16) and the wider countryside.
25. There should be designated cycle paths in pedestrian areas to avoid danger, with powerful enforcement to restrain the few most inconsiderate cyclists
26. Council design guidance should place pressure on development to provide safe and secure cycle parking within high density developments.
27. Deficiencies in public rights of way networks need to be identified and opportunities maximised for walking, cycling and riding and integrating access to the countryside with public transport.
28. The Core Strategy should promote outdoor recreation and access to the countryside.

### **Car Parking**

29. There should be a significant expansion of commuter car parking at Woking Rail station (500+?) to accommodate the rise in car usage.
30. Imposing 0.6 car parking spaces in Woking town centre causes congestion from on-street parking. Development sites should provide parking or payment in lieu.
31. Paragraph 6.157 could refer to the Surrey County Development Related Parking Guidance.
32. Parking for Woking rail station is often 10 minutes walk from the platform and do not offer value for money.
33. The Highways Agency is content that maximum car parking standards are used for new non-residential development, however this will need to be managed to ensure on-street parking is not encouraged. Alternative travel options need to be available at each end of the trips generated by developments at which lower parking standards are applied.
34. Reduced parking is supported, especially if complemented by community car-sharing schemes.
35. A more serious consideration of residential parking is needed for the medium to longer term to give a modal shift to other forms of transport.
36. The phase dealing with consideration of zero parking in WTC should be removed because it is not acceptable to highlight a potential outcome of a future review.
37. Strongly urge the council to include in the Core Strategy and maintain tough limits on car parking in developments with good links to transport infrastructure aiming towards developments that are car free in the town centre
38. At the consultation stage of major developments with limited car parking the council should carry out a review of parking restrictions in neighbouring



- residential streets to ensure there are adequate protections and restrictions to ensure new developments is not displace into nearby residential area.
39. The Council should use planning conditions and informatives to prevent the issue of parking permits for CPZs to the residents of new developments. The application of conditions and informative must be widely publicised in sales and marketing materials and by letting/estate agents.
  40. Higher density development justifies a very clear, tough policy on the provision of parking spaces for these developments. When space is at a premium it is unsustainable parking space is provided at the expense of good design, accommodation size and outlook and provision of open space.
  41. The government proposals to remove limits on the number of parking spaces will put developers in a strong position to pressure councils into allowing badly planned, land-hungry and car-dependent development.

### **Infrastructure Schemes**

42. Traffic works should be undertaken to relieve bottlenecks at Victoria Arch and Monument Hill to accommodate the rise in car usage.
43. Roads to and from the A3, M3 and M25 should be upgraded to accommodate the rise in car usage.
44. Traffic congestion is a serious problem now and during the morning rush it can be a nightmare to get to Woking Rail Station. Investment is needed now to improve quality of life, not degrade it by increasing demand further.
45. The requirements for any significant infrastructure mitigation measures should be established through the IDP and the Core Strategy before sites reach planning application stage.
46. The infrastructure requirements and the basis for contributions need to be set out in this plan, not left to later.
47. How will connectivity with a cycle/pedestrian bridge come forward unless linked with a very major development of the railway station (para.6.1.56)?
48. Access from the south of the railway remains extremely poor. A high quality tunnel or bridge is essential.
49. Dismayed there are no major road transport plans for Woking, particularly for routes into and out of Woking town centre.

### **Park and Ride**

50. A park and ride scheme (one in the north west and another in the south west are suggested), potentially in the green belt, should be provided to accommodate the rise in car usage.
51. Despite plans to increase shopping in Woking town centre the strategy doesn't consider a Park and Ride to get around congestion and parking problems, as seen in Guildford.
52. A park and ride site would be a better use of land than the sewage treatment works at Carters Lane.
53. A low cost frequent park and ride for commuters should be provided to Woking Rail station.

### **Traffic Issues**

54. What proposals are there for the long and short term to cure the present traffic chaos?
55. Cars should not be allowed 'through' the town.
56. There will not be economic growth if businesses perceive that it is too difficult to do business in the town due to congestion and further housing development will strain this further.
57. At present Woking is very congested, particularly at peak times, and further development will worsen this.

58. There are currently insufficient roads to take people either direct to the Town Centre or connect to other major roads. Consequently traffic goes through residential areas and local residents have to suffer.
59. No mention has been made of the impact on residents of high volume traffic through residential areas or the dangers of speeding traffic. Park Road regularly logs traffic driving in excess of 50mph. Park Road is a road of special residential character which sees well in excess of 21,000 vehicles a week. The Core Strategy mentions measures will be taken to protect new development areas from unsuitable heavy vehicles, however Park Road is often inconvenienced by heavy goods vehicles and the occasional coach. How does the plan propose to help improve existing road transport issues?
60. Traffic plans are 'tick the box' and never get monitored properly. The council should come up with a better way of evaluating the impact to improve matters.

#### **Future developments and the impact on transport network**

61. If the housing stock is expanded how are the roads and public transport, which are already strained, going to be managed?
62. Too many of the future developments in Woking depend on transport particularly as Woking Borough Council is not the Transport Authority for the area. In the past development has been made without the correct transport support, could this be the same for the Core Strategy?
63. Improvements in the transport infrastructure have the capacity to make higher density development nearer to transport hubs, particularly in town centres, work more effectively.
64. The issue of Woking growing in importance and population has been understated and missing solutions. Its location close to London and its extensive transport links make the process unstoppable.

#### **Greenbelt sites**

65. The infrastructure around Mayford would not support a large scale development. There is a limited local bus provision in Mayford and car use is essential in Mayford and would not be suitable for affordable housing development, additional cars in Mayford would place further strain on local roads and infrastructure.
66. Construction traffic would be a major issue.
67. Maybourne Rise has low public transport accessibility and is unsuitable for the rise in traffic that would result from development.
68. Saunders Lane is very narrow in parts and already has a problem with public transport with no bus service and commuter trains from Worplesdon Station completely packed out. What provisions will be made to increase the number of trains and buses to serve this considerably increased population?
69. Residents and visitors would need to use cars to access the Major Developed Site at Carters Lane as there is no public transport.

#### **Other matters**

70. There is little about accommodating the inevitable rise in car usage not only by local residents but by commuters from outlying villages using the rail station and links to Heathrow and Gatwick.
71. More should be made of the effect of the increasing affluence and desirability of the area which should outperform most towns in the south east as it moves "up market".
72. The policy is consistent with County Council's approach to transport.
73. The third Surrey County Council Local Transport Plan will be in place by the end of March 2011 and where relevant this will need to be reflected in Local Development documents.

74. The Highways Agency expects an assessment of the traffic impact on the SRN of each of the development options put forward in the Core Strategy, in line with PPS12.
75. Support the general intention of CS17.
76. Supporting evidence is weak with some evidence not available at this stage.
77. Object that the plan is deliverable and that apart from expressions of good intention there is a lack of evidence.
78. Decisions affecting the delivery of the plan need to be put into the Core Strategy as evidence that it is deliverable. Clear statements of intent agreed by the delivering agencies are needed, for example proposals in paragraph 6.156 should be more firmly identified in the policy itself.
79. Revisions are needed in accordance with the recent changes to PPG13.
80. The strategic issue is the level of development around a transport "hub", this needs to be unpicked:
  - The railway is the core infrastructure facility, however it is at capacity.
  - The railway and canal are significant barriers, measures to increase vehicular penetration across them would be prohibitively expensive.
  - Public transport connections too many directions are currently poor if not non-existent and need to be improved if a viable centre is to be supported.
  - The town sits in a matrix of green space, some of it common land. It is neither feasible nor publically acceptable to service the town by the scale of highways that would be needed for full car access.
  - The integrated transport study points out the extent of road congestion and that it is likely to increase.
81. There should be a plan to enable HGV traffic to reach businesses. Currently HGVs use the Wych Hill as Victoria Arch and Maybury Hill are not high enough to allow tall HGVs.
82. Good health is not enjoyed by Horsell Residents breathing NO2 at EU unsafe level of 52 from Victoria Way (40 safe limit).

**Matters raised that are beyond the scope of the planning policy and/or the Core Strategy**

83. The top speed of motorised chairs should be determined.
84. The Town Centre is currently a bottle neck due to ill thought out road closures by utility companies.
85. Broad support for development proposals for the Brewery Road Car Park.
86. The proposed ramps at Brewery Road Car Park are too long and will result in people trying to use the steps and due to the intensive use of the bridge this will be a real hazard.
87. A paragraph and objectives should be included about improvements to the rail service between Woking and London.
88. Extending the right to cycle in Woking Town Centre is potentially dangerous and should be monitored carefully.

## **Transport and Accessibility - Officer response**

### **Public Transport**

1 – 6. In April 2011 BAA announced it was withdrawing the Transport and Works Act Order application for the proposed Airtrack scheme due to unresolved issues including level crossings and the lack of public sector funding for the scheme. Therefore the policy should be amended to remove any references to the Airtrack scheme.

7. Comments noted.
8. The Council works with South West Trains through partnership working including Transport for Woking forum. Any comments relating to the service provided at Woking Rail Station will be forwarded on.
9. The Council will continue to work with key stakeholders and bus providers through partnership working, including Transport for Woking, to address any public transport concerns raised through the Core Strategy.
10. Please see response 9.
11. Comments noted. It is accepted that bus stations should be located within close proximity to local services. The proposed redevelopment near the station environs (The Gateway project) will enhance interchange facilities near the station.
12. Comments noted. It is accepted that not all areas of the Borough has good access to public transport. The policy provides the necessary framework for this to be improved. Furthermore the Core Strategy seeks to direct new development to areas with high public transport provision.
13. Support noted. The Council is committed to working with key partners towards the delivery of the Core Strategy, particularly in the current economic climate. The Core Strategy takes a long term view into the future and it is expected that the economic situation will improve.

### **Sustainable modes of transport**

14. Support and comments noted. The requirement of a Travel Plan will be extended to developments that are determined to have significant impact on the SRN.
15. A long term vision is important for sustainable transport in the future, this policy supports proposals that deliver improvements and increased accessibility to cycle, pedestrian and public transport networks and interchange facilities. Furthermore the Council is working with key partners, such as Surrey County Council, to provide viable alternatives to private cars. The policy also provides a strategic framework from which specific targeted actions can be developed.
16. A reference to carbon emissions will be included, in line with the National Transport Goals and the recent Local Transport White Paper 'Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen (January 2011).
17. Comments noted, "and encourage use of more sustainable transport" will be included within the policy.
18. Electric vehicle charging points are available in the Council's Victoria Way Car Park in the town centre. The Council in partnership with Enterprise Rent-a-car and Thamesway Limited have implemented the WeCar scheme. WeCar is a membership-based car sharing scheme that offers short-term affordable access to a car which is available to local residents and businesses. Information can be found at the Council's website. Additionally, Surrey County Council in partnership with the Council submitted a funding bid to the Department for Transport called Travel Smart. If successful the bid will provide funds to spend on sustainable transport in Woking and Guildford. One aspect of the bid is to encourage electric car use by providing charging points in public areas. If this is successful Surrey

County Council will then look at the possibility of working with businesses to set up an electric car loan or trial scheme.

19. Support noted.

### **Cycle and pedestrian routes**

20. Comments noted. The Council is keen to continue the positive impact Cycle Woking has had on cycling in the Borough and is working with Surrey County Council to ensure this trend continues.
21. Comments noted. The Council is currently working with Surrey County to look at a variety of measures to produce a transport infrastructure plan for the Borough. This work will form part of the Infrastructure Delivery Plan.
22. Comments noted.
23. Comments noted. Concerns raised will be passed to a relevant officer at Surrey County Council, the Local Transportation Authority for the borough.
24. Comments noted. A reference to green infrastructure will be included within paragraph 6.151.
25. The right to cycle in Woking Town Centre is not part of the Core Strategy. This is a matter which the Cycle Woking project has consulted the public on recently. Any concerns will be passed to the relevant officer within the Council.
26. Comments noted. These will be considered as part of a future Development Management or Design SPD.
27. Public rights of way is the responsibility of Surrey County Council, however a reference to access to the Borough's green infrastructure will be included as previously stated in response 25.
28. Please see Policy CS16: Open space, green infrastructure, sport and recreation.

### **Car Parking**

29. It is not felt necessary at present to increase the number of commuter car parking at Woking Rail Station. Situated within Woking Town Centre, the rail station is within close proximity to Town Centre car parks (such as Heathside Car Park) which are currently operating with spare capacity. Furthermore the station is accessible via the bus and cycle network.
30. The Core Strategy does not specify the number of car parking spaces in the Town Centre. The Council has an adopted SPG for Parking Standards which determines the level of parking provision per development. This will be renewed after the Core Strategy is adopted and will take into account the level of parking in future development and the potential impact on on-street parking.
31. Comments noted.
32. Parking charges set by the rail station car park are not within the remit of the Core Strategy. It is considered there are a number of car parks within 10 minutes walk from the station, including public car parks in the Town Centre, which also provide comparable parking services. Furthermore the station is accessible via the bus and cycle network.
33. Comments noted. Any future Parking SPD will assess and seek to minimise the impact parking standards will have on on-street parking.
34. Support noted. The Council will continue to work with key partners, such as WeCar, to introduce a car sharing scheme in the Town Centre. Additionally the Council will work with Surrey County Council should the Local Sustainable Transport Fund bid be successful (please see details in response 19) to expand the existing Surrey County Council Car Club network in the Borough.
35. Comments noted. An assessment of the required level of parking will be looked at as part of the review of the Parking Standards SPD.
36. It is not considered necessary to remove the reference to zero parking in the Town Centre as the policy outlines the scope of the review, not the potential outcomes.

- 37. Please see response 33.
- 38. Comments noted. This is a matter for Development Management. The Council will work with County Council to explore how a review of the parking orders can help address this issue.
- 39. Please see response 38.
- 40. As outlined in the policy the Council will undertake a Parking SPD to assess the required level of parking provision for new developments. This will take into consideration the sustainable location of Town Centre sites and access to public transport.
- 41. Please see response 40.

### **Infrastructure Schemes**

- 42. Comments noted. The Council is working with Surrey County to investigate and develop a transport infrastructure schedule to relieve traffic in the borough. There is an extant highway proposal scheme for Victoria Arch in the Woking Borough Local Plan (1999) WTC18 Policy, to improve access and accommodate traffic movements.
- 43. The local road network is under the control of Surrey County Council, the Local Transport Authority. Comments made will be passed onto the relevant department.
- 44. Please see response 42.
- 45. Please see response 42.
- 46. The details of infrastructure requirements will be looked at as part of the Infrastructure Delivery Plan, which will form part of the of the evidence base of the LDF. Policy CS15 of the Draft Core Strategy provides the policy for securing developer contributions towards infrastructure provision, including transport infrastructure. The Council has decided to introduce the CIL as the mechanisms to secure developer contributions.
- 47. The pedestrian/cycle bridge referred to in paragraph 6.156 is the new cycle and pedestrian bridge over the Basingstoke Canal, adjacent to Hermitage Bridge which is being funded by Cycle Woking with the aim to strengthen the existing cycle network but also provide a safe crossing point for pedestrians. This paragraph needs to be amended because the Cycle Woking project officially ended on 31 March 2011. However the Council is keen to work with Surrey CC to continue the progress made.
- 48. Please see response 42.
- 49. Comments noted, please see response 42.

### **Park and Ride**

- 50-53. A park and ride for Woking has been previously investigated, however analysis showed that due to the road network in Woking there is not a suitable route with enough critical mass to justify a park and ride. The Council is currently working with Surrey County Council to produce a transport infrastructure plan for the Borough and will examine all suitable options.

### **Traffic Issues**

- 54. Please see response 42.
- 55. Comments noted.
- 56. Comments noted, please see response 42.
- 57. Comments noted, please see response 42.
- 58. Comments noted, please see response 42.
- 59. The Core Strategy seeks to ensure that existing problems are not exacerbated by the impact of new development, the document cannot however address problems that exist on the current network. However the Council is working with Surrey County Council and other agencies to develop mitigation measures from

existing development contributions to address the issues that precede the Core Strategy.

60. Travel plans are a tool in the delivery of sustainable transport objectives including reducing car use, increasing use of sustainable transport modes, reducing traffic speeds, improving road safety and encouraging more environmentally friendly delivery and freight movements, as outlined in PPG13: Transport and within DfT guidance. The policy includes a section on monitoring and review, which sets out clearly how travel plans will be monitored. The Council is committed to ensure that this is met.

#### **Future developments and the impact on transport network**

61. Please see response 43. Furthermore the Council will work with key partners through the Transport for Woking partnership to improve public transport facilities/services in the borough. Specific proposals include improved interchange facility near the station as part of the Gateway project.
62. The Council has a close working relationship with Surrey County Council, the Local Transportation Authority. The Council is working with SCC to produce a transport infrastructure plan for the borough to ensure the correct level of transport support is provided for new developments.
63. Comments noted. Policy CS17 directs most new development in the main urban areas which are served by a range of sustainable transport modes.
64. Comments noted.

#### **Greenbelt sites**

- 65-69. The Draft Core Strategy does not include any Green Belt sites for any form of development. The sites referred to in Mayford are those in the Strategic Housing Land Availability Assessment (SHLAA). National Policy requires Local Authorities to identify specific deliverable and developable sites in order to demonstrate how the requisite level of housing supply is to be achieved. The Council is committed to preparing a Site Allocations DPD, which will allocate specific sites for development. It is not helpful at this stage to speculate the outcome of this task. A Green Belt Study will be carried out in 2016-17 to identify suitable land for housing purposes, which will not undermine the purpose and integrity of the Green Belt.

#### **Other matters**

70. To minimise the impact of increased car use from new development the policy directs most new development in the main urban areas which are served by a range of sustainable transport modes, requires development proposals to provide appropriate infrastructure measures to mitigate the adverse effects of development traffic and through a future Parking SPD will set the appropriate level of parking for new developments. Additionally the Council is working with Surrey County Council to produce a transport infrastructure plan for the borough to address traffic concerns.
71. Comments noted.
72. Support noted.
73. The policy has been assessed following the publication of the third Surrey County Council Local Transport Plan. Paragraph 6.149 needs to be amended to update the current Local Transport Plan objectives.
74. The Council has undertaken a Transport Assessment with Surrey County Council, which has been approved by the Highways Agency, to assess the traffic impact of future development options on the local and SRN road network in the borough.
75. Support noted.

76. The Council and Surrey County Council completed a Transport Assessment in December 2010 assessing the impact of development on the road network. A draft copy of this report was available to the Council in June 2010. The results of the study have informed details of the policy. This study can be found on the Planning Policy web page.
77. Please see response 76.
78. The Cycle Working project officially finished on 31 March 2011. Therefore the cycle investment infrastructure list should be updated and the planned cycle infrastructure improvements removed.
79. The main changes to PPG13 relate to parking standards and charges. The Council has an adopted Parking Standards, this is the appropriate document to manage any changes in PPG13 relating to Parking Standards. The Council will ensure that any future review of the standards takes into account these changes.
80. Comments noted.
81. Surrey County Council is the Highways Authority for the Borough, concerns raised will be passed to the relevant officer for their consideration.
82. Comments will be passed on to the Environmental Health Service to investigate appropriate action will be taken if this is proven to be the case.

**Matters raised that are beyond the scope of the planning policy and/or the Core Strategy**

- 83-88. These matters are beyond the remit of planning policy and the Core Strategy in particular. However these comments will be passed on to the appropriate services of the Council and Surrey County Council for their consideration.

**Transport and Accessibility - Recommendation**

Therefore the policy should be amended to remove any references to the Airtrack scheme.

Minor amendments should be made to the policy in light of the received responses.

- Paragraph 6.149 should be updated to reference the objectives of the recently published Surrey Transport Plan (LTP3).
- Point 4 of the policy will be amended to ensure a travel plan is required for development proposals that generate significant traffic and those that are determined to have a significant impact on the Strategic Road Network.
- Point 6 of the policy should be amended to outline the Council will consider managing the demand and supply of parking to control congestion and encourage use of more sustainable transport.
- Paragraph 6.151 should be amended to include a reference to easy access to the Borough's green infrastructure and the wider countryside.
- Paragraph 6.156 should be updated to reflect that the Cycle Working project has officially finished.
- The policy should make reference to the contribution of transport to carbon emissions, in line with the National Transport Goals and the recent Local Transport White Paper 'Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen (January 2011).



## **Policy CS18 – Social and community infrastructure**

The purpose of Policy CS18 is to ensure that there will be sufficient new social and community infrastructure to support the level of growth planned for in the Core Strategy.

Since consultation took place on the Draft Core Strategy, there have been a number of developments which will have implications for this policy:

- Woking Borough Council has resolved to introduce a CIL.
- The Council has undertaken a Social and community facilities study to assess the existing and future needs of the Borough.
- The Woking Partnership Pilot (Total Place) has proposals for the use of assets and development of community hubs.
- The IESE Public Sector Shared Asset Review has progressed.
- Woking Borough Council community assets programme introduced.
- Changes being proposed through the Localism Bill.

The policy will need to be reviewed in light of this, and the responses received through consultation.

Four individuals and organisations made representations on this policy. The key issues raised are summarised below.

### **Social and community infrastructure summary of comments of support**

1. Support for the inclusion of places of worship in the definition of infrastructure.
2. A well worded policy which is in line with national policy and recognises the importance of social and community infrastructure for the well-being of the population.
3. Support for the retention of existing facilities.

#### Officer response

Comments of support are noted.

### **Social and community infrastructure objections – summary of issues raised**

1. Concern that the Council will not be able to fund new social and community infrastructure. Developer contributions will be insufficient to cover the cost of facilities which are already considered to be at capacity. Support for the idea of co-location with education facilities, however, there are issues with the delivery of this in terms of funding and entrenched views.

#### Officer response

1. There are a number of options available to the Council and its partners to fund the provision of additional infrastructure or to use existing infrastructure more efficiently. The Council acknowledges that there are community groups with needs in the Borough and therefore has undertaken the Social and Community Facilities Study. The policy will be reviewed in order to take into consideration the findings of that Study and other emerging evidence and policy.

### **Social and community infrastructure - general comments on the policy**

1. Surrey County Council puts forward that the Core Strategy should support investment in new community facilities that rely on being part funded through the sale of surplus public sector assets. The Borough Council's commitment to the IESE Shared Assets Review is noted.

2. There is a lack of community space in the centre of Knaphill.

Officer response

1. Comment noted and officers agree with the course of action. The disposal and potential change of use of public sector assets will be considered through the SHLAA, ELR and Site Allocations DPDs as appropriate.
2. The Council is in the process of undertaking a Social and Community Facilities Study which will look at future provision of community spaces and will be used to inform this policy.

**Social and community infrastructure - Recommendation**

A number of changes will be made:

- Include reference to the potential delivery of new community infrastructure achieved through the sale of public sector assets.
- Re-assess the content of the policy following the publication of the Social and Community Facilities Study and Woking Partnership Pilot proposals.

## **Policy CS19 Heritage and Conservation**

### **Heritage and Conservation - Key issues raised**

1. Questioning the designated Conservation Areas, why the quadrangle formed by Madeira Road and Camphill Road has not been included.
2. Why was the new development in Birchwood Drive allowed?
3. Use of the term 'Character' in the Core Strategy is no helpful. There are objective standards against which a building can be measured and emphasise those aspects of the design of a building. Too much emphasis on preserving 'Character' can lead to conformity and lack of interest. The term 'amenity' is a more distinct term than character, ensuring that new buildings do not interfere with the amenities (space, light, outlook).
4. More emphasis should be placed on aspects of design such as external appearance, the use of materials, planting and landscape etc.
5. Consider adopting in the Core Strategy more guidance concerning the size mix of larger developments to encourage sustainable communities. In the design guidance, attention is paid to how new homes can be designed to be as adaptable as possible, to enable families with children to grow without the need to move to a larger home outside their community.
6. The Core Strategy should include a commitment to require appropriate archaeological assessment, evaluation and mitigation of all developments likely to disturb archaeological deposits. Including not only all developments on the defined 'Area of High Archaeological Potential' (included in the Core Strategy) but also developments more than 0.4 hectares.
7. 'Areas of High Archaeological Potential' have not been updated for many years and an appraisal should take place.
8. The former medieval deer park at Woking Palace should be included in the Old Woking 'Area of High Archaeological Potential'.
9. Woking Palace and Brookwood Cemetery are both at risk. The Core Strategy should comment on implementation. The Council has a duty under law for the maintenance of Woking Palace. The Core Strategy should comment on the Council's plans for improving both the maintenance of and public access to Woking Palace.
10. Locally Listed Buildings within Conservation Areas should be given greater protection.
11. It is important that Woking retain a sense of separation from the urban and suburban developments north of the Borough, and the growth of Guildford.
12. The Core Strategy should develop a plan to maintain Brookwood Cemetery.
13. Paragraph 6.176 states that development that adversely affects a Conservation Area and/or its setting cannot be mitigated will be resisted. If the development adversely affects a Conservation Area would normally be refused.

14. Para. 3.16 refers to various significant heritage features to be found in the Borough and the need for their protection, while responding to modern development pressures. PPS5 'Planning for the Historic Environment' draws attention to the need to not only protect, but also to enhance such assets and their settings, as part of a positive and proactive approach. We note and support Objective 12 that refers to such enhancement, but for consistency consider it should also be made clear as part of para. 3.16.
15. Reference could be made within this policy to the PPS5 Practice Guide which contains criteria that applicants must abide by when submitting an application relating to a heritage asset and additional policies for the determination and assessment of applications. This Guidance contains very important information.
16. Designated Conservation Areas must be protected.
17. A transformation of the built environment is required, even to the extent of demolition of the parts most in need of improvement.
18. The Strategy recognises that applications for Listed Buildings are assessed to ensure that the proposed changes will preserve the building and its setting. The Core Strategy should state that the Council is willing and able to devote the necessary resources to this task, and would enforce the policy if it is flouted.
19. The Core Strategy should record the Borough's intention to protect Woking's heritage, whether or not what is required is a mandatory requirement of Government legislation.
20. Paragraph 6.172 does not take into account non designated assets. Woking Palace is a Scheduled Monument; the surrounding medieval deer park is undesignated.
21. Any proposal that may affect the setting of Woking Palace and its deer park should be accompanied by a statement setting out the various interests pertaining to the site and park, their significance, and how the significance would be affected by the proposed development.
22. The undeveloped areas of the medieval deerpark (surrounding Woking Palace) remain free of inappropriate development.
23. The Council has a duty to maintain and preserve the whole of Woking Palace. The Council should complete its Conservation Management Plan for the site.
24. The Council acquired the eight acres comprising the moated area of Woking Palace in 1988. But has not yet acquired a general public right of access to it over neighbouring land, although the Council has a statutory duty to make the site available to the public.
25. The remaining 590 acres of the Great Park (close to Woking Palace) are not scheduled nor have they been included in an Area of Special Historic Landscape Value.
26. A significant part of the Great Park (close to Woking Palace) bordering the River Wey lies on deposits of sand and gravel, although not designated as a site where mineral extraction will be permitted in the plans up to 2016 they are

at risk from mineral extraction after that date and this should be ruled out in any LDF.

27. We urge that the Council continues to present the site to the local community with an annual grant to the Friends (or other body) towards signboards, displays, reconstruction drawings etc.

### **Heritage and Conservation - Officer response**

1. The Conservation Area Appraisal for the relevant Conservation Area did not consider that the Madeira Road and Camphill Road were worthy of inclusion. These roads were not highlighted in the Character Study, which forms part of the Evidence Base. The Camphill Industrial Estate was noted as a distinctive feature of the "West Byfleet – Station Road" zone which is summarised in the study.
2. The Core Strategy is a strategic document, and cannot comment on individual planning applications.
3. Character is a widely recognised term when dealing with heritage matters. Ensuring that developments meet acceptable standards and be compatible with the character of the area are not conflicting objectives.
4. Issues such as external appearance, the use of materials, planting and landscape are evaluated for each individual planning application. The policy provides the basis for these to be considered. However, design considerations are far broader than those the policy sets out; there are different approaches to design.
5. Core Strategy policy CS10 Housing Mix sets out by percentage the mix of dwelling types required. The policy encourages family units in particular, as there is a deficit in the Borough. A Design Supplementary Planning Document is proposed to set out detailed guidance on design principles.
6. Add to policy CS19 Heritage and Conservation, that developments larger than 0.4 hectares should be referred to the County Council's Archaeological Team.
7. The responsibility for archaeological appraisals lies with Surrey County Council. Woking Borough Council will request to the County that a new survey will be undertaken.
8. The responsibility for deciding which sites should be included in an Area of High Archaeological Potential and undertaking archaeological appraisals lies with Surrey County Council. Woking Borough Council will request to the County that a new survey will be undertaken.
9. This is outside the scope of the Core Strategy, the comment has been sent on to the Council's Asset Management department.
10. Locally Listed Buildings are not statutory listed. However, the policy provides the necessary framework for their protection. Paragraph 6.179 emphasises their importance to the heritage of the area.

11. The purpose of the Green Belt is to prevent the coalescence of Woking and Guildford urban areas. The Council is keen to ensure that this objective is not undermined by the Core Strategy.
12. It is not the purpose of Core Strategy to develop management plans for various sites across the Borough. This is something that can be achieved outside the scope of the Core Strategy.
13. Comment noted, however the policy was trying to cover all possible scenarios and the wide range of planning applications that the Council receives.
14. Amend paragraph 3.16 to include the need to enhance as well as protect heritage assets.
15. A reference to the PPS5 Practice Guide will be added making specific reference to the criteria.
16. Policy CS19 Heritage and Conservation, states that Conservation Areas will be protected and where possible enhanced.
17. There will be an incremental improvement to the built and natural environment in Woking Borough. Through having high design standards for new planning applications. Also master planning new developments, such as the Gateway development in Woking town centre.
18. Woking Borough Council will take enforcement action where necessary, for any planning application that is not being built in accordance with the approved plans.
19. The Council supports the rich and varied heritage present in the Borough, this is supported in Policy CS19 Heritage and Conservation.
20. It is accepted that non designated assets are not listed in paragraph 6.172. However, the policy seeks to protect all aspects of Woking that define its heritage significance.
21. This is a matter for Development Management to decide, to be based on the merits of any schemes that come forward.
22. It is not the purpose of the Core Strategy to go into this level of detail.
23. This is outside the scope of the Core Strategy and is a matter for the Council's Asset Management department.
24. This is outside the scope of the Core Strategy and is a matter for the Council's Asset Management department.
25. Comment noted and will be passed to the appropriate Officers to consider.
26. This is outside the scope of the Core Strategy, the comment has been sent on to Surrey County Council as the Minerals Planning Authority.
27. This is outside the scope of the Core Strategy and is a matter for the Council's Asset Management department.

## **Heritage and Conservation - Recommendation**

Minor amendments are made to the policy as set out above.

The policy also needs to be amended to account for the now published Localism Bill. As far as possible the whole document needs to be updated to take the Bill into account in order to “future proof” it.

## **Policy CS20: Design**

11 representations were received regarding policy CS20 Design, all of which were duly made.

### **Design – Key issues raised**

1. There should be an agreed standard architectural style for all new buildings in the town centre.
2. Town development plans should exclude ugly buildings, such as the two Barratt blocks of flats by the station and ones being built at the moment. Woking has been overbuilt with blocks of high-rise architecturally poor residential flats which should not have gone through the planning process.
3. Supportive of developments that make a positive contribution to the area.
4. Concern raised that the McLaren site has not provided a museum for the community, which formed the basis of the planning permission approval.
5. It is felt that the adverse visual effect of wind turbines outweighs any potential advantages and more cost-effective alternatives should be encouraged.
6. Reference to Tree Preservation Order trees need to be included in the policy.
7. Not convinced the policy is strong enough to ensure new development receives suitable amenity. Instead the policy is more focused on protecting existing residential amenity.
8. Strong support given for the requirement of new developments to incorporate provision for the storage of waste and recyclable materials.
9. The Core Strategy needs to recognise that developments on the fringe of the town centre should not just reflect the urban nature of town centre developments that should harmonise with and be sympathetic to the residential areas they adjoin. Therefore the scale, height and density of buildings should reduce as they approach the edge of the town centre redevelopment area. The WWF is an example of this approach.
10. Is there going to be a complete change of policy and are the more recent additions to the Woking landscape going to be pulled down?
11. Pleased the policy encourages sustainable means of travel.
12. The policy could make reference to the enhancement or creation of Green Infrastructure as part of development.
13. Further benefits for biodiversity in accordance with PPS9, paragraph 14, could be achieved by encouraging the incorporation of simple built-in measure, such as green walls, brown roofs and the installation of bat and bird boxes.
14. How will it be ensured that buildings fit with the statement “buildings and places that are attractive with their own distinct identity”, when past decisions would not support this.



15. The Core Strategy should include a high buildings policy encouraging the location of the highest building to the north of the rail station where there is less conflict with residential use. Landmark buildings on the edges of the central area, such as St Dunstan's site or Dukes Court, should normally be refused.

### **Design - Officer's response**

1. New buildings in the Town Centre should take into consideration the character and street scene of the area and the functionality and nature of the building. It is proposed that a Design Guide SPD will be prepared to detail design principles to be taken into account in the design of developments. The Council has prepared a Character Assessment Study which gives detailed descriptions of the distinctive character of the various parts of the Borough. This is a useful source of information to inform the design of buildings. Furthermore design standards would be considered as part of the proposed Woking Town Centre Area SPD.
2. Comments noted, the policy states that new development buildings should be "attractive with their own distinctive identity" and "respect and make a positive contribution to the street scene and the character of the area". The Council will seek to ensure that this objective is met.
3. Support noted.
4. This is beyond the scope of the Core Strategy. However the comments have been passed to a relevant officer.
5. The policy does not advocate wind turbines over other forms of renewable energy generation. Should any proposals be brought forward, the planning application process will assess any impacts. This matter has also been comprehensively dealt with under the Climate Change Policy (Policy CS22).
6. The policy seeks to retain "any trees of amenity value". The policy places importance to all trees of amenity value and not just trees protected by the Tree Preservation Order.
7. It is accepted that the policy should be re-worked to ensure new developments provide appropriate levels of amenity space.
8. Support noted.
9. It is not considered necessary to include a specific reference to the edge of the Town Centre. The policy currently states new buildings "should respect the street scene and the character of the area... paying due regard to the scale, height, proportions, building lines layout, materials and other characteristics of adjoining buildings and land".
10. Comments noted.
11. Support noted.
12. A reference to the enhancement or creation of Green Infrastructure would be more appropriate within Policy CS16: Open space, green infrastructure, sport

and recreation. The importance of Green Infrastructure is already recognised by this policy.

13. It is recommended a reference to biodiversity measures within new construction design is included in the policy. Further details of such measures could then be included within a development management DPD.
14. Once adopted, this policy will form part of the planning decision making process for new developments. Past decisions have not been subject to this policy.
15. It is not considered necessary to include a high buildings policy within the Core Strategy due to the reasons outlined in response 9. The height of buildings in the Town Centre will be examined within a Woking Town Centre Area Action Plan DPD or the Development Management DPD. However, Policy CS1 recognises that tall buildings could play a role in maximising the efficient use of land, when considered in its context.

### **Design - Recommendation**

Minor amendments should be made to the policy as following:

- The policy should ensure new developments provide appropriate levels of amenity space within their design.
- The policy to be extended to encourage design measures of new developments which protect and enhance biodiversity.
- For clarity of the detailed requirements of the policy, it is proposed that a Design Supplementary Planning Document be prepared.

## Policy CS21 Sustainable Construction

Eight representations were received regarding policy CS21 Sustainable Construction, all of which were duly made.

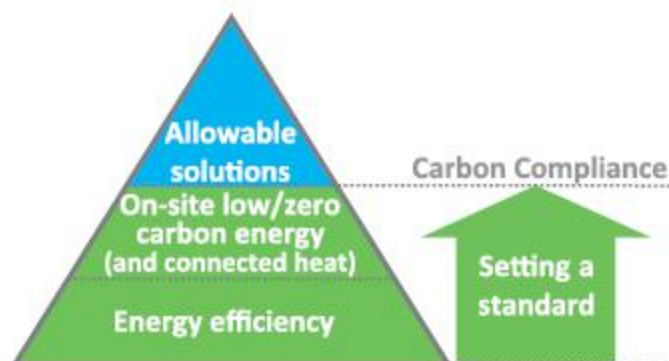
### Sustainable Construction - Key Issues Raised

1. Recognise the need to reduce carbon emissions and for new developments to minimise energy consumption and production of CO<sub>2</sub>. We support the Council's ambitions for 'Sustainable Construction' in principle.
2. Consider parts of the Policy CS21 to be onerous, without providing suitable flexibility. Concerned that this will affect the deliverability of development and therefore objects to Policy CS21 as it stands. We are of the opinion that there is no point in the Council setting targets if they will effectively make development unviable and will as a result prevent development from coming forward. The Council needs to maintain a balance between aspiring to achieve high standards of sustainability and energy savings, with the realistic feasibility of delivery and the cost required to do so.

Flexibility should be built into the policy and requirements in relation to an expectation for new development to provide a link into decentralised energy plants such as CHP – which is at present limited in its application, unsustainable in terms of delivering fuel requirements and excessively costly, so as to make it unviable.

3. Current CHP provision does not make any allowance for competition in supply and users become unavoidably and unfairly locked into single supplier contracts, with a risk that these are not at fair, market rates.
4. Policy CS21 states that developments within the identified zones in the Borough with "significant potential for CHP" will not only "be required to be designed and constructed to enable connection to the future network" but also "make a contribution to a fund which will enable the development of that network".

The approach adopted is inconsistent with national policy, which now favours targeting energy efficiency measures such as fabric enhancements at source, which reduce CO<sub>2</sub> emissions from the outset, rather than seek to deal with them at a later stage (see figure 1 below of Government's Preferred Hierarchy). This approach is as set out in the Department for Communities and Local Government's (CLG) Consultation document Zero Carbon Homes, December 2008.



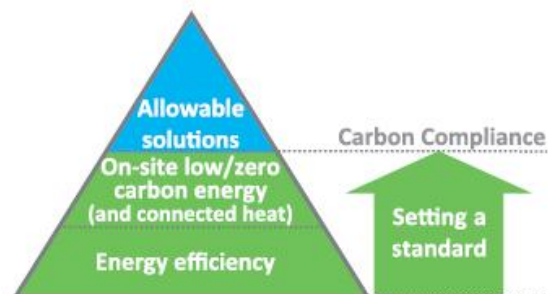
5. Request that the wording of Policy CS21 is amended to reflect the current Government energy hierarchy approach. Where CHP is to be developed, we consider that the Policy should be amended as follows:  
*“The evidence base sets out the locations in the Borough which have significant potential for CHP or other forms of low carbon district heating networks. Subject to viability and technical feasibility, all development within these zones will be required to be designed and constructed to enable connection to the future network and contributions will be sought towards a fund which will enable the development of that network. The level of contribution sought towards the delivery of the CHP network, will be reasonably related to the scale of the scheme, justified by Circular 05/05 and subject to financial viability.”*
6. With regards to Policy CS21’s requirement for a completed copy of the Council’s climate neutral checklist to be submitted with “all applications for new development” we support the aim of this requirement, however, consider this to be onerous for minor development. As such, we request that the supporting text provide details of minor applications which are likely to be exempt from the requirement of submitting the Council’s climate neutral checklist (i.e. minor external alterations) and that further information be included in a guidance note for the completion of the form/local requirements for the validation of planning applications.
7. Object to the current wording of the policy with respect to greenfield sites. This is considered inflexible and does not allow consideration of financial viability or the delivery of other planning requirements such as the provision of affordable housing.
8. Policy is inconsistent with the national guidance stated in the first paragraph. It is therefore recommended that the second paragraph is deleted to address this objection, as the last sentence of the first paragraph is sufficient to cover this aspect.
9. Commends the acknowledgement of the environmental implications of climate change within the Core Strategy, and welcomes the inclusion of this policy which encourages the use of more sustainable forms of design and construction.
10. Climate Change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore supports water conservation and the efficient use of water. All new dwellings should meet the water usage targets set out in code for sustainable homes code 3 rating as a minimum.
11. Heartily encourage use of more renewable energy resources. Might all new developments be required to re-use "grey water" and include solar panels wherever possible?
12. The Design and Construction element of this policy should also include the ‘sourcing of sustainable materials for construction’ i.e. local materials, could ‘reduction’ also be mentioned in the reuse and recycling bit.
13. The Core Strategy meets our recommendations for including a standard of water efficiency where all new residential properties meet CfSH level 3 from

now and level 5 from 2016. Non residential will have to meet BREEAM standards which we consider very good.

14. It will be beneficial to include in this section that biodiversity enhancements should be encouraged in new buildings such as green roofs (green roofs also provided other functions such as sustainable drainage and insulation for development etc) and bird and bat boxes.
15. Policy CS21 states that the design of all new developments should facilitate the recycling and composting of waste. These references are strongly supported in order to promote waste minimisation and recycling as the lack of space in new development for separate storage and collection facilities for segregated waste is often cited by householders as a barrier to recycling.
16. We strongly support the reference in Policy CS21 requiring all developments to consider the use of sustainable construction techniques that promote the reuse and recycling of building materials. However, it would be helpful if this paragraph was extended by including the following, *“to conserve important mineral resources”*. This is considered particularly important given that Surrey is likely to become increasingly reliant on recycled aggregates and imported marine sharp sand and gravel towards the end of the plan period as land won resources capable of being worked within the county without breaching environmental constraints rapidly diminish. Alternatively, a similar reference in the supporting text would be acceptable should the borough council consider such an amendment to the policy undesirable.

### **Sustainable construction - Officers’ Response**

1. Support noted.
2. UK Climate Change Act commits the UK to a reduction in carbon dioxide equivalent emissions of at least 34% by 2020 and 80% by 2050 (both against a 1990 baseline). In July 2010 the Government confirmed its commitment to ensure that from 2016 new homes can be zero carbon and all new non-domestic buildings net zero carbon by 2019. This ambition is very challenging. Zero carbon homes are achieved by a combination of:
  - Ensuring an energy efficient approach to building design
  - Reducing CO2 emissions on-site through low and zero carbon technologies and connected heat networks.These first two steps are together referred to as Carbon Compliance. In addition, there is a third step:
  - Mitigating the remaining carbon emissions through Allowable Solutions, which secure carbon savings away from the site.



The Council's Draft Core Strategy sets out that a significant amount of office, retail and residential floorspace is expected to be built in the town centre within the plan period. The centre is the focus for development. The town centre is compact, with the Basingstoke Canal forming the northern boundary and the railway line a significant barrier to the south. As a result the development is likely to be high density on small sites and generate a significant energy demand.

Development will need to do the best to maximise opportunities for low carbon heat and energy generation to meet national targets.

There are limited opportunities for renewable and low carbon energy technology use in the town centre. There is no opportunity for landfill gas, sewerage gas, waste heat recovery or hydro in the town centre. Buildings are likely to be tall with a small footprint and therefore have a small roof area for photovoltaic. Wind speeds within the urban area are limited and there is little opportunity for large turbines within the town centre. There is potential for ground source heat but the deep piling necessary for high density building is very expensive. It is going to be very difficult for development to hit the required standards without an expanded town centre energy network.

The Draft Core Strategy expects 2,500 homes to be built within the town centre between 2010 and 2027. These will have to be Zero Carbon from 2016 onwards so have to have very high standards of energy efficiency, use technology and also contribute to allowable solutions.

It may be possible for each development to have an individual biomass boiler but then each building will need to have room for biomass storage. There will be no economies of scale and each occupier will have to set up a supply chain for the biomass. Biomass boilers need a lot of maintenance compared to gas ones. Every system will have a gas back-up boiler. When the boiler needs significant maintenance in 3-5 years the buildings occupants will not be tied to using the biomass so may be tempted to use the gas back-up full time. The ongoing use of biomass can not be enforced.

The existing town centre energy station is powered by natural gas but there is the potential to convert this to run on renewable energy (such as biogas or biomass). Only one CHP engine will need to be converted and not many in individual buildings. Once the network is in place it will be possible to link it to out-of-centre wind turbines or solar farms elsewhere in the Borough in the future.

3. Regarding CHP provision not making any allowance for competition and users becoming *"unavoidably and unfairly locked into single supplier contracts, with a risk that these are not at fair, market rates"*. Thamesway normally enters contracts of up to 20 years with their commercial customers. Energy prices are linked to wholesale gas prices and full transparency is provided to customers on how heat prices are set. If the client does not feel they are getting a fair market rate they can renegotiate at this point to an alternative rate with Thamesway or can break the contact and use an alternative supplier. Residential customers can switch to an alternative electricity supplier. Thamesway are aware they are open to criticism in this regard and therefore their residential prices are 5% below the average price of the main 5 local suppliers' standard prices. Although switching to an alternative "heat" supplier is more difficult and the buildings will not have been

built with a main gas supply (not unusual with large blocks of flats where there is fear of gas leaks from individual boilers), customers can install electric heaters and these can be powered from an alternative electricity supplier.

The policy allows for flexibility by allowing alternative sources to be used if an applicant can demonstrate that it will better reduce carbon emissions.

4. The approach proposed by the Council is not considered to be *“inconsistent with national policy”*. In order to achieve zero carbon homes by 2016, high levels of energy efficiency will be required. The Council fully appreciates and supports the government's approach of *“energy efficiency first”*. However in order to achieve zero carbon homes by 2016, a combination of all 3 stages of the triangle will be needed.
5. Suggestion of amendment to wording of *“technical feasibility”* is accepted.

Suggestion of the amendment to add the word *“viability”* is reluctantly accepted. The Council accepts that very specific situations may require flexibility in the policy. If developers need to prove to the Council that it will not be viable to use the approach set out, they will be expected to take an open book approach and be expected to share their financial information with the Council and it is assessed by an independent body. The Council used this approach with affordable housing contributions when necessary.

The Council does not wish for developers to assume they can easily avoid connecting to the CHP. When buying land developers take into account S106 costs, affordable housing costs and other costs incurred from policy requirements and development costs and pay less for the land accordingly. If the Council has a firmly worded policy developers will be far more inclined to take this into account when acquiring land. The development industry frequently request clarity from planning policy.

Suggestion of the addition of text: *“The level of contribution sought towards the delivery of the CHP network, will be reasonably related to the scale of the scheme, justified by Circular 05/05 and subject to financial viability”* is considered to be unnecessary. The Council is aware of the circular and would not ask for a contribution that did not meet the tests set out in it. Furthermore, the Council is committed to introduce CIL (Community Infrastructure Levy) to replace planning obligations. It is likely that any contributions will be secured under the CIL regulations.

6. The Council accepts that this requirement may be too onerous for some very small scale development such as minor external alterations. Text will be amended to include examples of exempt development.
7. Adams Integra produced an Economic Viability Assessment (EVA) in July 2010 which forms part of the LDF evidence base. The focus of this report was affordable housing but planning infrastructure obligations and the costs of achieving sustainable construction and design standards were also considered. All (base) appraisals were carried out assuming that Code Level 4 is achieved. This is *“full”* Code Level 4 and not just the energy and water components.

Code for Sustainable Homes: A cost review (March 2010) stated that the increase in build costs for Code 5 was 25-30%. The EVA considered the

combined impact on residual land values (RLVs) of both Code Level 5 and 50% affordable, and concluded values would need to reach Value Point 4 (£4,000 per m<sup>2</sup>) to overcome possible land value expectation levels. If viability is an issue, the Council will take a flexible approach and may be willing to reduce the requirement to Code Level 4 if independent assessment considers the development to be unviable.

8. The PPS1 supplement makes it clear that where local circumstances warrant higher standards of energy efficiency, LZC (low or zero carbon) energy and climate change resilience these must be clearly expressed and evidenced. The addition of the second paragraph clearly sets out the Council's expectations. The development industry frequently request clarity of planning policy. The current text in its entirety provides this clarity.
9. Support noted.
10. Support for water targets set out in the policy is noted.
11. Support noted. Using the energy and water components of the Core for Sustainable Homes will encourage the use of technologies such as solar panels and encourage installation of greywater recycling without being too prescriptive of the specific technology which should be used.
12. Suggestions noted. These suggestions will be added to the policy as requests rather than requirements in order that the policy is not too onerous on development.
13. Support noted.
14. Suggestions noted. These suggestions will be added to the policy as 'encouraged' rather than 'required' in order that the policy is not too onerous on development.
15. Support noted.
16. Support noted. Suggestion of amendment is considered appropriate and suitable text will be added to the reasoned justification.

### **Sustainable construction - Recommendation**

The policy is amended as set out in points 5, 6 12 and 14 of the Officers response above. Please see revised policy below.

#### **CS21: Sustainable construction**

New residential development on previously developed land will be required to meet the energy and water components of the Code for Sustainable Homes level 3 (or any future national requirement) from now until 31 March 2013, the energy and water components of at least Code level 4 from 1 April 2013 and the energy and water components of Code level 5 from 1 April 2016. New residential development is encouraged to meet the full requirements of each Code level, in particular the material and ecology elements. Where the scale, nature and location of a development would justify a higher Code level, the Council will negotiate with developers to achieve that because of the lower cost of developing such sites.



New residential development on greenfield sites will be required to meet the Code for Sustainable Homes level 5 (or any future national requirement) because of the relatively lower cost of developing such sites. Subject to a full open book approach, if viability is an issue, the Council will be willing to take a flexible approach and may be willing to reduce the requirement to Code Level 4 if independent assessment considers the development to be unviable.

New non-residential development of 1,000m<sup>2</sup> or more (gross) floorspace is required to comply with BREEAM very good standards (or any future national equivalent).

All new development should consider the integration of Combined Heat and Power (CHP) or other forms of low carbon district heating in the development. All new development in proximity of an existing or proposed CHP station or district heating network will be required to be connected to it unless it can be demonstrated that a better alternative for reducing carbon emissions from the development can be achieved. Details of the zones where connection will be required will be set out in an SPD and will be determined by factors such as the capacity of the existing CHP network, distance from it and physical constraints.

The evidence base<sup>i</sup> sets out the locations in the Borough which have significant potential for CHP or other forms of low carbon district heating networks. Subject to technical feasibility and financial viability all development within these zones will be required to be designed and constructed to enable connection to the future network and will be expected to make a contribution to a fund which will enable the development of that network.

Applications for developments with exceptionally high total energy consumption, such as large leisure facilities with a high heat demand or buildings with exceptionally high power/cooling loads (such as data centres), will be required to reduce the total carbon emissions from the development by 10% through the use of renewable energy measures on site.

Where it can be demonstrated that these standards cannot be met on site, permission will only be granted if the applicant makes provision for compensatory energy and water savings elsewhere in the Borough equivalent to the carbon savings which would have been made by applying this policy.

The Council will encourage proposals for residential extensions and non-residential developments of 1,000m<sup>2</sup> or less (gross) floorspace to incorporate energy and water efficiency measures.

The standards will be reviewed to reflect any future change in national standards and/or any equivalent standards that might be introduced.

The Council is actively promoting electric vehicle charging points and has already provided a number of these in the Borough. These are of particular value when the electricity source is low carbon. Details of when new development will be expected to provide electric vehicle charging points or when a contribution towards public charging points will be required, will be set out in an SPD.

### **Design and construction**

The design of all new developments will be required to take account of layout, landform, orientation and landscaping to maximise efficient use of energy and adapt to the impacts of climate change.

The design of all new developments should facilitate the reduction of waste and the recycling and composting of waste produced.

All developments should consider the use of sustainable construction techniques that promote the reuse and recycling of building materials. All development is encouraged to use responsible sourcing of materials, encouraged to source materials locally and all new residential development is encouraged to meet the 'materials' element of the Code.

#### **Checklist**

All applications for new development should include a completed copy of the Council's climate neutral checklist (with the exception of very minor development such as minor exterior alterations).

#### **Ecology and biodiversity**

All development is encouraged to make biodiversity enhancements such as green roofs and bird and bat boxes. All new residential development is encouraged to meet the 'ecology' element of the Code.

The **policy** needs to be amended as set out above.

The **reasoned justification** needs to be amended as below:

All developments to consider the use of sustainable construction techniques that promote the reuse and recycling of building materials. This is considered particularly important given that Surrey is likely to become increasingly reliant on recycled aggregates and imported marine sharp sand and gravel towards the end of the plan period as land won resources capable of being worked within the county without breaching environmental constraints rapidly diminish.

The **delivery strategy** needs to be amended to include text as per below.

The Council will prepare and keep under review a **Climate Change SPD** which will provide detailed information regarding the implementation and delivery of this policy. Specifically, the SPD will include:

- . The zones within which all new development will be required to connect to a CHP station or district heating network.
- . Advice on the open book approach to viability assessments.
- . Details of the allowable solutions and the Councils carbon offset fund.

## Policy CS22 – Renewable and low carbon energy

Two representations were received regarding policy CS22 Renewable Energy.

### Renewable and low carbon energy - Key Issues Raised

1. What are the on site renewable targets for developments that need to be met?
2. Support for nuclear power stations.
3. We feel the adverse visual effect of wind turbines outweighs any potential advantages. We would encourage more cost-effective alternatives.
4. Pleased to see a policy commitment to renewable and low carbon energy generation within the Borough. We note that the intention is to produce a Supplementary Planning Document (SPD) which will set out the detail behind this policy. We urge the Council to use this document to provide a strong steer on the sources and locations of renewable and low carbon energy that it wants to see developed in the Borough.
5. We are pleased to see that the supporting text recognises that the designated landscapes and habitats within the Borough will have a bearing on where it may be appropriate to develop wind turbines.

### Renewable and low carbon energy - Officers' Response

1. There are no specific targets for on site renewables. Policy CS21 requires new residential development on previously developed land to meet specific levels of the energy and water components of the Code for Sustainable Homes on set dates (see tables below).

**Table 1: Anticipated timetable of improvements to Part L of the Building regulations and equivalent standards within the Code for Sustainable Homes**

Date	2010	2013	2016
Energy efficiency improvement of the dwelling compared to 2006 Part L (Building Regulations)	25%	44%	Zero carbon
Energy efficiency improvement of the dwelling compared to 2010 Part L (Building Regulations)	0%	25%	Zero carbon*
Equivalent standard within the Code for Sustainable Homes	Code level 3	Code level 4	Code level 6

Source rows 1 and 3: DCLG 2008: Greener homes for the future

Source row 2: Code for Sustainable Homes Technical Guide (Nov 2010)

\*Zero carbon was defined in the Government's Plan for Growth (March 2011) as including the carbon dioxide emissions from energy use that are covered by Building Regulations. This "regulated" energy includes those from heating, fixed lighting, hot water and building services. They do not cover the emissions related to "unregulated" energy use from cooking or from plug-in electrical appliances such as computers or televisions.

**Table 2: Code Levels for Mandatory Minimum Standards in CO<sup>2</sup> Emissions**

<b>Code Level</b>	<b>Minimum % Improvement in Dwelling Emission Rate over 2010 Target Emission Rate (TER)</b>	<b>Maximum Indoor Water Consumption in Litres/ Person/Day</b>
Level 1	0%	120
Level 2	0%	120
Level 3	0%	105
Level 4	25%	105
Level 5	100%	80
Level 6	Net Zero CO <sup>2</sup> Emissions	80

Source: Code for Sustainable Homes Technical Guide (Nov 2010)

2. Support noted.
3. The Council recognises that significant progress needs to be made if national targets for the generation of renewable energy are to be met and encourages the development of stand-alone renewable energy installations in the Borough including wind turbines. All proposals will be considered on their individual merits with regard to scale, location, technology type and cumulative impact on the surrounding area.
4. Supported noted. The Council intends to produce an SPD which will set out the detail behind this policy.
5. Support noted.

**Renewable and low carbon energy - Recommendation**

The policy wording needs to be amended in light of the responses.

## **Policy CS23 Woking's Landscape and Townscape**

### **Key issues raised**

1. Support the policy.
2. Encourage the Council to consider carrying out a Landscape Character Assessment. This would provide a comprehensive landscape evidence base to underpin planning and management decisions.
3. How are you going to 'green up' the centre of Woking? It's full of hard materials including the buildings and external paving. The canal is not really brought into the town due to the road network, can this be improved? Consider burying Victoria Way so it is underground.
4. The first bullet point of the policy text should include heathlands as an example, part of the key landscapes.

### **Woking's Landscape and Townscape - Officer response**

1. Comments welcomed.
2. A Character Study has been carried out to comprehensively assess the urban landscape of the area. At this stage, it is not recommended that a Landscape Character Assessment beyond the urban area be carried out as most new developments are concentrated in the built up centres in the Borough. This assessment is proposed to be carried out as part of the review of the Green Belt boundary.
3. This comment also relates to other policies such as CS2 Woking town centre, CS16 open space, green infrastructure, sport and recreation, CS19 Heritage and Conservation and CS20 Design. The combined requirements of these policies will ensure that the landscape quality of the town centre is enhanced as schemes come forward for development. There are currently no plans to move Victoria Way underground.
4. Add to the first bullet point of the policy, the example of heathlands, as a key landscape in the Borough.

### **Woking's Landscape and Townscape - Recommendation**

Minor amendments are made to policy CS23 Woking's Landscape and Townscape as set out above.

The policy also needs to be amended to account for the now published Localism Bill. As far as possible the whole document needs to be updated to take the Bill into account in order to "future proof" it.

### **Comments that were not related to particular policies - summary of issues**

- 1 The term Local Development Framework has no basis in the Planning and Compulsory Purchase Act. The right terminology should be used.
- 2 There should be a policy to deal with cultural facilities.
- 3 The Core Strategy should not be so rigid that it could not be reviewed in the future.
- 4 Any request for developer contributions towards infrastructure should comply with the Community Infrastructure Levy Regulations 2010 and the five policy test set out in Circular 05/05. The policy should be amended to reflect this.
- 5 Accessibility by non-car modes should be a consideration for defining the hierarchy of centres. Areas with best accessibility should be the most suitable for high density development.
- 6 The document is fragmented, unstructured and lacks a strategy that focuses on community driven by a strong town planning leadership.
- 7 The strategy should not isolate the elderly from the main centres where facilities and services are readily available.
- 8 Paragraph 4.10 should acknowledge that population is one of the principal factors underpinning climate change.
- 9 The three retail outlets in Wych Hill hardly constitute a shopping parade.
- 10 No attempt has been made to define the term 'sustainable development'.
- 11 Uses identified in paragraph 4.3 should be widened to reflect the wider range of employment uses defined as economic development in PPS4.
- 12 There is no justification for the phrase 'that could include tall buildings. The principle of high density development at the centre covers this point without being presumptions.
- 13 The Core Strategy should promote the use of local labour agreements as part of Section 106 Agreements.
- 14 Recent changes to national policy should be taken into account.
- 15 The slow down of the economy should be taken into account.
- 16 The overall figure for retail does not tally with the sub-total of its component parts.
- 17 There should be immediate termination of the Core Strategy process. This should be resumed in future when there is adequate information to support less growth.
- 18 There should be minimum density standards.
- 19 The housing target should be expressed as minima with the policy making it clear that opportunities to exceed the targets will be supported subject to other policy considerations.
- 20 The Council should give careful consideration before committing to any new housing growth in Hook Heath.
- 21 We live on a finite planet with finite resources. To consume these resources ever more profligately as populations and living standards increase will only bring closer the point at which the planet can no longer support human life. Woking Borough Council needs to accept the new economic reality and concentrate as far as possible on supporting the needs of existing residents rather than encouraging more inward migration of people and business.
- 22 Hope in the long term Woking will not turn into Basingstoke or Milton Keynes.

### **Comments that were not related to particular policies - Officer's response**

- 1 The Core Strategy will be reviewed to ensure that the right terminology is used. This matter has been investigated and it is correct to say that the Town Planning Act itself does not make any reference to Local Development Framework. The terminology has subsequently been introduced in many national planning policy guidance notes and other government document.

- 2 It is acknowledged that culture is an important issue. Policy CS2 deals with the location of cultural infrastructure. The Core Strategy will be amended to strengthen the importance of enhancing the cultural infrastructure of the area.
- 3 The suggestion to ensure the flexibility of the Core Strategy to adapt to change is noted and the Core Strategy will be amended accordingly where relevant. For example, the economy policies have been amended to ensure that they are sufficiently flexible to adapt to changing economic circumstances.
- 4 The Council will ensure that Section 106 Agreements comply with the requirements of Circular 05/05. The Council is committed to introduce CIL. The CIL tariff will go through a separate Independent Examination. An Economic Viability Assessment will be undertaken to ensure that the CIL tariff is set at a reasonable rate.
- 5 The main centres are defined and identified as the focus for future development because of the relative availability of key services and facilities, including public transport.
- 6 Officers will continue to improve the presentation of the Core Strategy until it is finally published. The comment made about the structure of the document is noted and will be taken into account in the continuous review of the document. However, it is not accepted that the Draft Core Strategy lacks a strategy.
- 7 Officers are fully aware of the need for accommodation for the elderly to be close to key services and facilities. It will take this into account when considering specific sites for development or determining planning applications.
- 8 Paragraph 4.10 does not deal with the causes of climate change and it will be out of place to single out population as a single cause. That could be misleading as there are many other causes of climate change.
- 9 The criteria for classifying the various centres have been applied consistently. Based on that, Wych Hill is a Shopping Parade.
- 10 The suggestion to define sustainable development is noted. The Glossary will be amended to include a definition. For the avoidance of doubt, the goals of sustainability is defined as **‘to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generation’**. This definition is consistent with the one set out in the South East Regional Sustainability Framework.
- 11 The Economy and Places policies have been amended to emphasise the points raised about PPS4. In particular, much more flexibility has been introduced to allow the local economy to adapt to changing economic circumstances.
- 12 The need to maximise the efficient use of land is a key objective of the Core Strategy. Tall buildings in the right context have a place in the way that development is managed at the Town Centre. However, this is only acceptable if such buildings do not detract from the general character of the area and are well designed to enhance the environment of the area. Reference to tall buildings in the policy provides an indication that it could be acceptable in principle at the right location with the right design approach. It is therefore suggested to retain the reference in the policy.
- 13 Section 106 Agreements are negotiate on the individual merits of proposed schemes. The importance of local labour agreements is recognised in the Draft Core Strategy to give it an in-principle support. Policy CS5 specifically says that ‘the Council will promote local labour agreements with developers to enable local people in the Priority Places to secure employment and skills development’

- 14 Officers are mindful of emerging changes to national planning policy and have taken them into account in reviewing the Draft Core Strategy.
- 15 Local and national economic circumstances are taken into account in preparing the Draft Core Strategy. This includes the current slow down in the economy.
- 16 The sub-total of the component parts of the retail policy has been rechecked. The Core Strategy has been amended to correct the suggested inconsistency. This is a factual correction.
- 17 The Local Plan is nearly out of date. It is important that it is renewed to reflect current local need and national policies. The Government has introduced a new form of planning, which the Core Strategy is part of to replace the Local Plan. It continues to encourage Local Authorities to speed up the preparation of their Core Strategies. The Council will be neglecting its duty if it does seek to address the key challenges facing the Borough. The policies of the Draft Core Strategy are justified by robust evidence. The evidence base to support the Draft Core Strategy is all on the Council's website and listed in Appendix 1 of the Draft Core Strategy. There is therefore no reason to halt its preparation.
- 18 The requirement for minimum density standards has been removed by the Government. It is therefore not intended to adopt minimum standards. However, the Council will ensure that development proposals respect the character of the area that they are situated. The need to maximise the efficient use of land will always be a primary material consideration in this regard. The indicative densities in the Draft Core Strategy reflect the existing character of their respective areas.
- 19 The Core Strategy is clear about its housing target. The Council will continue to monitor the delivery of this target. Any over-provision or under-provision, which will undermine the overall objectives of the Core Strategy will be resisted.
- 20 The Core Strategy does not allocate sites. Consequently, it has not identified any site in Hook Heath. The allocation of sites will be dealt with as part of the Site Allocations DPD. The comments made about Hook Heath will be taken into account during this process.
- 21 The development proposals in the Core Strategy are justified to meet local need. It is not the objective of the Core Strategy to encourage inward migration as implied by the comment.
- 22 The Core Strategy seeks to deliver a vision for Woking and enhance its unique identity. It is not intended to turn it into Basingstoke or Milton Keynes.

#### **Comments that were not related to particular policies - Recommendation**

- 1 The entire document is edited to use the correct terminology to replace Local Development Framework where relevant.
- 2 The document is strengthened to emphasise the importance of culture in the community (see Policy CS2).
- 3 The entire presentation of the document is improved to make it more user-friendly.
- 4 The glossary is amended to include the definition of sustainable development. The goals of sustainable development is defined as "to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generation".



### **Delivery of the Core Strategy - summary of issues**

- 1 How much will all the proposal cost and the effect it will have on local tax payers.
- 2 The wholesale removal of trees for the Hoe Valley scheme will prove to be the most disastrous decision of this decade.
- 3 Detail of how intended outcomes will be delivered is unclear. Methodologies for the deployment of the strategy should be made clear and how it will be monitored.
- 4 The Core Strategy should concentrate of what is achievable rather than what is aspiration.
- 5 Woking and West Byfleet centres need to be smartened up.
- 6 Wolsey Centre should not be connected to the Peacock.
- 7 The Draft Core Strategy does not appear to be a spatial strategy with a justified means of delivery. It ignores the contribution that other partners could play in the future of the town. It treats the town in isolation as if it is immune from the likely trends that will affect it in the next 15 – 20 years.
- 8 There is no demonstration that the strategy contributes towards wellbeing. There is no consideration for contingencies.
- 9 Councillor should understand that developers need to make profit and should not be burdened with too many Section 106 requirements.

### **Delivery of the Core Strategy - Officer's response**

- 1 It will be difficult if not impossible to quantify the total cost of delivering the Core Strategy. Most of the requirements of the Core Strategy will be delivered by the private sector without any burden of cost to the local tax payer. Overall, it is expected that the local economy will benefit significantly as a result of the implementation of the Core Strategy. The Council is preparing an Infrastructure Delivery Plan, which sets out the infrastructure requirements to support the Core Strategy. The cost implications of the various infrastructure items and who will be responsible for their provision are set out in the document. However, this will not represent the full cost of delivering all aspects of the Core Strategy. Again, the private sector will bear a significant part of the cost.
- 2 The removal of trees for the Hoe Valley scheme is a Development Management decision, which is a matter of detail outside the scope of the Core Strategy. The comment will be passed on to the appropriate department to note.
- 3 The Core Strategy is prepared on the basis that it will be a deliverable document and this is one of its tests of soundness. The Council has been concerned to ensure that the document is founded on robust evidence to demonstrate its deliverability. Examples of such evidence are the SHLAA and the Economic Viability Assessment. Each policy provides an indication of how it will be delivered. Furthermore, the implementation section provides a clear path for its delivery, including built-in mechanism to address contingencies.
- 4 See above comments.
- 5 Woking town centre and West Byfleet centre are earmarked for significant change. The Council will seek to ensure that this opportunity leads to an environmental improvement of the areas through good design and high standards of sustainable construction.
- 6 The joining up of Wolsey Place to Peacock is a specific matter of detail design and functionality that is outside the scope of the Core Strategy. This will be determined through the development management process and the public will have the opportunity to comment on any planning application.
- 7 Policy CS1 sets out the overall spatial strategy of the Core Strategy. The Council's commitment to partnership working runs throughout the document.

Each policy has a section on delivery strategy and many of them highlight partnership working as key to implementing the Core Strategy. The Implementation section also emphasises the importance of partnership working to achieving the requirements of the Core Strategy. The Council is already doing this in practice and will continue to do so with the implementation of the Core Strategy.

- 8 The Core Strategy effectively seeks to enable the provision of housing to meet the needs of all sections of the community, jobs to ensure the vitality of the local economy, infrastructure including education, community facilities to support development and the protection of the natural environment. All these will combine to enhance the well-being of the community. The Core Strategy would have failed to achieve its purpose if it did not contribute towards improving the well-being of the community. Officers are confident that it will help improve well-being.
- 9 The Councillors of the Council are fully aware of the local and economic context within which the Core Strategy will be delivered, including the need for developers to make profit. They also have a clear duty to ensure that the needs of the community are met, including the need to secure infrastructure to support development. An Economic Viability Assessment has been carried out to ensure that the burden of cost imposed through Section 106 Agreement does not prevent development coming forward in the future.

**Evidence base - summary of issues**

- 1 There is no evidence for the strategy. There is no assessment of alternatives and there is no evidence that the strategy is deliverable.

**Evidence base - Officer's response**

- 1 The Core Strategy is founded on robust up-to-date evidence base. This evidence base includes a clear demonstration of the deliverability of the key elements of the Core Strategy. For example, the Council has carried out an up-to-date SHLAA to demonstrate that it has identified sufficient deliverable and suitable sites to meet its housing land requirements. It has carried out an Economic Viability Assessment to demonstrate that its affordable housing and infrastructure requirements are deliverable. A list of the evidence base is included in Appendix 1.

The Council has published an Issues and Options document for consultation. The various alternatives have been tested using the SA framework/process. This assessment is contained in the SA Report. It is therefore incorrect to suggest that there has not been any assessment of alternative options.

**Evidence base - Recommendation**

N/A

### **Site specific comments - summary of issues**

- 1 The Core Strategy should not deal with details of specific sites.
- 2 Goldsworth House should be allocated for housing development.
- 3 Development around Royal mail sites should be sensitive to their future redevelopment.
- 4 Land at Silverly, Pyly Hill should not be included in the Core Strategy for development because of its planning history.
- 5 West Byfleet Golf course should also be considered as a suitable location for leisure and hotel development.
- 6 Development at Brookwood Farm should give consideration to its impacts on school provision, biodiversity, surface water run-off, drainage in the area. The Green Belt boundary was moved to allow for the development.
- 7 The basis for estimating the number of dwellings for Brookwood Farm should be made clear. This should be based on sound evidence rather than officer opinion.

### **Site specific comments - Officer's response**

- 1 Generally speaking, the Core Strategy does not deal with site specific/site allocations issues. The Council is committed to preparing a Site Allocations DPD which will address site specific matters and allocate specific sites for development. Consideration of land at Goldsworth House, Royal Mail sites and Silverly, Pyly Hill etc. for development will be done as part of this process. In the meantime, the Council will ensure that future development will not compromise the ability of any suitable sites coming forward for development.
- 2 See point 1 above
- 3 See point 1 above
- 4 See point 1 above
- 5 See point 1 above
- 6 Brookwood Farm has always been safeguarded in the Local Plan for possible long term housing purposes. The principle for its development for housing has been established in this regard. The Council will be concerned to ensure that the impacts of the development on matters such as biodiversity, drainage, traffic etc. are fully assessed and appropriate mitigation measures put in place to mitigate any potential adverse impacts. It needs to be emphasised that the site has never been in the Green Belt. It is only subject to the Green Belt policies of the Local Plan in the interim. The Core Strategy identifies it to contribute towards its housing land supply. This is in line with its intended purposes as identified in the Local Plan.
- 7 The Strategic Housing Land Availability Assessment provides an estimated capacity for the Brookwood Farm site. Previous proposals on the site have provided useful benchmark for estimating the capacity of the site. This also takes into account what can be achieved on the site without compromising the character of the area. Officers believe that the anticipated capacity is a reasonable estimate taken into account site constraints and the general character of the area. However, officers do accept actual density of development on the site will only be determined when a specific scheme comes forward for determination.

### **Site specific comments - Recommendation**

N/A

## **General approach to the Draft Core Strategy Consultation**

### **Summary of key issues**

- 1 The consultation was timed during Christmas to avoid negative feedback.
- 2 The consultation process did not proactively engage with local residents. Consequently, a large number of people are excluded from the process. It is a process that only benefited people with vested interests. Furthermore, the period of the consultation was too short. Many people did not know about the consultation.
- 3 The Local people should be asked for their broad vision for the Borough for the next 15/25 years. There is democratic deficit for the preparation of the Core Strategy. The previous Core strategy attracted less than 1% of the electorate, which is not a ringing endorsement of the Plan.
- 4 The opinion of local residents has not been sought about the level of affordable housing being proposed and yet they will be expected to subsidise its provision. It does not seem fair that the burden of financing affordable housing should fall on purchasers of new market housing.
- 5 The Council should consult whole wards where development occurs before determining proposals for large scale development.

## **General approach to the Draft Core Strategy Consultation**

### **Officer's response**

- 1 The Council took into account the fact that the consultation period included the Christmas period and extended it from the normal six weeks to nine weeks to enable adequate time for people to respond. This was clearly acknowledged the Council as a key reason for extending the consultation period. Officers are therefore satisfied that adequate time was given for people to respond, having fully taken into account the Christmas period.
- 2 The Council has been concerned to ensure that all efforts are taken to give the public the opportunity to discuss their concerns with its officers and be informed about the Core Strategy. The following consultation events were carried out during the consultation period:
  - Initial and reminder letters to 1,332 members of our consultation database (who have expressed an interest in the LDF) and to members of the Citizens' Panel
  - Initial and reminder emails to 838 members of our consultation database (who have expressed an interest in the LDF) and to members of the Citizens' Panel
  - Large colour photographs (of "2027" written in sparklers) and stories in the News and Mail and the Woking Informer to promote the consultation
  - Statutory notice in the News and Mail
  - Large display in Woking library for 2 sets of 3-week blocks
  - Display in Knaphill library for 3 weeks
  - 2 "drop-in" events held at the pool in the park during peak periods
  - 2 "drop-in" events held at Parkview Community Centre
  - Attended Woking Farmers' market twice
  - Attended Byfleet Farmers' Market
  - Held 6 afternoon and evening seminars where people could listen to a presentation and ask detail questions about the consultation
  - Large article in the Woking Magazine which is delivered to 48,000 households and many public information points across the Borough
  - Leaflets are displayed in the Civic Offices, all Borough libraries, 4 community centres plus various other community buildings such as Marjorie Richardson's, Strollers, etc around the Borough.

- . Presentation to Mind Cornerhouse
- . Saturday drop-in event at the Peacocks Centre
- . Friday drop-in event in Wolsey Place shopping centre
- . Posters on 5 Borough boards from 28 Nov – 12 Dec then on all 14 from 12 Dec – 9 Jan.
- . Posters inside and outside the Civic Offices for the full 9 week consultation
- . Attended the Youth Council meeting
- . Attended Horsell Resident's Association meeting
- . Attended Woking Chamber meeting
- . Links from the front page of the Woking BC website.

Based on the above, Officers are satisfied that enough was done within reasonable budget to engage the local community about the Draft Core Strategy. The Government is encouraging neighbourhood planning to be formally part of the statutory development plan for an area. This will further enhance community involvement in the planning process, including consultation on major planning applications.

- 3 A draft vision for the Core Strategy was a subject of the Draft Core Strategy consultation. Officers do not accept that the public were not given the opportunity to influence the vision for the Core Strategy. Comments received have been taken into account in the revision of the Draft Core Strategy.
- 4 Officers do not accept that local residents were not given the opportunity to comment on affordable housing provision in the Draft Core Strategy. The topic was a subject for consultation at both the Issues and Options and the Draft Core Strategy consultations. It is not expected that local residents will bear the cost of providing affordable.
- 5 The emerging planning system requires developers to consult neighbourhoods on significant development proposals before planning applications are submitted. As part of the current system, the Council always consult properties and neighbourhoods that are directly affected by proposed development. It also publishes a weekly list of applications that it receives to give the general public the opportunity to comment on them. Whilst it will continuously seek to improve its communication with the community, much is being done already to involve the general public in the planning process as set out above. The suggestion to consult a whole ward on major applications is well noted and will be passed on to the Development Management team to consider.

## Sustainability Appraisal - summary of key issues

1. The Water Framework Directive should be added to the list of Plans, Programmes and Strategies in Appendix 1.
2. It is not clear whether there has been assessment of the transport impacts of the proposals in the Draft Core Strategy.
3. The numbering of the Sustainability Framework objectives in section 13.3 and the table on pages 27 – 30 is confusing and do not seem to match the appraisal objectives on page 138. It appears that the policies have not been assessed against transport and accessibility objectives.
4. The Highways Agency would request that the setting of specific targets and encouragement of the use of more sustainable modes of transport is outlined in the SA. The targets should be measurable. The following indicators are suggested – the proportion of trips by non-car modes, the proportion of new development that is meeting its travel plan objectives, the level of traffic growth on key routes within Woking Borough, percentage of in and out commuting, percentage of people using sustainable modes of travel to work and percentage of development which is served by public transport and cycle/pedestrian routes. The method for measuring the above should be sound.
5. Reference in pages 117 and 119 to PPG15 and PPG16 should be deleted and replaced by PPS5.
6. Appendix 1 should make reference to the Surrey Minerals Plan Core.
7. Paragraph 8.2 should list all the six SSSIs. These are:
  - o Ash to Brookwood Heaths SSSI;
  - o Basingstoke Canal SSSI;
  - o Colony Bog and Bagshot Heaths SSSI;
  - o Horsell Common SSSI;
  - o Smart's and Prey Heaths SSSI; and
  - o Whitmoor Common SSSI (fragment only).
8. Objective 10 has lost the commitment to making the assets that are listed accessible for enjoyment. It is an objective of Natural England to make the natural environment accessible for enjoyment.
9. The indicators in Appendix 2 should be amended to reflect comments made by Natural England in their letter of 4 September 2009.
10. Core Strategy objective 1 should reflect comments made in Natural England's letter of 7 December 2009.
11. Where Core Strategy objective 3 is considered against SA objective 9, reference should be made to the effect that some previously developed urban sites can hold significant biodiversity and this should be taken into account when site allocations are made.
12. CS objective 8 is predicted to have neutral impact on SA objective 9. This should be positive as the provision of further green infrastructure to keep pace with growth will provide opportunities for the enhancement of biodiversity.
13. Appendix 4 should be arranged in numerical order.
14. The impact of CS9 on SA objective 9 should also take account of comments made on Brookwood farm.
15. If policy CS7 is amended to reflect Natural England's comments, it will have a positive impact when measured against SA objective 12.
16. CS16 will have a positive impact when measured against SA objective 3.
17. The impact of CS22 on objective 9 should be positive because a move towards renewable and low carbon energy generation and thus a slowing of the rate of human induced climate change would be of benefit to many habitats and species.
18. The impact of CS17 on objective 2 will not only have positive impacts through improved access to key services and facilities but also improve the health and

wellbeing of the population by providing improved opportunities for pedestrians and cyclists.

19. The caveat suggested for the impact of CS17 on objective 8 should also apply to SA objectives 8, 9 and 19.
20. A landscape assessment of the Borough should be carried out.
21. Objective 2 – indicator f of Appendix 2 – SANGs should not be an indicator as it only represents a small group of open spaces. Suggested indicators should be number of 'health walks' carried out and the number of residential developments that incorporates the provision of open space or recreational space.
22. Objective 9 – indicators 'a' and 'd' should be merged.
23. Objective 9 – indicator b should be split into three – condition of SPA and SAC, condition of SSSIs and the number of area of local wildlife sites (LNRs and SNCIs).
24. Objective 9 – indicator f – This indicator will fit well in objective 10 as it relates to access. Ancient woodland should be added to the list with a target of no net loss of area. The amount of land under environmental stewardship schemes should be added to the list of targets. The information can be obtained from Multi Agency Geographic Information for the Countryside (MAGIC).
25. The Council should undertake Habitats Regulation Assessment (HRA) of the Core Strategy.

#### **Sustainability Appraisal - Officer's response**

1. The Water Framework Directive is an important that has been taken into account in the preparation of the SA Report and the Core Strategy. It is therefore accepted that it should included in Appendix 1.
2. The Council has carried out a Transport Assessment of the development options of the Core Strategy. This study was completed in June 2010 and its recommendations had been used to inform the Transport and Accessibility policy of the Draft Core Strategy. The SA Report clearly lists this as one of the evidence base to support the Core Strategy (paragraph 6.2 of the SA Report).
3. Comment noted. The numbering of the SA Framework objective in Section 13.3 and in pages 27 - 30 has been amended to make them consistent with each other as suggested by the representation to avoid confusion. However, the objectives set out in page 138 are the objectives of the Core Strategy. This is entirely different to the SA Framework objectives. Consequently, their numbering is also likely to be different.
4. The proportion of trips by non-car modes, percentage of people using sustainable modes of travel to work is measured by the census data. The census is carried out every ten years. It will be very expensive and impractical at this stage to reproduce this information at the local level on a yearly basis. The Council will work with the County Council and the Highways Authority to identify the best way of doing this. The number of major development with travel plans will be measured locally. The measuring of the level of traffic growth on key routes is a matter for the County Council who is the Highways Authority for the area. The Council will work with them to ensure that this indicator is measured.
5. Reference to PPG15 and PPG16 will be deleted and replaced with PPS5. It is a fact that PPS5 is a recent publication to replace PPG15 and PPG16.
6. The Core Strategy is required to take account of the provisions of the Surrey Minerals and Waste Development Framework. Appendix 1 will be amended to include this document.
7. Paragraph 8.2 has been amended to include a list of the six SSSIs. This is a factual comment, which is acceptable (see revised SA Report).



8. Access to the natural, archaeological, historical environment and cultural assets and landscape contributes to the well-being of the community. Consequently, objective 10 should be amended by adding this to the text.
9. Comment noted. The document has been amended accordingly.
10. Comment noted. The document has been amended accordingly.
11. It is an accepted fact that previously development land could be significant habitats for some species. The SA Report has been amended by adding this fact. (See Core Strategy 3 against SA objective 9).
12. Whilst some of the scores could be subjective judgment based on assumptions used, it is accepted that this comment is reasonable. The score has been amended to reflect this.
13. Comment accepted. It was always the intention to arrange the Appendix in a numerical order. Appendix 4 has now been arranged in a numerical order.
14. The assessment of the impacts of Policy CS9 on SA objective 9 has been amended to emphasise that development at Brookwood Farm should take account of the biodiversity value of parts of the site.
15. Whilst some of the scores could be subjective judgment based on assumptions used, it is accepted that this comment is reasonable. The score has been amended to reflect this.
16. Whilst some of the scores could be subjective judgment based on assumptions used, it is accepted that this comment is reasonable. The score has been amended to reflect this.
17. Whilst some of the scores could be subjective judgment based on assumptions used, it is accepted that this comment is reasonable. The score has been amended to reflect this.
18. The impact of Policy CS17 on objective 2 has been amended by adding 'improve the health and well-being of the population by providing improved opportunities for pedestrians and cyclists.
19. The caveat suggested for the impact of policy CS17 on objective 8 has been applied to SA 8, 9 and 19.
20. The Core Strategy concentrates development at the main urban areas. A character assessment of the urban landscape has been carried out to ensure that development do not detract from the character of the area. At this stage it is not considered urgent or necessary to carry out a landscape assessment of the rest of the Borough as the impacts of development on those areas will be marginal. It is proposed to carry out a Green Belt boundary review in 2016/17 to release sites to meet housing need between 2022 and 2027. A landscape assessment has been recommended to be carried out as part of this process.
21. The suggestion to add the number of residential development that incorporates the provision of open space as an indicator is acceptable. Because a significant proportion of development in the area comprise high density flatted accommodation the provision of SANGs as recreation open space plays an important role in the well-being of the community. Consequently, it is recommended that its use as an indicator should be retained. The collective monitoring of these indicators will provide a better picture of the use of open space in the area.
22. Objective 9 indicators 'a' and 'd' have been merged because they seek the same objectives.
23. Objective 9 indicator b has been split into three to emphasise the different status of the designations.
24. Indicator f of objective 9 has been moved to objective 10 for reason of compatibility. A new topic – Ancient Woodland with an indicator to measure the number of net loss of area has been added.
25. The Council has already commissioned Mayer Brown consultants to carry out Habitats Regulations Assessment of the Core Strategy. This work will

complement the Sustainability Appraisal of the Draft Core Strategy. A copy of the document is available for Inspection and will also be on the Council's website.

**Sustainability Appraisal - Recommendation**

It is proposed that the SA Report be amended as set out in the Officer's response above.

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