

# Policy Consultation Report

## Policy:

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 27	First Name David		Last Name Fazakerley				On Behalf Of	William Lacey Group

59 Yes Yes

### Representation

Agrees that the Core Strategy is legally compliant and sound.

### Representation Changes Necessary

### Officer Response

Support noted.

### Council's Proposed Action

Customer ID 35	First Name Terence		Last Name Tigwell				On Behalf Of	
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75 Yes Yes

### Representation

Eform was blank.

### Representation Changes Necessary

### Officer Response

### Council's Proposed Action

**Policy:**

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Customer ID 47	First Name JOHN		Last Name MONKHOUSE			On Behalf Of		

439

**Representation**

Blank online form submitted

**Representation Changes Necessary**

**Officer Response**

**Council's Proposed Action**

**Policy: CS1 Spatial**

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Customer ID	7	First Name	Robert	Last Name	Shatwell	On Behalf Of		
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387	Core Strategy PD			No	No	More		
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**Representation**

The proposed document does not exclude development designated as:

Conservation Areas- by definition these should be exempt.

SNCIs- these are areas specifically designated for protection.

Flood Plains- These are areas that should not be developed, common sense dictates that development on these areas will jeopardise existing neighbouring properties.

Common Land- Registered common land is protected from development by sec38, the commons act 2006.

Green Belt- It has long been considered by the council that these areas should be 'protected at all cost.'

**Representation Changes Necessary****Officer Response**

The Spatial Strategy seeks to concentrate most new development in the main urban areas, away from environmentally sensitive and designated areas and areas at risk of flooding. It also has robust policies to prevent inappropriate development that will affect the integrity of these sites. For example, the SHLAA which identifies suitable sites for residential development excludes sites the following areas - Special Protection Areas (SPA), Special Area of Conservation (SAC), Sites of Special Scientific Interests (SSSI), Sites of Nature Conservation Interest (SNCI) Local Nature Reserves (LNR), Public Open Space (POS), Ancient Woodland and Flood Zones 3a and 3b. Furthermore, all the proposed employment floorspace will be met on existing employment sites. It is therefore incorrect for the respondent to suggest that the Core Strategy does not exclude development from environmentally sensitive sites.

The Council has been clear about the need to release Green Belt land to meet housing need between 2022 - 2027. A review of the Green Belt boundary will be carried out in 2016/17 to ensure that any land that is released will not undermine the purpose and integrity of the Green Belt. This approach is supported by the South East Plan and national policy.

It should be noted that national policy lists a number of acceptable uses that can be developed within the Green Belt. The policies of the Core Strategy are sufficiently comprehensive to ensure that the openness of the Green Belt is not compromised by any such development.

**Council's Proposed Action**

**Policy: CS1 Spatial**

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Customer ID	9	First Name	Last Name	On Behalf Of					Burhill Group Ltd

9 Core Strategy PD

**Representation**

Burhill supports the housing target set for the Borough and encourages the Council to support housing development on a flexible case by case basis, having regard to a wide range of planning considerations such as housing density, viability and affordable housing provision in order to ensure that housing targets are met.

Burhill fully supports the Council's approach to locating future housing in the infill sites and on sites released from the Green belt and would encourage the council to consider a wide range of housing types, size and mix on such site on a site by site basis.

**Representation Changes Necessary**

**Officer Response**

Support is noted. The policies of the Core Strategy allows scope for development to be tailored to the specific circumstances of individual sites if a satisfactory case can be made.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of		

27 Core Strategy PD No Justified

**Representation**

This Strategy is based on the delivery of 4964 additional dwellings; 28000 square metres of office floor space; 20000 square metres of warehousing and 93900 square metres of additional retail floor space

Unfortunately the Strategy, with the exception of housing, fails to identify where the future demand is coming from and totally ignores what the real economic strengths of the Borough are.

As indicated above the British Council of Shopping Centres are forecasting an increasing void in Retail Space, with a downward shift in rentals. They do indicate that if the development of new retail space remains depressed beyond the next few years that this could imply that their forecast is too pessimistic. It also assumes that none of the other Borough will increase their Retail Space. It is very unlikely that Guildford BC will not take some action to retain their current market share of Woking BC expenditure indicated their May 2011 Retail & Leisure Strategy Study

Unfortunately the Strategy fails to take cognizance of two of Woking's greatest technological assets – McLaren Cars and potentially Thamesway (if it focused on its core raison d'être). If Woking rebranded itself as a Technology and Innovation Centre working in collaboration with Brooklands College of Technology and the University of Surrey in Guildford it could set about developing a Technology Campus in Broadwater Park and thus ensure that the Community is providing real wealth creation jobs and potentially specialist light engineering Companies in support. These could be relocated in a modernized Sheerwater.

What is needed is VISION rather than chasing Governmental plaudits.

I do not know of anyone in Woking who supports a strategy that includes the paragraph – 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" This statement is TOTALLY UNJUSTIFIED within any of the supporting documentation and should be removed

**Representation Changes Necessary****Officer Response**

The proposed growth in employment floorspace is justified by evidence, in particular, by the Employment Land Review and the Town, District and Local Centre Study. Policy CS15 promotes smart growth, innovation and technology. It makes sufficient sites available to accommodate potential growth that could result from the McLaren Production Centre. The Core Strategy therefore capitalise on its assets and strength and is fully aware of that.

The Core Strategy does not allocate specific sites for development. The specific request to identify Broadwater Park as a technology park is a matter that can be considered as part of the Site Allocations DPD process. In any case, the policies of the Core Strategy will not prevent such a proposal coming forward in advance of the adoption of the Site Allocations DPD.

**Council's Proposed Action**

**Policy: CS1 Spatial**

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Customer ID	17	First Name	Richard	Last Name	Last	On Behalf Of
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**Representation**

As a Woking resident for 41 years my chief concern is the apparently unstoppable move towards high rise building. In the section on A Spatial Strategy for Woking (P.28, para 4.4 and CS1) the report states that "In the town centre, high density development that could include tall buildings and which enhances its image will be encouraged". Given the number of high rise buildings which have already been introduced or are under construction, most notably in Guildford Road now being turned into a canyon, this use of "could" when the meaning is clearly "will" seems somewhat coy. The Council should recognise that not everyone things that buildings of 20 storeys or more are an "enhancement" of the towns profile. Your excuse for this form of development referred to throughout the report as "high density" is the necessity to provide a further 292 dwellings per year for th next 15 years. Apart from the very dubious desirability of accommodating people in towers it should be borne in mind that major building development of any kind is not only for the benefit of those occupying the buildings but forms an inescapable part of everyone's visual furniture. The high rise developments already on view such as the Centrium tower which now dominates the south side of Woking railway station are hardly an encouraging portent for the future of our town. Given a say in the matter I would like a strict upward limit, say 10 storeys, for building in the town centre and very much less than that in outlying parts including West Byfleet. Much as I value the Green Belt I would be happier to see this encroached on to provide some of the needed housing expansion rather than the systematic destruction of the town's skyline. Reading the report it is difficult to avoid the conclusion that much of the urge towards high rise development is driven not by the need for housing provision but by a wish on the part of the planners to keep up with much larger urban centres.

**Representation Changes Necessary****Officer Response**

There is no doubt that land for development is a limited resource that should be managed effectively and efficiently. High density development, including tall buildings could ha a role in achieving this objective. However, its role is only acceptable when it is considered in its wider context and are of high quality design that enhances the general charact of the area. Setting a specific target for the height of buildings will be unhelpful and restrictive, because it ignores the specific unique characteristics of each site. No change is proposed.

Policy CS6 deals with the Green Belt. It identifies the Green Belt as broad location for future growth. Consequently, it proposes to release Green Belt land for residential development between 2022 - 2027, but will do so in a way that will not undermine its purpose and integrity.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	22	First Name	Helen	Last Name	Murch	On Behalf Of		

50 Core Strategy PD No

**Representation**

Policy CS1 proposes to deliver 20,000 of additional warehousing floorspace in the period 2010 and 2027. Policy CS1 provides no guidance as to where this space may be located, or the criteria that would be used to assess the suitability of sites that come forward. Without this direction Surrey Heath, and other interested parties, are unable to properly assess whether policy will have an impact on their matters of interest

**Representation Changes Necessary****Officer Response**

Paragraph 5.125 of the Core Strategy is clear to emphasise that the future requirement for warehouse floorspace will be met on existing employment areas. No change is proposed.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 30	First Name Michael		Last Name Ness			On Behalf Of		
66	Core Strategy PD		30 fig 3		No	Justified		

**Representation**

Figure 3 ( page 30), which did not appear in the previous (Nov 2010) draft of the strategy is misleading as it identifies the majority of the green belt as a broad area for growth. This is in direct conflict with objective 3.3 (9) (page 28) which seeks to protect the integrity of the Green Belt.

**Representation Changes Necessary**

Figure 3 should be withdrawn from the strategy, or at a minimum replaced by a figure that indicates inviolate parts of the green belt such as SSSI and common lands and a much more restricted indication of where growth might be allowed.

**Officer Response**

As set out in Policy CS6 the Green Belt has been identified as a future direction of growth to meeting housing need. The map shown in figure 3 sets out this broad location for growth, whilst omitting the SPA and Zone A (which forms a 400m buffer zone), where in accordance with European designation a net gain of residential development cannot occur.

Officers do not see any 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.

The review of the Green Belt will be carried out in 2016/17, as set out in paragraph 5.10 it is expected that the review will include a number of impact assessments including ecological impacts on the SSSI, SNCI's and common land. This map will therefore not be removed from this document.

**Council's Proposed Action**



**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 33	First Name Jean		Last Name Dare				On Behalf Of	Hook Heath Residents Association

88      Core Strategy PD      No      More than 1 selected

**Representation****Summary**

The Core Strategy includes a commitment to two important principles: to concentrate new development within the existing urban area, and to preserve the Green Belt that surrounds it. It follows that when the urban area has been developed to the maximum extent possible while respecting the essential character of each area, Woking will have reached a natural limit beyond which further growth should be severely restricted. Unfortunately, the Core Strategy does not recognise the existence of such a limit, but instead makes provision for expanding the urban area by progressively removing land from the Green Belt, thus undermining the very purpose for which the Green Belt was created. Loss of open space around Woking will be detrimental to the health and well being of future generations of Woking residents.

The Core Strategy establishes a planned rate of house building at 292 dwellings per annum on average, well below the estimate of demand, but which could be met, or very nearly met, without incursion into the Green Belt. However, there is no mechanism to prevent a faster rate of growth if sufficient housing proposals are brought forward. There is a danger of increasing the population by inward migration and placing new demands on infrastructure that struggles to meet the current level of demand.

For these reasons the Hook Heath Residents' Association believes that the Core Strategy Publication document requires revision before it can be considered sound.

**Representation Changes Necessary****Officer Response**

Rightly, the Core Strategy concentrates most new development on previously developed land at the main urban areas. However, it is also clear that Green Belt land will have to be released to meet housing needs between 2022 - 2027 and the reasons for that are clearly stated. The need for housing is not only about the quantity of development but also the nature and type of the need such as affordable family homes that cannot all be met by high density, high rise accommodation at the main centres.

The comments about population growth resulting from in-migration has been fully addressed by a response to other representations made by the respondent. In the main, the Council is satisfied that the population assumptions undermining its growth forecasts are sound.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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83      Core Strategy PD      29, 63      No      More than 1 selected

**Representation**

Part 2: Specific Comments

Housing Demand and Provision

Future demand for housing is extremely difficult, if not impossible, to predict with confidence. In many respects it is similar to predicting future traffic levels. Improvements designed to solve current problems if successful generate more traffic until the same problems occur again. So with housing, new developments to solve a local housing shortage can attract large numbers of willing buyers and tenants from elsewhere. Conversely, economic stagnation or decline will reduce demand below current levels.

CS1 (page 29) and CS10 (page 63) state that WBC will make provision for 4964 houses in the period 2010 to 2027 (292 dwellings per annum for 17 years). This is in accordance with the now defunct South East Plan, but the basis from which it was derived is something of a mystery. The rate of build may well have originated in estimates supplied to GOSE by WBC of the rate that the borough could maintain. Whatever its origin, WBC appear to have accepted 292 houses per annum as the housing target for Woking for the period 2010 - 2027 even though the urban area may not be able to sustain this rate for the whole period.

The predicted rate of building on land currently identified is shown in figure 3 on page 67. It results in a total build of 4514 houses between 2010 and 2027. This is 450 short of the target of 4964. However, the predictions take account only of major sites identified by WBC for development. They do not include small private developments that arise frequently, but unpredictably, throughout the borough. Such developments need only occur at a rate of 30 per year between 2012 and 2027 for the target to be met, and recent experience suggests that these windfall sites will come forward sufficiently frequently to meet the requirement with ease. A review to identify new areas for development may prove to be unnecessary.

Areas identified for future growth in the Proposals Map (figure 3, page 30) indicate that almost all the green belt land within the borough is considered as potential building land. The possibility of such widespread additional development will create uncertainty and anxiety that will deter prospective property owners and tenants. In particular, green belt land within the borough is essential to the spiritual and material well being of Woking residents; its loss would adversely affect their quality of life.

An alternative approach would have been to identify areas within the borough where housing of varying densities could be accommodated and to earmark, or zone, them for housing, and to release them as required. The rate of release should reflect market demand, which in turn will be determined by the general level of economic activity in Woking and the surrounding area. When the identified areas zoned for housing development have been used, Woking will have reached its limit of growth. This may or may not occur before 2027, but the temptation to continually designate land for development must be resisted.

**Representation Changes Necessary**

**Officer Response**

It is accepted that there could be limitations to predicting future demand for housing as with any other predictions. However, there is strong evidence to support the need for 29 new dwellings per year.

There is clear national requirement not to count windfall development in the first 10 years after the adoption of the Core Strategy except that it can be justified by special

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Customer ID 33	First Name Jean		Last Name Dare				On Behalf Of	Hook Heath Residents Association

circumstances. The fact that windfall sites come forward regularly for development is not sufficient reason to justify special circumstances. The Council proposes to carry out a Green Belt boundary review to release land for residential development between 2022 - 2027. The review will take into account the housing situation at the time. At this stage, is estimated that land will be released to accommodate 550 new homes.

Figure 3 identifies the broad location for growth from which specific site will be identified. The Council have sought not to limit the scope of the review to a particular area to ensure a thorough and comprehensive review. Narrowing the scope of the search at this stage can undermine this objective and could also be misleading. There is nothing in the Core Strategy to suggest that the entire area of search will be earmarked for development.

**Council's Proposed Action**

**Policy: CS1 Spatial**

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Customer ID 33	First Name Jean		Last Name Dare				On Behalf Of	Hook Heath Residents Association

82 Core Strategy PD No More than 1 selected

**Representation****Part 1: The General Approach to Planning Policy**

The Core Strategy is based on the principle of 'sustained development' defined in the Glossary as meaning 'to enable all people throughout the world to satisfy their basic need and enjoy a better quality of life, without compromising the quality of life of future generations'. It should be noted that the definition does not mention urban growth or expansion; the emphasis is on improving quality of life. Re-development and refurbishment within existing urban areas may prove to be more appropriate routes to achieving the required outcome. Unfortunately, in western societies we are all encouraged to accept as an article of faith that growth is necessarily a good and desirable attribute of every community and organisation; to question it is to invite ridicule and suspicion. The facts, however, are not supportive.

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. To earlier generations that point has always appeared to be so far in the future that we could safely ignore it. But now we are beginning to face the consequences of the finite nature of our environment. Many of the raw materials on which we rely are becoming scarce, e.g., oil, water and natural gas are current sources of friction between nations that could easily trigger major conflict. The most fertile agricultural land is being farmed ever more intensively, and every new building project reduces its extent. Pollution levels are rising. The composition of the air we breathe is changing, leading, many argue, to climate change.

At the global level, the reality is that as human population grows the quality of life for all but a favoured few falls. Far from being beneficent, growth is becoming the enemy of well being. At the local level, southern England is already one of the most populous places on earth. Woking, one of the largest towns in Surrey, will not be immune to the consequences of worldwide resource depletion. For instance, much of the open land that currently surrounds the urban area of the borough, while perhaps not of the highest quality, nevertheless has potential for agricultural use. Imported food will become increasingly expensive as world population rises and may cease to be available in quantity. Transportation costs will rise as fossil fuels become more scarce. Eventually local food production may become essential, requiring conversion of land currently devoted to grazing, horticulture and recreation. Land lost to building will rarely be capable of reclamation. The Core Strategy, or its supporting document, the Sustainability Appraisal Report, should have addressed this issue.

Woking residents aspire to achieve a high quality of life, to live in a pleasant, healthy, and safe environment, to have access to essential municipal services, and to benefit from more prosperous economic activity supported by efficient transport and infrastructure systems. It will be difficult enough to achieve these goals for the existing population. Any further increase will delay, and possibly prevent, their achievement.

Economists may argue that growth will result in a higher income in future that will finance our aspirations, but they often fail to factor in the increasing demands that will be made on all our resources by the new economic activity and associated personnel. Ultimately growth will be detrimental to living standards. At the individual level we are beginning to appreciate that borrowing to finance new possessions cannot continue indefinitely. At the nation level the same principle is being pursued. Collectively we need 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. [See comments on CS1.]

The notion that economic growth will ultimately fail to deliver prosperity and improvements in the quality of life for all has been eloquently expressed most recently by the Commission for Sustainable Development in the publication Prosperity without Growth, March 2009. Woking planners clearly do not agree with the Commission's findings, but

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Customer ID 33	First Name Jean		Last Name Dare				On Behalf Of	Hook Heath Residents Association

the Core Strategy offers no rebuttal to the arguments presented in this government sponsored report. Furthermore, the lack of any alternative intellectual framework to support its own growth dependent vision of a more prosperous and environmentally sustainable Woking in 2027 greatly diminishes confidence in the Core Strategy document.

**Representation Changes Necessary**

**Officer Response**

The Spatial Strategy is upfront about the evidence based level of growth that is needed to meet the needs of the area and directs them to the main urban areas to maximise the efficient use of previously developed land and to reduce the need to travel, especially by the car. This approach to the spatial distribution of development is in line with the key principles of sustainable development, which seeks to minimise the use of non renewable natural resources and reduce the adverse impacts on climate change. There is a clear path for the implementation of the proposed level of growth to ensure that they are delivered in a sustainable manner.

The other comments of the respondent are noted. However, most of them are issues that will also require global attention and many Governments are already making efforts to address some of them in a variety of ways. At the local level, the Core Strategy puts in place a policy framework to ensure that development is sustainable. It sets high standards for sustainable construction, promotes renewable energy and minimises the use of natural resources. Other strategies of the Council such as the Climate Change Strategy would also contribute towards this effort. All these measures will contribute towards global efforts to minimise the adverse impacts of human activity on the planet.

The respondent's comments about population growth is too simplistic. It ignores the fact that a significant proportion of population growth is the result of natural population growth. This is something that the Core Strategy has no control. Furthermore, it concentrates on in-migration but ignores out-migration. The changing nature of the existing population is also underplayed. The Council has taken all these factors into account in its growth projections and is satisfied that the level of proposed growth is appropriate for the area.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 50	First Name Mark		Last Name Carter			On Behalf Of		
289	Core Strategy PD	29		No	No	More		

**Representation**

The Governments objective in PPS 3 is to ensure that the planning system delivers an adequate, flexible, and responsive supply of housing land. That is likely to be reinforced by the National Planning Policy Framework and the policy fails in this regard.

The Core Strategy must recognise that more residential allocations are required than currently envisaged by the Borough Council to replace SHLAA sites that do not come forward, to replace windfalls, to meet demand, to ensure the annual guidelines can be comfortably met and to provide the necessary flexibility. This is especially important if the Council continue to make housing development difficult through the onerous application of standards, the restrictive application of densities policies in urban areas and the failure to make the best use of previously developed land in urban areas. If needs be there may also have to be a review of the Green Belt boundaries.

**Representation Changes Necessary**

Provide adequate housing to meet housing needs and demands as required by PPS3 and PPS12.

**Officer Response**

The annual housing target of 292 new dwellings is justified by evidence. The overall strategy builds in sufficient contingencies to ensure its comprehensive delivery. At the moment, there SHLAA identifies 13 years supply of deliverable sites, 3 years more than have been identified by the Core Strategy. This is more than sufficient to compensate for any non-implementation. Furthermore, the Core Strategy has sufficient in-built monitoring regime to identify under and over supply of housing when they occur. The Council will take action to address any such circumstances. Paragraph 6.19 - 6.21 of the Core Strategy sets out the measures that the Council will adopt to deal with risks and contingencies.

A viability study has been carried out to ensure that the proposed standards set out in the Core Strategy would not compromise the prospect of development coming forward.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 56	First Name David		Last Name Lander				On Behalf Of David Lander Consultancy Ltd	

304	Core Strategy PD	30		No	No	More		
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**Representation**

Legal Compliance: The generalised approach to identifying the Green Belt around Woking as a broad location for growth does not comply with the requirement of Policy LF5 of the South East Plan, as amplified by para 20.14.

Soundness: Whilst PPS12 allows for the identification of broad locations for growth, they must be specific enough so that their suitability can be tested through the process - see para 44 of "Learning from Experience" (PINS November 2009). Policy CS10 suggests there is a need to identify sites for 550 dwellings in the Green Belt post 2021/22. Assuming that figure is justified, potential locations will need to be tested and selected in conjunction with a Green Belt review. Absent that exercise it is not appropriate to indicate the Green Belt as a whole to be a broad location for growth.

**Representation Changes Necessary**

Legal Compliance: The Core Strategy should be based on a detailed assessment to test the scale of the boundary review that is needed and can be justified. In accordance with para 20.14 of RSS this should be undertaken in conjunction with Guildford Borough Council. Absent that work the Core Strategy cannot be legally compliant.

Soundness: Policy CS6 states that the Green Belt boundary review will be carried out in 2016/17 and states that any housing provision is not needed until post 2022. Until that review is carried out any required provision cannot be identified with sufficient precision and the reference to the Green Belt being a broad location for growth should be deleted from the policy (and figure 3).

**Officer Response**

The Core Strategy sets out a clear target for housing provision that is justified by evidence. The Council has carried out a Strategic Housing Land Availability Assessment to demonstrate that there is sufficient deliverable sites to deliver at least 13 years supply of housing. This is 3 more years worth of housing land supply than is identified in the Core Strategy to address any contingencies such as non-implementation. As such, the Council has a clear view about the quantity of housing development that it will have to release Green Belt land to deliver. This is estimated to be about 550 new dwellings. A Green Belt boundary review will be carried out in 2016/17 to release land to meet housing need between 2022 - 2027. The date of the review is about 5 years before the site(s) will be needed for development. This is sufficient enough to address all matters that will be necessary to consider to ensure that the purpose of the Green Belt is not compromised by the release of the sites. It will also enable appropriate public involvement in the process.

The Council has a clear objective to protect the purpose and integrity of the Green Belt and to ensure that there is permanency to its boundary. It is therefore necessary to ensure that the review is comprehensive and robust enough to achieve these objectives. Narrowing the scope of the review at this stage will undermine these objectives.

**Council's Proposed Action**

**Policy: CS1 Spatial**

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Customer ID 61	First Name Malcolm		Last Name McPhail			On Behalf Of		
315	Core Strategy PD			Yes	No	Effective		

**Representation**

We support the identification of Woking town centre as the main focus for residential, employment, retail and cultural facilities in the Borough, but consider that the 35% affordable housing is too high and will affect the viability - and hence deliverability - of much-needed residential and mixed- use redevelopment schemes.

**Representation Changes Necessary**

Change first bullet point to read: "...with an overall affordable housing provision target of 30% (subject to viability appraisal)."

**Officer Response**

A viability study has been carried out to justify the level of affordable housing targets being sought. The affordable housing policy allows scope for an applicant to make a case for the Council to consider if it is thought that the target will compromise the delivery of a specific proposal. No change is proposed.

**Council's Proposed Action**



**Policy: CS1 Spatial**

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Customer ID	64	First Name	James	Last Name	Clegg	On Behalf Of
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330	Core Strategy PD	29	3.4	Yes	Yes
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**Representation**

The wording of this policy is good as it encourages the provision of community facilities and therefore will contribute to the sustainability of the community. This is in line with national policy.

'Diversity and Equality in Planning' Page 21, Box - "Definition of Sustainable Communities" states that: "Sustainable communities meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice".

**Representation Changes Necessary****Officer Response**

Comment is noted.

**Council's Proposed Action**

329	Core Strategy PD	27	3.3	Yes	Yes
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**Representation**

Objectives 2 and 9 are valuable objectives as they highlight the importance of community facilities/infrastructure. This is in line with national policy. 'Diversity and Equality in Planning' Page 21, Box - "Definition of Sustainable Communities" states that: "Sustainable communities meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice".

**Representation Changes Necessary****Officer Response**

Support for the objectives are noted.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
344	Core Strategy PD	29		Yes	Yes			

**Representation**

My comments are in regard to the text: The Green Belt are identified as broad locations for the future direction of growth and the corresponding cross-hatched area in Figure 3. This broad area in the Green Belt is too broad: although the CS report goes on to refine those sites designated for development and other sites protected or conserved, it is nevertheless the case that Woking treasured ancient woodland and recreation grounds should be formally removed from the broad area to protect them from development in the future. It will be a sorry loss to future generations if they are ever built over. The small amount of development creep into the Green Belt in the current CS shows that the Green Belt itself may one day be compromised by the ever-present need for development

**Representation Changes Necessary**

Remove areas such as Woking Park, Wheatsheaf Heath and adjacent woodland, and so on from the broad area of the CS, placing them out of reach for development for the foreseeable future. The risk to these sites should be reduced from the current small or negligible to risk free.

**Officer Response**

The case for the need to release Green Belt land for residential development between 2022 - 2027 is clearly made by policies CS1, CS6 and CS10. In doing so, the strategy is clear to emphasise that the natural and built assets of the area, including sensitive environmental designations, ancient woodland, buildings of heritage value etc. will be protected and enhanced.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell				On Behalf Of	Natural England

119 Core Strategy PD No Justified

**Representation**

CS1: A spatial strategy for Woking

Natural England is concerned that neither of the issues which we raised in relation to this policy in our response of 7th January 2011 appear to have been addressed. These are re-stated briefly below:

When considering development in Woking Town Centre it is essential that the Council has due regard to the stretch of the Basingstoke Canal which is not designated as a Site of Special Scientific Interest (SSSI) within the Borough since this is an essential ecological link between the two halves of the SSSI. This connecting stretch of the canal is designated as a Site of Nature Conservation Importance (SNCI) and is important at a county level. Development along this section of the canal corridor could have potentially negative impacts on biodiversity, especially bats which rely on the canal.

The policy also fails to acknowledge the biodiversity value which previously developed land (PDL) can often support, in particular Biodiversity Action Plan (BAP) species! habitats and species which are scarce on a national, regional or local scale. Given that new development will come forward largely through redevelopment of PDL, it is crucial that the Core Strategy ensures that the biodiversity value of PDL must be adequately taken into consideration, as outlined in CS7:

Biodiversity and nature conservation which seeks to conserve and enhance biodiversity within Woking.

**Representation Changes Necessary****Officer Response**

Policies CS17 and CS7 offers adequate protection to the entire corridor of the Basingstoke Canal. No further benefit will be served by repeating that in Policy CS1.

The Council accepts as a matter of fact that some previously developed sites has biodiversity value. It is proposed that this is acknowledged in paragraph 3.7 of the Core Strategy.

**Council's Proposed Action**

It is proposed that paragraph 3.7 (p31) which is part of the reasoned justification to support policy CS1, should be amended by adding the following sentence "Consideration will be given to the biodiversity value of previously developed land when sites are allocated for development or planning applications are determined".

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

108 Core Strategy PD

**Representation**

We support the inclusion of some strong biodiversity policies and particularly a policy noting the requirements to support the network of natural habitats which watercourses offer.

We are mainly concerned about the clarity of the flood risk policy which at present could be regarded as not being in conformity with PP525. We are also concerned that the proposed submission document does not fully take account of Water Framework Directive requirements. We support the inclusion of water efficiency measures and sustainable building design policies. Our concerns could relate to points of unsoundness but at the same time we consider that some very simple minor amendments and clarifications in the text would remove our concerns about the soundness of the document.

Consequently we respond to the core strategy offering support for some of the policy and suggesting where changes would make the document more compliant with Water Framework Directive and Planning Policy Statement 25. If these changes, which we consider are simple enough to avoid significant new consultation on the document, are made, we would offer overall support for the Core Strategy and look forward to working with you on the development of robust site allocations and development management policies.

**Representation Changes Necessary**

delete this comment as summary & all points covered elsewhere

**Officer Response**

The representation relates to Policy CS9 - Flooding and is addressed under this section.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID 82	First Name John		Last Name Hack			On Behalf Of		
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**Representation**

In the short term, therefore, steps should be taken to reduce land take from development by encouraging higher densities by reducing unproductive space (for roads and parking) for all uses, including housing. This can best be done near to public transport centres and by providing excellent pedestrian and cycle routes from the outset, and compensatory measures in the interim through car-sharing schemes. Concentration on the Town Centre is therefore reasonable given the present infrastructure in Woking. However, in the longer term, the need for housing should be assessed against the impact of development on both policy aims (the green belt) and the natural environment (especially the implications on nationally sensitive sites and European designations) within the Borough and beyond.

It is also likely that in the longer term (the 10-15 year period and beyond), significant changes will have occurred in the price of energy, food and in the climate, to render current assumptions about land use obsolete. Resilience needs to be built in now to cater for the probability that land will be much more valuable than it is now to house and feed people, and to maintain biodiversity (on which the planet depends), and not to waste on hard standings for the movement and parking of vehicles (see for example the scenario produced for DEFRA and by Foresight).

Any development found necessary should be the least environmentally damaging, reducing its ecological footprint by both energy conservation and modal shift. This is likely to be in the form of development of sufficient size (or cumulatively with an existing settlement) to meet 'ecotown' principles, including development around a public transport and walking/cycling spine and community and local commercial/retail facilities to reduce the need to travel. It therefore follows that no decisions about the long term allocation of land should be taken in this plan without a full assessment of the impact of development and how the new development relates to existing development (including retrofitting more sustainable energy and transport approaches in the existing areas). The published plan does not consider these issues, does not set out alternatives for evaluation and takes no account of the need to rethink the design and location of housing in relation to an overall strategy for the next 10+ years in relation to evidence of likely changes affecting the future. Given that there does not look as if there is the evidence to come to any conclusion as a result of the Examination, the plan should

- delete the reference to the green belt as an "area of growth"
- set out policies based on the above criteria for the selection of development locations in the longer term, and
- set out criteria (for housing design, location and infrastructure including transport) for an immediate review of the core strategy to take these points into account.

**Representation Changes Necessary**

Please see comments above, but in summary:

Changes to the town centre policy to make growth contingent on the development of a significantly improved railway station and services;

Specific reference to infrastructure and its means of delivery in the plan to support town centre growth, including positive policies for reducing car use;

Reinstatement of the principle of orbital rail services (to replace the previous reference to Airtrack) and policies to ensure that progress is made on the delivery of the necessary infrastructure;

Changes to the reference to the green belt as an area of growth, and

Reformulating policy on housing to clarify the status of green belt and to set clear criteria for an immediate core strategy review to determine the location and form of sustainable development in the longer term (10 years onwards).

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 82	First Name John		Last Name Hack				On Behalf Of	

**Officer Response**

See response to representations made by John Hack Policy CS10 and CS1. Furthermore, the new planning system allows scope for frequent review of the Core Strategy either in whole or in part. There are a number of unforeseen circumstances that cannot be planned for in the Core Strategy. However, the document builds in a monitoring mechanism to ensure that events are closely monitored and the Core Strategy reviewed to take account of changing circumstances if it is proven to be necessary. An Annual Monitoring Report will be published each year to demonstrate whether the policies are achieving their intended objectives.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of	West Estates Ltd

154 Core Strategy PD 3.7

**Representation**

Taylor Wimpey West London and West Estates Ltd support the acknowledgement of the need to plan for growth within the green belt to sustain the character and amenity of existing urban areas and help address the boroughs considerable need for family and affordable homes within the plan period.

**Representation Changes Necessary**

**Officer Response**

Support noted.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of	West Estates Ltd

153 Core Strategy PD

**Representation**

Taylor Wimpey West London and West Estates Ltd support acknowledgement of the need to identify broad locations for growth on green belt land to meet the boroughs housing and employment needs within the plan period. The inclusion of these on the key diagram also provides the necessary policy hook to define specific sites within such locations in the subsequent Site Allocations DPD.

Taylor Wimpey West London and West Estates objects however to the inference that the identification of specific sites within such broad locations areas will not be confirmed through the subsequent Site Allocations DPD, but deferred to 2016/17. If, as acknowledged in the plan, strategic requirements cannot be identified for the full plan period, then the Core Strategy DPD should proactively plan for such growth. The policy should be revised to state the review of the green belt will be undertaken as part of the subsequent Site Allocations DPD. This would accord with the objectives of PPG2- Green Belts, allocating or at the very least safeguarding areas to endure the plan period and beyond (para. 2.12, PPG2).

For clarity it may also be useful to revise the policy title to confirm the spatial strategy applies to the borough and not just Woking'.

**Representation Changes Necessary****Officer Response**

The SHLAA identifies sufficient deliverable sites to meet over 13 years of housing land supply. This is more than it is required by PPS3, which requires the Core Strategy to identify specific deliverable sites to years 1 - 10. Furthermore, the Core Strategy identifies the Green Belt and the Town Centre as broad locations for future direction of growth. This is also in line with the requirements of PPS3. Based on the above, the Core Strategy confirms that Green Belt land will be released to meet housing provision between 2022 - 2027. A Green Belt boundary review is scheduled for 2016/17 to identify sites for this purpose. The Council is satisfied that a lead period of 5 years is more than sufficient and reasonable for the review to be completed to identify sites for when it is needed. The preparation of the Site Allocations DPD has started. A first call for sites was made early 2011. Policy CS6 paragraph 5.10 is clear to emphasise that the Site Allocations DPD will be reviewed to take account of the outcome of the Green Belt boundary review. The Council is satisfied with the chronology of events set out above.

The comment about referring to the title of the policy as 'Woking Borough' is a valid one to avoid confusion of interpretation. It is proposed to amend the title of the policy to read - A spatial strategy for Woking Borough.

**Council's Proposed Action**

It is proposed that the title of policy CS1 should be amended to 'A spatial strategy for Woking Borough' (rather than 'A spatial strategy for Woking').



**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 89	First Name Lisa		Last Name Bowden				On Behalf Of Royal Mail	

184 Core Strategy PD

**Representation**

See letter for general comments.

In our previous representations we supported the Council's Spatial Strategy for Woking, which encourages sustainable growth and prioritises previously developed sites; acknowledged the Council's need to provide affordable housing within the Borough; and welcomed the flexibility provided by Policy C51. In particular, we supported the Council's requirement for a viability assessment in order to justify the proportion of affordable housing required on all new residential developments. However, we note that this section of Policy CS1 has subsequently been removed. This has not been justified and would not in our view be effective should developments be required to provide 35% affordable housing provision without regard to the impact on viability and therefore deliverability. Nor would this be consistent with PPS3, which states at paragraph 29 that Local Planning Authorities should:

Set out the approach to seeking developer contributions to facilitate the provision of affordable housing. In seeking developer contributions, the presumption is that affordable housing will be provided on the application site so that it contributes towards creating a mix of housing. However, where it can be robustly justified, off-site provision or a financial contribution in lieu of on-site provision (of broadly equivalent value) may be accepted as long as the agreed approach contributes to the creation of mixed communities in the local authority area. In addition, we note and support the removal of the section of Policy CS1, with regard to climate change; which previously required, "contributions towards the mitigation of the adverse impact on climate change", such as, sustainable construction, supply of renewable energy, connection to the existing network of Combined Heat and Power Stations, efficient management of water or waste and contributions such as alternative solutions. This is because we previously requested that the Council amend the wording of the policy to state that this element of applications should take into consideration the practicality and viability of applying these technologies on a site by site basis.

**Representation Changes Necessary****Officer Response**

The representation are addressed under Policy Cs12 - Affordable housing and CS22 - Sustainable construction. No purpose will be served by repeating that under Policy CS1. It should be emphasised that a viability study has been carried out to justify the affordable housing requirements and the standards for sustainable construction being sought.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 90	First Name James		Last Name Stevens				On Behalf Of Home Builders Federation	

185 Core Strategy PD

**Representation**

A spatial strategy for Woking

The policy is unsound as it does not represent the most appropriate strategy given the impending demise of the South East Plan. The Council has not given adequate consideration to the strategic implications of how it will accommodate its unmet housing need and to what extent this need will be accommodated by adjoining authorities of the Housing Market Area.

We note that the Council is proposing a housing requirement that matches the housing targets in the South East Plan. However, as the Council is aware, the Regional Strategies and the housing targets they contained are intended to be revoked by the Government through the implementation of the Localism Bill. In the place of the South East Plan and the targets and planning strategies it contained, local planning authorities will instead be required to assess their own housing requirements. In doing so they will need to ensure that they develop a strategy that ensures that they take account of the household and population projections while also taking into account migration and demographic change (paragraph 28 of the draft NPPF). The Council will need to assess what its housing requirement is for the 17 year plan period (2010 to 2027) and devise a strategic plan that will ensure that these targets can be met. Because the housing targets in the South East Plan will have gone, so too will the strategy that was devised by the South East Regional Assembly to apportion the housing among the Surrey local authorities and, perhaps more importantly, throughout the wider South East. That earlier sub-regional planning strategy will soon be defunct. In its place the Council will need to devise a strategy to ensure that its identified housing requirement can be accommodated. The RS housing targets have gone, but so too has the regional strategy for distribution.

This will require Woking Council to cooperate with its neighbouring authorities to plan to meet this requirement (and other development needs). Woking may even need to cooperate with those further afield who may previously have accommodated an element of Woking's future housing demand. This is necessary to take account of the plans of these other authorities and to ensure that they are addressing their own needs, and not relying on Woking to accommodate a proportion of their housing requirement. If they are, then this cooperation is necessary to make sure there is a sound delivery strategy to accommodate the unmet newly arising need of these authorities.

The Council will be required to assess what its new housing need will be and how it will go about ensuring that it is able to deliver that housing in accordance with its housing trajectory.

We note that the 2008-based household projections indicate an increase of 7,000 households between 2008 and 2026. This would equate to 389 households per year over the 18 years from 2008-2026. If we assume that new household formation grows at an even rate each year, then multiplying 389 by the 17 years of the plan period (2010-2027) would indicate the need for 6,613 homes in total over the plan period. The SHMA indicates a need for 594 new homes per year. The housing requirement proposed by Woking of

4,964 net additions, or 292 per year, will fall short of meeting the district's overall housing need. The implication following from this is that this shortfall will need to be picked-up by another authority. As demonstrated above, this will require a strategy and co-operation with other authorities who will need to accommodate this "overspill" from Woking since it is not being addressed by the authority itself.

Unfortunately the Core Strategy is silent on this duty to co-operate or the steps that have been taken to ensure that the housing requirements of the Borough have been fully addressed. This is an important question that warrants further attention.

**Representation Changes Necessary****Officer Response**

See response to representation made by James Stevens to Policy CS10.

**Policy: CS1 Spatial**

<b>Rep ID</b>	<b>Which Doc Does Comment Relate To</b>	<b>Page</b>	<b>Paragraph</b>	<b>Legally compliant</b>	<b>Sound</b>	<b>Test Of Soundness</b>	<b>Participate in Exam</b>	<b>Why Participate in Exam</b>
<b>Customer ID</b> 90	<b>First Name</b> James		<b>Last Name</b> Stevens				<b>On Behalf Of</b> Home Builders Federation	

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 92	First Name Barbara		Last Name Beck				On Behalf Of Campaign to Protect Rural England - Woking	
226	Core Strategy PD	29			No	Justified		

**Representation**

Policy CS1 includes a reference to an overall housing provision target of 35% affordable housing.

National guidance refers to meeting the housing needs of all sectors of the community. Evidence produced by the Council in their Strategic Market Housing Assessment includes the reference to a need for 499 new affordable houses per year. The gap between the average price of a new dwelling in Woking and the average household income is very considerable, resulting in a substantial affordability gap.

However, faced with this evidence the Council only includes a target of 35% in CS1 for the affordable housing target. This is clearly insufficient response.

We recognise that it would be quite impossible to include a figure to satisfy overall need, but we feel the 35% target is too low in the circumstances that exist at the present time.

The SE regional plan figure was set at 40%. At least one of the recently adopted CS in Surrey that of Mole Valley, has adopted a figure of 40% and this has been accepted by the Examination Inspector.

We consider, therefore in the circumstances existing in Woking today, the Council should aim for a higher target. In a Plan that is intended to last for up to 17 years, 40% may not ultimately be achieved, but the council should at least aim for a higher target above 35%. At the very least a higher target than 35% shows the Council's intent and aim to achieve the maximum possible affordable housing. The higher percentage figure is a reasonable target and we consider any target should be challenging.

We are aware of the questions and issues concerning site viability and the case made by developers and others that too high percentages of affordable housing prevents certain sites from ever being developed, but that issue can be addressed at the planning permission stage when each site is considered on its individual merits. If a robust case can be made to the Council that the percentage figure included in the Policy is unachievable then it can be reduced. We note that figure of 50% is included for the percentage of affordable houses for Greenfield and publicly owned sites. This will help to increase the amounts of affordable housing built and make a target of 40% more achievable.

**Representation Changes Necessary****Officer Response**

The delivery of affordable housing is a key priority of the Council. The Council would therefore wish that more affordable housing can be delivered to meet the significant unmet need. However, the overall target of 35% is what can realistically be achieved based on the current delivery mechanism for securing affordable housing. It is necessary that whatever target that is set is proven to be deliverable. A viability assessment has been carried out to demonstrate that the 35% is what can realistically be achieved without undermining the likely prospect of market housing and other forms of housing coming forward for development. A clear balance has to be struck between aspiration and realism and the approach adopted by the policy achieves that.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 92	First Name Barbara		Last Name Beck			On Behalf Of Campaign to Protect Rural England - Woki		
216	Core Strategy PD	29,30,31	3.11		No	More than 1 selected		

**Representation**

We object to the existing wording in CS1, when it refers to: "The Green Belt, and Woking Town Centre, are identified as broad locations for the future direction for growth." This wording is unfortunate, misleading and vague and needs to be made clearer. WE have no real concern over the reference to WTC as an area (or direction) of growth, BUT we take issue with the Policy also referring, in the same way, to the whole of the Green Belt area surrounding built up areas.

We believe this wording could lead to pressure for housing on sites in the Green Belt, in the middle years of the Plan, when there still remains suitable and available brown field land within urban areas.

The existing wording gives completely the wrong impression and is, we are sure, not what WBC really intends. We believe the policy wording is meant to convey where limited future housing will be possible from 2022, once a Green Belt Review has been undertaken and the most sustainable and least environmentally damaging areas have been selected. But this is not what the present wording implies, or could be interpreted to mean by developers, even though the Policy wording continues with a reference to a review of the GB boundary and any release of GB land for development not undermining its purpose and integrity.

Thus to clarify the situation and state more clearly the Council's intentions we suggest the following amendments: "Limited housing development from 2022", "in the last five years of the Plan period" and "to ensure that the Borough's housing target to 2027 is achieved".

Also we suggest inserting additional wording in the second sentence "to this end" and "any limited" which provide further clarity and precision.

Also we suggest that the wording "direction of growth" is deleted as it is not necessary and it gives the wrong impression when included in the same sentence as the reference to the Green Belt.

With these additions and deletions the existing Policy's ambiguity is removed.

Even the text at paragraph 3.11, (page 31) although an improvement on the actual Policy wording and somewhat more precise, would benefit from extra clarity, as it is not sufficiently clear when it states "the Green Belt and Woking town Centre are identified as broad locations for future direction of growth to identify sufficient sites to meet housing target for the last five years of the periods of the Core Strategy"

**Representation Changes Necessary****Officer Response**

The Council's intentions based on the available evidence is to release Greenbelt land for development between 2022 - 2027. A Green Belt boundary review has been schedule to be carried out in 2016/17 to ensure that any land that is released does not undermine the integrity of the Green Belt. These dates are clearly set out in Policy CS6. The area of the Green Belt identified in Figure 3 is only an area of search from which specific sites will be identified. Because of the significance of this policy decision, it is recommended that the specified dates are repeated in Policy CS1. It is also recommended that clarification be given to emphasise that the direction of growth identified by Figure 3 are only

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 92	First Name Barbara		Last Name Beck					On Behalf Of Campaign to Protect Rural England - Woki

areas of search to identify specific sites.

**Council's Proposed Action**

It is proposed that the last but three paragraph of the policy (which begins 'The Green Belt and Woking Town Centre') on p30, be amended by inserting the dates when Green Belt land will be needed for housing development and when the Green Belt boundary review will be carried out. The sentence should read 'The Green Belt and the Town Centre are identified as broad locations for the future direction of growth to meet housing need between 2022 - 2027. A review of the Green Belt boundary will be carried out in 2016/17 to ensure that the release of Green Belt land for development does not undermine its purpose and integrity.'

The following sentence should be added after the last sentence of the policy (p29). 'The area of the Green Belt identified in Figure 3 as broad location for growth is an area of search from which specific sites will be identified through the review of the Green Belt boundary.'

201	Core Strategy PD	29-30		Yes	Yes
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**Representation**

We support, generally (except for three concerns set out in separate representation forms) the overall thrust and vision of this overarching policy that sets the strategy for Woking unit 2027.

Especially we wish to support:

\*The housing target of 4,964 net additional dwellings, at an average figure of 292 dwellings per annum to 2027. We are aware that this is the same figure set for WBC in the SE plan. Although it represents a challenging target, which at present requires a small loss of Green Belt land in the last five year period of the plan, we are not aware of any valid reasons that can be put forward for it to be reduced.

The figure has the legitimacy that it is the accepted figure in the SE plan and resulted from a combination of evidence and work undertaken by the Regional Assembly and the Government's appointed Panel. We are aware that any reduced figure would face a severe examination at a public Examination and very convincing case that is likely to be successful.

\*The emphasis placed on new future development being directed to previously developed land and the most sustainable locations within the urban areas. Existing national policy (and also the draft NPPF) make clear that the first priority should always be previously developed land/ Brownfield land, and only as the last resort should Greenfield land be considered.

**Representation Changes Necessary****Officer Response**

Support noted.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 94	First Name Jeremy		Last Name Woolf			On Behalf Of	Martin Grant Homes Ltd	
217	Core Strategy PD			Yes	No	More than 1 selected		To respond to points raised and consider more uptodate housing info.

**Representation**

Policy CS1 sets out the overarching spatial approach in seeking to provide for development and growth related needs within the Borough during the period 2010 to 2027.

Whilst we are broadly supportive of the extent of the plan period which covers a 15 year period from the anticipated date of adoption of the DPD, for the reasons set out in our detailed representations submitted upon the Issues and Options Consultation in December 2009 and in response to the draft November 2010 Core Strategy, we remain of the view that the overarching spatial strategy is unsound. This includes in relation to the 4,964 dwelling requirement to be met within the plan period.

Our objection relates to the approach to the level and distribution of housing to be met within the period to 2027 as well as the failure of Policy CSI to identify the need for a review of the Green Belt.

Detailed representations are set out in our objections to Policy CS6 (Green Belts) and CS10 (Housing Provision and Distribution) see below.

The Tests of Soundness

PPS12 sets out the principal components to be included in local spatial plans.

Paragraph 4.42 requires that in order to be 'sound' a core strategy should be justified, effective and consistent with national policy.

In order to be justified the Core Strategy ("CS") must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.

Effective means that the document must be deliverable, flexible and able to be monitored. A strategy is unlikely to be effective if it cannot deal with changing circumstances.

This includes the need for Core Strategies to be flexible (paragraphs 4.44 to 4.46).

Paragraph 4.46 clearly states that a strategy is unlikely to be effective if it cannot deal with changing circumstances adding that plans should be able to show how they will handle contingencies i.e. what alternative strategies have been prepared to handle any uncertainty and what would trigger their use. It is clearly stated in PPS12 that Authorities should not rely on a review of the plan as a means of handling uncertainty.

Consistency means that the CS must be founded upon an adequate evidence base, and be consistent with National Policy (including, inter alia, PPG2, PPS3 and PPS12).

The above principles/requirements must be borne out through the overarching approach to the CS. We comment upon this below.

PPS12 sets out the nature and role of Core Strategies, stating at paragraph 4.5 that:

It is essential that the core strategy makes clear spatial choices about where developments should go in broad terms. This strong direction will mean that the work involved in the preparation of any subsequent DPD5 is reduced. It also means that decisions on planning applications can be given a clear steer immediately.

(Our emphasis underlined).

A supporting publication, issued by PINS, is Local Development Frameworks

Examining Development Plan Documents: Learning from Experience (Sept 2009). The publication provides advice to LPAs in the preparation of their DPDs.

Paragraph 20 concerns housing delivery and notes that despite its critical importance, this is an area where many plans are notably weak.

Paragraph 21 relates to the approach to land identification in Core Strategy, stating:

In some instances the weakness derives from a failure to identify sufficient and/or appropriate land for development. Sometimes this appears to derive from a reluctance to accept that unpopular decisions about allocating land, possibly green field land, for development have to be made. 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 a evidence that the urban areas 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 this clear. In this example if the DPD is a core strategy it should either make strategic allocations or give adequate guidance for a subsequent site allocations DPD to readily identify the land needed without having to re-visit strategic considerations. (Our emphasis underlined)

## Policy: CS1 Spatial

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 94	First Name Jeremy		Last Name Woolf				On Behalf Of	Martin Grant Homes Ltd

Pages 9 to 11 deal with the evidence base and development options/scenarios.

The box above paragraph 33 on page 9 clearly sets out the preferred approach to the collection of evidence, stating;

Evidence should be proportionate and should inform what is in the plan rather than being collected retrospectively in an attempt to justify the plan. The Inspector will only delve deeply if the plan cannot be justified because the evidence seems to be absent, flawed or out-dated.

Paragraph 37 emphasises the importance of a Strategic Housing Market Assessment ('SHMA') and a Strategic Housing Land Availability Assessment (SHLAA) stating:

A Strategic Housing Market Assessment and SHLAA are important for showing how the plan will enable the right amount of housing, at the right time, in the right place to be delivered.

As to development options/scenarios, the text in the box above paragraph 38 on page 10 adds:

If options are limited there is no point in trying to artificially create options. Options are more than simply the location of development.

Paragraph 38 supplements the above text box, adding that it appears in some instances that options are identified for the sake of having options rather than because they are realistic.

Paragraph 39 states as follows:

Some authorities appear to focus their thinking about options simply on the location of development forgetting that the notion of options includes matters such as density, the rate of development, delivery mechanisms etc.

In addition to the above and evident from the content of PPS12 is that the role of Core Strategies is to provide an overall vision which sets out how the area and the places with it should develop. The spatial approach should set out how much development is intended and where, when and by what means it will be delivered.

As to planning for site allocations, paragraph 4.1 is quite clear in that locations for strategic development should be indicated on a key diagram

As set out at paragraph 4.5, it is essential that Core Strategies make clear spatial choices about where developments should go in broad terms. As stated, this strong direction will mean that the work involved in preparing any subsequent DPDs is reduced. It also means that decisions on planning applications can be given a clear steer immediately.

The above comments cut-through the themes set out in the consultation paper and form the basis against which the CS should be prepared.

The Core Strategy should not defer important strategic decisions about possible Green Belt site releases to a subsequent DPD. That is not the role of Core Strategies.

### Summary of Suggested Changes

Against the above background, Policy CSI must show how the vision, objectives and strategy for the area will be delivered, including making provision for the necessary flexibility to deal with changing circumstances.

In accordance with the requirements of national policy, CSI should be amended to provide for a more targeted approach to the distribution and delivery of housing within the Borough. This should include reference to the need for a local review of the Green Belt to the south of the Woking urban area. Policy CS1 should also provide for an increase in housing provision as set out in our representations upon Policy CS10.

### Representation Changes Necessary

#### Officer Response

See response to representations made by Jeremy Woolf to Policy CS10 and by James Steven to Policy CS10.

#### Council's Proposed Action



**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

385 Core Strategy PD

**Representation**

Westfield Common Residents' Association have grave concerns about the core strategy as it stands at present being capable of delivering a place where people will choose to live, work and play. We encourage the local MPs to prevent over development in the borough. We challenge the council to see if it is able to find any existing residents who are keen to live in a high density area and believe it to be an 'attractive place to live'.

I am disappointed to see Woking Borough Council conduct yet another hasty and incomplete consultation exercise.

**Representation Changes Necessary**

**Officer Response**

The comments are noted. The Council has evidence to demonstrate that the level of development being proposed are necessary to meet local need. The Council is also satisfied that the nine week consultation period was enough to give the public sufficient time to respond to the Publication Documents.

**Council's Proposed Action**

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

403	Core Strategy PD					More than 1 selected		As we consider that: a. serious consideration needs to be given to an alternative scenario to that offered in the Plan,
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**Representation**

Woking LA is guided by a Steering Group, forming an active membership of about 10, with more involved in specific projects or volunteering. This representation is made on behalf of those steering group members who were able to become involved.

Through projects and involvement in the community, we encourage a way of living where quality of life improves as we reduce our impact on the planet. We wish our ecological footprint to be significantly lower than the national average, and to work towards a "One Planet Woking".

In our comments on the Draft Core Strategy (November 2010), we supported many of the individual intentions of the strategy set out in the spatial vision and the spatial strategy (Chapter 4 of the draft) where they emphasised truly sustainable development. However, we expressed disappointment that the draft did not appear to be a spatial plan in the terms of PPS12 and had no justified means of delivery. Many of the individual policies seemed to be development control policies in the mould of old style Local Plans, ignoring the contribution of other partners in the future of the town, and neither recognising the need for collaboration (under the present system) nor the "duty to cooperate" under the proposed new one. It tended to view Woking as immune from the likely trends that will affect it over the next 15-20 years, and treated the town in isolation, a serious deficiency the plan is expected (under the current proposals) to form the strategic context of planning with the removal of regional plans (especially as they currently form part of the development plan).

In its response to all the representations made on the draft (as set out in the Report on Representations), and in the Core Strategy Publication Document, the Publication Plan's approach seems to be to dismiss the legitimate concerns of those who are arguing for a more considered approach to future development and to interpret the most recent government statements about the purpose of planning to foster economic growth in an extremely narrow way. The end result appears to be a planning document that does not meet either the existing requirements of PPS12 paras 2.2 to 2.7 (the spatial planning approach) or the proposed paras 22 to 25 of the draft National Planning Policy Framework.

We are very conscious of the debate that has been started on the Draft NPPF and consider that undue reliance on it in detail in the Plan could be very misleading, especially a

- The definition of "sustainable development" needs to be set out in the final NPPF document from government and if necessary tested in the courts;
- Nothing in the NPPE can countermand the requirements of the European Directive on SEA, which inter alia requires consideration of the likely significant effects on the environment of implementing the plan, and reasonable alternatives.
- Government policy (as articulated by DEFRA) still supports the fundamental purposes of sustainable development:
  - o Living Within Environmental Limits
  - o Ensuring a Strong, Healthy and Just Society
  - o Achieving a Sustainable Economy
  - o Using Sound Science Responsibly
  - o Promoting Good Governance

## Policy: CS1 Spatial

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

We therefore consider that the dismissal of our concerns about an unsustainable future as being not government policy is actually incorrect in terms of current policy and that if pursued through the examination without amendment renders the plan unsound, especially measured against the large and growing evidence pointing to the dangers (if not impossibility) of carrying on as we are, and the explicit requirement in the soundness tests to demonstrate the most appropriate strategy when considered against the reasonable alternatives (PPS12 para 36).

### Representation Changes Necessary

We wish to see a more spatial approach to planning as set out in PPS12 and the subsequent Planning Inspectorate's guidance notes on Development Plan Documents.

On the assumption that the matters considered above can be dealt with at the Examination and in the Inspector's Report, we have no wish to delay the adoption of the plan as current government policy (yet to be tested) suggests that where there is an out of date plan, applications will be approved. This could be disastrous in a town surrounded by highly protected land and facing the problems set out in the SWOT analysis.

We therefore propose that the plan:

- Specifically incorporates the relevant published policies from the South East Plan as an interim measure, so there is no vacuum on that plan's abolition, especially in respect of the complete understanding of sustainability (as set out in the government SD strategy). It should be possible to do this as the policies have gone through all the statutory processes, including meeting the SEA Directive.
- Is adopted only insofar as it deals with the short term (and certainly not more than 10 years), leaving major decisions on the longer term growth of the Town Centre and the issue of the location of housing growth incorporating Green Belt boundary changes to be properly assessed as soon as possible in collaboration with neighbouring authorities and delivery bodies as required in national Planning Policy (and the forthcoming Localism Bill when enacted).

Instructions should therefore be given for the plan to be immediately reviewed with the following requirements:

1.  To recognise the role of the Core Strategy as a spatial plan and strategic document bringing together the actions of different agencies in achieving the strategy, and not to be an old-fashioned "Local Plan". Development management is only one of the instruments to be used in delivering the strategy (and not always the most significant).
2.  To clearly justify the desired growth through consideration of the Borough's location in the sub-regional and regional economy and to recognise the impacts on (and restraints required to enhance) the environment both in the Borough and its hinterland.
3.  To demonstrate how the growth can be managed to live within the planet's resources and to secure resilience in the face of the very real resource and climate change threats affecting SE England.
4.  To plan development and infrastructure in a fully integrated way, demonstrating the feasibility of the developments proposed, and showing how direct and indirect impacts can be reduced, for example:
  - a.  Encouraging the local sourcing and distribution of food (affecting land use decisions, design, retailing and management of food stores and local centres);

### Officer Response

The Core Strategy identifies a clear path for its implementation. Indeed, each policy includes a section on delivery. Furthermore, there is a whole chapter about implementation and the monitoring of the Core Strategy. Paragraph 6.15 is a whole section about the Council's commitment to work in partnership with others to deliver the Core Strategy. It is therefore incorrect to just say that there is no commitment by the Council to work in partnership to ensure the delivery of the Core Strategy.

**Policy: CS1 Spatial**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

The Core Strategy has evolved through a number of stages. In all these stages, the Council has ensured that community involvement is an essential part of the process. The Council has valued and taken into account all comments that have been received during consultation exercises. Evidence of how comments have been taken into account has been published on the website. It is also set out in the Council's Consultation Statement. Again, it is incorrect to suggest that comments received have been ignored.

The Core Strategy is required to be in conformity with national planning policy. It has therefore been prepared taking into account national policy, regulations, circulars etc. The Council is also aware of the Draft National Planning Policy Framework. Whilst little weight is presently given to it, its requirements cannot be ignored. The Council has ensured that the Core Strategy is not at odds with its requirements.

There is an overriding need for development to meet the needs of the area that is justified by local evidence. The Core Strategy will be failing in its responsibility if it failed to make adequate provision to meet the needs. However, it has sought to ensure that development is promoted in a sustainable manner and at sustainable locations.

A Sustainability Appraisal to include the requirements of the SEA Directives has been carried out to assess the social, economic and environmental implications of the Core Strategy. Overall, it concluded that the implementation of the Core Strategy will help improve the well-being of the community.

**Council's Proposed Action**

418 Core Strategy PD

**Representation**

We therefore request that measures are put in place to deal with:

How the plan contributes to Well-Being. Given the above, it is not appropriate to comment in detail on the ability of the strategy to be monitored (PPS12 para 4.47), but we note that a national measure of well-being is under development. Policy CS1 should acknowledge the principle that Well-Being is an important objective for informing development over the period of the plan. There is a long history of Quality of Life indicators in government, and the principles should be applied to the plan.

**Representation Changes Necessary****Officer Response**

Sustainability Appraisal (SA) has been carried out to assess the social, economic and environmental implications of the Core Strategy. Overall, the SA concluded that the implementation of the Core Strategy will improve the well-being of the community.

Each policy includes a section on monitoring and review. Indicators are established to help monitor and measure how the policies are delivering on their objectives. The Council will follow the development of the national measure on well-being and take it into account when it is completed.

**Council's Proposed Action**

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	9	First Name	Last Name	On Behalf Of Burhill Group Ltd				
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10 Core Strategy PD

**Representation**

Burhill supports the indicative density range set out in the Core Strategy, and encourages the Council to adopt a flexible approach when considering housing densities for developments and consider them on a site by site basis.

Burhill notes that the Council will adopt a site by site approach in Policy CS10 'Housing Mix' which states that the appropriate percentage of different housing types and sizes for each site will depend upon the established character and density of the neighbourhood and the viability of the scheme.

**Representation Changes Necessary****Officer Response**

Support and comments noted

**Council's Proposed Action**

Customer ID	12	First Name	K	Last Name	Foot	On Behalf Of Woodham Court		
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16 Core Strategy PD

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**Representation**

Please take note of the special circumstances relating to land at Woodham Court and our change to proposal . The Woodham Court site's former usage should establish it as a brownfield site prior to the green belt policy and sympathetic development would upgrade this derelict area.

The site is directly opposite the first and second expansion sites of the McLaren Technology Centre. The recent expansion of the Recycling Centre in Martyrs Lane, and the acquisition of further land behind the Woodham Court site indicated as Surrey Waste Plan (2008) site - in the recently published MAP (Woking Borough Local Development Documents of July 2011), points to an industrial expansion within the Green Belt.

**Representation Changes Necessary****Officer Response**

The Core Strategy is not allocating specific sites for development. It only sets out the broad locations where development will be accommodated. The identification of specific sites will be dealt with at the Site Allocations DPD stage and there will be an opportunity to consider the site as part of this process. Furthermore, the site is in the Green Belt and the Council intends to carry out a Green Belt boundary review in 2016/17. There is a further opportunity for the proposal to be considered as part of this process.

**Council's Proposed Action**

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of
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33	Core Strategy PD				No	Justified
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**Representation**

With regard to the data used to calculate housing need, we recommend that the council revise the strategy in line with up to date statistics and plan according to that data, rather than seeking to justify further over development of Woking.

For Social and Affordable Housing considerable weight is put on the 2007 Fordham's Research paper, made at a time when demand for local housing was much higher than it is today, accompanied by the 2007 WBC Household Survey which is now four years out of date. It is hoped that WBC would have taken care of many of the issues raised in the survey and thus the issues highlighted would not still be relevant today. In addition:

2007 was a freak year when Property Prices were at an all time high relative to earnings. Due to the current economic climate a lot has changed since then. At that time (March 2007) Woking had 3244 households on its register for social Housing (a 47% increase over the previous year!) which by March 2010 had fallen to 2086. During the same period the number of Social Homes in both Woking and the South East had stayed constant although the demand for Social Housing in the South East had increased by 3.3 % homes in the SE at the same time as it had decreased in Woking by 35%! The Study fails to highlight that multiple applications can be made to LA registers. Furthermore non married couples can both register individually.

WBC's strategy (CS1) is to build 1737 new affordable dwellings) of which 440 are planned to be in Westfield and 300 in Brookwood Farm (5.66 page 65). Based on the deprivation issues of Sheerwater and Lakeview considerable care will be needed in the design of these new Estates to make sure that Woking does not generate two further "pockets of deprivation". As indicated below the supporting Evidence Base does produce conflicting numbers of Affordable Homes required. However if the SHMA is correct it would imply that WBC will have a considerable pent up demand for Affordable Homes

Future Home demand indicated in Section 1.27 and Paragraph 12.41 of the now defunct Fordham Research Housing Needs and Assessment Paper states that Woking requires an additional 8910 new homes up to 2027 (42% of which will be Affordable i.e. 3735 or 249 per year).. This number is in direct conflict with the 499 number used in Sections 1.27 and other sections throughout this document. The 499 number therefore requires changing throughout this Report and on the WBC website

Paragraph 2.14 requires rewriting to bring it up to date and use consistent dates. According to the ONS data Woking now has the 2nd lowest Median House Price value in Surrey (£248,000) compared with a Median Value of South East England of £217,000 and Surrey Median Value of £290,000. The figures used in Sections 2.12 to 2.15 should be adjusted accordingly and brought up to date.

ONS Tables 581 & 582 shows the following data for Mean/Median Property Prices:

- Q4 2010   Q1 2011
- Mean  Median  Mean  Median

England  £236,221  £182,000  £238,807  £175,000  
South East  £279,197  £225,000  £278,865  £217,000  
Surrey  £386,525  £300,000  £397,896  £290,000  
Woking  £340,202  £275,000  £326,344  £248,000

•  Two other issues exist within this Paragraph

It makes the presumption that the correct strategy in today's Housing Climate is for first time buyers to purchase property at a time that average mortgage advances are in

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 16	First Name Colin		Last Name Weeks				On Behalf Of	

excess of 3 times disposable income. The SHMA Report S11 highlights the fact that Families renting are far more mobile than those purchasing with 68.2% Woking renters moving within the past 2 years. I.e. renting facilitates a more dynamic workforce.

o  Uses average earnings in the Borough as a comparison with average House Purchase Prices. SHMA Paragraph 5.17 indicated that the Average (Mean) Household Income in Woking was around £52000 whereas the average of newly formed households was £15405 thus  $\frac{£345,674}{52000} = 6.6$  not 13.6. It is suggested it may be better to use ONS Table 572 which shows the Median Earnings vs. Median House Price and Table 576 shows the 15% Quartile vs. Mean Lower Earnings as an indicator of "Affordability" for New Households.

This Strategy indicates the proposed construction of 440 dwellings on Moor Lane, Westfield, a site of 9.75 hectares. This equates to a density of 45 homes per hectare which is totally inconsistent with the local area and current Local Plan of 20dph. Surely under the new Localism Bill this together with all the other targets needs to be discussed and agreed with the local population. Because of this together with the other factors listed above this whole Strategy needs to be written along the following lines. The Council, in consultation with local neighbourhood forums will discuss and agree the future sites to enable delivery of 4964 new homes between 2010 and 2027, 35% of which need to be classified as affordable for either rent or assisted purchase.

### Representation Changes Necessary

With regard to the data used to calculate housing need, we recommend that the council revise the strategy in line with up to date statistics and plan according to that data, rather than seeking to justify further over development of Woking.

### Officer Response

The Council is satisfied that the policies of the Core Strategy and in particular, the housing target are justified by robust, up-to-date and credible evidence base. The South East Plan continues to be part of the development plan for the area until it is formally revoked. It is therefore a material consideration. The Council had used the South East Plan evidence base to justify its housing target because it considers the evidence to be credible and sound. In using the evidence, the Council had tailored it to its local circumstances by also looking at its population base, availability of land, sustainability appraisal of options, past trend of housing delivery and the Government's objectives for growth.

The density specified for the Moor Lane site can be delivered without compromising the character of the wider locality. Obviously, a detailed scheme at planning application stage will determine the specific nature of the proposal that will be implemented. The public will have the opportunity to comment on any scheme that will come forward. It should be emphasised that there is a resolution to grant planning permission for a scheme on the site subject to Section 106 Agreement being signed. Paragraph 5.66 will be amended to clarify this point.

### Council's Proposed Action

It is proposed that the last but one sentence of paragraph 5.66 (p65), which is part of the reasoned justification to support policy CS10, be amended to read 'There is a resolution to grant planning permission for a scheme on the site for 440 new dwellings, 60% of which will be affordable. This is subject to a Section 106 Agreement being signed

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	22	First Name	Helen	Last Name	Murch	On Behalf Of
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48	Core Strategy PD				No	
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**Representation**

In Policy CS10 the WCSPD seeks to meet the South East Plan (SEP) annual housing target for Woking of 292 dwellings. Surrey Heath Borough Council welcomes Woking's the intention to deliver the SEP housing targets.

It is noted that Woking has only been able to identify a 13 year supply of sites in its SHLAA and two Broad locations for Future Growth have been identified to help overcome the shortfall in the later part of the plan period; namely, Woking Town Centre and the Green Belt. Policy CS6 confirms that a green belt review will be carried out in 2016/17 to enable the Borough to identify land to meet the development requirements of the Core Strategy. Policy CS10 indicates that green belt sites will be released after 2012/22 to provide assist in providing for around 550 homes.

The SEP identified in Policy LF3 that selective reviews of the green belt may possibly be needed in Woking. The SEP directs the possible green belt releases to sustainable urban extensions. The WCSPD intention to release green belt to provide new sites for housing is understandable in light of the SEP policy and the fact that Woking is heavily constrained by Green Belt and urban areas. However, unlike the SEP policy, the Woking Core Strategy does not indicate where in the borough these releases may take place or identified what approach/criteria will be used to select them. Explanatory text at Para 5.56 indicates that the specific locations of the release will be determined through the Site Allocations DPD. It is considered that the broad location of the green belt releases is a matter that the Core Strategy should properly address. Without this direction Surrey Heath, and other interested parties, are unable to properly assess whether the policy will have an impact on their matters of interest.

Policies S6 and CS10 also suggest that Woking may be departing from the requirements of Policy LF3 of the SEP for green belt releases to be sustainable urban extensions. This is not clear but if it is the case then adequate justification has not been given for the policy relating to green belt releases and the provision of new housing.

At present the policy on green belt release is considered to be too ambiguous in terms of dealing with the location and nature of future green belt releases and not in accordance with regional policy. As such policies CS6 and CS10 are considered to be ineffective, inconsistent with national policy and thus unsound.

**Representation Changes Necessary****Officer Response**

The Core Strategy identifies the Green Belt as a broad location for future growth. This approach is justified by the requirements of PPS3. The Council is committed to the protection of the Green Belt and also to ensure the permanency of its boundaries. A comprehensive review of Green Belt boundary will enable these objectives to be achieved, whilst at the same time ensuring that development needs are met. Narrowing the scope of the review at this stage will undermine these objectives. Paragraph 5.10 of the Core Strategy expects the Green Belt boundary review to include an assessment of the landscape, transport and ecological impacts of development of the identified sites. These assessments will ensure that appropriate mitigation measures are put in place to deal with any adverse impacts. The concerns expressed can therefore be addressed by the provisions of the policy. It should be emphasised that interested parties will have the opportunity to be involved in the review when it is carried out.

**Council's Proposed Action**



**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
70	Core Strategy PD			No	No			to assure myself that the many previous presentations have been rectified

**Representation**

The Draft Core Strategy relating to the Woking Local Development Framework is dangerously flawed and is likely to affect future generations by ignoring correct planning procedures and embarking on commercial projects financed by Rate/Taxpayers.

In particular the proposed housing sites of Moor Lane and Brookwood Farm are promoted without evidence of sustainability.

The costs of alleviating or overcoming the flood problems of Moor Lane have not been recorded and it is not stated nor is there evidence of any statement by the Environment Agency.

The Brookwood Farm Site has, according to Press Statements been offered for sale to a Construction Company, regardless of the fact that the Plan Inspector in October 1992 (2.41 B) stated, Given the construction of the road (Bisley By-Pass) and the remaining countryside beyond, I consider the development of Brookwood Farm as a preferred Option is acceptable'.

The road proposal was not proceeded with.

The Local Plan sub Committee minutes of 5th March 1990 contains a list of Policy 6 recommendations.

Category 1 status (suitable for Policy 6 designation)

Site No 9 Land West of A320 Egley Road

No 15 Land South of Kingfield Moor Lane 8H

No 23 Rowley Bristow

No27 Land at Byfleet East of M25

No 28 Land at Sanway Nursery

There followed:

Category 2 Status (possibly suitable for Category I Status)

This consisted of Sites 2,3,7,12,14,25

The Committee then recommended the following sites should be defined as

Category 3 Land (unsuitable as Policy 6 Land and included site No 29 Brookwood Farm).

The Moor Lane Development Site involves cuffing into large areas of Nature Conservation importance (NE2).

The Egley Road Site is the natural extension of the Southern built limit of Woking, on the A320 and is the main arterial route between Woking and Guildford.

The Site is superior to either Moor Lane or Brookwood Farm in fulfilling the sustainability aims of PPS1, PPS3 and PPG13, in transport terms it is the most suitable for Resident Development.

The reference to flooding (SHLAAMSGOO9) is completely incorrect, the only water problem is caused by Surrey County Council's negligence in their maintenance of the roadside ditches over the last 20 years confirmed in correspondence with SCC and the Environment Agency.

**Representation Changes Necessary**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 34	First Name William		Last Name Bocking				On Behalf Of	

**Officer Response**

Land at Moorlane and Brookwood Farm are already safeguarded in the Local Plan for residential development. The principle of using this site for residential development has been comprehensively debated and no purpose will be served by repeating that. The Core Strategy brings the sites forward to contribute towards the overall housing supply. The Council will ensure through the development management process that adequate measures are introduced to address any adverse impacts of the development on flooding.

The Core Strategy is not identifying specific sites for development. That is a matter for the Site Allocations DPD. Land at Egley is in the Green Belt. The Council is committed to carry out a Green Belt boundary review in 2016/17. This will be the appropriate document to promote the suitability of the site.

**Council's Proposed Action**

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
264	Core Strategy PD	63	CS10	Yes	No	Justified,Effective		

**Representation**

Infill development in the rest of urban area 30 - 40dph is not a practical or effective target given so many areas of urban areas with less than 1dph currently and the desire of these areas to keep the status quo

**Representation Changes Necessary**

Adding another designation beyond "rest of urban area" to "all urban areas which currently have less than 5dph to a recommended 10-40dph" would be a far more effective policy to implement to increase housing rather than developers trying to avoid this part of the plan entirely and continue building very low density developments in some parts of the borough.

**Officer Response**

A density range of between 30 - 40 dwellings per hectares for sites within the urban area is not unreasonable indicative target to achieve. These sites will come forward from a variety of locations and actual density will take into account the specific characteristics of their locality.

**Council's Proposed Action**

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 41	First Name Louise		Last Name Morales			On Behalf Of		
353	Core Strategy PD	61	CS9 & 5.45	No	No	More		

**Representation**

The policy takes NO account of sewage inundation and has NO policies for reducing or even stabilising this serious problem, even though it is identified as a serious problem that threatens the livelihood of residents (paragraph 5.44). There are no requirements for a risk assessment for sewage inundation in the most seriously impacted areas, no requirements for measures to be taken and no indication the council's surface water management plan will be taken into account during planning considerations.

**Representation Changes Necessary**

Take into account Strategic Flood risk assessment when making planning decisions. Do not grant planning permission for any new connections to the sewage system in the highest risk areas ( i.e. zones labelled 10 or more properties impacted in the previous 10 years in the SFRA). until such time as the annually updated SFRA indicates that the Sewage authority has improved the situation.  
Include the updated local surface water management plan in all planning decisions in future so as to not make the situation worse.

**Officer Response**

Generally speaking, the Core Strategy seeks to prevent development from areas at risk of flooding. The SHLAA and policy CS9 makes this very clear. The Council has carried out a Strategic Flood Risk Assessment to inform the identification of land for development and planning decision. Policy CS9 requirement development proposals in Flood Zones 3a and 3b to be accompanied by a comprehensive Flood Risk Assessment to demonstrate that the development will not increase flood risk elsewhere or exacerbate the existing situation. Furthermore, a flood risk assessment will be required for development proposals within or adjacent to areas at risk of surface water flooding.

The Council has carried an Infrastructure Delivery Plan to determine the infrastructure needs of the area. Policy CS16 seeks developer contributions towards infrastructure provision to support development and encourages the Council to work in partnership with service providers to ensure coordinated delivery of the infrastructure. The Core Strategy therefore provides adequate scope for the above concerns to be addressed.

**Council's Proposed Action**

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	48	First Name	Kevin	Last Name	Stevens	On Behalf Of
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281	Core Strategy PD	65	5.66	Yes	No	
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**Representation**

It has been proven that developments where affordable housing mix is above 30-40% then the area becomes less desirable and the effect of mixing with normal housing is lost

**Representation Changes Necessary**

reduce the mix to 30-35%

**Officer Response**

There is sufficient evidence to justify a significant need for affordable housing. Furthermore, the proposed affordable housing targets are proven to be viable to enable development to come forward. There is no evidence seen by the Council to demonstrate that the affordable housing target will have undesirable effect in the area.

**Council's Proposed Action**

Customer ID	50	First Name	Mark	Last Name	Carter	On Behalf Of
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291	Core Strategy PD	63		No	No	More
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**Representation**

We object to Policy CS10.

It is not necessary or appropriate to include a distribution allocating housing growth to each Settlement Area.

This is not based on any evidence.

The actual housing distribution will be clear once the Development Management and Site Allocations Development Plan has been concluded and the relative merits of all the potential housing sites have been considered. To do otherwise creates a 'chicken and egg situation'.

**Representation Changes Necessary**

CS10 is unnecessary, unsupported by evidence and should be deleted.

**Officer Response**

It is the role of the Core Strategy to determine the broad locations for development. The Site Allocations DPD will allocate specific sites for development. The Council has carried out a SHLAA to assess the capacity of the of the main centres and the rest of the urban area to accommodate growth. The broad distribution of growth is informed by this study. No change is proposed.

**Council's Proposed Action**

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 56	First Name David		Last Name Lander				On Behalf Of	David Lander Consultancy Ltd

305 Core Strategy PD 63 No No More

**Representation**

This objection is consequent upon our objection to Policy CS1 and relies on that representation

**Representation Changes Necessary**

The reference to housing provision on green belt sites (550 dwellings post 2021/22) should either be removed from the policy or be refined with greater specificity on the basis of a Green Belt review and selection/testing of potential sites prior to the Core Strategy proceeding further.

**Officer Response**

The Council has a clear objective to protect the purpose and integrity of the Green Belt and to ensure that there is permanency to its boundary. It is therefore necessary to ensure that the review is comprehensive and robust enough to achieve these objectives. Narrowing the scope of the review at this stage will undermine these objectives.

**Council's Proposed Action**

Customer ID 61	First Name Malcolm	Last Name McPhail	On Behalf Of
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317 Core Strategy PD Yes Yes

**Representation**

We support the allocation of a high proportion of the Borough's housing requirement to Woking town centre, this clearly being the most sustainable location. Residential or mixed use redevelopment is needed to bring forward the regeneration of older parts of the town centre. The acknowledgement that higher densities will be appropriate in the town centre is also welcomed.

**Representation Changes Necessary****Officer Response**

Comment noted. No change is required.

**Council's Proposed Action**

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	66	First Name	Peter	Last Name	Cannon	On Behalf Of
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351	Core Strategy PD	63		Yes	Yes	
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**Representation**

it is difficult to see how the densities can be consistent with the housing profile given in CS 5.72, especially for sites outside the town centre, unless the sites are very large and can accommodate a good proportion of flats. 40 dph equates to an average plot size of 250 sq m, and this includes green spaces and roads, etc. The CS does indeed identify some large sites but there is a concern that the pursuit of density and affordability, the most common themes in the CS other than sustainability, will pre-empt the application of other policies and skew a balanced assessment of a development site's best use, despite the comment to the contrary in CS 5.57.

**Representation Changes Necessary**

State more clearly that the merits of a site will be considered even-handedly and that the densities in CS10 will be accommodated without compromising other objectives of the CS. The Council may feel that this issue is already adequately covered by the sum total of provisions in the CS.

**Officer Response**

The densities given in Policy CS10 are indicative density range. Actual densities will be determined through the development management process, taking into account the unique characteristics of the locality.

**Council's Proposed Action**

Customer ID	71	First Name	Grace	Last Name	Brown	On Behalf Of
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362	Core Strategy PD	63	5.52 to 5.54			
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**Representation****Representation Changes Necessary**

Make better use of the housing that exists already without encroaching on any green belt - upgrade and refurbish and don't build new until the need is proven to be there. The town centre is dense enough already without adding more. Protect the green belt, it will never come back once built on. Why is the community not 'sustainable' with the housing that already exists in central Woking, though I am in favour of providing more affordable housing in the outlying areas, not the centre.

**Officer Response**

The Council has a strategy to bring forward empty homes into effective use. The Housing Strategy sets out how this will be achieved. The Core Strategy also encourages mix use, high density development at appropriate locations to maximise the re-use of existing buildings. However, these measures alone will not be enough to meet the entire quantity and type of housing that is needed. It will therefore be necessary to release Green Belt land to meet the shortfall. It is clear that many of the concerns expressed by the respondent are already being addressed by the Core Strategy. No change is proposed.

**Council's Proposed Action**

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell				On Behalf Of Natural England	

125 Core Strategy PD No Effective

**Representation**

It should be made clear that the caveat in this policy relating to internationally designated nature conservation sites applies to ALL development proposals which, either alone OR in-combination with other development, would result in an adverse effect on integrity. Provided that this caveat is altered there is no need for the final sentence in the boxed policy text which makes reference to the need for Habitats Regulations Assessment.

Natural England has recently confirmed in a response to Surrey Heath Borough Council that we consider such a caveat, providing it is appropriately worded, to be an appropriate approach to delivering a housing allocation in excess of currently identified SANGs capacity. This approach will allow the Council to take forward its proposed housing allocation without having identified all necessary SANGs at the outset, although delivery of additional housing numbers will be contingent on securing sufficient SANGs capacity. It should be recognised in adopting this approach, that there is a risk that the housing numbers set out in the policy might not be fully deliverable.

Natural England recognises that the Council are best placed to locate land for SANGs and we recognise that over the course of the plan period, there could be opportunities to bring forward new SANGs. We will continue to work closely with the Council to clarify what is deliverable in terms of SANGs both within and outside the Borough in order to avoid impacts on the SPA. On a more specific note we are pleased to now be involved in discussions around the bespoke SANGs solution which will allow development to come forward at Brookwood Farm.

**Representation Changes Necessary**

**Officer Response**

Policy CS10 relates to solely housing provision and distribution, therefore it is not appropriate to refer to other forms of development. It is explicit in policy CS8 SPA that all development proposals which, either alone or in combination with other development, would result in an adverse effect on integrity .

As at 15 September 2011, there is 10.56 years worth of SANG, this is based on the three existing SANG and three SANG which are to be adopted by the Council in the next year. Woking Borough Council is in advanced discussions about acquiring further SANGs across the Borough. Obviously if these come forward there will be more SANG capacity. The process of identifying and adopting new SANG is an ongoing process.

It is not anticipated that all of the housing will be delivered at the same time, looking at the housing trajectory all of the SANG will come on stream before the development will occur. Natural England will object to proposals if that is not the case. The point can well be clarified by a minor amendment to the second paragraph of Policy CS10.

**Council's Proposed Action**

It is proposed that the second sentence of the second paragraph of Policy CS10 beginning 'where the development proposals (page 63) should be amended to read 'Where development proposals, either alone or in combination with other development, are demonstrated to adversely affect an SPA, SAC or RAMSAR site, permission will not be granted. As a consequence of this amendment, it is proposed that the last sentence of the policy beginning 'A habitats Regulations Assessment will be carried out ..' (page 64) should be deleted.



**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 80	First Name Kevin		Last Name Wilcox			On Behalf Of	Crest Nicholson	
177	Core Strategy PD	63-64		No	No	More than 1 selected		It is considered that the issues raised are imperative to the soundness of the CS

**Representation**

Policy CS10 and Fig. 4 of the CS identify housing provision over the Plan period to meet housing requirements set through the South East Plan. The Council identifies a rolling five-year housing land supply in their SHLAA and further sites that are likely to come forward over the lifetime of the CS. Savills on behalf of Crest Nicholson, has reviews the SHLAA and relevant policies in the emerging CS and are not satisfied that the approach to housing delivery is robust and therefore justified.

The SHLAA 2010 states that there are sufficient sites that are considered to be deliverable to meet housing targets for the period 2010/11 -2016/17. Savills is unable to assess the credibility of the evidence supporting this assumption as appendix 1-4 are not yet available on the website. The current approach to housing delivery cannot be assessed due to the lack of access to the evidence base, the approach can therefore only be considered as unsound under the three tests set out in PPS12. As Savills is unable to review identified sites it is unclear whether the approach accords with requirements set out in PPS3 which requires local authorities to ensure sufficient, suitable land is available to achieve their housing objectives. Without being able to access the evidence base, Savills is unable to review the various allocations. From review of previous SHLAA (2009) Moor Lane and Brookwood Farm were previously assessed as deliverable. However, it is unclear whether these sites are within the Green Belt and therefore should form part of the Green Belt Review. It is also unclear what site 'New Lane' relates to or 'Hoe Valley' as shown within Fig. 4 of the emerging CS. It is assumed these sites correspond with the identified Woking Town Centre sites in CS10.

Important to note is the Council's inability to meet housing requirements over the past two years, falling below SEP requirements to deliver 299 dwellings per annum. There is a fall back position in the SHLAA or CS to account for a likely shortfall in delivery.

The approach to housing delivery recognises that there are an insufficient number of sites that are considered to be developable for years 11-15 of the plan period. PPS3 states that where it is not possible to identify specific sites to meet this requirement, broad locations for future growth should be indicated. The Council has achieved this by identifying the Town Centre and Green Belt areas as possible broad locations for future housing development. Key to ensuring a robust approach to housing delivery, however, will be to undertake a Green Belt Review as proposed through the CS. A review of Green Belt boundaries is supported. However, it is considered that a review by 2016/17 is too late in the process and should be brought forward to ensure that the Council can demonstrate a 15 year supply upon submission of the CS to the Secretary of State. Further discussion on Green Belt allocations can be found in our representation on CS6.

Proposals for Town Centre development state that density in excess of 200 dph will be sought to ensure the target of 2,300 dwellings can be met. This directly conflicts with the supporting paragraph 5.64 which states that there has even an increase in the delivery of apartments across the borough over recent years which, although makes the best use of the land, does not necessarily deliver the right type of housing to meet the need of the whole community. Savills, on behalf of Crest Nicholson, therefore question the approach to housing delivery that meets housing need for the borough. The Royal Borough of Windsor and Maidenhead's CS was postponed in 2010 due to the need to review the capacity of the town centre to accommodate the proposed new housing. It is important that the Council is therefore certain that the current approach is robust.

Savills, on behalf of Crest Nicholson, is not confident that the Council has adequately identified a five year supply. This is further strengthened by the lack of access to the evidence base (chiefly the appendices to the 2010 SHLAA) to support the allocations identified in Policy CS10 and Figure 4. It is also questionable whether the total amount of housing proposed for Woking Town Centre, which will undoubtedly be predominantly apartments, is achievable whilst meeting the need for family housing across the Borough.

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 80	First Name Kevin		Last Name Wilcox				On Behalf Of Crest Nicholson	

The draft NPPF, which forms a material consideration for plan making states that local plans should be inspirational but realistic. The current approach to housing delivery does not achieve these aims.

It is proposed that the Council review their stated five year supply to ensure that sites identified meet the criteria set out in PPS3. It is also integral that the Council makes available its entire evidence base to ensure a transparent assessment of the stated supply that will meet overall targets. The current approach can only be assessed as unsound due to these shortcomings. A review of Green Belt boundaries is also required with the submission of the CS to provide the Inspector enough certainty that an 11-15 year supply can be achieved. The current approach only makes the plan sound until 2017.

It is proposed that the Council review their approach housing delivery, chiefly the dominance of Town Centre delivery. The provision of 2,300 in excess of 200 dph not only raises concern over likely delivery but does not accord with the council's own evidence base that states too much reliance in the past has been placed on apartment led schemes. A review of such an approach is required to ensure a sound strategy to housing delivery is achieved. It is important to bear in mind the decision of the Royal Borough of Windsor and Maidenhead Council to postpone their CS due to a lack of evidence to support such an approach.

### Representation Changes Necessary

#### Officer Response

There is sufficient and robust evidence to demonstrate that the housing target can be delivered. The Council has carried out a SHLAA to ensure that there are sufficient suitable and deliverable sites to meet the housing land supply requirements set out in PPS3. The SHLAA update is available for scrutiny. The SHLAA has been prepared in accordance with good practice guidance and the Council is satisfied that it is comprehensive enough to provide sound basis for housing delivery.

Land at Moor Lane and Brookwood Farm has never been within the Green Belt and has been reserved for residential development since the adoption of the 1993 Woking Local Plan. The principle of residential development of the site has already been established. The Core Strategy only seeks to bring forward the sites to contribute towards its housing land supply. The Proposals Map clearly demonstrates that the sites are not in the Green Belt. Therefore, there should be no confusion about whether the two sites are within the Green Belt. The Hoe Valley scheme has commenced and the Housing Trajectory provides a profile of when the housing element of the scheme will be delivered.

Past completions of new housing against the housing target has been healthy. The inability to meet the housing requirements in the last two years is a reflection of market conditions rather than issues of land supply. There is sufficient land to deliver the requirement when there is an upturn in the economy. The Council is working with its partners to intervene to improve housing delivery.

The Core Strategy builds in a monitoring mechanism to monitor the performance of housing delivery. The Council will take action if it is clear that lack of housing delivery is due to land supply. Paragraphs 6.19 - 6.20 deals with how the Council will deal with risk and contingencies. There is therefore a clear strategy by the Core Strategy to address the concerns of the respondent.

The Core Strategy is clear about the timetable for the release of Green Belt land for housing development. Based on the SHLAA evidence, Green Belt land will only be needed for housing development between 2022 - 2027. The date for the Green Belt boundary review, which is set at 2016/17 is therefore considered reasonable to allow sufficient time for sites to be released from 2022.

**Policy: CS10 H p&d**

<b>Rep ID</b>	<b>Which Doc Does Comment Relate To</b>	<b>Page</b>	<b>Paragraph</b>	<b>Legally compliant</b>	<b>Sound</b>	<b>Test Of Soundness</b>	<b>Participate in Exam</b>	<b>Why Participate in Exam</b>
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<b>Customer ID</b> 80	<b>First Name</b> Kevin		<b>Last Name</b> Wilcox				<b>On Behalf Of</b> Crest Nicholson	
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There is no conflict between the proposal to concentrate development at the town centre and the statement that high density apartments does not necessarily deliver the right type of housing to meet the needs of the WHOLE community. The word 'whole' is particularly relevant in this regard. The Core Strategy does not give the impression that all types of housing need can be met by high density town centre developments. The core Strategy puts together a variety of sites that combines to deliver the range of housing need for the area, including housing for the elderly and affordable family homes. The variety of sites identified for development includes previously developed land at the town centre, greenfield land and land to be released from the Green Belt. The Council is satisfied that a balanced approach has been taken to meet the needs of the whole community.

**Council's Proposed Action**

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	82	First Name	John	Last Name	Hack	On Behalf Of		

149	Core Strategy PD				No	More than 1 selected		To elaborate the points above, if requested, given extensive experience in the strategic planning field.
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**Representation**

In my view, the overall level of housing is not unreasonable, given the national and regional background, which has been considered for many years in the regional context. It has been clear for ages that there is a serious underprovision of housing in the wider SE. There is ample evidence of the need for housing, especially affordable housing. However, the SE does have a serious problem in reconciling this need for housing with living within environmental limits. This is partly a problem of the amount of housing and the encroachment on the countryside (including important ecological designations) and partly the design and location of housing, especially the direct and indirect impacts on the land from traffic and parking. Given this, the figures prepared by the SE region for the Regional Spatial Strategy are probably the best that can be offered in the absence of a more serious national-regional redistribution of economic and population growth and the development of Northern cities.

Much work has been done on the relationship between density and land use. The pressure for housing in London and the SE led to studies as to how housing can be maximised whilst minimising the impact on land and the environment. Higher densities on the conventional model tend to lead to 'town cramming' and increase levels of congestion and pollution. The solution is to significantly reduce car use. The principles of 'Sustainable Residential Quality' (studies were commissioned for the regional planning guidance in London and the SE from, Dr Patrick Clarke and others), and the Urban Task Force (1999) should be applied. More recent studies include 'Grey to Green', 'Hallmarks of a Sustainable City', and others from CABI, and the 'Grabs' international study by the TCPA. The building of housing with significantly less space for cars means that less land is used, and more of the land within the built neighbourhood is available for gardens, recreational greenspace, biodiversity and food production. (The supposed panacea of electric cars will not of itself do anything to solve the land use problem.) Studies were also undertaken of the gains achieved when land used for car parks and single storey sheds was utilised for housing, which has implications for policy for out of centre retailing and activities requiring large areas of car parking.

**Representation Changes Necessary**

Please see comments above, but in summary:

Changes to the town centre policy to make growth contingent on the development of a significantly improved railway station and services;

Specific reference to infrastructure and its means of delivery in the plan to support town centre growth, including positive policies for reducing car use;

Reinstatement of the principle of orbital rail services (to replace the previous reference to Airtrack) and policies to ensure that progress is made on the delivery of the necessary infrastructure;

Changes to the reference to the green belt as an area of growth, and

Reformulating policy on housing to clarify the status of green belt and to set clear criteria for an immediate core strategy review to determine the location and form of sustainable development in the longer term (10 years onwards).

**Officer Response**

The respondent accepts the need for new housing and considers that the housing target is not unreasonable. The Core Strategy already seeks to maximise the efficient use of land by concentrating most new development on previously developed land at the main urban areas. High density mixed use development, which are well designed is encouraged at the town centre. This approach to spatial distribution of development also minimises the need to and distance travelled. However, there is a clear recognition that for high density development to be acceptable, it will have to be of high quality design that enhances the character of its locality. Consequently, there is a robust design

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 82	First Name John		Last Name Hack				On Behalf Of	

policy,policy CS21 which is sufficiently comprehensive to ensure that a holistic approach to design is achieved.

Policy CS18 puts strong emphasise on encouraging modal shift to walking, cycling and public transport. It encourages the preparation of travel plans to help change travel behaviour. It also provides positive guidance on using parking as a tool to minimise congestion. The number of parking that are associated with development is dealt with by SPD in the form of parking standards. Policy CS18 provides the framework for the existing standards to be reviewed if it is deemed necessary. It is however important to note that the review of parking standards should always take into account the economic needs of the are.

The Council through Transport for Woking is working in partnership with transport providers, the County Council and network rail to improve transport provision in general and rail services and infrastructure in particular. For example, the Gateway project when it is implemented will improve the bus/rail interchange in the vicinity of the Station. The Cc Strategy is already addressing most of the concerns raised by the respondent.

The case to release Green Belt land for housing development is made by Policies CS1, CS6 and CS10. It is considered that after concentrating most new development on previously development land, it will still be necessary to identify Green Belt land to contribute towards both the quantity and nature of housing need, in particular, affordable family homes and housing for the elderly.

The Council is satisfied that the combined effect of the policies of the Core Strategy will ensure the sustainable development of the area. This is confirmed by the conclusions of the Sustainability Appraisal Report.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of	West Estates Ltd

160 Core Strategy PD

5.56

### Representation

Taylor Wimpey West London and West Estates support reference and the Council's justification for the need for green belt releases. It is recommended that the last sentence of this paragraph is reflected in Policy CS6 and CS10 to confirm a green belt review will be undertaken and sites identified through the subsequent Site Allocations DPD. The preceding paragraphs and policies all infer such a review will not take place until 2016/17. Taylor Wimpey West London and West Estates object to this inference and recommend all such references are replaced to state this review will be undertaken through the Site Allocations DPD, having regard to the broad locations identified in the Core Strategy DPD.

### Representation Changes Necessary

### Officer Response

The Core Strategy is clear about the date of the review of the Green Belt boundary. The Council is satisfied that a review date of 2016/17 allows sufficient scope for sites to be identified to meet housing need between 2022 - 2027. Paragraph 5.10 emphasises that the Site Allocations DPD will be reviewed to take account of the outcome of Green Belt boundary review. It is not intended to carry out the review before the Site Allocations DOD.

### Council's Proposed Action

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of West Estates Ltd	

159 Core Strategy PD

### Representation

Taylor Wimpey West London and West Estates object to the absence of a non implementation allowance within this table, particularly given the significant and allocation given to the town centre and the uncertain nature of sources yet to be identified. There is no flexibility provided to act as a contingency should these assumptions not be delivered in full. The absence of such flexibility falls contrary to the soundness tests required for such DPDs. In addition, Taylor Wimpey West London and West Estates object to the current wording of the paragraph below the table. 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 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. The Council's aim is to achieve 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.

### Representation Changes Necessary

### Officer Response

The Council is satisfied that there is sufficient and robust evidence to demonstrate that the housing target can be delivered in full. The Council has carried out a SHLAA to ensure that there are sufficient suitable and deliverable sites to meet the housing land supply requirements set out in PPS3. The SHLAA has been prepared in accordance with good practice guidance and is comprehensive enough to provide a sound basis for housing delivery.

Historically, completions of new housing has been achieving required targets . The inability to meet the housing requirements in the last two years is a reflection of market conditions rather than issues of land supply. There is sufficient land to deliver the housing requirement when there is an upturn in the economy. The Council is working with its partners to intervene to improve housing delivery.

The Core Strategy builds in a monitoring mechanism to monitor the performance of housing delivery. The Council will take action if it is clear that lack of housing delivery is due to land supply. Paragraphs 6.19 - 6.20 deals with how the Council will deal with risk and contingencies. It sets out the action that the Council will take to address any significant slippage or non-implementation.

The paragraph under the table adequately conveys the intention of the policy.

### Council's Proposed Action

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of	West Estates Ltd

151 Core Strategy PD

### Representation

Refer to letter for two pages of general comments.

Taylor Wimpey West London and West Estates Ltd supports the Council's reference to the severity of housing need in the borough, particularly for affordable housing. Reference at paragraph 2.14 to required earnings ratios to access the average home also confirms this need is considerable. This highlights the importance of retaining at least the South East provision of 292 dwellings per annum, with the addition of some contingency to allow for slippage and non-implementation. This approach is advocated most recently in the draft NPPF, with current references to an additional year of sites being demonstrated to create competition and choice for land. The commonly used non-implementation percentage of 10% would be a good starting point, or a higher provision if there is evidence to suggest implementation may be slowed further as a result of the extended effects of this recession.

### Representation Changes Necessary

#### Officer Response

Support for the approach to housing provision is noted.

The Council is satisfied that there is sufficient and robust evidence to demonstrate that the housing target can be delivered. The Council has carried out a SHLAA to ensure there are sufficient suitable and deliverable sites to meet the housing land supply requirements set out in PPS3. The SHLAA has been prepared in accordance with good practice guidance and is comprehensive enough to provide a sound basis for housing delivery.

Past completions of new housing against the housing target has been healthy. The inability to meet the housing requirements in the last two years is a reflection of market conditions rather than issues of land supply. There is sufficient land to deliver the housing requirement when there is an upturn in the economy. The Council is working with its partners to intervene to improve housing delivery.

The Core Strategy builds in a monitoring mechanism to monitor the performance of housing delivery. The Council will take action if it is clear that lack of housing delivery is due to land supply. Paragraphs 6.19 - 6.20 deals with how the Council will deal with risk and contingencies. It sets out the action that the Council will take to address any significant slippage or non-implementation.

### Council's Proposed Action



**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID 88	First Name H		Last Name Payne				On Behalf Of	Thomas Roberts Estate Ltd
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182	Core Strategy PD			Yes	Yes			
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**Representation**

The overall target of 4964 dwellings is supported on the basis that is treated as a minimum target of housing to be provided within the plan period, since it falls significantly short of housing market demand, as evidenced by the housing market assessment.

It is noted, however, that in meeting this requirement, the core strategy relies on some 200 additional dwellings coming forward within Woking Town Centre (identified as broad location) and 550 dwellings with the green belt, which can not properly be regarded as falling within a broad location as envisaged with PPS3. Together, these elements make up some 15% of housing land supply over the plan period.

Government guidance in PPS3 states that planning authorities should set out in local development documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable the continuous delivery of housing for at least 15 years from the date of adoption. It further advises planning authorities to identify sufficient specific deliverable sites to cover the first five years of the plan period and a further supply of specific, developable sites for years 6-10 and where possible for years 11-15. Nothing that where this is not possible, broad locations for future growth should be indicated.

The preparation of the site allocations DPD is clearly required as soon as possible after the core strategy to identify specific locations and it is considered that the green belt review will need to be undertaken much sooner than 2016/17. It should commence during the preparation stage of the site allocations DPD, which will establish the approximate quantum of housing likely to be required within the green belt.

**Representation Changes Necessary****Officer Response**

The Sustainability Appraisal has assessed the social, economic and environmental impacts of various options for housing growth. It concluded that significant over provision of housing based on the alternatives that were tested will be damaging to the environment and will be unsustainable. The annual target of 292 dwellings is justified to meet local need and is in general conformity with the South East Plan. The Council believes that the target will be delivered and there are sufficient contingencies built into the strategy to address lack of implementation. The need to monitor and take action against any under provision of housing that will undermine the Core Strategy will also equally apply to significant over provision. The Core Strategy has in-built mechanism to monitor the performance of housing delivery and the Council will take action to address any significant under-provision or over-provision that is considered unsustainable or damaging to the Core Strategy and/or the environment of the area.

The process for preparing the Site Allocations DPD has begun. The Council has already made a call on sites early this year and will be doing the same early next year in preparation for the Site Allocations DPD. The timetable for the preparation of the Site Allocations DPD is set out in the Council's Local Development Scheme. The Site Allocations DPD will be reviewed to take into account the outcome of the Green Belt boundary review.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 90	First Name James		Last Name Stevens				On Behalf Of Home Builders Federation	

188 Core Strategy PD

### Representation

Housing provision and distribution

The policy is unsound. The housing target is too low and does not reflect the scale of new housing required as indicated by the evidence base. The Core Strategy does not provide evidence to demonstrate how Woking has planned in collaboration with adjoining local authorities of the housing market area for this undersupply to be catered for beyond the Borough's boundary.

The 2008-household projections indicate that some 7,000 new households will form over the plan period. The evidence from the Council's SHMA shows that 594 new homes are needed each year (page 11 of the Core Strategy). The SI—IMA annual requirement multiplied by the 17 years of the plan would require a total of 10,098 homes by 2027. The target represents only half of what is needed to meet future emerging needs.

The question which is unanswered by the Core Strategy is where and who will provide for this shortfall of 5,000 homes.

The draft NPPF sets out the Government's key housing objective to increase significantly the delivery of new homes (paragraph 107). To this end local planning authorities are required to develop an evidence base to ensure that their Local Plan meets the full requirements for market and affordable housing in the housing market area. The Council has identified the need for 10,098 homes in its borough, but only plans to provide half that number. The Core Strategy does not set out how this other half will be provided for in the adjoining districts of the housing market area. The draft NPPF nevertheless requires local authorities to cooperate in order to plan strategically across local boundaries (paragraphs 44-47). This will include taking account travel- to-work areas. Local planning authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross- boundary impacts such as when capacity constraints mean that development requirements cannot be met within their own area.

### Representation Changes Necessary

#### Officer Response

The Council do not accept that the policy is unsound. The annual housing target is in general conformity with the South East Plan requirement. In accepting the South East Plan evidence to justify Woking's target, the Council have also taken into account housing land availability, population and household projections. The South East Plan took into account any redistribution that might be necessary to meet the overall strategic target for the region. Therefore, the assumption is that if authorities are to meet their respective requirements, the strategic regional target will be met. The Council has taken into account housing targets of neighbouring authorities and authorities in the Housing Market Area in preparing the Core Strategy. The general approach by most of the authorities has been to deliver the South East Plan requirement as demonstrated by the analysis of the various authorities below. On the basis of that, it is unlikely that Woking will be required by any of the other authorities to make provision to meet their needs and vice-versa:

- \* Elbridge - Core Strategy is adopted. Housing target is broadly in line with SEP requirement.
- \* Epsom & Ewell - Core Strategy is adopted. Consulting of housing land supply options in autumn 2011.
- \* Guildford - Have just finished consulting on housing options.
- \* Mole Valley - Core Strategy is adopted. Considering a partial review on replacement housing requirement.
- \* Reigate and Banstead - Updating revised housing target.
- \* Runnymede - Core Strategy on hold at the moment.
- \* Spelthorne - Core Strategy is adopted. It is delivering the SEP requirement and no change is being proposed.
- \* Surrey Heath - Have just consulted on housing options. Likely to adopt SEP requirement. Examination by the end of the year.
- \* Tanbridge - Meeting the SEP target and no intention to change that.

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 90	First Name James		Last Name Stevens				On Behalf Of Home Builders Federation	

\* Waverley - Consulting on options for future housing requirement.

\* Woking - Adopting the SEP requirement.

Furthermore, the Council has ensured that all nearby authorities are consulted at the various stages of the Core Strategy process. No Local Planning Authority has objected to the Core Strategy on the basis that it had failed to meet part of their housing provision. Similarly, the Council is not expecting any other authority to meet part of its housing need. The Consultation Statement provides the extent of consultation carried out in this regard.

As evidenced by the above analysis, the Local Planning Authorities in Surrey are not preparing their Core Strategies at the same time and it will be unreasonable to expect Woking to delay the preparation of its Core Strategy in order to ensure the rationalisation of housing provision across the Housing Market Area or the region. It has prepared the Core Strategy on the basis of information that is currently available. There are a number of established groupings such as Planning Working Group and the West Surrey Group to ensure that account is taken of each other's Core Strategy. The Planning Working Group is Pan-Surrey group and Woking is an active member of the group.

PPS12 emphasises the importance of delivery and the Council takes this seriously. It has tested the higher options of delivering 499 new affordable housing per year and 594 comprising affordable housing and demand for market housing and has concluded that these options are neither deliverable nor sustainable. It is considered that the harm to the environment for delivery these levels of housing will far outweigh the benefit for doing so. The SA of Options provides the evidence to support this and is clear that delivering 499 or 594 new dwellings will be unsustainable. The Council is also satisfied that it has been reasonable in its approach to taking into account the housing needs of other authorities before confirming its housing target of 292 per year.

**Council's Proposed Action**

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 94	First Name Jeremy		Last Name Woolf			On Behalf Of	Martin Grant Homes Ltd	
222	Core Strategy PD			Yes	No	More than 1 selected		To consider the points raised and consider more up-to-date information.

**Representation**

Policy CS10 sets out the overarching spatial approach to the distribution of the strategic housing requirement to be met during the period 2010 to 2027. The strategy carries forward the 292 annualised requirement set out in the South East Plan. It also provides the locus against which the overall amount and location of growth to be met within the area will be determined.

The policy basis against which the CS is to be prepared includes the Regional Spatial Strategy (RSS) for the South East (the South East Plan) ('SEP'). This was adopted in May 2009 and sets out the approach to meeting the strategic housing requirement within the Borough in the period to 2026.

Policy HI sets out a requirement for the delivery of 292 dwellings per annum within Woking Borough, equivalent to 5,840 dwellings during the plan period. However, the supporting text to Policy HI (paragraphs 7.6 and 7.7) notes that the strategic housing requirements of the Policy are still significantly below the forecast growth of households and even more so by the more recent 2006 based population projections. It is added that Local Authorities can test higher numbers through their development plan documents provided that they are consistent with the principles of sustainable development.

Following the CLG's announcement and accompanying advice noted dated 6 July 2010, Regional Strategies were revoked by the Secretary of State under s79(6) of the Local Democracy Economic Development and Construction Act 2009 and were said to no longer form part of the Development Plan for the purposes of s38(6) of the Planning and Compulsory Purchase Act 2004. It was advised at that time that the legal basis for Regional Strategies is a matter to be abolished through the Localism Bill.

The 6 July revocation decision was then subject to challenge in the Cala Homes (South) Ltd case (2010 EWHC 2866). This was decided on 10 November 2010 and the outcome was to quash the 6 July revocation. The Secretary of State has decided not to appeal this decision.

On 27 May 2011 the Court of Appeal provided important clarification of the Chief Planner's letter of the 10 November 2010 issued following the statement made by Rt. Hon Eri Pickles MP on the same date regarding the Government's intention to revoke Regional Strategies.

In R (CALA Homes South Limited) v Secretary of State for Communities and Local Government (No. 2) the Court of Appeal has concluded that the Government's intention to abolish Regional Strategies through primary legislation could be a material planning consideration in making development control decisions, but not in plan-making decisions. The CALA Homes judgements to which we refer above have established that as matters now stand, LPAs must work within the current framework of the SEP. This includes in relation to plan preparation.

Against the above background, the South East Plan housing requirement figure is the starting point against which the strategic housing requirement to be met within Woking Borough is to be assessed. However, the delivery of housing is seen as a matter of national priority and there have been various recent statements both by the Chancellor of the Exchequer and other Ministers of DCLG indicating the importance of housing delivery and the benefits of the same to both the National and Local economies.

In all of the circumstances the need to provide for and address housing delivery is an issue which must be viewed both positively and urgently by local planning authorities. This approach is reaffirmed by the Coalition Government in the draft NPPF.

The NPPF makes it clear at paragraph 109 that in significantly increasing the supply of housing LPAs should meet the full requirements for market and affordable housing. This in part, carries forward the requirements set out in PPS3 which states that, inter alia, when determining the local level of housing provision LPAs are required to take into account evidence of current and future levels of need and demand for housing and affordability levels based upon, inter alia, local and sub-regional evidence of need and demand, set out in Strategic Housing Markets Assessments (SHMAs) and other relevant market information such as long term house prices.

The above implies the need to plan for a higher annualised strategic housing requirement to be met within Woking above the 292 dwelling annualised requirement set out in the SEP.

In seeking to address local housing needs through preparation of the CS, the Council's Issues and Options Consultation Paper (Oct 2009) identified three possible levels of growth as follows:

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	94	First Name	Jeremy	Last Name	Woolf	On Behalf Of	Martin Grant Homes Ltd	
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The Council's Strategic Housing Market Assessment ('SHMA') estimates that there is a need for 499 new affordable homes in the Borough every year. This is equivalent to 9,980 dwellings during the period 2006 to 2026 and is almost twice that of the South East Plan ('SEP') target figure. The 594 figure per annum is the demand identified by the Borough's evidence base. This is equivalent to 11,880 dwellings for the period 2006 to 2026 and is twice that of the SEP requirement. The planned level of growth at 292 dwellings per annum is significantly below the identified levels of need set out above. Accordingly, the evidence base points to a need to plan for a materially higher number of dwellings than currently proposed in the draft CS.

The need to plan for a materially higher number of dwellings than currently proposed in the draft CS. The Council's updated SHLAA (Nov 2010) forms part of the evidence base to the CS and provides information on the housing land supply position. However, a fundamental omission from the SHLAA is the lack of site specific information. Site assessments are supposed to be included at appendices I to 4. However, this information has not been published alongside the main report. Accordingly, it is not possible at this stage for the Council to rely upon their findings as there is no means of assessing whether the identified components of supply relied upon by the LPA in meeting the strategic housing requirement are deliverable and or developable within the time frame they envisage. The Housing Land Supply Position Statement at 1 April 2011 sets out the position in planning for the residual requirement to be met during the plan period based upon the requirement of the South East Plan. The five year HLS position is set out on page 6 of the Statement. This suggests that the LPA has a supply of 1,896 dwellings in meeting a 1,732 requirement in the six year period 2011 to 2017. The above results in a surplus of only 144 dwellings. Moreover the supply figure includes a material amount of dwellings without planning permission. Accordingly, there is uncertainty as to their ability to deliver during the first five/six years of the plan. As to longer term needs, PPS3 (para 54) requires LPAs to identify a further supply of specific, developable sites for years 6-10 and years 11-15. The above has not been addressed by the LPA in drafting their Core Strategy. Evident from the above is the evidence of a considerable need for housing within the Borough. It is clear that planning for the SEP requirement will fail to deliver sufficient housing opportunity and choice. The Council's approach to housing delivery as set out in Policy CS10 relies, in the main, 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 the strategy set out 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 detailed housing market assessments. As set out in the CS, evidence points to the continued need to plan for a mix of housing types and tenures, including family sized dwellings. However, the Council's continued reliance on housing delivery from previously developed windfall/UCS sites is likely to continue to bring forward primarily flatted schemes. In contrast, larger, greenfield sites, adjoining the urban area can provide for a more appropriate mix of dwelling types and sizes including both flatted and family sized dwellings.

he release of suitably located greenfield sites can provide the quantum of development necessary to provide for necessary supporting infrastructure, including, inter alia, affordable housing provision and appropriate financial contributions toward local service and facility provision. It can also help ensure that qualitative needs in terms of housing mix and type are met. Against the above background, and having regard to the policy position set out in PPG2 and the SEP, we 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 in accordance with the proposed policy set out in response to Policy CS6.

**Representation Changes Necessary****Officer Response**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 94	First Name Jeremy		Last Name Woolf				On Behalf Of	Martin Grant Homes Ltd

The Council is satisfied that the 292 annual target for housing provision is adequate to meet its housing need. It considers that evidence used to justify the target at the regional level is credible and robust. In adopting the target, the Council has also taken into account availability of land for housing, population and household projections, sustainability appraisal of alternative options and the Government's commitment to growth. More importantly, it considers that the requirement is deliverable.

The Council has tested the higher options of delivering 499 new affordable housing per year and 594 dwellings comprising affordable housing and demand for market housing and has concluded that these options are neither deliverable nor sustainable. It is considered that the harm to the environment for delivery these levels of housing will far outweigh the benefit for doing so. The SA of Options provides the evidence to support this and is clear that delivering 499 or 594 new dwellings will be unsustainable. The Council is also satisfied that it has been reasonable in its approach to taking into account the housing needs of other authorities before confirming its housing target of 292 per year.

The SHLAA identifies sufficient sites to meet about 13 years of housing land supply. The Core Strategy also identifies the Green Belt and the Town Centre as broad locations for the future direction of growth, in line with the requirements of PPS3. There is clear evidence to demonstrate that there are sufficient deliverable sites to meet the housing target over the period of the Core Strategy. It should also be emphasised windfall development for the first 10 years after the adoption of the Core Strategy have not been counted towards the housing land supply.

The Core Strategy identifies a range of sites comprising previously developed land, greenfield land and Green Belt land to meet its varied nature of housing needs. Examples of large greenfield sites identified for residential development are Land at Moor Lane and Brookwood Farm. Many of the concerns raised are already addressed by the Core Strategy.

Support for the release of Green Belt land is noted. However, at this stage, it will be unhelpful to narrow the scope for the area of search for the Green Belt boundary review.

The Council is aware of comments made in paragraphs 7.6 and 7.7 of the South East Plan regarding the inability of the region to meet the scale of housing demand for South East. However, the South East Plan took into account the limitations of the various sub-regions to accommodate higher level of growth before arriving at the requirements that were set for each area.

### Council's Proposed Action

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

369 Core Strategy PD

### Representation

In Paragraph 1.26, the document sets out how the core strategy has taken elements of the South East Plan and proven them to be reliable.

Until this core strategy is finalised, the Local Development Plan remains in place with its recommendation for no more than 200 homes on Moor Lane. So why then in the core strategy does it state in Paragraph 5.66 that in Westfield, 'The site (Moor Lane) has outline planning permission for 440 new dwellings, 60% of which will be affordable'. This is clearly not in line with the existing LDP; outline planning permission has lapsed and the site does not have adequate access. It is wrong to imply that this development is already 'decided' in its entirety in the core strategy. Either it is covered by the LDP or the core strategy. We recommend that development in South Woking is developed either in line with the LDP or in line with the core strategy from January 2014. Unless such action is taken, we strongly believe that development in Moor Lane is being 'squeezed in' before the core strategy has been finalised, and not in accordance with existing Local Development Plan's.

### Representation Changes Necessary

### Officer Response

There is a resolution to grant planning permission for a proposal on land at Moor Lane subject to Section 106 Agreement being signed. It is proposed to amend paragraph 5.66 of the Core Strategy to clarify this. The principle of residential development of the site has been established by the Local Plan by safeguarding it for that purpose. The Core Strategy confirms the development of the site to make a significant contribution towards the overall supply of housing land in the area. The suitability of any scheme that will come forward will be determined by the development management process. The Council will always ensure that proposals for development will be determined in accordance with the development plan for the area.

### Council's Proposed Action

**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

374 Core Strategy PD

**Representation**

The historic SE Plan (Paragraph 1.27) indicates a need for 5840 additional homes; the ONS Household Forecast – Table 406 - provides an estimate of an increase of 8000 additional households during this period. All of these numbers are in excess of the current plan to build an additional 4380 homes. To monitor reality it is suggested that Fig 4 is also used to show Actual Change in Households together with Forecast change in Households against the actual and forecast number of new homes built.

**Representation Changes Necessary****Officer Response**

The 292 housing requirement of the Core Strategy is in general conformity with the South East Plan requirement for the area. The base date for the SEP requirement is 2006. The Core Strategy is 2010. That is why there is a difference in the overall quantity of development. The annual figure of 292 is the same. The housing requirement take account of population and household projections. Information about the expected changes to the population of the area during the life of the Core Strategy is included in the Population Topic Paper. This is on the Council's website and part of the evidence base to support the Core Strategy.

**Council's Proposed Action**

377 Core Strategy PD

**Representation**

CS10 indicates the proposed construction of 440 dwellings on Moor Lane, Westfield, a site of 9.75 hectares. This equates to a density of 45 homes per hectare which is totally inconsistent with the local area and current Local Plan of 20dph. Surely under the new Localism Bill this together with all the other targets needs to be discussed and agreed with the local population. As such this whole Strategy needs to be written along the following lines. 'The Council, in consultation with local neighbourhood forums will discuss and agree the future sites to enable delivery of 4964 new homes between 2010 and 2027, 35% of which need to be classified as affordable for either rent or assisted purchase.'

**Representation Changes Necessary****Officer Response**

Land at Moor Lane is safeguarded in the adopted Woking Local Plan for residential development. The identification of the site for this purpose went through extensive consultation and a public inquiry before it was adopted. The site is carried into the Core Strategy to make a contribution towards housing provision in the area. The Core Strategy itself has evolved through a number of stages with significant public involvement at each relevant stage. There is already a resolution to grant planning permission for scheme on the site subject to Section 106 Agreement being completed and signed. The Council is satisfied that the capacity anticipated for the site is reasonable and can be accommodate without compromising the general character of the area. The public will have a further opportunity through the development management process to comment on any detailed scheme that will come forward.

**Council's Proposed Action**



**Policy: CS10 H p&d**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 100	First Name Carmelle		Last Name Bell			On Behalf Of	Thames Water Utilities Ltd	

433 Core Strategy PD No More than 1 selected

**Representation**

Thames Water have concerns regarding the Moor Lane, Westfield and Brookwood Farm, Brookwood Safeguarded Sites.

We have concerns regarding Waste Water Services in relation to these sites. Specifically, the sewerage network capacity in these areas is unlikely to be able to support the demand anticipated from the developments.

**Representation Changes Necessary**

The Developers should therefore be required to undertake a drainage study to demonstrate that there is adequate waste water capacity both on and off the site to serve the developments and that it would not lead to problems for existing or new users.

It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary.

**Officer Response**

The principle of developing these site for residential use has been established in the Local Plan. The Core Strategy considers it to play a significant role in delivering the housir strategy for the area. There is already a resolution to grant planning permission for residential development on Land at Moor Lane, subject to Section 106 Agreement being signed. There is on-going pre-application discussions for development on Brookwood Farm with the view to submit planning application. Community involvement exercises are on-going to inform details of the proposal. Polcy CS16 - Infrastructure delivery allows scope for infrastructure requirements to be resolved prior to planning permission and or developer contributions to be secured towards the delivery of infrastructure to support development. There is already a robust policy in place to address the concerns raised through the development management process.

**Council's Proposed Action**

**Policy: CS11 Hmix**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 13	First Name David		Last Name Williams			On Behalf Of	McCarthy and Stone Retirement Lifestyles	

20 Core Strategy PD No Justified

**Representation**

A retirement and care development centre by its very nature is a single entity with communal space and facilities and could not provide a mix of house types and tenure within the same block due to potential service charge and management conflicts and associated viability of providing separate communal and administration areas.

If minimum floor space standards are to be used these must be guided by industry wide standards for the likes of specialist housing. A catch all general standard for all residential would be inappropriate. Levels of car parking, amenity space and internal communal space as well as landscaped gardens and safety and security of care are integral to making a retirement scheme deliverable and viable.

**Representation Changes Necessary**

Policy CS11 should clarify that specialist housing such as retirement housing will be considered on its own merits and will not be expected to provide a mix of dwelling types, sizes and tenure.

**Officer Response**

The identified housing mix reflects the need for the borough, and it is expected that development will reflect this need and allows flexibility for a case to be made for schemes that reflect the established character and density of the locality and the viability of the scheme.

**Council's Proposed Action**

**Policy: CS11 Hmix**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of
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51	Core Strategy PD				No	Justified
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**Representation**

The historic SE Plan (Paragraph 1.27) indicates a need for 5840 additional homes; the ONS Household Forecast – Table 406 - provides an estimate of an increase of 8000 additional households during this period. All of these numbers are in excess of the current plan to build an additional 4380 homes. To monitor reality it is suggested that Fig 4 is also used to show Actual Change in Households together with Forecast change in Households against the actual and forecast number of new homes built.

As highlighted in Paragraph 5.96 and supported by the ONS Population Projections, it is forecasted that the older Population will increase by 32% and require an additional 2500/3000 homes. Although this should free up some larger homes (January 2011 Housing Strategy Consultation Paper) it is unlikely these will satisfy the increased demand created by the envisaged future population growth. It is our understanding that the Housing Mix in Paragraph 5.72 developed using the BHM tool does not take into account the projected future change in type of household and household size as projected by the ONS. If this observation is correct the SHMA numbers requiring reworking to reflect the anticipated changes in the profile of Woking residents.

If this observation is correct the SHMA numbers require reworking to reflect the anticipated changes in the profile of Woking residents.

**Representation Changes Necessary**

**Officer Response**

The Council recognises the changing nature in the population, particularly in regards to the rate of increase in the aging population. Indeed the Core Strategy has a specific policy to ensure this matter is properly addressed and accounted for, this is fully set out under Policy CS13.

**Council's Proposed Action**

**Policy: CS11 Hmix**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 80	First Name Kevin		Last Name Wilcox			On Behalf Of	Crest Nicholson	
155	Core Strategy PD	68	5.72	No	No	More than 1 selected		It is considered that the issues raised are imperative to the soundness of the CS

**Representation**

Savills on behalf of Crest Nicholson, support the wording as proposed in policy CS11, which is sufficiently flexible to meet changing housing requirements over the plan period. However, the supporting text to the policy, specifically paragraph 5.72, should be deleted as it is contrary to the flexibility established within Policy CS11. to overly prescribe the mix of dwellings required for a proposed development does not take account of market demand and housing need at the time, neither does it enable a flexible approach for changing circumstances.

**Representation Changes Necessary**

It is proposed that supporting paragraph 5.72 of the CS is deleted. Reference should only be made to the evidence base for housing mix as demonstrated through the SHMA, May 2009 which will indeed change over the plan period. To state a required mix for new developments is contrary to the flexibility established through proposed policy CS11.

**Officer Response**

The wording of policy CS11, along with the supporting justification sets out that whilst the Council will expect the housing mix of new residential schemes to reflect the latest evidence of need, this is subject to character, density and viability. It is considered that this provides sufficient flexibility to balance need, demand and viability. Paragraph 5.72 should be retained because it is a clear expression, based on evidence of what the general needs to the Borough are.

**Council's Proposed Action**

**Policy: CS11 Hmix**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 89	First Name Lisa		Last Name Bowden				On Behalf Of Royal Mail	

192 Core Strategy PD

**Representation**

In our previous representations we objected to 'Policy CS10: Housing Mix' (now Policy CSI 'I) on the basis that we considered it to be overly prescriptive. We therefore support the re-wording of the policy to take account of the viability of the scheme.

Further, we note and support that the Council has adopted a more design-led approach to development in order to justify the form and density of proposals. We also note that the Council will expect residential schemes to reflect the latest evidence of need, subject to density and character considerations. We support the same.

**Representation Changes Necessary****Officer Response**

Comments and support noted

**Council's Proposed Action**

Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of Westfield Common Residents Association	
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376 Core Strategy PD

**Representation**

As highlighted in Paragraph 5.96 and supported by the ONS Population Projections, it is forecasted that the older Population will increase by 32% and require an additional 2500/3000 homes. Although this should free up some larger homes (January 2011 Housing Strategy Consultation Paper) it is unlikely these will satisfy the increased demand created by the envisaged future population growth. It is our understanding that the Housing Mix in Paragraph 5.72 developed using the BHM tool does not take into account the projected future change in type of household and household size as projected by the ONS. If this observation is correct the SHMA numbers requiring reworking to reflect the anticipated changes in the profile of Woking residents.

**Representation Changes Necessary****Officer Response**

The Council recognises the changing nature in the population, particularly in regards to the rate of increase in the aging population. Indeed the Core Strategy has a specific policy to ensure this matter is properly addressed and taken account of. This is fully set out under Policy CS13.

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	9	First Name	Last Name	On Behalf Of Burhill Group Ltd				
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11 Core Strategy PD

**Representation**

Burhill supports the provision of affordable homes within new residential developments. Burhill however, 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 need to be considered on a site by site basis, even on large sites for 10 or more dwellings and particularly on greenfield sites. Hence it is suggested that the wording of Policy CS12 is changed to reflect this.

**Representation Changes Necessary**

**Officer Response**

The policy clearly states that the proportion of affordable housing to be provided by a particular site will take into account a number of factors; the last factor being the costs relating to the development, in particular the financial viability of developing the site (using an approved viability model).

**Council's Proposed Action**

Customer ID	13	First Name	David	Last Name	Williams	On Behalf Of McCarthy and Stone Retirement Lifestyles		
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21	Core Strategy PD	5.83	No	Justified
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**Representation**

Paragraph 5.83 implies that affordable housing will be sought on extra care accommodation most of which falls within a Use Class C2 use. Is a distinction being made between different types of Class C2 and the need for affordable housing to be provided. Clarification and justification is required to make this a sound statement.

**Representation Changes Necessary**

**Officer Response**

The intention of the policy is to seek affordable housing contributions on new residential units. The following amendment to the wording of paragraph 5.83 of the policy justification of policy CS12 is proposed to clarify this:

**Council's Proposed Action**

It is proposed that paragraph 5.83 (p72), which is part of the reasoned justification to support policy CS12, be amended to the following: 'This policy applies to all sites where new residential development is proposed, including mixed use schemes and proposals where there is a net increase in the number of units on a site. This will include sheltered and extra care accommodation and other forms of residential accommodation where relevant.'

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of
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53 Core Strategy PD No Justified

**Representation**

Throughout the Core Strategy reference is often made to their being a need for 499 Affordable Homes. This comes from the February 2009 Fordham Research West Surrey SHMA Report Paragraph 10.11 which states that there is an annual need for Affordable Housing in Woking of 499 homes = 7485 over the 15 year period. However the February 2009 Fordham Research Housing Needs and Assessment for Woking Paragraph 12.41 (which is used for developing the required Housing Mix) states that there is an Annual Need of 594 (indicated in Para 1.27) homes in Woking over the next 15 years - 42% of which are affordable = 3735 Affordable homes required i.e. 249 per year NOT 499. This requires correcting throughout Woking 2027 and its supporting documentation

Woking's Plan to build 1737 Affordable Homes which according to the SA backup papers is limited due to their being insufficient land available. It is very clear that this Core Strategy is unsound due to there being confusion over the base numbers (provided by a now defunct organization Fordham Research going into Administration). Comments are also made within the SA that Housing List Numbers are increasing they have however decreased by over 35% since the data for the above Reports was collected. AS mentioned above the ONS Neighbourhood Statistics show that this fall took place at the same time as there was an increase in demand in both the SE of England as well as England as a whole This further leads one to the opinion that the whole strategy on Affordable Housing is flawed, being driven by National Targets rather than Local Needs.

CS 12 fails to recognize the Social issues associated with large high density mixed sites having a proportional high level of Social Housing. The prime reason that Woking has areas of Social Deprivation is because historically it created such sites without any thought of the Social consequences. (See comments on Para 1.27 above). Woking's Community Strategy includes the following objectives  
exploring through policy and action ways in which all local people have an expectation of a decent, appropriate and affordable place to live ensuring that when new areas are built the local infrastructure grows with it conserving green spaces and ensuring they are accessible to all helping people to feel safe in their community  
exploring ways in which an imaginative architectural approach might meet housing needs in semi rural locations.

To ensure such objectives are taken into consideration CS12 should therefore add a Paragraph that Affordable Housing should be built in accordance with the aims developed in consultation with the local citizens and expressed in Woking's Community Strategy.

Furthermore the clause 'A financial payment to be utilized in providing affordable housing on an alternate site' should be removed. It is because of such historic 'get outs' that Woking has failed to keep pace with its Social Housing commitment.

No where in either the Core Strategy or supporting documentation can I find any reference to tackling WBC's poor performance with regard to RSL rents (Table 704) which in 2010 were the 4th highest in England. CS12 needs to be modified to include a target that Woking's RSL rents are equal or no higher than its adjoining Boroughs

- 2010 Ave Weekly Rents
- Woking □ £103.13
- Guildford □ £99.67
- Surrey Heath □ £92.48
- Elmbridge □ £98.70
- Mole Valley □ £86.48
- Runnymede □ £98.91

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID 16      First Name Colin      Last Name Weeks      On Behalf Of

Surrey Average  £95.38

Although it is fully appreciated that there is a need for Affordable Housing, there does not appear to be any reference to any research of the Social implications of introducing a 50% requirement for affordable housing, recognizing there is also a high (undetermined) requirement for Social Housing implied within the SHMA and the issue of deprivation it has brought to Sheerwater and Lakeview. There is a requirement for supporting evidence that building mixed tenancy high density family housing estates in semi rural locations such as South Woking will not bring with them the Social problems found elsewhere in Woking and other areas. The Joseph Roundtree Foundation Report on Mixed Tenure sites conclude that The research suggests that the Government objective of delivering more affordable homes in mixed communities will only succeed if close attention is paid to their management, how 'affordable' they are for LCHO residents, and the placement of the affordable properties within the scheme. The development also has to fit correctly within the surrounding neighbourhood and community.

**Representation Changes Necessary**

**Officer Response**

CLG SHMA Practice Guidance version 2 published August 2007, provides the following definitions of housing need and demand which are set out in PPS3. The definitions are as follows:

Housing demand - The quantity of housing that households are willing and able to buy or rent.

Housing need - The quantity of housing required for households who are unable to access suitable housing without financial assistance.

The SHMA published by Fordham Research in February 2009 estimated the annual need for affordable housing in Woking Borough to be 499 affordable homes. The figure of 594 set out in paragraph 12.41 is the estimated overall net demand situation in Woking. Overall, across all tenures there is an apparent shortfall of 594 dwellings per annum. Of this shortfall around 42% is for affordable housing. Thus the 594 figure is a demand rather than need figure and no correction to the figures set out is required.

There is overwhelming evidence to justify the need for affordable housing. In seeking to meet this need the Council is keen to ensure that there is even distribution across the Borough. That includes ensuring that sites that come forward for residential development have an effective mix of tenures. The Council has been mindful that the social, economic and environmental implications of the Core Strategy should be assessed. A Sustainability Appraisal has been carried out and the outcomes do not suggest that the level of affordable housing being sought will damage the social fabric of the community. By seeking an element of on site affordable housing provision on all sites of five or more dwellings Policy CS12 seeks to ensure affordable housing is distributed throughout the Borough. The proposal seeks a maximum provision of 50% affordable housing on Greenfield sites and sites in public ownership, but is prepared to negotiate a percentage of the 50% target to be provided off-site if that will ensure a more effective distribution of affordable housing across the Borough. It is not considered necessary to amend the policy to make reference to the Woking Community Strategy as public involvement has been integral to its preparation, and the aspirations of the local community as expressed in the Sustainable Community Strategy have been a key objective (please refer to paragraph 1.5 of the introduction to the Core Strategy).

It is not considered necessary to remove the clause 'A financial payment to be utilized in providing affordable housing on an alternate site' as on some sites this will be the only viable means of contributing to affordable housing provision.

The concerns raised concerning management, affordability and specific design of schemes are all issues that would be considered by development management in the



Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 16	First Name Colin		Last Name Weeks				On Behalf Of	

processing of future applications.

Table 704 refers to the CLG Live Tables which sets out average rents by district for all RSL lettings based on the RSR. This is something that will be taken up with RSL partners in due course.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 24	First Name Tom		Last Name Crisp				On Behalf Of	Woking Constituency Labour Party

52 Core Strategy PD

### Representation

The Woking Labour Party submitted a detailed response to the draft Core Strategy consultation in January. Having considered the Council's account of the other submissions made and the revised draft, it is particularly disappointing to us that the council's position on the delivery of affordable homes remains unchanged.

We remain of the view that the Council's approach to the issue of affordable housing remains unambitious. We cannot emphasize enough the importance of delivering more affordable homes if Woking is to develop into a sustainable community. The Council's justification for departing from the sound recommendation of the Strategic Housing Market Assessment is that delivering 292 affordable homes per year is the "feasible" option. We believe this is a pessimistic assessment.

For the 2010/11 financial year the council committed itself to a target of building 117 new affordable homes. By January 2011, just 18 had been delivered.

This is wholly inadequate. This rate of delivery just compounds the problem further: more new homes will have to be delivered to make good the shortfall over the last and previous years. The failure to deliver more affordable homes in the past only points to the need for the increased delivery of new homes in the future.

The Council's housing business manager was quoted as saying:

"The dearth of affordable housing opportunities coming forward in the borough, this target [117 affordable homes in 2010/11], this target is unlikely to be achieved without a significant change in market conditions."

The failure to deliver anything like enough affordable homes in 2010/11 is not we submit just a symptom of the economic climate and damaging cuts in government capital funding. The developers of the New Central development clearly felt "market conditions" were good enough to bring forward a significant development of new homes. It will deliver 445 new homes on its own. It points to a failure negotiate a better deal from private developers delivering new homes. It points to a lack of imagination and failure to consider how new affordable homes might be delivered without solely relying on the private house building sector. What consideration has been given to the release of redundant publicly owned land for affordable housing development? What about the promotion of community land trusts - putting land in the hands of local communities for the development of affordable homes in perpetuity?

The Core Strategy in this respect is not justified. The decision to adhere to a target of 292 affordable homes falls far too short of what is plainly needed. The initial draft and consultation draft contained a figure that was devised without reference to the fact that the Council was plainly failing to meet the delivery target it had previously adopted. There is no evidence that the Council has looked beyond the private sector housebuilders as the source of new affordable homes, and more imagination is required.

### Representation Changes Necessary

#### Officer Response

One of the key priorities of the Council is to help deliver affordable housing. However, it is important that any target that is set has a realistic chance of being delivered. Paragraph 5.82 clearly states that the Council recognises that the level of provision set out in policy CS12 is insufficient in the context of local need which is estimated at around 499 new affordable homes a year, however, this is what can realistically be achieved without constraining the overall delivery of housing in the Borough. The economic viability assessment produced by Adams Integra in 2010 forms part of the evidence base underpinning the Core Strategy and was used to inform development of the policy. The policy

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 24	First Name Tom		Last Name Crisp				On Behalf Of	Woking Constituency Labour Party

also clearly sets out how affordable housing will be delivered over the plan period.

The justification for the annual requirement of 292 new homes is comprehensively covered under policy CS10 and it is not intended to repeat that.

A community land trust is defined as a corporate body established for the express purposes of furthering the social, economic and environmental interests of the local community by acquiring and managing land and other assets, according to the Housing and Regeneration Act 2008. The property and any profits will provide benefits exclusively for the local community and the CLT will be controlled by individuals living and working in such a community. The essence of the CLT is a mechanism for the democratic ownership of land by and for the benefit of a local community in a specified area. Setting up a CLT is beyond the scope of the Core Strategy.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 33	First Name Jean		Last Name Dare				On Behalf Of	Hook Heath Residents Association

84 Core Strategy PD No More than 1 selected

**Representation**

The Strategic Housing Market Assessment highlights (para 1.19) a need for 499 new affordable homes p.a. and a total of 594 new homes p.a. when market housing demand is included, i.e., only 95 homes p.a. are required to meet free market needs. According to WBC’s assessment the total requirement of 594 homes p.a. is approximately double the which has been deemed reasonable in setting the target.

Market demand is clearly not the problem. 95 new homes can easily be accommodated. The high level of demand for affordable housing (5 times the market demand) is surprising given that the current mix in the borough is 90% market housing to 10% affordable. It is also at variance with another finding of the Strategic Housing Market Assessment (paragraph 6.68) that future demand is likely to be 81% for market housing and 19% for affordable housing. We are not given any detail of the reasons for the high demand for social housing, but any strategy that attempts to meet it will necessarily change the social composition of residential areas of the borough and affect the demand for centrally provided facilities. The recent change of national policy to introduce means testing, to end tenancies for life, and to increase rents charged on social housing from around 20% of market rates to something closer to 80% may well change the pattern of demand significantly.

The Strategic Housing Market Assessment is said to be based on a survey of local households, but the questions asked and the method by which households were selected to receive the survey are not revealed. One can easily speculate that most householders when asked if they would prefer to live in a larger/better home than their current one if they could afford it would answer in the affirmative. The results could then be presented as demonstrating a heavy demand for affordable housing. Of course the survey may have been conducted in a much more even-handed way, but unless the evidence is produced, the “assessed” demand must be treated as an article of faith, not fact.

CS1 also states that the of the 4964 dwellings to be built over 17 years (292 per annum), 35% will be affordable housing, i.e. 190 dwellings at market value to 102 affordable dwellings on average each year. This represents double the number of market value homes previously assessed as the demand. It must represent a deliberate attempt to expand the population via immigration. In addition, the 2 to 1 ratio of new market value housing to new affordable housing will lead to a higher proportion of affordable housing within the borough than the current 9 to 1 mix. The higher concentration surely means that council tax income per head of population will decrease. Thus, not only is a degree of social engineering evidently planned on which the opinion of residents has not been sought, but also those very residents will be required to subsidise it.

CS11 in paragraph 6.67 states that affordable housing will be financed by imposing a levy on all new developments on Brown Field sites to enable affordable housing to be built equivalent to between 10% and 40% of the development depending on size. For all developments on Greenfield sites the levy will be 50%. WBC acknowledges that even this level of forced contributions will not meet predicted demand and proposes further measures to increase the amount of affordable housing. (See comments on the Green Belt.)

It does not seem fair that the burden of financing affordable housing should fall so heavily on the purchasers of new market housing. In the past when housing costs in an area were beyond the means of essential workers, employers had to make the necessary provision. This was common practice in the police force and health service until quite recently, and in industry before that. Tied housing may no longer be considered acceptable, but a requirement for employers whose workers needed accommodation to make contributions to the affordable housing stock would spread the load more fairly as well as helping to identify the full cost of providing certain services.

**Representation Changes Necessary**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 33	First Name Jean		Last Name Dare				On Behalf Of	Hook Heath Residents Association

**Officer Response**

Refer to rep 53 which clarifies the difference between housing need and housing demand. The SHMA clearly sets out both the need and demand for affordable housing in the Borough. It identifies an overall net demand for 595 dwellings per annum comprising 252 affordable dwellings and 342 market dwellings. The SHMA sets out the reasons why affordable housing (including social housing) is required and these are reiterated in paragraph 5.80 of the policy. The main reason being the differential between local incomes and house prices. As of the second quarter of 2007 the average property price in the Borough was £334,725, and the average (mean) gross household income was £52,322 per annum. The median income is noticeably lower than the mean (at £36,342 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.

The references to changes in national policy to introduce means testing, to end tenancies for life, and to increase rents charged on social housing refers to some of the proposals outlined in the Localism Bill which is currently going through Parliament and some which have already been introduced such as the 'Affordable Rent' model for new build affordable housing. The uncertainty regarding the Government's new affordable rent model while the Core Strategy was being written, policy CS12 was written in such a way to allow flexibility. If any further changes are made during the life of the Core Strategy we will be able to adapt to them. The glossary definition refers readers to PPS3 for the most up to date definition. The detail will be set out in an SPD.

It should be emphasised that financial contributions from developers to support improvements to infrastructure services and facilities that are required as a result of development will be required and collected via S106 or CIL (on its introduction). It should also be noted that the core strategy has been the subject of rigorous consultation, and thus the views of local residents on the provision of affordable housing in the Borough have been considered.

With regard to the point made concerning employers making necessary provision to house workers, it should be noted that the Council will require proposals for non-residential development which generates needs for additional housing to make an appropriate contribution to affordable provision, where market pressures are especially strong and the need for affordable housing is acute. No change is proposed to the policy.

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	43	First Name	Robert	Last Name	Palgrave	On Behalf Of
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271 Core Strategy PD Yes No Justified

**Representation**

The CS identifies a need for 499 new affordable homes per year but puts forward an aspiration to deliver just 1737 over the life of the plan, i.e. 116 per year. Formalising this very significant under-provision in the CS will surely allow developers to argue that a rate of 116 per year is acceptable?

**Representation Changes Necessary**

**Officer Response**

Paragraph 5.82 clearly states that the Council recognises that the level of provision set out in policy CS12 is insufficient in the context of local need which is estimated at around 499 new affordable homes a year, however, this is what can realistically be achieved without constraining the overall delivery of housing in the Borough. The economic viability assessment produced by Adams Integra in 2010 forms part of the evidence base underpinning the Core Strategy. It demonstrates that the level of affordable housing being sought is realistic and viable to enable development to come forward. No change is proposed to the policy

**Council's Proposed Action**

Customer ID	48	First Name	Kevin	Last Name	Stevens	On Behalf Of
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282 Core Strategy PD 70 cS12 Yes No

**Representation**

It has been proven that developments where affordable housing mix is above 30-40% then the area becomes less desirable and the effect of mixing with normal housing is lost

**Representation Changes Necessary**

**Officer Response**

No evidence has been provided to substantiate the claim that an area becomes less desirable where affordable housing mix is above 30-40%.

Refer to response to representation 53 about the Sustainability Appraisal. No change is proposed to the policy.

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
292	Core Strategy PD	70		No	No	More		

**Representation**

CS12 is contrary to Government policy in PPS3 and PPS12.

Housing policies in LDFs are required to take on board both the need and demand.

The level of housing proposed is inadequate to meet demand.

The Council in setting its strategic policies has ignored demand and set the annual requirement in the South East Plan as a housing target. If demand is not addressed then the Council cannot expect to fully address housing need.

PPS3 sets a site size of 15 dwellings above which affordable housing should be sought. Thresholds below this should only be sought where it can be demonstrated that setting lower thresholds will not adversely affect the financial viability of sites to the detriment of overall housing delivery.

We have reservations about the % targets.

The application to mixed use schemes is not clear. These have different viability criteria and should be treated differently. Applying the policy to commercial development will be uneconomic and stifle the economic recovery.

**Representation Changes Necessary**

Policy CS12 should be simplified and drafted in accordance with Government guidance in PPS3.

**Officer Response**

The policy has been informed by the SHMA which considers both housing need and demand, in accordance with Government guidance in PPS3. In setting out the proposed criteria for the scale of affordable housing required on different sites the Council has had regard to an Economic Viability Assessment produced by Adams Integra in 2010. The viability assessment demonstrates that the affordable housing targets are a viable proposition and therefore deliverable. The requirements of PPS3 are met in this regard. The policy also allows for the costs relating to the development, in particular the financial viability of developing a particular site to be taken into account when consideration is given to the proportion of affordable housing to be provided by a particular site.

The Council will only seek a financial contribution towards affordable housing from non-residential developments where a need for affordable housing is directly related to a commercial development and the contribution is appropriate to the scale and kind of the development.

No change is proposed to the policy.

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
318	Core Strategy PD			Yes	No	Effective		

**Representation**

We consider that the 40% affordable housing target for sites over 15 units is too high and will inevitably affect the viability - and hence deliverability - of residential and mixed-use schemes. Lowering the site threshold to include developments of less than 15 units will have the same effect, particularly at the lower end - i.e. less than 10 units. This is effectively imposing a tax on development which will ultimately be borne by the householder, as part of the purchase price, not the developer, leading to fewer market dwellings becoming 'affordable'.

**Representation Changes Necessary**

Paragraph 2 should read: "...in accordance with the following criteria, subject to a site-specific viability appraisal and a consideration of the factors outlined below."

**Officer Response**

The policy clearly states that the proportion of affordable housing to be provided by a particular site will take into account a number of factors; the last factor being the costs relating to the development, in particular the financial viability of developing the site (using an approved viability model). The viability study proves that the affordable housing targets being sought will be viable. No change is proposed to the policy.

**Council's Proposed Action**



**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
346	Core Strategy PD	73	5.86	Yes	No	Effective		

**Representation**

With a headline target for affordable housing at 35% (CS 5.82, a reasonable figure) and 70% of these targeted to be social rented accommodation, this means 25% of all new housing will be social rented and 11% will be intermediate shared ownership. Since the CS implicitly cites low ownership as a visible indicator of deprivation in Sheerwater it would seem that encouraging more people into shared ownership schemes will be good for communities and their sense of franchisement.

**Representation Changes Necessary**

Design schemes to allow for a higher proportion of shared ownership. Policy CS11 housing mix is endorsed. Also compare to CS5.64, also endorsed.

**Officer Response**

The SHMA highlights that many households cannot afford to access shared ownership schemes. The percentage breakdown between social rented and intermediate housing has been based on evidence contained in the SHMA.

Support for the housing mix proposed and information on the design and densities of new housing set out in paragraph 5.64 is acknowledged.

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
347	Core Strategy PD	72	5.84	Yes	No	Effective		

**Representation**

The need for an alternative site for affordable housing, in the event that the original site does not receive its affordable housing quota, to have the sum of affordable housing for both sites, will mean that the alternative site will potentially have a very high proportion of affordable housing and will therefore not be consistent with the mix of dwellings promoted by policy unless the alternative site is in itself very large. This issue is most severe for sites outside the town centre.

**Representation Changes Necessary**

In instances where there are good reasons as to why the affordable housing quota cannot be met on the original site, the 'standard' proportion of affordable v market housing should be adhered to for the alternative site rather than insisting on a higher quota. A higher-than-standard quota of affordable housing assumes an implicit priority of policy, i.e., that providing affordable housing, and therefore high density housing, overrides all other considerations that would otherwise be taken into account on the alternative site. Inevitably there will be instances where this will dilute the effectiveness of some of the other policies (mixed communities, enhancement of character, green environs, and so on).

**Officer Response**

The Council has a number of different delivery mechanisms for achieving affordable housing delivery. This includes the potential of utilising existing housing stock, such as that promoted by Woking Borough Homes and through exception sites. One of the key objectives for securing off site provision is to ensure an even distribution of affordable housing across the Borough. The Council will be mindful of this objective when it is considering higher levels of affordable housing on particular sites.

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 80	First Name Kevin		Last Name Wilcox			On Behalf Of	Crest Nicholson	
162	Core Strategy PD	70		No	No	More than 1 selected		It is considered that the issues raised are imperative to the soundness of the CS

**Representation**

Savills on behalf of Crest Nicholson, object to the approach of affordable housing provision across the borough, specifically in regard to Greenfield sites. It is not clear from the policy or supporting text why such an approach has been taken. There is not justification provided that supports 50% requirement of affordable housing on Greenfield sites irrespective of their size or number of dwellings proposed. The approach is therefore not effective or justified in PPS12 terms as it is not based on a robust evidence base. There is little Flexibility in the approach to Greenfield housing development which could impact on the viability of delivery over the plan period. The absence of any reference to viability does not take account of the recent downturn in the housing market which demonstrates the volatility that can occur in respect of land values, and thus the ability to deliver a prescribed proportion of affordable housing and other planning obligations, especially at such a high rate. It is important that a viability clause is included in the paragraph related to Greenfield sites to ensure that policy is sufficiently flexible to allow for variation across the Borough and during the life of the CS. The draft NPPF, which is material consideration to plan making, states at paragraph 39 that local authorities should ensure that policies within their development plan ensure viability, taking into account elements such as affordable housing provision, that provides an acceptable return to a willing land owner and developer to enable the development to be deliverable. A 50% requirement with no flexibility would likely render many schemes undeliverable.

It is proposed that the Council reassesses its requirement for 50% affordable provision on Greenfield land as there is no justification to take such a rigid policy approach.

If the policy remains it is integral to the soundness of the plan that a viability clause is added that allows flexibility to account for changing circumstances over the plan period. The current working of Policy CS12 relating to Greenfield sites is considered inconsistent with national policy and unjustified. A viability clause exists within Policy CS12, however, this only seems to relate to sites in public ownership.

**Representation Changes Necessary****Officer Response**

On greenfield sites and/or Council owned land the viability study modelled up to 60% affordable housing and up to Code for Sustainable Homes (CfSH) Level 6 alongside other base assumptions (see paragraph 3.12, figure 15 and table 10b). The study found that to achieve a reasonable Greenfield value per ha (noted as potentially being between £300,000 to £500,000 per ha) whilst providing 50% affordable housing and on the basis of CfSH level 5 a level of residential value equivalent to between value point 3 and 4 is required. Given that these are identified as typical value levels for the Borough, the study does demonstrate that the policy provides a potentially viable scenario (bearing in mind all the caveats and explanations contained in the report).

The policy clearly states that the proportion of affordable housing to be provided by a particular site will take into account a number of factors; the last factor being the costs relating to the development, in particular the financial viability of developing the site (using an approved viability model).

**Council's Proposed Action**

To improve clarity the following minor amendments to the layout of policy CS12 are proposed:

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
<b>Customer ID</b> 80	<b>First Name</b> Kevin		<b>Last Name</b> Wilcox				<b>On Behalf Of</b> Crest Nicholson	

- The wording 'subject to an assessment of the financial viability of the development of the site' on the second line of page 71 should be removed as viability is considered later in the policy.
- Split the first paragraph on page 71 before the word generally and replace the first sentence of the new paragraph with the following sentence – 'On sites where the Council is seeking a 50% affordable housing contribution, generally, the Council's preference will be to provide all the 50% affordable housing in-situ as part of the development'.

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of	West Estates Ltd

164 Core Strategy PD

5.89

**Representation**

Taylor Wimpey West London and West Estates support the need to maintain an exceptions policy and requests this is also included within policy CS12 for added weight and avoidance of doubt.

Taylor Wimpey West London and 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' the fourth sentence, ' or substantial community benefits in lieu of a higher percentage,,'

**Representation Changes Necessary**

**Officer Response**

Paragraph 5.89 sets out the Council's approach to possible future exception sites. 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 CS16: Infrastructure delivery.

Given that the paragraph sets out possible exceptions to the policy, it is not considered that this paragraph should be inserted within the policy wording itself.

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of West Estates Ltd	

163 Core Strategy PD 5.86

**Representation**

This paragraph should be revised to reflect Policy CS11. The split should reflect the latest evidenced SHMA or more up to date assessments of local need, along with viability evidence where appropriate, rather than any prescribed district wide percentages that do not reflect local need and could become out of date rapidly.

**Representation Changes Necessary**

**Officer Response**

It is not felt necessary to mention viability in paragraph 5.86 as this is covered in the policy itself.

**Council's Proposed Action**

To ensure consistency and provide flexibility to enable the policy to reflect possible changes in updated evidence collected during the lifetime of the Core Strategy it is propose to amend the wording of paragraph 5.86 (p73) to read:

"The Council will expect that new affordable dwellings should be delivered in accordance with the tenure split as evidenced in the latest SHMA. The SHMA (2009) identifies that there is a need for 70% of new affordable dwellings to be in social rented tenure and 30% at intermediate level (including shared ownership)".

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of	West Estates Ltd

161 Core Strategy PD

**Representation**

Taylor Wimpey West London and West Estates object to the current wording. It is recommended the provisions applying to green field and brown field 'Council' land Housing are clarified. It is unclear why the flexibility given to green field 'Council' land, in respect of a proportion being provided off-site to meet wider objectives, could not equally apply to other green field sites. Taylor Wimpey West London and West Estates also consider the exception site provisions of paragraph 5.89 should be embodied in the policy for avoidance of doubt. Taylor Wimpey West London and 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 or indeed increased levels of shared ownership or accommodation to meet other local needs, rather than a strict and counterproductive adherence to specific percentage targets at district level. This flexibility is considered important to assist the timely delivery of much needed family and affordable housing.

**Representation Changes Necessary**

**Officer Response**

Refer to proposed change set out in the response to rep 162 to address the concern regarding flexibility given to Greenfield 'Council' land.

Second point concerning exception sites is addressed in rep 164 (customer id 83).

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 89	First Name Lisa		Last Name Bowden				On Behalf Of Royal Mail	

193 Core Strategy PD

**Representation**

We previously requested that 'Policy CS11: Affordable Housing' (now Policy CS12) be divided into two separate policies to provide greater clarity; the first dealing with affordable housing arising from residential development and the second with that from non-residential development.

We note that the policy has not been revised! reformatted. We therefore reiterate our previous request for the Policy to be divided in to the following:  
L Affordable Housing Arising from Residential Development

**Affordable Housing Arising from Non-Residential Development**

We are of the opinion that the policy approach currently adopted by the Council may be ineffective, and therefore (arguably) inconsistent with national policy, which as set out above requires Local Planning Authorities to set out the approach to seeking developer contributions (paragraph 29 of PPS 3) for reason that developers may not consider their proposals subject to affordable housing provision which, if wrongly assumed, could later render their schemes unviable.

**Affordable Housing Arising from Non-Residential Development**

We support the policy's contributions only being sought as appropriate to the scale and kind of the development and subject to an assessment of financial viability' We also recognise and support that the Council will provide further guidance for developers and the public in the form of an Affordable Housing Delivery SPD. However, we note that the Council has not included further details on the likely uses that would generate the requirement for affordable housing in non-residential development as per our original request. We consider this omission may not be effective or consistent with national policy, for the same reasons as above.

**Representation Changes Necessary**

**Officer Response**

The issue raised regarding the splitting of the policy was addressed in the officer response to the Draft Core Strategy consultation. The Council remains of the view that there is no need to split the policy.

The Council is of the opinion that the policy is consistent with national policy including paragraph 29 of PPS3. Given the variety of potential non-residential schemes that may directly result in a need for affordable housing it is not prudent to list potential schemes in paragraph 5.85 of the policy justification.

**Council's Proposed Action**



Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 90	First Name James		Last Name Stevens				On Behalf Of Home Builders Federation	

189 Core Strategy PD

**Representation**

Affordable housing

We object to the policy as unjustified as the percentage affordable housing targets are not supported by the evidence base, nor is the evidence base sufficiently robust.

The evidence base for the affordable housing targets is the Local Development Framework Economic Viability Assessment (EVA) published in July 2010.

Paragraph 17 of the report states that the report authors have made an assumption that market conditions will restore to pre-2007 conditions (the height of mortgage lending fuelling rapid house price inflation). Again, the report acknowledges in paragraph 3.2.9 on page 38 that “current conditions add up to a negative financial viability impact when compared with how schemes are viewed and pursued in a more stable, confident market”. We do not support an approach to assessing the viability of the Council’s affordable housing target that assumes buoyant market conditions and ignores current market realities. Viability assessments have to be based on current market conditions. They must not speculate about the future performance of the housing market lest the targets adopted prove unviable and become an obstacle to delivery. This is particularly a risk for the early years of the plan. Many commentators, especially within the house building industry, suspect that the current depressed market may be the norm for some years yet to come. It is important to note that the EVA report acknowledges the current problems facing delivery in Woking (paragraph 19).

We would draw attention to the draft NPPF which expects that any affordable housing requirement, or other local standards that may be applied to development, are based upon an assessment of current market conditions and a local understanding the district-wide development costs at the time Local Plans are drawn up (paragraph 43 of the draft NPPF). Similarly, the ministerial statement Planning for Growth requires that local authorities take full account of relevant economic signals including land prices. It goes on to state that local planning authorities should be sensitive to market conditions and take positive steps to support development where prior assessments are no longer up-to-date. These statements provide a clear indication that the Government expects that polices and other local regulatory demands imposed on residential development are realistic and therefore deliverable at the time when the plan is adopted. This is necessary to ensure that development projects have the best chance of commencing without the need for further protracted negotiation with the local authority to secure an implementable planning permission.

We note that the EVA assumes Code Level 4. This is a flawed assumption as for the main part of the plan period all new homes will be required to meet Code Level 5 (equivalent to zero carbon, from 2016 onwards) and this is a policy requirement in policy CS22. This will add considerably to build costs. The most recent assessment by the DCLG (Cost of Building to the Code for Sustainable Homes, August 2011) shows that building to Code 5 on urban regeneration sites (i.e. Woking Town Centre) will add an additional 27.7% on top of the 2006 Part L baseline. For city infill schemes it represents a 31.1% increase. These are not insignificant additional costs and need to be accounted for in the viability assessment. The Building Regulations elements of the Code are also mandatory (Part L accounts for 80% of the Code). Because they are non-negotiable they have to be factored into the viability assessment.

Table 10 in Appendix IIg models the impact on viability of Code 5. It is troubling to read that zero residual values are recorded against the lower value points (close to current market conditions) at 40% AH for all types of development mix. Most troubling, given the Council’s reliance on flat developments in Woking Town Centre to meet most of its housing requirement, is the evidence that the 100 unit flats scheme records a zero residual value at all proportions of affordable housing at value points 1, 2, 3 and 4 and even when no affordable housing is applied at value points 1 and 2. We note that Appendix II provides the results from the base appraisals across a range of scenarios assuming a tenure mix of 70% affordable rent and 30% intermediate. We are anxious to read that at the lower value points only modest levels of residual value are generated when 40% A is modelled, and in the case of 100 unit flat schemes (as in the case of Woking Town Centre) a negative residual land value is recorded at value points 1, 2, and 3, and only £0.5 million at value point 4 (value points 3 and 4 approximate to current selling prices according to the report’s authors. These are unlikely to be sufficiently attractive offers to incentivise the land owners to bring their sites forward for development.

A 10 unit housing scheme that gives the land owner only £971,148 million at value point 4 applying 30% AH is also unlikely to provide a sufficiently attractive return, when the selling price of each house is £301,720 (for 3 bed houses according to Figure 4 on page 33 of the EVA report).

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 90	First Name James		Last Name Stevens				On Behalf Of Home Builders Federation	

At 30% AH and at value point 4 a 10 unit flat scheme would secure only £0.5m for the landowner. A 15 unit fiat scheme only generates £610,561. To ensure the delivery against the Council's housing trajectory we recommend setting much lower targets for affordable housing. For Woking town centre schemes, in order to ensure that these come forward, and in view of the mandatory costs associated with building zero carbon homes, we recommend that no affordable housing is sought. This would be in keeping with paragraph 29 of PPS3. We object to the proposal to delegate matters associated with the implementation of the policy to an Affordable Housing SPD. PPS12 discourages the use of SPD to establish policy on matters that should be tested at examination. The draft NPPF also cautions against the use of SPDs except where they can assist bring forward development at an accelerated rate. It goes on to state that SPD should not be used to add further financial burdens on development.

**Representation Changes Necessary**

**Officer Response**

The Council is satisfied that the viability assessment is robust enough to provide credible justification for the affordable housing targets. The study was thus undertaken at the plan-making stage as directed in paragraph 43 of the draft National Planning Policy Framework. The methodology and process used for the assessment has been accepted as robust in every EiP that it has been exposed to. The Consultants are confident that the right approach has been used.

We do not agree that the approach to assessing the viability of the Council's affordable housing target assumes buoyant market conditions and ignores current market realities. Paragraph 23 of the Executive Summary states that 'we have to consider the particular market conditions now in coming to our recommendations...'. Land Registry informatio shows that values are about 3% higher now than at the point of the research with sales volumes also improved relative to that point in time. Thus the study takes into account the economic conditions at the time of the assessment, but also balances that with future forecasts. This is a sound approach for a Core Strategy that has a timeframe up to 2027.

The respondent states that the ministerial statement 'Planning for Growth' requires that local authorities take full account of relevant economic signals including land prices. Th viability report states that underlying value levels in Woking are still very high. Land prices are primarily driven by property value levels, and thus land price expectations local tend to be high. Paragraph 3.2.9 also clearly states that affordable housing is not solely responsible for any viability difficulties and it should not be regarded in that way. There is often a complex interaction of influences. Further, in paragraph 20 the consultants 'consider that in the overall context of the Borough – with varying values – and assuming variable market conditions over the LDF period, a 40% headline would be a sufficiently challenging and appropriately pitched target'.

The policy clearly states that the proportion of affordable housing to be provided by a particular site will take into account a number of factors; the last factor being the costs relating to the development, in particular the financial viability of developing the site (using an approved viability model).

With regard to the viability of urban regeneration sites, we would emphasize that policy CS22 does not require new residential development on previously developed land to achieve CfSH level 5 until April 2016 (and then only the energy and CO<sup>2</sup> and water components of the code). The viability assessment demonstrates that code level 4 is a potentially viable scenario for such sites. Further, the Council's Housing and Previously Developed Land Trajectory (figure 4 page 67), taken from the SHLAA, highlights that a significant number of dwellings are expected to be completed in the town centre prior to 2016. If in 2016 (when the Government implements its proposed standards for CfSH and Building Regulations), the requirement to build to CfSH level 5 proves to impact the viability of bringing forward certain types of sites within the Borough the Council will review its viability assessment and make a case to review affordable housing targets such types of sites if required.

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 90	First Name James		Last Name Stevens				On Behalf Of Home Builders Federation	

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 92	First Name Barbara		Last Name Beck				On Behalf Of	Campaign to Protect Rural England - Woking
243	Core Strategy PD	70			No	Justified		

**Representation**

Policy CS1 includes a reference to an overall housing provision target of 35% affordable housing. National guidance refers to meeting the housing needs of all sectors of the community. Evidence produced by the Council in their Strategic Market Housing Assessment includes the reference to a need for 499 new affordable houses per year. The gap between the average price of a new dwelling in Woking and the average household income is very considerable, resulting in a substantial affordability gap.

However, faced with this evidence the Council only includes a target of 35% in CS1 for the affordable housing target. This is clearly insufficient response.

We recognise that it would be quite impossible to include a figure to satisfy overall need, but we feel the 35% target is too low in the circumstances that exist at the present time.

The SE regional plan figure was set at 40%. At least one of the recently adopted CS in Surrey that of Mole Valley, has adopted a figure of 40% and this has been accepted by the Examination Inspector.

We consider, therefore in the circumstances existing in Woking today, the Council should aim for a higher target. In a Plan that is intended to last for up to 17 years, 40% may not ultimately be achieved, but the council should at least aim for a higher target above 35%. At the very least a higher target than 35% shows the Council's intent and aim to achieve the maximum possible affordable housing. The higher percentage figure is a reasonable target and we consider any target should be challenging.

We are aware of the questions and issues concerning site viability and the case made by developers and others that too high percentages of affordable housing prevents certain sites from ever being developed, but that issue can be addressed at the planning permission stage when each site is considered on its individual merits. If a robust case can be made to the Council that the percentage figure included in the Policy is unachievable then it can be reduced. We note that figure of 50% is included for the percentage of affordable houses for Greenfield and publicly owned sites. This will help to increase the amounts of affordable housing built and make a target of 40% more achievable.

**Representation Changes Necessary**

**Officer Response**

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 in current policy.

Support acknowledged for a figure of 50% of affordable housing to be accommodated on Greenfield and publicly owned sites.

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 94	First Name Jeremy		Last Name Woolf			On Behalf Of	Martin Grant Homes Ltd	
230	Core Strategy PD			Yes	No	More than 1 selected		To expand upon the points raised and consider more uptodate information.

**Representation**

The Policy states that all new residential development on greenfield land will be required to provide 50% of dwellings to be affordable, irrespective of the site size or number of dwellings proposed. However, there is a caveat to this requirement which refers to the need to assess the level of provision on a site by site basis, including viability. Whilst acknowledging the acute housing need within the District, including that for affordable homes, our client is of the view that a 50% affordable housing target on greenfield sites is inappropriate and unduly onerous. The imposition of such a requirement could actually serve to further constrain the release of sites to the detriment of housing delivery generally. This would have the adverse impact of actually reducing the amount of affordable homes provided rather than increasing the level which is the intention.

We have considerable experience in dealing with LPAs where viability is an issue, on which basis we are of the view that the imposition of such a target will not only put into doubt the ability of sites to come forward, it will also cause significant delays to the determination of subsequent planning applications. The SEP (Policy LF4) requires 40% of housing within the London Fringe Subregion to be affordable. This figure should be carried forward in the CS and set as a minimum requirement to be met, instead of insisting upon a more onerous 50% requirement.

**Representation Changes Necessary**

The Policy should be amended within the deletion of a 50% target for greenfield sites and substitution with a 40% requirement. As set out above, we have a number of overarching concerns that need to be addressed in preparation of the CS, including in relation to, inter alia, ensuring the timely and responsive provision of sufficient housing land and undertaking the necessary Green Belt Review to underpin the spatial distribution of housing during the plan period. Importantly, the CS must accord with the requirements set out in the RSS having regard to inter alia, the need to undertake a selective local review of the Green Belt on land to the south of the Woking urban area. The CS must be prepared in accordance with the policy basis and should, inter alia, satisfy the 'justified' test set out in PPS12 by representing the most appropriate strategy when considered against the reasonable alternatives. It must also be "effective" and provide for a flexible approach.

PPS12 (Para 4.50) clearly states:

It is essential that the Core Strategy makes clear spatial choices about where development should go in broad terms. This strong direction will mean that the work involved in the preparation of any subsequent development plan documents is reduced. The accompanying Plan Making Manual notes that Core Strategies are where tough decisions need to be made. The CS must provide a strategic framework for any other development plan documents. PPS1 2 (Para 4.46) further states:

A strategy is unlikely to be effective if it cannot deal with changing circumstances. Core strategies should look over a long time frame 15 years usually but more if necessary. In the arena of the built and natural environment many issues may change over this time. Plans should be able to show how they will handle contingencies: it may not always be possible to have maximum certainty about the deliverability of the strategy. In these cases the core strategy should show what alternative strategies have been prepared to handle this uncertainty and what would trigger their use. Authorities should not necessarily rely on a review of the plan as a means of handling uncertainty. In seeking to ensure an appropriate level of housing delivery at the most appropriate locations, including through a selective review of the Green Belt to the south of the Woking urban area, the strategy must be effective, justified and consistent with Policy. Reliance upon the delivery of SHLAA sites within the urban area and failing to provide for a review of the Green Belt and/or the inclusion of an appropriately worded policy in the CS to deal with the same (see above) is unlikely to result in a sound strategy.

The CS should be amended in accordance with our detailed representations set out above.

**Officer Response**

On greenfield sites and/or Council owned land the study modelled up to 60% affordable housing and up to CfSH Level 6 alongside other base assumptions (see paragraph 3.12)

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 94	First Name	Jeremy	Last Name	Woolf			On Behalf Of	Martin Grant Homes Ltd

figure 15 and table 10b). The study found that to achieve a reasonable Greenfield value per ha (noted as potentially being between £300,000 to £500,000 per ha) whilst providing 50% affordable housing and on the basis of CfSH level 5 a level of residential value equivalent to between value point 3 and 4 is required. Given that these are identified as typical value levels for the Borough, the study does demonstrate that the policy provides a potentially viable scenario (bearing in mind all the caveats and explanations contained in the report).

The relevant housing delivery matters will be considered under the response to Policy CS10.

**Council's Proposed Action**

**Policy: CS12 AffH**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

379 Core Strategy PD

**Representation**

Nowhere in either the Core Strategy or supporting documentation can we find any reference to tackling WBC's poor performance with regard to RSL rents (Table 704) which in 2010 were the 4th highest in England. CS12 needs to be modified to include a target that Woking's RSL rents are equal or no higher than its adjoining Boroughs:

2010 Ave Weekly RSL Rents

Woking £103.13

Guildford £ 99.67

Surrey Heath £ 92.48

Elmbridge £ 98.70

Mole Valley £ 86.48

Runnymede £ 98.91

Surrey Average £ 95.38

An action statement needs to be included to cover this point

**Representation Changes Necessary**

**Officer Response**

Please refer to officer response to representation 53.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

372 Core Strategy PD

**Representation**

WBC's strategy (CS1) is to build 1737 new affordable dwellings) of which over 400 are planned to be in Westfield and 300 in Brookwood Farm (5.66 page 65). Based on the deprivation issues of Sheerwater and Lakeview considerable care will be needed in the design of these new Estates to make sure that Woking does not generate two further "pockets of deprivation". As indicated below the supporting Evidence Base does produce conflicting numbers of Affordable Homes required. However if the SHMA is correct it would imply that WBC will have a considerable pent up demand for Affordable Homes

**Representation Changes Necessary**

**Officer Response**

Please refer to officer response to representation 53.

**Council's Proposed Action**

370 Core Strategy PD

**Representation**

With regard to the data used to calculate housing need, we recommend that the council revise the strategy in line with up to date statistics and plan according to that data, rather than seeking to justify further over development of Woking.

For Social and Affordable Housing considerable weight is put on the 2007 Fordham's Research paper, made at a time when demand for local housing was much higher than it is today, accompanied by the 2007 WBC Household Survey which is now four years out of date. It is hoped that WBC would have taken care of many of the issues raised in the survey and thus the issues highlighted would not still be relevant today.

**Representation Changes Necessary**

**Officer Response**

It is considered that the findings from the SHMA remain valid. Although market conditions are still relatively fragile, given constricted mortgage lending and concerns over unemployment and inflation the demand for affordable housing is unlikely to have diminished from the results of the SHMA.

**Council's Proposed Action**



Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

373 Core Strategy PD

**Representation**

Future Home demand indicated in Section 1.27 and Paragraph 12.41 of the now defunct Fordham Research Housing Needs and Assessment Paper states that Woking requires an additional 8910 new homes up to 2027 (42% of which will be Affordable i.e. 3735 or 249 per year). This number is in direct conflict with the 499 number used in Sections 1.27 and other sections throughout this document. The Strategy also makes the presumption that Affordable Homes have to be supplied via new build or Council Acquisitions. No economic comparison is made anywhere in the documentation of the economic benefits of further subsidising open market rents. A strategy that could provide a more rapid supply of "Affordable Housing" plus a more integrated Society.

**Representation Changes Necessary**

**Officer Response**

Please refer to officer response to representation 53 with regard to figures of 249 and 499 mentioned.

Further subsidy of open market rents would result in the reduction of market rented stock and would thus not address shortage of housing supply.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

378 Core Strategy PD

**Representation**

CS12 requires further thought. Although it is fully appreciated that there is a need for Affordable Housing, there does not appear to be any reference to any research of the Social implications of introducing a 50% requirement for affordable housing in areas that already have Social problems such as Kingfield and Westfield, recognizing the issues of deprivation that similar historic policies have brought to Sheerwater and Lake View. These ideals are further expanded in Woking's Community Strategy which includes the following objectives:

- o Exploring through policy and action ways in which all local people have an expectation of a decent, appropriate and affordable place to live
- o Ensuring that when new areas are built the local infrastructure grows with it
- o Conserving green spaces and ensuring they are accessible to all
- o Helping people to feel safe in their community
- o Exploring ways in which an imaginative architectural approach might meet housing needs in semi rural locations

To ensure such objectives are taken into consideration CS12 should therefore add a Paragraph that Affordable Housing should be built in accordance with the aims developed in consultation with the local citizens and expressed in Woking's Community Strategy.

Furthermore the clause "A financial payment to be utilized in providing affordable housing on an alternate site" should be removed. It is because of such historic "get outs" that Woking has failed to keep pace with its Social Housing commitment.

**Representation Changes Necessary**

**Officer Response**

Refer to response to representation 53.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

371 Core Strategy PD

**Representation**

With regard to the data used to calculate housing need, we recommend that the council revise the strategy in line with up to date statistics and plan according to that data, rather than seeking to justify further over development of Woking.

2007 was a freak year when Property Prices were at an all time high relative to earnings. Due to the current economic climate a lot has changed since then. At that time (March 2007) Woking had 3244 households on its register for social Housing (a 47% increase over the previous year!) which by March 2010 had fallen to 2086. During the same period the number of Social Homes in both Woking and the South East had stayed constant although the demand for Social Housing in the South East had increased by 3.3 % homes in the SE at the same time as it had decreased in Woking by 35%! The Study fails to highlight that multiple applications can be made to LA registers. Furthermore non married couples can both register individually.

**Representation Changes Necessary**

**Officer Response**

The numbers on the housing register are constantly fluctuating but remain high. The Council's Housing Register in 2007 was particularly high (3,244 April 07) because the new hometrak system (move to the Choice Based Lettings allocation scheme) had been introduced and there was a back log of possibly inactive applications to review.

Once the review had taken place the application numbers on the Housing Register has been between 2,000 and 2,600, which is not considered to be a dramatic change since 2007. However, the Council operates an open register which anyone is entitled to join, even if they do not have a housing need. Therefore the number of applications on the register may not necessarily reflect the numbers of people in actual housing need but is a reasonable indication.

It is not accepted that 2007 was a "freak year". In the last four years prices in the borough have been:  
Mean prices - 2007 = 329,300, 2008 = 334,060, 2009 = 305,124 and 2010 = 343,083  
Median prices - 2007 = 250,000, 2008 = 250,000, 2009 = 235,000 and 2010 = 263,00

It is considered that the findings from the SHMA remain valid, including those for housing need.

**Council's Proposed Action**

**Policy: CS13 Older**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 13	First Name David		Last Name Williams				On Behalf Of	McCarthy and Stone Retirement Lifestyles

18 Core Strategy PD 5.96

**Representation**

Overall McCarthy and Stone are encouraged by the positive references to housing for the older population, e.g.. Paragraph 5.71, Paragraph 5.96 and Paragraph 5.99.

Paragraph 5.9 should be expanded further to acknowledge the wider benefits that Owner Occupier Retirement Housing can provide in meeting other planning policy objectives, as supported by recent research.

**Representation Changes Necessary**

**Officer Response**

It is not considered necessary to amend the policy

**Council's Proposed Action**

**Policy: CS13 Older**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 13	First Name David		Last Name Williams				On Behalf Of	McCarthy and Stone Retirement Lifestyles

19 Core Strategy PD No Justified

**Representation**

Typically the average resident moving into retirement housing will be a single person who does not and will not require two bedrooms. Para 5.100 rightly acknowledges a need for a proportion of two bedroom units for older people however there is no justification to enshrine a figure of 50% two bedroom units into policy.

It is unclear what is meant by "generous space standards and generous amenity space" - this should be clarified or deleted.

Residents of such accommodation do not desire to have extensive gardens or amenity areas which require maintenance and extra costs but require good internal communal areas and more passive amenity areas which do not require the full extent of grounds that say family housing would require.

**Representation Changes Necessary****Officer Response**

Elderly people and vulnerable groups often require accommodation with two bedrooms which allows for visitor overnight stays. As these groups spend a considerable amount of time in their accommodation, the need for generous space standards is important to contribute to quality of life. Paragraph 5.101 clearly states that further guidance on design which takes into account 'lifetime homes' standards and wheelchair accessibility standards will be set out in the Quality Design Standards SPD.

The Council is aware the government is proposing to change the regulations regarding housing benefit in the forthcoming Welfare Reform Bill. Consequently an amendment to the wording is proposed to allow flexibility to take account of the emerging proposals.

**Council's Proposed Action**

It is proposed that policy CS13 is amended to add the following text: "At least 50% of schemes should have two bedrooms (unless the development is entirely for affordable units when a smaller percentage may be more appropriate)". Paragraph 5.100 of the reasoned justification will be amended to add the following text "The government is proposing to change the regulations regarding housing benefit in the forthcoming Welfare Reform Bill. Flexibility will be required for determining planning applications which include affordable sheltered and supported units to reflect those changes".

**Policy: CS13 Older**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 16	First Name Colin		Last Name Weeks			On Behalf Of		
54	Core Strategy PD	18	5.96		No	Effective		

**Representation**

The Graph on Page 18 uses age ranges that do not appear to equate with the Community Service and Leisure facilities required. I would suggest that 0-4; 5-24; 25, 49; 50, 64; 65, 90+ may be more appropriate. CS13/Para 5.96 clearly recognizes the need for increased specialist facilities for the ageing population. However what appears to be lacking is the appreciation that the ageing population are also becoming more active requiring more facilities than just playing golf. The strategy therefore needs to evaluate what the future population requires e.g. recreational walking and cycle areas; safe mobility, scooter paths etc and build it into the above Core Strategy and Para 5.96. Furthermore Green Space needs to be reserved to facilitate the creation of such facilities such that they are accessible to all members of the Community i.e. from N, S, E and W into the Centre of Woking

**Representation Changes Necessary****Officer Response**

The age cohorts and figures used in graph 1 on page 18 are derived directly from ONS statistics. Policy CS13 relates to the specific accommodation needs of older and vulnerable groups. Policy CS18 Transport seeks to support proposals that deliver improvements and increased accessibility to cycle, pedestrian and public transport networks and interchange facilities. The general provision of infrastructure to support the Core Strategy is addressed by the Infrastructure Delivery Plan. Policy CS16 will ensure that developer contributions are secured to provide necessary Infrastructure where relevant.

**Council's Proposed Action**

**Policy: CS13 Older**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
348	Core Strategy PD	75, 76	5.96, 5.99	Yes	Yes			

**Representation**

The point made in regard to freeing up larger houses is understandable but should ultimately be left to individual choice. Incentives can be given to encourage people into smaller units in more sustainable locations, but care must be exercised to guard against policy becoming social bigotry, arguably a cause of much of the housing issues in deprived areas today. Neighbourhoods tend to be more mixed and more vibrant when they are not designed or constrained by subjective social-based agendas. If the paragraph is intended to focus primarily on older people who are vulnerable or infirm, then this is a somewhat different matter, but the wording of the paragraph should be changed to reflect this.

**Representation Changes Necessary**

Let old people end their days in accommodation of their choice without being subject to the 'behaviour police' in regard to green credentials or space utilisation. Houses belonging to old people are, as the CS points out, often owned outright and these houses, in addition to being pleasant homes in which to live, are often the primary investment made by the older generation to be ultimately shared with their children and grandchildren. This is not to say alternative accommodation cannot be promoted, but it should be done so primarily to benefit the older members of society who may find it difficult to maintain their independence.

**Officer Response**

Paragraph 5.99 clearly states that over three-quarters of older person only households are owner occupiers. Whether these households choose to down size is of course personal choice, however given the level of under occupation in the local area combined with a need for family housing to house the working age population, it is imperative that policy seeks to encourage wherever possible older households to free up larger accommodation. Paragraph 5.99 simply sets out some of the mechanisms by which this might be achieved.

**Council's Proposed Action**

**Policy: CS14 Gypsy**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 28	First Name Steve		Last Name Staines			On Behalf Of		
61	Core Strategy PD		5.107-5.120	Yes	No	Justified		

**Representation**

Our objections to this policy principally rest on the level of provision planned for. The policy rests on the argument that the GTAA provides sufficient evidence on which to plan future needs. The policy and preamble make no mention of the testing process that planned provision has been through. Policy H7 of the SE Plan was subject to forensic examination in February 2010 at an examination in public in Reading.

The panel report was substantially completed, indeed the Chair of the Panel said at the end of the examination that the report would be complete by Easter though its publication might be held up by the purdah period associated with the forthcoming general election. In the event the panel report was not published but a Freedom of Information Request by ourselves and the Showmen's Guild resulted in the release of the substantially completed document.

Planning policy has evolved since the advent of the Coalition Government and it has signalled its intent to revoke Regional Spatial Strategies but they remain in force until the relevant legislation is forthcoming. The Government has consulted on a new planning guidance for Gypsies and Travellers and Travelling Show people but the results of this consultation are as yet uncertain. As such Circular 1/2006 remains in force.

In any event given the detailed examination of Policy H7 by an examination in public and the substantially complete Panel Report the Panel report is and remains a material consideration when considering the levels of accommodation for Gypsies and Travellers to be planned for.

The GTAA as quoted by Woking indicates a need for 10 pitches from 2006 to 2016. A result of a thorough examination of the evidence the Panel concluded that there was a need for 40 pitches in Woking over the same period. This is contained in the proposed wording for Policy H7 in the Panel report.

The Panel report was highly critical of the use made of results in the GTAAs in a number of areas but in Surrey in particular.

We quote:

2.6 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. By far the best was the in-house GTAA done by Chichester District Council prepared with assistance from several Council departments, FFT, the County Council Traveller Education Service (TES), the Primary Care Trust, a sites manager and a resident local authority site warden and a planning consultant with considerable expertise in gypsy and traveller matters. It was prepared over a period of 11 months in 2006 and clearly understood both the local circumstances and the accommodation needs of local gypsies and travellers from first hand knowledge.

11.13 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 show people 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.

The Panel report commented on the situation in Surrey as a whole:

11.2.□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



**Policy: CS14 Gypsy**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 28	First Name Steve		Last Name Staines				On Behalf Of	

provision, extensive areas covered by protective environmental and planning designations, restrictive planning policies, high urban land values and vigorous enforcement. The GTAA's 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.

The panel report considered the GTAA for N Surrey which includes Woking and we reproduce here their comments in full:

North Surrey: Elmbridge, Runnymede, Spelthorne & Woking

11.27.□ This GTAA was undertaken by consultants working to a group of local authority officers and members and representatives from the Surrey GTTS community. 147 interviews were carried out (40 with gypsies and travellers living in housing). This approach appears to have reached a high percentage of the gypsy and traveller population, at least those living on authorised sites: the 87 interviews with households on authorised sites represents 64% of the number of authorised pitches. The use of members of the local gypsy and traveller community as interviewers adds credence to the findings. The survey coverage of gypsies and travellers living on unauthorised sites which they owned was much less: just 5 households in Woking, though the GTAA used a figure of 18 unauthorised pitches, of which only 2 were recorded in Woking.. The 40 households interviewed in housing was a much higher figure than for many GTAA's covering a much larger area, but as explained above it is likely to represent a relatively small number of the estimated housed gypsy and traveller population living in N Surrey

Need arising from overcrowding, concealed households and new family formation from existing sites.

11.28.□ The GTAA found high levels of overcrowding (50% on Council sites and 45% overall) and a substantial need for additional pitches from the children of gypsy and traveller families (118 over the next 5 years), together with an expressed need for 199 pitches for existing families over a similar period. While the latter question was slightly ambiguous, and may include some of the needs from the newly forming households included in the earlier figure, as well as some need for larger pitches rather than additional pitches, these figures show a very high level of concealed and frustrated existing and future need. These findings are consistent with those of Friends, Families and Travellers (FFT) .

11.29 However, rather than accept these local findings which 'if taken at face value .. would represent a substantial increase over total existing authorised provision' the GTAA (paragraph 4.1.5) considered 'the survey responses ... too variable to be a basis for estimation, and in light of the risk of double counting, ... [chose] to apply a standard estimation of need generated by overcrowding' of 10% to the current pitch supply resulting in a pitch need of 13. While CLG Guidance notes that 'some studies, on the basis of survey evidence, assume that 10% of pitches on authorised sites are overcrowded', this is not a recommended 'standard estimation' and the Guidance says (page 27) that 'GTAA's should attempt to estimate pitch requirements from frustrated family formation.'

11.30.□ Given the significantly higher figures for overcrowded and/or concealed households found in what would appear to be a soundly-based survey, we consider that there is no justification for applying an assumed figure of 10% derived from surveys undertaken elsewhere.

11.31.□ With regard to anticipated family formation generated from within existing households the GTAA used the '3% p.a. household growth rate to households on authorised pitches' from 'the Birmingham/Salford/Sheffield Hallam benchmarking study (2007). That Document advises the application of this rate to the total number of gypsy and traveller households on authorised and unauthorised pitches. But the GTAA instead applied a '3% adjustment' to the estimated population figure, of 540 (despite previously estimating the gypsy and traveller population living in caravans in the study area to be about 650) to produce a population growth figure of 86 over 5 years. From that it derived a pitch need of 18 'based on the identified caravan occupancy rate and household size'. This would imply an assumed household size of 4.7 people per household, whereas paragraph 2.2. of the GTAA found an average household size of 3.6 persons.

11.32.□ By these means the GTAA would appear to have under-estimated likely new household formation rates. If the 3% p.a. compound rate was applied as recommended by the CLG study to the corrected number of authorised pitches in 2006 (137), plus the number of households on unauthorised developments (18) - a total of 155 households (assuming only 1 household per pitch) this would produce a household growth figure of 26 over 5 years.

11.33 Thus the combined need arising from overcrowding, concealed households and family formation over the next 5 years is estimated by the GTAA to be 31. Even if there was some overlap between these categories, and it is reasonable to assume that some over-crowded families might need a larger pitch rather than an extra pitch, or pitches,

**Policy: CS14 Gypsy**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 28	First Name Steve		Last Name Staines				On Behalf Of	

the survey findings of 118 or 199 pitches from Table 5, are so much greater that they cannot be regarded as the consequences of double counting. The GTAA findings may, in their view, have 'produced an apparently high demand which would greatly exceed both the current site provision and any realistic estimation of pop growth', but in our view there is no reason to assume that they are not sound and credible evidence of a substantial frustrated need for additional pitches from these sources, which accord with the independent findings of FFT.

11.34. Further CLG Guidance, published just after the N and E Surrey GTAAs had been completed, stresses the importance of accurately capturing local data on overcrowded and suppressed household formation, as well as future household formation, rather than by applying national multipliers that may not be applicable to the particular local population. In our view rather than using such multipliers here, which appear highly likely to under-estimate local needs, the lower, survey based need figure of 118 new households over 5 years (purely from the adult children of gypsy and traveller households) should be used to reflect concealed households, overcrowded household requiring a additional pitch and new family formation. Although some of this expressed need for new pitches is likely to include some 'pairings' it excludes existing concealed need from adult households from existing overcrowding and in our view it is the minimum, realistic, survey-based figure which can be used.

Need arising from housed gypsies and travellers

11.35. The GTAA survey interviewed 40 gypsies and travellers living in housing in N Surrey. It was reported that in terms of expressed preference, 32% of housed gypsies and travellers 'wanted housing rather than caravan accommodation', which implies that 68% might want caravan accommodation rather than housing. This apparent dissatisfaction with housing is reinforced by the finding that in 50% of cases gypsies and travellers had left housing within a year. The GTAA separately reports that 'two respondents said that they wanted a pitch on a site' but it is not clear whether a specific question in these terms was put to all housed gypsies and travellers. Despite these findings of between 5% and 68% of housed gypsies and travellers expressing a need or preference for a caravan pitch, the GTAA assumes a 0 need on the basis of a circular argument that 'we consider that any demand from housed gypsies and travellers cannot be expected to materialise until suitable sites are available'. For the reasons given earlier in the Chapter we cannot accept this finding as sound or credible.

Unauthorised developments and encampments

11.36 The GTAA assumed a need of 18 pitches from unauthorised developments for which planning permission is not expected, although there is no evidence that the actual needs of these families were explored, apart from the 5 households interviewed in Woking. No allowance was made for need arising from any unauthorised encampments. Although the survey interviewed 11 such households living on the roadside no reference is made to their needs in the published GTAA.

Vacancies arising from pitch turnover

11.37. The only survey findings which the GTAA used were those concerning the supply of pitches from net vacancies, the GTAA found that 'pitches rarely fall vacant' and assumed no supply from this source. However, in their April 2008 Advice the North Surrey authorities agreed, in the light of a similar approach by Oxfordshire and Buckinghamshire, to take the advised 4.6% p.a. average pitch turnover figure for local authority sites in Surrey and apply this figure to the number of local authority pitches in Surrey, and an assumed 2.5% for privately owned pitches over the period 2007-2016 to produce a supply of 43 pitches over this period, reducing their need to 44. The principle of the use of local authority turnover rates in this way is discussed above.

11.38. Only the North Surrey local authorities applied a private site turnover rate of 2.5%. It is said that the Steering Group, which included 'a representative from the Gypsy community' discussed the matter and 'after some debate a figure of 2.5% was agreed as acceptable for private sites. However, it should be noted that this figure was reached by consensus and had no evidential basis.'. The Minutes of that Meeting note the attendance of Charmaine Valler as the only gypsy and traveller representative present, but in their EiP statement the Surrey Gypsy and Traveller Communities Relations Forum, the organisation that Ms Valler represents, say that 'in the absence of any evidence to support the turnover rate of 2.5% we feel that the Panel should consider this assumption too high'. We agree. There is no evidence of any turnover figure for private sites in Surrey (or any part of the South East). All parties agree that it is likely to be a lower figure than on public sites but as discussed in Chapter xx pitch turnover cannot be regarded as a significant or reliable source of net supply.

11.39. The use of turnover figures in this way is unsound. Their use to reduce the identified need for additional pitches in North Surrey by 43 over the period to 2016 is not justified or credible.

We recommend, as for all other counties, that no net supply should be assumed from this source.

## Policy: CS14 Gypsy

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 28	First Name Steve		Last Name Staines				On Behalf Of	

### Additional needs 2012-2016

11.40 The GTAA applied a figure of 3% compound household growth for the period 2012-2016 of 21, but this was accepted as an error and corrected in the N Surrey Advice of October 2007 to 34 to reflect both the existing authorised pitch numbers and estimated needs 2007-2012. Table 2 of the Advice (with some further slight amendments to reflect a Caravan Count undertaken in April 2007) was submitted in place of the GTAA Table 6 and shows an estimated need of 53 pitches to 2012 and 87 to 2016. However, the use of the figure of 21 for estimated needs 2007-2012, which in our view is a significant under-estimate of true need to that date, consequentially under-estimates the assumed need from household growth 2012-2016.

### Allocation to Districts 2006 – 2016

11.41.□The GTAA sets out a distribution of pitch need to 2012 between the North Surrey Districts in proportion to the districts' respective share of average total caravan numbers in recent counts. This approach was used as the Option A (Needs Arising) figures in the N Surrey Advice of October 2007, which used the higher figure of 53 to 2012 and 87 to 2016. N Surrey adopted the Surrey Option B distribution approach (see above) to produce a revised, and more even, distribution between the four authorities. The April 2008 Second Round Advice reduced the Option A and B figures for each authority, as discussed above, on the basis of the assumed supply of pitches from turnover on public and private sites 2007-2016, both of which sum to 44. These were the figures used by SEERA in Annex B of the 2008 public consultation document. Under Options C and D redistributions, Surrey was a net loser of pitch requirements, although in N Surrey the difference between Options B and D is slight.

### Conclusions on the GTAA and estimate of need in North Surrey

11.42.□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 an 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.

11.43.□Thus while the GTAA survey and its findings can be regarded as sound and credible, the way that they were used, or rather not used, by the GTAA as the basis for the assessment of need in the North Surrey authorities results in a figure that is neither sound nor credible.

11.44 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 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.

Therefore FFT cannot agree with the contention of Woking that short term needs have been met through the identified extension and potential granting of permission for the three pitches mentioned in CS 14. Indeed given the evidence of the Panel report reproduced above and its recommended pitch provision there is a need for a further 30 pitches over and above the ten identified in the core strategy, a substantial shortfall.

We are disappointed to see that the policy only intends to plan for ten pitches for 2016 to 2027. The council provides no reasons for choosing this figure. Conventionally a 3% compound growth rate is applied to Gypsy and Traveller pitches. This would on the evidence available to us at the moment amount to 22 pitches for 2016-2027. This is calculated by applying a 3% compound increase to the baseline of 24 pitches in 2006 plus the identified need of 40 pitches to 2016 contained in recommended policy H7 in the Panel Report.

### Representation Changes Necessary

The accompanying text should be amended to take into account the material considerations contained in the Panel report and should conclude that the GTAA and Panel report taken together identify a need for 40 pitches to 2016 in the Borough. In addition para 5.113 should be amended to identify the need for 22 pitches for 2016-2027.

## Policy: CS14 Gypsy

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	28	First Name	Steve	Last Name	Staines	On Behalf Of		

These basic changes will help ensure that the policy and its accompanying text reflect the totality of the evidence available. Failure to do so will mean a gross shortfall in accommodation available to this ethnic minority with all the ills which attend lack of provision. Indeed such a course would mean prolonging the severe constraint on pitch provision, something which previous and current emerging Government policy intends to address.

### Officer Response

On 13 April 2011 the Government published a new draft PPS on Planning for traveller sites for a period of consultation which ended on 6 July 2011. When published in its final form, the new PPS will replace Circular 01/2006: Planning for gypsy and traveller caravan sites and Circular 04/2007: Planning for travelling showpeople. The new PPS may eventually be incorporated within the new National Planning Policy Framework. Existing guidance on needs assessments will also be revoked. When the new PPS is finally published, its provisions will be taken into account.

Regarding the Partial Review of the South East Plan (Policy H7) - Accommodation needs of Gypsies, Travellers and Travelling Showpeople.

The Panel report following the Examination in Public in February 2010 (EiP) into provision of accommodation for Gypsies, Travellers and Travelling Showpeople in the South East has not been completed, as a result of the revocation of the South East Plan. The reinstatement of the South East Plan following the recent court decision has not affected this position. The Panel report will not now be published due to the Government's intention to abolish the South East Plan.

This review assessed the accommodation needs of gypsies and travellers across the South East region and aimed to set district-based targets for pitch provision. The background papers which set out the local authorities proposed advice to SEERA (since abolished) can be viewed online.

Following a Freedom of Information (FOI) request the unfinished Panel report is available on the Planning Inspectorate's website:

<http://www.planningportal.gov.uk/planning/appeals/planninginspectorate/regionalstrategies> The link is provided for information only. It does not represent the views of the Government and does not form any formal part of the planning system.

The Core Strategy Development Plan Document (DPD), once adopted, will identify suitable locations for new pitches in the Borough. It will also include a criteria based policy to assist in the assessment of future planning applications for new Gypsy, Traveller and Travelling Show person's sites.

It should be noted that the GTAA for North Surrey was carried out with neighbouring Runnymede and Elmbridge and nearby Spelthorne by a consultant. Both Elmbridge and Spelthorne Borough Council's have adopted Core Strategies, the GTAA was not challenged at either Examination.

The figures for pitch provision in Woking Borough suggested by FFT are from the SEP Examination. They cannot be taken into account for the Core Strategy as the panel figures are not being used as explained above. The pitch provision figures are based on the North Surrey GTAA, as guidance says that Core Strategy policies should be.

The policy is based on evidence provided in the GTAA (April 2007). However, the Council is fully aware of the unpublished Panel's report (as highlighted above). The Core Strategy has acknowledged that the GTAA will be reviewed to inform any revised provision that may be necessary to meet identified need. The review had been scheduled for 2011. However, the Local Authorities in Surrey have agreed to develop a common methodology to use for the GTAA's in Surrey to ensure consistency of information and clarity of what is needed. This process has started and is ongoing. It is likely that the GTAA will now be carried out in 2012 instead of 2011. Consequently it is proposed that the 2011 in the last sentence of paragraph 5.113 be changed to 2012.

### Council's Proposed Action

It is proposed that paragraph 5.113 (p79), line 5 be amended to replace the year 2011 with 2012.

**Policy: CS14 Gypsy**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 71	First Name Grace		Last Name Brown				On Behalf Of	

361 Core Strategy PD 78 5.107-5.114

**Representation**

To make more pitches available for gypsies and travellers locally in the light of current events in the past week in the UK (and the enormously costly legal battle over the last 10 years) is surely asking for trouble.

**Representation Changes Necessary**

None proposed.

**Officer Response**

I presume that the respondent is referring to the Dale Farm case in Essex, regarding an unauthorised gypsy encampment.

Woking Borough Council has to ensure that it provides adequate housing to meet the needs of all sections of the community. This includes providing pitches for gypsies and travellers. The number of pitches included in policy CS14 is in line with the LDF Evidence Base; namely the Gypsy and Traveller Accommodation Assessment.

**Council's Proposed Action**

**Policy: CS14 Gypsy**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell				On Behalf Of	Natural England

127 Core Strategy PD No Effective

**Representation**

CS14: Gypsies, Travellers and Travelling Show people

We are disappointed that our previous recommendation that when identifying sites for gypsies and travellers, due consideration should be given to impacts on the environment has still not been addressed. Although the policy text makes reference to the potential need for Habitats Regulations Assessment this is only relevant to internationally designated sites and the aim should be for proposed sites to avoid any land of interest for nature conservation.

**Representation Changes Necessary**

None proposed.

**Officer Response**

Paragraph 5.111 sets out that mobile homes are vulnerable to flooding and that flood risk will be considered when determining site allocations and planning applications.

In the policy box, with the list of criteria to be considered, bullet points will be added setting out flood risk and environmental considerations.

**Council's Proposed Action**

It is proposed that Policy CS14 (policy box, page 78) be amended by inserting the following sentence before "A Habitats Regulation Assessment".  
"Any proposal that will have an adverse impact on environmentally sensitive sites that cannot be adequately mitigated will be refused".

**Policy: CS14 Gypsy**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

130 Core Strategy PD

**Representation**

We have no concerns with the policy but we consider a more explicit reference to not permitting such sites in the functional floodplain for flood zone 3a should be made here. PPS25 identifies the special risk that caravans and mobile homes have when it comes to flooding and elaboration on this point, in the same manner ecology is mentioned in the policy, would be welcomed.

**Representation Changes Necessary**

None proposed.

**Officer Response**

Paragraph 5.111 sets out that mobile homes are vulnerable to flooding and that flood risk will be considered when determining site allocations and planning applications.

A reference to environmental constraints will be included at the end of paragraph 5.111. In the policy box, with the list of criteria to be considered, three bullet points will be added setting out flood risk and environmental considerations; including ecology.

**Council's Proposed Action**

It is proposed to amend paragraph 5.111 by adding the following sentence "The Council will not allocate sites or grant planning permission for additional pitches for Gypsies and Travellers or sites for Travelling Showpeople in the functional floodplain for Flood Zone 3a."

**Policy: CS15 Econ**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 16	First Name Colin		Last Name Weeks			On Behalf Of		
63	Core Strategy PD				No	Effective		

**Representation**

This is the most crucial Strategy in Woking 2027. Without "Added Value" jobs the Community cannot survive. It is therefore important that this Strategy is "beefed up" and supported by WBC to encourage new Manufacturing Enterprises to Woking. Support for the proposed McLaren/GSK Technology Centre would be a starter, maybe in the Broadoaks West Byfleet site.

**Representation Changes Necessary****Officer Response**

The policy provides sufficient framework to promote economic growth. However, the Core Strategy is only one of a number of Council policy documents which relate to economic issues. The Council will shortly be producing an Economic Development Strategy which has taken into account the Core Strategy and will set out the Council's objectives for the support of businesses and economic development in the Borough.

**Council's Proposed Action**



**Policy: CS15 Econ**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 26	First Name Rhian		Last Name Powell				On Behalf Of McLaren Group Limited	
60	Core Strategy PD	81,82	5.125	Yes	Yes			given the importance of the McLaren group to Woking, we consider we would be able to contribute to the examination debate.

**Representation**

Although the CS appears legally compliant and sound, we consider the effectiveness of policy CS15 can be improved by referring to the special importance of the McLaren group as an established site within the green belt and as one of the largest employers within Woking.

The economic priorities contained within policy CS15 should also include an additional aim for the council to continue support the innovative high-technology sector as a means to diversity and increase the economic potential of the borough.

In addition, the last sentence of paragraph 5.125 could be misleading and should be removed to avoid confusion and replaced by a new paragraph as set out below. This should recognise that McLaren is one of a small number of world-class, innovative companies that have very particular accommodation requirements.

**Representation Changes Necessary**

Policy CS15 should include an additional bullet point priority for the council to 'continue to support the innovative high-technology engineering sector.' Policy CS15 should also include an additional paragraph stating 'McLaren's importance to the borough and the region is acknowledged and WBC will continue to work with McLaren to seek to accommodate the groups specific requirements within the borough.' A new paragraph should be inserted after 5.125 stating 'the McLaren group is recognised as a significant employer within the borough, and as a world-class and innovative, high technology company that has very particular accommodation requirements which can not always be met within existing industrial estates or urban employment sites within the borough.'

**Officer Response**

It is not considered necessary to incorporate the amendments proposed. The Council does not intend to designate the McLaren site as a major developed site in the Green Belt, and whilst McLaren is acknowledged as an important company in the local area, the policy offers general support to companies and it is not considered appropriate to single out McLaren in that regard.

**Council's Proposed Action**

To provide additional clarity to the policy justification in paragraph 5.125 (p82) the following amendment is proposed to the last sentence:

"Sufficient land also exists in the Borough to accommodate potential spin off growth in high technology manufacturing".

**Policy: CS15 Econ**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 29	First Name Sarah		Last Name Bowers			On Behalf Of		
68	Core Strategy PD	81 - 84		Yes	No	Effective		wish to understand further detail of history of economic inactivity at Broadoaks Estate

**Representation**

We are of the view that the Core Strategy Publication Document is generally sound. However, we consider the wording of policy CS15 'Sustainable Economic Development' does not satisfy 'soundness' test 9- that policies should be sufficiently flexible to allow for changing circumstances. The reasons for this are set out below:

Policy CS15 states that the Council will "retain the Broadoaks site in West Byfleet as a high quality business park". The supporting text states that the reason for this is that Broadoaks is the only site of this nature in the Borough, and has unique characteristics being located in an attractive landscaped setting (para 5.128).

However, this is at odds with a statement made earlier in the policy that the Council will "allow for flexibility to cater for the changing needs of the economy", and a statement in the supporting text advising that the Council will adopt "a flexible approach to economic development capable of accommodating growth in new sectors and changes in economic circumstances".

Despite the extant permission granted in 2000 by the Secretary of State for the redevelopment of Broadoaks for 3 x 2 storey office buildings, and refurbishment of the Grade II listed Manor House for offices (ref. 98/0340), the site has remained vacant (and therefore economically inactive) for 11 years. It is not assured that office occupiers will be secured at the site given both current and foreseeable market conditions and the high level of office vacancy in the Woking area generally. Broadoaks is therefore a site which should benefit from the 'flexibility' referred to above to enable the Planning Authority to positively consider alternative uses for parts of the site on their merits. Indeed, to do so would (whilst not ruling out an office use) enable other more deliverable uses to be provided, which would still provide important employment, have the significant benefit of bringing the site back into economic use, and secure a future for the Listed Manor House building.

With regards to the listed building, we consider there is real risk that without the flexibility sought this building could remain unoccupied for a very considerable period of time. However the possibility to be able to consider alternative use should not be restricted to the Manor House only.

It is considered crucial that activity be provided at the site in order to act as a catalyst for securing future occupiers. The site is currently in a visually poor condition with a part-demolished 1970s extension attached to the listed building, and remnants of the former Ministry of Defence buildings remaining on the site. This is unhelpful in attracting the high quality office occupiers envisaged as a result of the office permission. The provision of more flexible wording in policy CS15 would therefore enable potential other uses at the site so as to facilitate development that will assist in painting a positive picture about the future of Broadoaks.

The site may provide a valuable asset to the Borough to help satisfy other pressing land use needs, such as housing for the elderly (C2 use) where supporting services also provide additional jobs as part of the offering. We are not fully assured that as in test 7 of soundness, the allocation of the site as an employment site represents the most appropriate use, and that in all the circumstances the Planning Authority has considered all relevant alternatives in this regard.

Finally, we would point out that the more flexible approach we are advocating is consistent with the Draft National Planning Policy Framework (NPPF), which actively encourages planning authorities to promote sustainable economic development in order to facilitate growth.

The NPPF states that:

**Policy: CS15 Econ**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 29	First Name Sarah		Last Name Bowers				On Behalf Of	

“Planning policies should avoid the long term protection of employment land or floorspace and applications for alternative uses of designated land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses.

**Representation Changes Necessary**

We would request that the wording of policy CS15 be amended in respect of Broadoaks Estate to read as follows:

“To retain the Broadoaks site in West Byfleet as a high quality Business Park maintaining flexibility to consider alternative use proposals that contribute to employment objectives on their merits throughout the plan period”.

We considered this would provide flexibility when securing a potential future occupier as set out above.

**Officer Response**

The Employment Land Review (ELR) identifies a residual requirement for approximately 28,000sq.m of office floorspace over the life of the Core Strategy. The suitability of the Broadoaks site (which is designated as a major developed site in the Green Belt) was considered in the market appraisal produced by Lambert Smith Hampton (LSH), which forms part of the ELR. LSH recommended that the site be retained for employment use, and thus the site is considered suitable to contribute towards employment provision in the Borough. The ability of the site to accommodate high quality businesses premises over the plan period should assist in generating the required number of jobs, particularly much needed ‘added value’ jobs to the local economy. It is thus considered that the Core Strategy is both justified and flexible and therefore no amendment is proposed to the policy.

In order to be effective, the Core Strategy should be flexible enough to adapt to change. Paragraph 5.124 of the policy justification, states that a five-yearly review of the ELR will enable any unforeseen changes in the local economy to be monitored, so that policies can be reviewed where necessary, to reflect changing circumstances. It is thus considered that monitoring will enable the flexibility required to accommodate any longer term structural changes to the economy that may occur.

**Council's Proposed Action**

**Policy: CS15 Econ**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	61	First Name	Malcolm	Last Name	McPhail	On Behalf Of
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319	Core Strategy PD			Yes	Yes
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**Representation**

We support the recognition that allowing the redevelopment of outmoded employment floorspace is a positive step for the local economy. Similarly, the re-use or redevelopment of redundant, vacant or outmoded Class B sites for alternative uses (point 3) is supported, this being consistent with emerging NPPF guidance.

**Representation Changes Necessary****Officer Response**

Support noted.

It should be emphasised that the policy allows under point 3 for the redevelopment of B use sites elsewhere in the Borough for alternative uses, i.e. not on those sites covered by points 1 and 2.

**Council's Proposed Action**

Customer ID	77	First Name	Marianne	Last Name	Meinke	On Behalf Of
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101	Core Strategy PD			No	Effective
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**Representation**

It is hoped that this will assist traffic in Woking but a request is made that consideration be given to those living locally. Traffic has increased considerably and this is likely to bring more traffic into the area.

**Representation Changes Necessary****Officer Response**

The need for further economic development floorspace will not necessitate the allocation of additional Greenfield land for employment use and the growth in office space will be accommodated within the Town Centre (the most sustainable location in the Borough) and to a limited degree the District Centre. Where planning permission is required for new economic development traffic issues will be considered via the development management process. Policy CS18 will ensure that traffic impacts are addressed when proposals are determined.

**Council's Proposed Action**

**Policy: CS15 Econ**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 89	First Name Lisa		Last Name Bowden				On Behalf Of Royal Mail	

195 Core Strategy PD

**Representation**

In our previous (January 2011) representations we supported the principle of the Council's objective to encourage sustainable economic and employment growth in the Borough. We note that this Policy has been revised and we subsequently support the Council's encouragement of redevelopment of outmoded employment floorspace to cater for modern business needs", which we consider is in conformity with national planning policies, adopted and emerging. We note that part of 2 of Policy CS1 5 'B Class Uses' will seek to safeguard land within the employment areas B uses, however will, Permit the redevelopment B use sites elsewhere in the Borough for alternative uses that accord with other policies in the Core Strategy where (i) the existing use of the site causes harm to amenity and/or (ii) it can be demonstrated that the location is unsuitable for the needs of modern business'. We consider the policy's stance on the redevelopment of employment sites for alternative uses is suitable to allow for the continued use of sites within the Borough to assist with delivering the Council's Vision for the Borough.

**Representation Changes Necessary****Officer Response**

Support noted.

**Council's Proposed Action**

Customer ID 91	First Name Patrick		Last Name Blake				On Behalf Of Highways Agency	
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194 Proposals Map

Yes Yes

**Representation**

The proposals map illustrating development being brought forward in the CS does not include all employment areas named within CS15. In order for an assessment to be made on the potential impacts these sites could cause on the SRN, we would need to accurately assess the location of these sites in relation to the SRN.

**Representation Changes Necessary****Officer Response**

All sites mentioned in policy CS15 are shown on the proposals map. It should be noted that all the sites are existing sites and the need for further economic development floorspace will not necessitate the allocation of Greenfield land for employment uses although intensification of employment floorspace will be required mainly for office uses within the Town Centre.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 7	First Name Robert		Last Name Shatwell			On Behalf Of		

7 Core Strategy PD

**Representation**

Considers the "New Homes Bonus" open to abuse for not being ring fenced and that any bonus received from a housing development should be used to compensate the residents in the community that has been affected. Any other use would be rather like the last governments tax referred to at the time as "The Robin Hood Tax". If this money is not ring fenced as he suggests it would cause unscrupulous politicians to elicit votes in a marginal seat. For example a housing project as such as the Moor Lane development will create infrastructure problems which unless the money is ring fenced for use in Westfield could be used to support community projects in Byfleet, an area totally unaffected by the development.

**Representation Changes Necessary**

**Officer Response**

The New Homes Bonus is a new form of grant given to Local Authorities as an incentive for them to deliver housing. The decision not to ring-fence the grant is made by Government. However Woking Borough Council is committed to ensure that the money is used to provide the necessary infrastructure to support development. It should be noted that the Council has already resolved to use the first payment to provide improved communities facilities in the area. The Council will be transparent about how the money is spent and will use it appropriately.

**Council's Proposed Action**

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 16	First Name Colin		Last Name Weeks			On Behalf Of		
64	Core Strategy PD				No	Effective		

**Representation**

In the strategy document Woking's status as a cycle town is mentioned along with the desire to influence a shift in transport choices. This is clearly commendable, but it is important to consider how this will be delivered. Merely designating roads as cycle routes, does not make them safe or appropriate. It would also not be advisable to further dissect our limited green space by adding new cycle paths. So a clear strategy for this should be developed.

Perhaps, Woking could make better use of existing foot paths, which are by their nature the shortest from one place to another. Cyclists could be encouraged to 'give way' to pedestrians using a Woking cycle 'code of conduct' to alleviate issues.

At the same time care needs to be taken to communicate to car drivers the values of Woking being a cycle town and to ensure that they are aware of their conduct whilst driving on roads in the borough. We believe the creation of Woking as a cycle town has been poorly delivered as evidenced by the issues highlighted in the Town Centre and along the canal.

**Representation Changes Necessary****Officer Response**

The policy required the Council to work in partnership with Infrastructure providers to ensure a coordinated approach to infrastructure delivery, including cycle and pedestrian infrastructure. Furthermore, policy CS16 encourages modal shift to cycle and walking. The combined objectives of the policy provide sufficient framework for a sensitive and safe detailed scheme to be delivered. The Council, through the Cycle Woking Partnership will ensure that there is a clear strategy for the implementation of detailed scheme that is sensitive to other road users, safer and well connected to places where people want to go. The Council has secured some funding towards the provision of cycle infrastructure. Part of this is revenue funding towards educational programmes. The Cycle Woking programme has delivered positive outcomes and it is not accepted that it has been poorly delivered. An end of programme report has been published to demonstrate the success of the programme. Copies of the report are available on request and will also be published on the Council's website.

**Council's Proposed Action**

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	32	First Name	Rose	Last Name	Freeman	On Behalf Of		

134 Core Strategy PD 85

**Representation**

However given the many references to cultural facilities in the document we are surprised that the definition of social and community infrastructure on pg85 does not include cultural facilities. For clarity and continuity we suggest a more inclusive definition would be social and community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.

We also suggest that open spaces, parks and play spaces would be more appropriately included within the definition of green infrastructure as these items are not buildings. Places of worship are not a public service (i.e. provided by the council) but are private cultural facilities and should be included within social and community infrastructure as suggested above.

**Representation Changes Necessary**

A more inclusive definition would be social and community facilities, open spaces, parks and play spaces included within the definition of green infrastructure and places of worship are not a public service and should be included within social and community infrastructure.

**Officer Response**

The Council acknowledges that cultural facilities can be an important part of Social and Community Infrastructure. The definition of such infrastructure includes 'social and community facilities'. Whilst not exhaustive, as set out in paragraph 5.173 relating to policy CS19: Social and Community Infrastructure the Council has identified cultural facilities such as museums and libraries fall within such definition.

Whilst open spaces, parks and spaces have been identified as green infrastructure, they also form an important part of social and community infrastructure. It is not just buildings, but also space in general which provides social and community infrastructure.

The definition of Infrastructure set out on page 85 of the Core Strategy reflects that set out in the South East Plan (2009), to ensure that the Core Strategy conforms to the Regional Spatial Strategy. However the Council also acknowledges that places of worship are also a social and community facilities as set out in paragraph 5.173 relating to policy CS19: Social and Community Infrastructure.

**Council's Proposed Action**



**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 33	First Name Jean		Last Name Dare			On Behalf Of	Hook Heath Residents Association	

86	Core Strategy PD	86			No	More than 1 selected		
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**Representation**

Woking is now one of the largest towns in Surrey. There has been a huge increase in population without commensurate improvements in local infrastructure including traffic congestion, insufficient seats of rush hour trains and inadequate and bus services. We need to invest in infrastructure now to improve our quality of life, not further degrade it by increasing demand still further. CS16 (page 86) requires developers to provide all necessary infrastructures on site, but every development will have implications for off site infrastructure as well.

**Representation Changes Necessary**

CS16 should be amended to ensure improvements are made in key services and facilities such as schools, healthcare, water supply, drainage and flood alleviation, leisure, green infrastructure and community facilities for the current population before any further growth is contemplated.

**Officer Response**

Overall the Core Strategy ensures an effective integration of development and Infrastructure. This policy does identify that financial contributions will be required from developers to support improvements to infrastructure services and facilities that are required as a result of development. The definition of infrastructure set out on page 85 of the Core Strategy does identify all the key services and facilities listed above. An Infrastructure Delivery Plan has been prepared to provide information about the capacity of existing infrastructure, the impact that the proposed developments will have on them, what might be needed to mitigate the impact and how they will be funded. This will ensure that infrastructure delivery does not lag behind development.

**Council's Proposed Action**

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 61	First Name Malcolm		Last Name McPhail			On Behalf Of		
320	Core Strategy PD			Yes		More		

**Representation**

This policy should place more emphasis on the production and adoption of a CIL charging schedule, given that the CIL Regulations are already in place and the charging schedule must be effective by April 2014 if infrastructure payments are to be levied on development after that date.

**Representation Changes Necessary**

The text referring to CIL should be placed at the head of the policy, after the first sentence in paragraph 1, and the remainder of the policy re-worded to reflect the priority to be given to CIL rather than s.106 obligations.

It should also be made clear that infrastructure payments will be collected via the CIL charging schedule while other matters (e.g. TBHSPA SANG contributions & affordable housing) will continue to be dealt with via s.106.

**Officer Response**

It is not for the Core Strategy to set out an indicative time frame regarding the adoption of a CIL. However, the council is committed to replacing Planning Obligations. The project timetable for its introduction will ensure that it is completed and effective by April 2014 when Planning Obligations are scheduled to be scaled back.

**Council's Proposed Action**

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID 64      First Name James

Last Name Clegg

On Behalf Of

331      Core Strategy PD      85      5.132      Yes      Yes

**Representation**

The definition of infrastructure (public services) includes places of worship. This is in accordance with national policy. PPS1 at page 8 states that: "Plan policies should: ...take into account the needs of all the community, including particular requirements relating to...religion..."

**Representation Changes Necessary****Officer Response**

Comments noted.

**Council's Proposed Action**

332      Core Strategy PD      85      5.132 (Policy wording)      Yes      Yes

**Representation**

The policy is well written as it acknowledges the need to resist the loss of existing infrastructure services and facilities. In addition to this Paragraph 5.137 comments that land will be safeguarded for the provision of future infrastructure requirements.

**Representation Changes Necessary****Officer Response**

Comments noted.

**Council's Proposed Action**

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 69	First Name Anthony		Last Name Kremer			On Behalf Of		
355	Core Strategy PD	86	CS16	Yes		Effective		

**Representation**

Important to close the gap regarding the digital broadband connectivity.

**Representation Changes Necessary**

We should require developers and/or WBC provide broadband services to the kerb. I won't say that broadband is already becoming as important a part of society's infrastructure as electricity and gas, but who knows how the world will look in the next decade.

**Officer Response**

The policy requires developer contributions towards infrastructure provision, the definition of which includes Telecommunications, which broadband is a fundamental component of. The draft Infrastructure Delivery Plan (IDP) (2011) includes a schedule of infrastructure that is considered necessary to support the spatial strategy and forms part of the evidence base to inform the provision of new infrastructure. The IDP identifies the main infrastructure requirements over the lifetime of the Core Strategy, which currently includes 100% superfast broadband coverage (by 2013). The policy already therefore provides the basis for the suggested proposal to be delivered.

**Council's Proposed Action**

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 70	First Name James		Last Name Robertson				On Behalf Of	Hockering Residents' Association
358	Core Strategy PD	52	5.5	Yes	No	More		

**Representation**

Nearly 67% of Woking's sewage passes under White Rose Lane. This system cannot support increased levels of waste. Raw sewage regularly overflows into the Hoe stream within the Hoe Conservation Area because it is insufficient to meet current population needs. A public footpath, leading to primary school grounds, runs along the Hoe Stream. This is a potential serious health threat.

The draft Infrastructure Plan identifies the need for additional sewerage capacity but does not propose that any work is started until 2017. Thames Water will require up to ten years to provide the extra capacity. Without a major investment in sewerage now, any further significant building development is unsound.

The plan is unjustified because research would prove that there is already insufficient sewerage capacity and any population increase would exacerbate the problem.

The plan is ineffective because the timescales required to provide adequate sewerage make the plan undeliverable.

**Representation Changes Necessary**

"The current sewerage system is inadequate. Remedial work will be undertaken to upgrade the system to cope with current and future waste water requirements. This includes increased capacity at the Carters Lane Waste Treatment facility and improvements to the network of sewers leading to the facility."

It is clear to anyone who uses the White Rose Lane / Old Woking Road junction on a regular basis that there is already a major sewerage problem in the area. There is significant residual smell of sewage in this road and on the Old Woking Road and in the Hoe Conservation Area which, despite being regularly highlighted, has not been satisfactorily addressed by the Council. While overflow during exceptional storms is legally permitted from a historical perspective, there is a nationwide drive to improve the condition of our fresh waterways and therefore of the Hoe Stream rather than to increase the negative environmental impact from higher volumes of waste.

It is difficult to comment on the capacity of the Carters Lane Facility, however it is clear that the sewage transport system to Carters Lane must be upgraded before any further development in Woking Town Centre is considered.

**Officer Response**

It is not the purpose of the Core Strategy to identify potential specific deficits in Thames Waters sewage capacity. The Council will continue to work with Thames Water to improve and provide additional facilities, however as set out in the IDP due to the complexities of sewerage networks and the interrelationships with other boroughs, it is difficult for Thames Water to comment on the impact of developments on its waste assets without an understanding of the location, scale and phasing of new developments over the whole catchment.

Policy CS6 identifies the Sewage Works along Carters Lane as a major developed site in the Green Belt. In doing so, the principle of redevelopment or infilling required in connection with the sewage works will be considered acceptable (subject to other material planning considerations). This has been designated as such in order to assist Thames Water in meeting the needs of the borough and surrounding area during the life time of the Core Strategy, and beyond.

**Council's Proposed Action**

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell				On Behalf Of	Natural England

424 Core Strategy PD 85

**Representation**

Infrastructure delivery Natural England supports the inclusion of Green Infrastructure (GI) within the types of infrastructure considered necessary to support growth within the Borough.

**Representation Changes Necessary****Officer Response**

Comments and support noted.

**Council's Proposed Action**

Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of	Environment Agency
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423 Core Strategy PD 85

**Representation**

We suggest changing the term 'flood defences' to 'flood alleviation measures' as this better reflects the fact that you can never fully remove the risk of flooding. A residual risk always remains - such as from the defences being overtopped during an incident that exceeds the design standard.

**Representation Changes Necessary**

Changing the term 'flood defences' to 'flood alleviation measures.'

**Officer Response**

Comments is considered acceptable.

**Council's Proposed Action**

It is proposed that 'Flood defences' in Definition of Infrastructure box on page 85 should be amended to read 'Flood alleviations measures'.

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of	West Estates Ltd

165 Core Strategy PD

**Representation**

Taylor Wimpey West London and West Estates question the need to provide Infrastructure financial viability appraisals with every development where s106 or CIL provisions are accepted. The 'level' of contribution should also be based on a developments net impact rather than ability to pay. To do otherwise would fall contrary to the guidance within Circular 05/2005. Concern is therefore raised at the wording of the forth paragraph, which implies the LPA could seek contributions higher than is reasonable and necessary for the development proposed.

**Representation Changes Necessary**

For transparency current circular guidance should be confirmed in this policy or clarification given on exceptional circumstances where this may be applicable.

**Officer Response**

The overriding aim of the policy is to ensure that development is supported by adequate Infrastructure, in particular, to mitigate the impacts of development. Developer contributions will continue to play a significant role towards this. The Council is committed to introduce CIL. However, before it is adopted it will continue to secure contributions through planning obligations. The terms, nature and the scale of the Infrastructure and the contributions that will be sought will be secured through Section 106 Legal Agreements. The test of Circular 05/05 will always apply and it is not the intention to the Council to seek Contributions higher than is reasonable or necessary for the development proposed. This is already emphasised in paragraphs 6.8-6.9 of the Core Strategy Publication Document. The requirement for a financial viability appraisal will arise when an applicant requests that the viability of their scheme would be threatened by the requirements of developer contributions being sought by the Council.

**Council's Proposed Action**

It is proposed that the second penultimate paragraph of Policy CS16 (p86), which currently begins "Prior to the adoption" be rephrased for clarity. The following change is proposed:

"Before CIL is adopted by the Council, Planning Obligations will continue to be the basis to secure developer contributions. The level of contributions will be determined on a case by case basis taking account of the test of Circular 05/05".

"The Council will consider a case by an applicant subject to a requirement for a financial viability appraisal if it is demonstrated that the contributions being sought will threaten the viability of the proposal".

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 89	First Name Lisa		Last Name Bowden				On Behalf Of Royal Mail	

196 Core Strategy PD

**Representation**

The Policy states that The Council will work in partnership with infrastructure service providers to ensure that the infrastructure needed to support development is provided in a timely manner to meet the needs of the community' Royal Mail supports this Policy and the need to provide appropriate infrastructure to meet the needs of the community. Furthermore, Royal Mail supports, in principle, the mechanism proposed to deliver infrastructure. In particular, we note that Policy CS16 states that the Council will introduce a Community Infrastructure Levy (CIL) and, prior to this, subject to viability.. .will expect development to contribute to infrastructure provision, which will be assessed on a case by case basis through planning obligations.

**Representation Changes Necessary**

Notwithstanding the support expressed above, we still consider this Policy should provide further detail by identifying any contributions sought will have to comply with the five tests set out in government guidance Circular 05/05. As you are aware, the Circular states that Section 106 contributions should only be sought when the following tests are met:

- i Necessary;
- ii Relevant to planning;
- iii Directly related to the proposed development;
- iv Fairly and reasonably related in scale and kind to the proposed development; and
- v Reasonable in all other respects.

This is further supported by Regulation 122 of the Community Infrastructure Levy Regulations 2010 which provides three of the five policy tests in Circular 05/05 with statutory force. Specifically, Regulation 122 provides that planning obligations can constitute a reason for granting planning permission for a development only if the obligation is:

- i Necessary to render the development acceptable in planning terms;
- ii Directly related to the development; and
- iii Fairly and reasonably related in scale and kind to the development.

We therefore request that Policy CS16 explicitly reference the five policy tests set out in Circular 05/05, so as to be consistent with national policy.

**Officer Response**

The Council accepts that any developer contributions that are sought should meet the tests of Circular 05/05, or the CIL Regulations, whichever will be applicable. Indeed the tests of the Circular are now a statutory requirement. Paragraphs 6.8- 6.9 of the Core Strategy highlights the importance of taking account of the test of the Circular.

**Council's Proposed Action**

To ensure clarity, it is proposed that paragraphs 5.141 (p88) be amended by cross referencing it to section 6 of the Core Strategy. The following sentence should therefore be added to paragraph 5.141 (p88) "Guidance on Developer Contributions is provided in Section 6". The second penultimate paragraph of the policy has also been amended to emphasise this point.



**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

212 Core Strategy PD 5.132

**Representation**

The definition of social and community infrastructure in paragraph 5.173 is much broader than the definition in the table in paragraph 5.132. Such a broad definition for the purposes of Policy CS19 is supported, but it would be helpful if the same term social and community infrastructure with its far narrower definition were to be replaced with some other wording in paragraph 5.132.

**Representation Changes Necessary**

**Officer Response**

The definitions set out in para 5.132 relate to different types of Infrastructure. Under social and communities infrastructure, social and communities facilities were identified as one broad type of this provision, which does encompass all those listed under para 5.173. This is an indication of the broad scope of Social and Community Infrastructure, this list is not meant to be exhaustive.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

413 Core Strategy PD

**Representation**

Despite the recent publication of the Infrastructure Delivery Plan (IDP), there is no evidence whatsoever that the strategy is deliverable. PPS12 para 4.45 is clear about the requirements, but the plan is vague at the extreme about the provision of infrastructure, who is to provide it and when it will be achieved, leaving most decisions to be decided sometime in the future by the council working with others. This is very vague and more an expression of hope than evidence of deliverability. The key elements of the IDP need to be incorporated into the Core Strategy.

**Representation Changes Necessary**

Incorporate an understanding of community infrastructure issues into the strategy, including health and waste, relating these to future patterns of development and the likely changes in lifestyle needed within the duration of the plan.

**Officer Response**

Regarding the issues of deliverability, this matter is adequately addressed by the Implementation and monitoring chapter of the Core Strategy. The chapter makes specific reference to the Infrastructure Delivery Plan. The IDP identified the scale of infrastructure needed to support the Core Strategy, how this will be delivered, by whom and when. The document will be regularly reviewed to ensure that it is up-to-date. It has been prepared with full involvement of the delivery agencies and that the Council is satisfied that delivery will keep pace with development.

This policy does identify that the Council will continue to review the Infrastructure schedule to ensure that it remains up-to-date for the duration of the plan and fully acknowledges that infrastructure includes health and waste provision

**Council's Proposed Action**

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	100	First Name	Carmelle	Last Name	Bell	On Behalf Of	Thames Water Utilities Ltd	
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430	Core Strategy PD				No	More than 1 selected		
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**Representation**

Sewage Treatment Works (STW) such as Woking, should also be taken into account when considering other development proposals around the STW. When considering odour sensitive development around a STW a technical assessment should be undertaken by the developer, or by the Council before approving the development, to confirm that either: (a) there is no adverse amenity impact on any proposed occupied use anticipated to take place therein or; (b) development can be configured to ensure that any potential for adverse amenity impact on any proposed occupied use anticipated to take place therein can be avoided or mitigation solutions are identified as part of the odour survey and implemented by the developer prior to occupation.

**Representation Changes Necessary**

**Officer Response**

Whilst referred to under policy CS16 this is a matter which should be addressed under Design. Design has an impact on how noise, dust, vibrations, smells and other environmental pollutions can be controlled. Therefore it is proposed that a further bullet points is included in Policy CS21: Design to take into account that development proposals are considered appropriately.

**Council's Proposed Action**

It is proposed a further bullet point be added to policy CS21: Design (p100) which states: "Ensure that the proposed development avoids significant harm to the general amenity from noise, dust, vibrations, light or other releases".

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	100	First Name	Carmelle	Last Name	Bell	On Behalf Of	Thames Water Utilities Ltd	
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429	Core Strategy PD			No	More than 1 selected			
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**Representation**

Thames Water are the statutory sewerage undertaker for the Borough but not the water supply undertaker for the Borough.

Thames Water do not object to Policy CS16 in principle, but consider that it does not adequately cover sewerage/waste water [and water] infrastructure provision. Thames Water consider that a Core Strategy policy (either Policy CP15 or a new Policy) should specifically cover sewerage [and water] infrastructure which is essential to all development as identified in the South East Plan.

Due to the complexities of sewerage networks and the interrelationships with other boroughs it is difficult for Thames Water to comment on the impact of development on its waste assets without understanding in detail the exact location scale and phasing of development for the whole catchment. Thames Water would welcome the opportunity to work closer with Woking and the neighbouring boroughs in understanding the future infrastructure needs.

The water companies' investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP5 period which runs from 1st April 2010 to 31st March 2015 and does not therefore cover the whole LDF period. AMP6 will cover the period from 1st April 2015 to 31st March 2020, but we have not yet submitted our business plan for this period.

As part of our five year business plan review Thames Water advise OFWAT on the funding required to accommodate growth in our networks and at all our treatment works. As a result we base our investment programmes on development plan allocations which form the clearest picture of the shape of the community (as mentioned in PPS12). We require a three to five year lead in time for provision of the extra capacity. Where a complete new water or sewage treatment works is required the lead in time can be between five to ten years. New development may therefore need to be phased to allow the prior completion of the necessary infrastructure.

Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements can not be required to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.

Water and sewerage undertakers also have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.

It is essential that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.

**Representation Changes Necessary**

To comply with PPS12 and the South East Plan, we consider that either Policy CS16 needs to be amended to refer to water and sewerage infrastructure or there should be a

**Policy: CS16 Infra**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 100	First Name Carmelle		Last Name Bell				On Behalf Of	Thames Water Utilities Ltd

new Policy dealing with water and sewerage infrastructure along the lines of:

Proposed Addition to Policy CS16 or Text for new Water/Waste Water Infrastructure Policy

the Council will....

Take account of the capacity of existing off-site water and sewerage infrastructure and the impact of development proposals on them. Where necessary, the Council will seek improvements to water and/or sewerage infrastructure related and appropriate to the development so that the improvements are completed prior to occupation of the development. The development or expansion of water supply or sewerage/sewage treatment facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.

Proposed new policy supporting text - The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.

**Officer Response**

As set out in the definition of Infrastructure, this policy does acknowledge that water utility services including water supply and waste water treatment form part of Infrastructure. The specific water and sewerage infrastructure requirements to support the delivery of the strategy will be addressed in the IDP which will be a living documents which we be continually updated during the life of the plan. It will be mis-leading to single out this particular type of infrastructure in the text.

It should also be noted that following a request from Thames Water, the Sewage Treatment Works along Carters Lane have been designated as a major developed site within the Green Belt. This means that (subject to other material planning considerations) the principle of further development required in connection with this use will be acceptable within this defined area.

**Council's Proposed Action**

**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 9	First Name		Last Name				On Behalf Of	Burhill Group Ltd

13 Core Strategy PD

**Representation**

Burhill encourages the Council to adopt a flexible approach when considering the level of contributions required towards the provision of outdoor recreational facilities through the Community Infrastructure Levy or on larger sites through on site provision and/or a S106 contribution as appropriate, and determine this on a case by case basis.

Burhill supports the protection of sport and recreational facilities and encourages the Council to consider a variety of types of recreational facilities which can be permitted on these sites such as a woodlands based "high-ropes" facility as well as an adventure golf facility.

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.

**Representation Changes Necessary**

**Officer Response**

The Core Strategy does not allocate specific sites for sport and recreational facilities. The Council expects the standards set out by the policy to be fully met. However, consideration will be given to an applicant to vary the standards if it is supported by satisfactory evidence. This will be determined on a case by case basis through the Development Management process.

The proposed Country Park at Land at Carters Lane, will be considered as part of the Sites Allocation DPD. This policy provides sufficient framework for this to be considered.

**Council's Proposed Action**

**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of
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**Representation**

For someone living in Westfield this reads as a very hollow Core Strategy. At the present moment there is an opportunity for creating a green corridor from the centre of Wokin via the River Hoe and Westfield Common to the Wey River Flood Plain and environs of Gresham Mill and onto Papercourt Lock or in the opposite direction Triggs Lock and Send. This can be accommodated by offering a private developer the opportunity to build 200 homes in accordance with HSG5 and your suggested Affordable Home Mix. This would not require the £40M+ PFI grant which could go northwards to finance the provision of a greater number of houses where the need is greater.

**Representation Changes Necessary**

**Officer Response**

The policy offers an in- principle support for the creation of Green Infrastructure. It will not prevent the suggested scheme from coming forward if it can be justified. This can be considered through the development management process where detailed schemes can be considered.

**Council's Proposed Action**

**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	41	First Name	Louise	Last Name	Morales	On Behalf Of
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266	Core Strategy PD	89 - 90		Yes	No	More than 1 selected
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**Representation**

Policy CS17 states: "Development involving the loss of public open space will not be permitted unless:... the development is directly related to the enhancement of the open space." "Where alternative facilities of equal or better quality will be provided as part of the development"

Previously the strategies have consistently been used by Councillors to agree to the loss of 30% of allotments, 20% of parks and half of our village green, with the "enhancement to the open space" bolted on to planning applications as an afterthought by the provision of a few new bits of children's play equipment on the smaller space left behind.

The survey of open space has identified a need for more open space of all qualities; there is no justification for loss of open space by replacing it with very small amounts of "high quality open space" which leaves no open space in the urban area.

**Representation Changes Necessary**

The Core Strategy should state that development is not "enhancement of open space". Development is a loss of open space and should be prevented. Enhancement of open space should not involve loss of the open space, but enhancement of the space should be paid for by 106 agreements from other developments not by selling off and building on the open space itself.

**Officer Response**

This policy is intended to ensure the appropriate level of Open Space provision required to support development and provides a clear standard to be achieved, as well as the enhancement of the existing provision. The policy is phrased appropriately to enable these objectives to be achieved.

The manner in which previous planning applications have been dealt with in the past is a separate issue. Decision makers will continue to ensure that in future planning decisions are taken in accordance with the provisions and spirit of the policy.

**Council's Proposed Action**



**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	43	First Name	Robert	Last Name	Palgrave	On Behalf Of		
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274	Core Strategy PD			Yes	No	Effective		
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**Representation**

The intended provision of more allotments sites in the Infrastructure Plan is welcomed - local food production will increasingly become more relevant and valuable to Woking residents over the period of the CS. However Policy CS 17 does not expect developers to contribute to allotment provision - although contributions to children's' play areas are identified.

**Representation Changes Necessary**

**Officer Response**

The policy emphasises that planning applications for development that would create additional pressures on the Green Infrastructure Network should incorporate proposals to improve the network, adequate to address these pressures. This will allow scope for consideration to be given to the provision of allotments if a sufficient case can be made.

**Council's Proposed Action**

**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 58	First Name Lynne		Last Name Coetzee			On Behalf Of		
309	Core Strategy PD	89		No	No			

**Representation**

CS17 Development involving the loss of public open space will not be permitted unless: alternative and equivalent provision is made available in the vicinity or the development is directly related to the enhancement of the open space.

A sentence very like this in Woking's last plan was used by Councillors to agree to the loss of 30% of our allotments, 20% of our park and half of our village green, with the "enhancement to the open space" bolted on to planning applications as an afterthought by the provision of a few new bits of children's play equipment on the smaller space left behind. Rydens way is an example of this , no common sense and no transparency just building on the open space in front of peoples houses. There has been no thought on the outcome of such squashed housing conditions .

Common sense should be used prior to deciding what Open Space should be built upon . The process should be transparent and lessons learnt from the underhand way building is taking place in Rydens Way . This land was previously designated greenbelt.

**Representation Changes Necessary****Officer Response**

This policy is intended to ensure the appropriate level of Open Space provision required to support development and provides a clear standard to be achieved, as well as the enhancement of the existing provision. The policy is phrased appropriately to enable these objectives are met to be achieved.

The manner in which previous planning applications have been dealt with in the past is a separate issue. Decision makers will continue to ensure that in future planning decisions are taken in accordance with the provisions and spirit of the policy.

**Council's Proposed Action**

**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 77	First Name Marianne		Last Name Meinke			On Behalf Of		

102 Core Strategy PD No Effective

**Representation**

Whilst supporting and applauding this policy, hope the Council will ensure that those who currently have no green areas in the immediate vicinity will be considered. Little Ridir is such a road. There are few green areas in Woking, introducing such areas would be great for everyone.

**Representation Changes Necessary**

**Officer Response**

Support and comments noted. This policy requires that any new residential developments would contribute towards outdoor recreational facilities.

**Council's Proposed Action**

**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell				On Behalf Of Natural England	

129 Core Strategy PD No Effective

**Representation**

While Natural England is pleased that GI is included within CS policy and acknowledged as bringing multifunctional benefits to the Borough we remain disappointed, in light of the comments made in previous responses, that this policy still does not appear to fully engage with the concept of GI.

Natural England believes that the provision of green infrastructure should be an integral part of the creation of sustainable communities throughout England. Networks of multi-functional greenspace providing a wide range of environmental and quality of life benefits should be identified in regional and local plans and designed into all major new development and regeneration schemes from the outset. We are pleased that the policy makes reference to river corridors and SANGS. However, these are only two aspects of what should be a fully comprehensive GI network as evidenced by the list given in paragraph 5.146. We are pleased to see the Council encouraging within the policy the improvement in terms of both quality and quantity of the Borough's GI network.

We further note that reference is now made in the Reasoned Justification to our Accessible Natural Greenspace Standards (ANGSt) although we would stress that deficiency in ANG is something that the Council should be looking at addressing strategically across the Borough and not just something to be applied to new developments.

**Representation Changes Necessary****Officer Response**

Given the comments are from the Environmental Planning Advisor at Natural England it is disappointing that no suggested alternative wording has been provided.

Officers are of the view this policy fully acknowledges the importance of Green Infrastructure (GI) and how as part of the planning application process developers should incorporate GI into planned developments. Furthermore policy CS22 encourages ecology and biodiversity measures are incorporated into all developments, along with policy CS7 which encourages that development contribute to biodiversity via the creation of green spaces and where appropriate, linkages between site to create local and regional biodiversity networks of GI. As set out in paragraph 5.157 the Council will also continue to work with the relevant stakeholders, and community groups to provide and improve outdoor sporting facilities and GI across the borough. As set out within paragraph 5.158 the Council aim to deliver this, in part, through Planning obligations/ CIL and indeed this is further set under policy CS16.

For clarity, minor amendments to the wording of the paragraph which begins "Planning applications for development" are proposed to emphasise the importance of GI in the Development Management process.

**Council's Proposed Action**

It is proposed to amend the paragraph in policy CS17 which starts "Planning applications for developments" to say "Development which would create additional pressures on the Green Infrastructure network should, as part of the planning application process, incorporate details of how they intend to mitigate against these pressures."

**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

399 Core Strategy PD

**Representation**

We welcome the inclusion of undeveloped buffer zones being required alongside watercourses particularly that you have included the specific minimum widths for main rivers and ordinary watercourses.

**Representation Changes Necessary**

**Officer Response**

Comments noted.

**Council's Proposed Action**

**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

111 Core Strategy PD

5.153

**Representation**

We support the fact that you have identified that multifunctional open space adjacent to watercourses can serve both biodiversity and flood risk benefits. This space should be synergised to achieve the objectives of both features.

We welcome the inclusion of built-in measures to enhance biodiversity (brown roofs, bat boxes etc)

We support the inclusion of both policies CS21 and CS22 which state that all new homes will be built to an equivalent of 1051/hid which is equivalent to Code for sustainable Homes level 3, some development will be required to meet higher standards by the policy with non-residential development expected to achieve 'very good'.

Overall support this policy

**Representation Changes Necessary****Officer Response**

The Environment Agency's support for this policy is noted.

For clarity, minor amendments to the paragraph are proposed.

**Council's Proposed Action**

It is proposed to amend the wording of paragraph 5.153 to "The Council recognises that water resources, such as river and canal corridors are of great importance for water quality, nature conservation, recreation and landscape value. Rivers and canals are also an important source of open space, form valuable links between Green Infrastructure and/or habitats (as set out in PPS9: Biodiversity and Geological Conservation), aid with flood storage and can enhance biodiversity."

**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

121 Core Strategy PD

**Representation**

The Environment Agency welcome the inclusion of undeveloped buffer zones being required alongside watercourses, particularly that you have included the specific minimum widths for main rivers and ordinary watercourses.

The document as a whole needs reinforcing with Water Framework Directive

**Representation Changes Necessary**

Policy CS17 and/or Policy CS7, this should include a reference to the Thames River Basin Management Plan and the need to ensure there is no deterioration in water body status as a result of development. Furthermore, a statement could be added to suggest that the council would support development which delivers measures towards achievement of the Water Framework Directive

Policy CS17 could be slightly improved by suggesting that the council will support proposals which enhance and protect aquatic ecosystems and their associated wetlands and habitats.

**Officer Response**

Support Noted regarding undeveloped buffer zones set out in paragraph 5.153.

The points raised in terms of Thames River Basin Management Plan and the support for development which delivers measures towards achievement of the Water Framework Directive are addressed under Policy CS7.

Policy CS17 identifies that river and canal corridors are green infrastructure, this policy seeks to protect and enhance all green infrastructure, all of equal importance. Policy CS encourages that new development make a positive contribution to biodiversity (which includes ecosystems, as set out in paragraph 5.122). It is not the intension of policy CS17 to repeat that already covered under other policies.

**Council's Proposed Action**

**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 86	First Name Mike		Last Name Smith				On Behalf Of Woking Football Club	

176 Core Strategy PD

**Representation**

Policy CS17 should make specific reference to the need to provide enhanced sports facilities for the borough, and that these facilities should be in sustainable locations with good accessibility for the communities they serve. This would tie in with the currently stated position that 'planning applications for development that would create additional pressures on the green infrastructure network should incorporate proposals to improve the network sufficient to address these pressures.

**Representation Changes Necessary**

There are no suitable places within the urban area in which to relocate the football club and stadium and on that basis the opportunity should be taken in the plan to re-designate the Agley Road land for the purpose. This would enable the club and other sports to provide more modern facilities and for the community football teams and other clubs to continue to expand alongside the stadium. It would also remove concerns about local parking on match days.

**Officer Response**

See Officer response to 'unclassified' representation made by the Football Club.

**Council's Proposed Action**



**Policy: CS17 Open**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 89	First Name Lisa		Last Name Bowden				On Behalf Of Royal Mail	

197 Core Strategy PD

**Representation**

This policy requires all residential developments to contribute towards the provision of children's play areas and outdoor recreational facilities for young people, and also towards outdoor sports facilities. Royal Mail recognises that the Council will require developers' to contribute to provision through Community Infrastructure Levy (CIL) or on larger sites through on-site provision and/or a S106 contribution as appropriate.

We therefore reiterate our previous request that the Council amend the policy 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. We are of the opinion that the approach adopted by the Council may be ineffective and therefore (arguably) inconsistent with national policy given that in its current format it could make development unviable and could prevent development from coming forward.

**Representation Changes Necessary**

**Officer Response**

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 (NPFA). Furthermore the current system for securing developer contributions and the proposed Community Infrastructure Levy (CIL) will be proportionate to the development proposed and reflect the scale and nature of developments and the required infrastructure to support them.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 15	First Name Douglas		Last Name MacDonald			On Behalf Of		
23	Core Strategy PD	93		Yes	No	Effective		Happy to contribute if you feel beneficial

**Representation**

The Core Strategy is very specific about development objectives: Dwelling numbers, locations, gypsy site, affordable housing etc. This is good

The Core Strategy is very unspecific on infrastructure needed to enable the development - notably transport

You could be more specific with transport proposals to meet CS objectives (green development)

egg Obtain agreement with bus companies to increase regular/reliable services to the town centre and meet CS objectives of less car journeys. This before reducing car parks  
egg a "loop" bus from the south Woking to supplement unreliable 34 service.

**Representation Changes Necessary****Officer Response**

The Council is working with Surrey County Council, the Highway Authority for the Borough, to produce transport mitigation options to support development outlined in the Core Strategy. This mitigation work has taken into account the Woking Borough Transport Assessment and the cumulative assessment of future development impacts on the highway network across the Borough. The mitigation options consider a wide variety of transport measures including real time passenger information, bus priorities, cycle and pedestrians routes, as well as new road construction.

In addition the Council is committed to working in partnership with key stakeholders through the Transport for Woking Partnership to provide a sustainable functioning and integrated transport network to support the development in the Core Strategy.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of		

389 Core Strategy PD No Effective

**Representation**

One further issue is that the Core Strategy sees an expansion of Warehousing however Paragraph 5.166 is advocating that new developments do not lead to an increase in HGV's

**Representation Changes Necessary**

**Officer Response**

Paragraph 5.166 ensures developments do not lead to an increase in HGV movements along unsuitable roads, rather than an increase in total HGV's. The use of specific site mitigation measures will be used to address specific issues and will be taken into account at the planning application stage. It should be noted that the expansion of warehousing outlined in the Core Strategy have been planned to be provided on existing sites and the need for further floorspace will not result in the allocation Greenfield land

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 16	First Name Colin		Last Name Weeks			On Behalf Of		
72	Core Strategy PD		5.167		No	Justified		

**Representation**

Paragraph 5.167 indicates that Transport Assessments have been carried out to identify the Transport Issues. A review of the June 2010 Transport Assessment shows that to date no joined up thinking has been given to the Transport implications of all the developments taking place in adjoining Boroughs. The Transport Assessment just looks at the growth provided by known and future developments in Woking. Within Westfield Common we are only able to comment on the projected increase in Traffic identified under Zone 267 node which shows an increase in Traffic Movements created by the proposed Moor Lane development. This is quoted as creating additional departures of 152.5 vehicles and arrivals of 65.1 through the hours of 0800 – 0900. This is at complete odds with the Mayer Brown Transport Assessment, again calculated using the TRICS database, which indicated an increase of 213 arrivals and 88 departures during the same time period i.e. an increase traffic flow of 38%. If this error was replicated throughout this Assessment this would indicate that the Traffic Flows would increase from 1330 to 1840 during the Peak Period

**Representation Changes Necessary****Officer Response**

The Council had commissioned the County Council to prepare a Transport Assessment to assess the transport implications of the Core Strategy. The outcome of that has informed the policies of the Core Strategy. At this stage the Council does not have any reason to believe that the outcome of the study is not robust enough to support the Core Strategy. If there is an alternative assessment which is different from the outcome of the Transport Assessment the Council will forward that to the County Council to consider. It is true that the Transport Assessment concentrated on development proposals of the Core Strategy. However, the County Council has carried out a further study about the cumulative assessment of future development impact on the highway network. This takes a strategic view of transport impacts across Surrey. The mitigation measures that will emerge out of that will address any cross boundary transport impacts.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of		

388 Core Strategy PD No Effective

**Representation**

Park n' Ride and Electric Busses

Although this Strategy is supported it really doesn't make sense. If WBC want to increase Office and Retail Space in the Town Centre they either have to provide Car parking a reasonable cost or provide a Park n Ride facility preferably supported by Electric Busses as per Quebec City. This should also be supported by increasing the number of Pedestrian only streets

**Representation Changes Necessary**

**Officer Response**

The Town Centre is served by a number of sustainable transport modes which support the economic role of the Town Centre. In particular Woking Rail Station provides a frequent and quick service to a number of key destinations such as London. By concentrating development in these areas the amount and length of journeys, particularly by cars, can be minimised.

The implementation of a park and ride scheme has been considered in partnership with Surrey County Council and it has been determined that currently there is not enough critical mass along one corridor for a successful park and ride scheme to be implemented in the Borough. The Council and Surrey County Council will continue to keep this option under review as part of future transport mitigation measures

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	41	First Name	Louise	Last Name	Morales	On Behalf Of
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267	Core Strategy PD	95	5.179	No	No	More than 1 selected
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**Representation**

All 3 recently published research since 2007 has shown that Maximum car parking standards just mean more cars parked in the streets instead of in private driveways unless supported with strict onstreet prevention strategies. ( as in planning for streets national guidelines)□  
Limited parking INCREASES our carbon use as cars have to juggle parking spaces every day and residents can't leave their cars at home during the day due to lack of residential parking, so this policy statement directly conflicts with other parts of the document promoting public transport use

**Representation Changes Necessary**

Change words Maximum... to Sufficient residential parking needs to be provided to enable cars to be left stationary during the weekdays and public transport to be utilised.

**Officer Response**

Policy CS18 advocates minimum standards to be implemented for residential developments, recognising that insufficient residential parking can lead to highway safety issues and on-street parking problems.  
Parking controls will however be considered where it can be shown to encourage the use of sustainable modes of transport.  
Maximum car parking standards will be implemented for all types of non-residential development. It should be noted that most new development is directed to be located in the main urban area, in particular the Town Centre. These areas are well served by sustainable transport modes, such as Woking rail station and the cycle network, providing viable alternatives to private vehicles. In addition the requirement of travel plans from development proposals that generate significant traffic and transport statements from smaller proposals is a tool to encourage use of sustainable transport modes and reduce private vehicle use. No change required.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 58	First Name Lynne		Last Name Coetzee			On Behalf Of		
311	Core Strategy PD	95	5.170	Yes	No			

**Representation**

5.179 Maximum car parking standards are a means of restricting the number of cars on the road and influencing a shift in behaviour towards other transport modes, particularly in urban centres with high accessibility."

Untrue - recent research since 2007 has shown that Maximum car parking standards ( i.e. no more than 1 parking space MAXIMUM per new house) just mean more cars parked in the streets instead of in private driveways. Do we really need more houses built with insufficient parking provision included?

**Representation Changes Necessary**

Please review this , because most houses have 2 cars .

**Officer Response**

Policy CS18 advocates minimum standards to be implemented for residential developments, recognising that insufficient residential parking can lead to highway safety issues and on-street parking problems.

Parking controls will however be considered where it can be shown to encourage the use of sustainable modes of transport.

Maximum car parking standards will be implemented for all types of non-residential development. It should be noted that most new development is directed to be located in the main urban area, in particular the Town Centre. These areas are well served by sustainable transport modes, such as Woking rail station and the cycle network, providing viable alternatives to private vehicles. In addition the requirement of travel plans from development proposals that generate significant traffic and transport statements from smaller proposals is a tool to encourage use of sustainable transport modes and reduce private vehicle use

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 61	First Name Malcolm		Last Name McPhail			On Behalf Of		

321 Core Strategy PD Yes Yes

**Representation**

We support the Council's sustainable approach to transport issues, particularly the flexible interpretation of its maximum car parking standards in Woking town centre

**Representation Changes Necessary**

**Officer Response**

Support noted, no change is required.

**Council's Proposed Action**



**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 71	First Name Grace		Last Name Brown			On Behalf Of		

360 Core Strategy PD 93 5.161 to 5.164

**Representation**

The roads in central and surrounding areas are clogged up during most of the working day and at weekends - more housing in central Woking is only going to bring more car drivers - I see no sensible reasons written in the document as to why cycle riding between now and 2027 is going to take precedence over car driving. Bus services are decreasing not increasing in the borough.

**Representation Changes Necessary****Officer Response**

The Council is working with Surrey County Council, the Highway Authority for the Borough, to produce transport mitigation options to support development outlined in the Core Strategy. This mitigation work has taken into account the Woking Borough Transport Assessment and the cumulative assessment of future development impacts on the highway network across the Borough. The mitigation measures consider a wide variety of transport measures including real time passenger information, bus priorities, cycle and pedestrians routes, as well as new road construction that are targeted at problem areas.

In addition Policy CS18 encourages a shift in behaviour away from private vehicles to more sustainable choices of transport including walking, cycling and public transport and requires travel plans for significant traffic-generating developments. The Cycle Woking project has led to a significant increase in cycle journeys across the borough through a combination of infrastructure projects and soft measures and as stated in the Core Strategy the Council will continue to work in partnership with key stakeholders to encourage this shift in behaviour.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
298	Core Strategy PD	23	2.33	Yes	No	Effective		

**Representation**

A key issue for residents of Knaphill is the traffic congestion on the A322, Bagshot Road. Congestion will only get worse if both retail and housing development are allowed to continue along the A322 corridor without major changes to the layout of the road as it passes through the Borough at the Knaphill/Brookwood boundary

**Representation Changes Necessary**

All the local authorities along the A322 corridor have to work together to formulate a cohesive plan. This will require Woking Borough Council, Surrey CC, Surrey Heath, Highways Agency and Network Rail working together to come up with a solution or for Woking and Surrey Heath to limit further development along the A322 corridor.

**Officer Response**

The Council is working with Surrey County Council, the Highway Authority for the Borough, to produce transport mitigation options to support development outlined in the Core Strategy. This mitigation work has taken into account the Woking Borough Transport Assessment and the cumulative assessment of future development impacts on the highway network across the borough. The mitigation options consider a wide variety of transport measures including bus priorities, pedestrian crossing facilities, conventional traffic management and intelligent transport systems and are targeted to address problem areas.

The Woking Transport Assessment produced by the Council and Surrey County council evaluates the likely impact proposed developments could have on the highway network in the Borough. This found that the traffic impacts result from future developments are unlikely to be significant enough to cause major disruption or require significant highway infrastructure improvement measures.

In addition Policy CS18 encourages a shift in behaviour away from private vehicles to more sustainable choices of transport including walking, cycling and public transport and requires travel plans for significant traffic-generating developments and transport statements from smaller proposals. It should be emphasised that one of the areas where mitigation measures are targeted in the 'Technical Note about Transport Measures' prepared by the County Council is Knaphill and also around Brookwood and St Johns.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell				On Behalf Of	Natural England

131 Core Strategy PD No Effective

**Representation**

Natural England supports the commitment of this policy to sustainable modes of transport and the recognition of the need to influence a modal shift in this direction. However, much of the focus is around concentrating the majority of new development in main urban areas to minimise the need to travel by car and while this is commendable it is only part of the picture.

We believe the supporting text should make clear links between footpaths and cycleways, GI (Policy CS17) and improved access to the wider countryside. The CS should actively promote outdoor recreation and access to the countryside. Indeed CS Objective 12 makes this clear and Policy CS18 would be an appropriate place for a policy hook. Natural England are committed to enhancing access and enjoyment of the countryside for all and the CS should promote appropriate recreation in the countryside, especially in the countryside around towns, which can provide high quality accessible greenspace close to where people live. Countryside recreation can make an important contribution to a healthy lifestyle and a sense of well-being. In addition, 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.

**Representation Changes Necessary****Officer Response**

Comments noted, the Core Strategy recognises the importance of accessing the wider countryside. Paragraph 5.164 outlines an integrated transport system that provides easy access to green infrastructure and recreation. This reinforces Policy CS17 which supports the protection and enhancement of physical access, including public rights of way to open space and green infrastructure and recognises the importance of these areas in providing recreation space and a sense of wellbeing to the community.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 81	First Name Penelope		Last Name Mare				On Behalf Of	

141 Core Strategy PD

**Representation**

Particularly concerned about the road infrastructure is taken into account alongside housing and workplace development. I note that Sheerwater and Maybury estate are to receive attention as they are considered areas with higher than average deprivation. Their shopping parades are a sad sight of closed premises. However it would seem there are a very large number of cars and the connection between East-West to the town centre is not good as it crosses the very busy north-south road from Maybury Hill to the Six Crossroads roundabout. If another 5000 tonnes are to be built many of them will be south of the railway line and even more cars will try to access the town centre north of the railway. I suggest the whole stretch of road between Maybury Hill and the Basingstoke canal needs improving. Is it really necessary to have two crossings with traffic signals, could more roundabouts help? E.g. traffic from the north has to cut across the flow of traffic to turn west to the town centre. Would it be better if traffic from the Maybury Estate turned up the hill to the roundabout rather than cutting across traffic? Urges the circulation under the Maybury railway arch and connecting roads before 2027.

**Representation Changes Necessary****Officer Response**

The Council is working with Surrey County Council, the Highway Authority for the Borough, to produce transport mitigation options to support development outlined in the Core Strategy. This mitigation work has taken into account the Woking Borough Transport Assessment and the cumulative assessment of future development impacts on the highway network across the Borough. The mitigation options consider a wide variety of transport measures including real time passenger information, bus priorities, cycle and pedestrians routes, as well as new road construction.

Any development proposals brought forward will be required to provide appropriate infrastructure measures to mitigate the adverse effects of development traffic and where necessary developer contributions will be secured to implement transport mitigation schemes.

In addition Policy CS18 encourages a shift in behaviour away from private vehicles to more sustainable choices of transport including walking, cycling and public transport and requires travel plans for significant traffic-generating developments.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	82	First Name	John	Last Name	Hack	On Behalf Of		
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**Representation**

The Local Transport Plan admits that Woking has severe physical transport restrictions, with the prospect of increasing traffic congestion. The railway and canal in particular mean that increased accessibility needs to be found in better use of the existing road infrastructure. This means transferring road space to buses, cycles and pedestrians, and a better service pattern to provide frequent services to Woking's hinterland. The LIP also floats the possibility of Park and Ride. Although not immediately popular (to motorists), these measures would mean a significant reduction in carbon from transport and increased resilience for the time when fuel becomes too expensive for everyday use, or supplies are interrupted (quite likely over the whole life of the plan — see the literature on Peak Oil for evidence). They would not however deal with the main structural problem which is:

That the core infrastructure facility is the railway, providing the lifeblood of the area, especially for commuting (both in and out). The Route Utilisation Study notes that demand increasing (on the basis of present services and development) and that capacity is an issue. The SW Trains timetable is dictated to by the capacity restriction of the station itself and the first flat junction outside London — which the RUS notes should be tackled in the longer term. Increased development in the town centre on the scale proposed would bring this need forward — indeed it is arguable that for the security of services already it is needed now.

Increasing the capacity of the station is therefore a pre-requisite for development, and full development of the town centre should be prohibited without it. This is likely to require both greater through track capacity and a grade separated junction. The development of the station site and associated land would provide significant and environmentally attractive opportunities for development (and funding). Full safeguarding for this should be in place in the core strategy, as it is a key structural issue, and discussions started immediately for its implementation as part of town centre development and the transport interchange.

The published plan has removed the reference to Airtrack, on the (short-sighted) ground that it has been withdrawn by the promoters. However, a strategic spatial view of the transport infrastructure in the western approaches to London would see the benefit of an orbital route beyond Heathrow, providing a viable alternative to the ever-congested M25. This would both provide modal shift for Heathrow journeys (assisting in dealing with the air quality issues surrounding Heathrow access), and serve (and connect with) other services in W and NW London. Many sustainable travel choices would be opened up for journeys that are only now possible by car. A major intercity route linking with High Speed Two has been promoted by Greengauge (see Town and Country Planning, December 2010), taking a route avoiding the level crossings in Egham, but an alternative service, more attractive to Woking and the sub-region is a fast local service from Guildford to (say) Watford, integrated with Crossrail. This could be built quickly, and utilise (and provide increased justification for) the early improvement of the station and junction.

I therefore propose that the Airtrack reference on the key diagram of the draft core strategy be reinstated as an orbital rail proposal to support the town centre proposals and reduce car dependence. Frequent local rail services could be provided to a greater number of destinations, including Outer West London and the Chertsey line. Consideration should be given to park and ride at suitable stations in collaboration with neighbouring authorities. In Woking the centrepiece would be a greatly enhanced station and transport interchange, funded by

- a.  Direct development over the station and railway lands and
- b.  Tariff/CIL on ALL commercial development permitted in the town centre and (under criteria to be decided in detail) throughout the Borough.

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 82	First Name John		Last Name Hack				On Behalf Of	

and incorporating frequent bus services to serve the town and surrounding neighbourhoods, with good quality links to neighbouring towns not served by rail, a pedestrian and cycle thoroughfare (as a centrepiece of a comprehensive network) over the railway linking S Woking with the town centre (in place of the present unsatisfactory station subway and providing access to the new transport interchange; a pedestrian and cycle route under the railway to replace the Victoria Arch pavement, and car parking to be managed in accordance with the capacity of the approach roads and the development of public transport and park and ride. Electric vehicles could also be provided on a community car-share basis for residents and visitors.

**Representation Changes Necessary**

Please see comments above, but in summary:

Changes to the town centre policy to make growth contingent on the development of a significantly improved railway station and services;

Specific reference to infrastructure and its means of delivery in the plan to support town centre growth, including positive policies for reducing car use;

Reinstatement of the principle of orbital rail services (to replace the previous reference to Airtrack) and policies to ensure that progress is made on the delivery of the necessary infrastructure;

Changes to the reference to the green belt as an area of growth, and

Reformulating policy on housing to clarify the status of green belt and to set clear criteria for an immediate core strategy review to determine the location and form of sustainable development in the longer term (10 years onwards).

**Officer Response**

Comments noted, Policy CS18 supports proposals that deliver an improved interchange facility at Woking Rail Station. However, as stated in the IDP it is not yet possible to include details of specific rail and station schemes in the Core Strategy as schemes have not been drawn up. The Council will keep this under review and as stated in paragraph 5.166 will safeguard land required for major highways and transportations schemes through the Sites Allocations DPD.

Although previous drafts of the Core Strategy supported the Airtrack scheme, in recognition of the benefits it would bring to the Borough, because the scheme has been withdrawn by BAA it cannot be included in the Core Strategy. The suggested 'orbital rail proposal' is unlikely to be delivered and therefore cannot be justified. The Council will however continue to work in partnership with transport providers to seek improved links to Heathrow Airport.

Implementation of a park and ride scheme has been considered in partnership with Surrey County Council and it has been determined that currently there is not enough critical mass along one corridor for a successful park and ride scheme to be implemented in the Borough. The Council and Surrey County Council will continue to keep this option under review as part of future transport mitigation measures

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 91	First Name Patrick		Last Name Blake				On Behalf Of	Highways Agency

425 Core Strategy PD Yes Yes

**Representation**

Furthermore it is noted that Woking's Transport Assessment (2010/11) which evaluated the impact proposed developments will have on the highway network in the Borough, has been used to support the CS and other supporting evidence base documents. Results from this assessment indicated that developments brought forward would have no significant impact on the SRN. However, as the M25 Junctions 10, 11 and sections of the A3 and relevant junctions are operating close to capacity, the HA would request that a detailed Transport Assessment and junction modelling are conducted when a development comes forward. Developers need to identify and contribute to the funding of highway improvements measures that are needed to mitigate any potential adverse impact on the SRN. We therefore request this statement is incorporated in the Site Allocations Development Plan Document so that a Policy Framework is in place.

A Similar statement also needs to be included in the Infrastructure Delivery Plan so the developer will identify and contribute to the funding of measures required specifically for mitigating transport impacts on the SRN.

Having reviewed the sustainability Appraisal Report, we are content with the methodology and framework used.

**Representation Changes Necessary**

**Officer Response**

These comments are noted and will be taken into consideration when producing the Site Allocations DPD and in the update of the Infrastructure Delivery Plan. Policy CS18 already ensures that a detailed Transport Assessment be carried out to assess traffic impacts of development where relevant and appropriate mitigation measures put in place to address adverse impacts.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

213 Core Strategy PD

**Representation**

Any references in this section (and elsewhere in the document) to the Local Transport Plan should relate to the Surrey Transport Plan or the third Local Transport Plan.

**Representation Changes Necessary****Officer Response**

Comment accepted, the Core Strategy will be amended where necessary.

**Council's Proposed Action**

It is proposed that references of the Local Transport Plan be amended to the 'Surrey Transport Plan' as follows:

Para. 5162 "Surrey County Council is the Highways Authority for the Borough. Woking Borough Council will work in partnership with Surrey County Council to achieve the aims and objectives of the Surrey Transport Plan which sets out the transport strategy for Surrey. The vision of the Surrey Transport Plan seeks to..."

CS18: Transport and accessibility, bullet point 1 "Joint working with key stakeholders through the Transport for Woking Partnership to ensure that the principle objectives and overall vision of the Surrey Transport Plan are met."

Key evidence base for CS18 "The Surrey Transport Plan (the third Local Transport Plan), 2011, produced by Surrey County Council."

214 Core Strategy PD

**Representation**

Alterations to the Woking CPZ might be needed as a consequence of future development. Therefore, the Borough Council might consider amending the text in the sixth bullet point, first sentence to read "... providing it does not create unmanageable on-street car parking problems."

**Representation Changes Necessary****Officer Response**

Comments noted, however the current policy does not preclude alterations to the Woking CPZ and it is not felt necessary to specify the degree of potential on-street parking problems.

**Council's Proposed Action**



**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

215 Core Strategy PD 5.166

**Representation**

It would be helpful if the policy text were to set out that developments must ensure highway safety, to reflect the Surrey Transport Plan objective, and also set out a requirement for developments to include appropriate servicing facilities if needed. It is noted, however, that these matters are covered in supporting paragraph 5.166.

**Representation Changes Necessary**

**Officer Response**

The policy makes reference to developments having to provide mitigation measures for environmental and safety impacts and as mentioned the details of these have been set out in supporting paragraph 5.166. It is felt it is more appropriate to keep the details within reasoned justification.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

435 Proposals Map 5.167

**Representation**

Paragraph 5.167 indicates that Transport Assessments have been carried out to identify the Transport Issues. A review of the June 2010 Transport Assessment shows that to date no “joined up thinking” has been given to the Transport implications of all the developments taking place in adjoining Boroughs. The Transport Assessment just looks at the growth provided by known and future developments in Woking. Within Westfield Common we are only able to comment on the projected increase in Traffic identified under Zone 267 node which shows an increase in Traffic Movements created by the proposed Moor Lane development. This is quoted as creating additional departures of 152.5 vehicles and arrivals of 65.1 through the hours of 0800 – 0900. This is at complete odds with the Mayer Brown Transport Assessment, again calculated using the TRICS database, which indicated an increase of 213 arrivals and 88 departures during the same time period i.e. an increase traffic flow of 38%. If this error was replicated throughout this Assessment this would indicate that the Traffic Flows would increase from 1330 to 1840 during the Peak Period.

**Representation Changes Necessary**

**Officer Response**

The Council had commissioned the County Council to prepare a Transport Assessment to assess the transport implications of the Core Strategy. The outcome of that has informed the policies of the Core Strategy. At this stage the Council does not have any reason to believe that the outcome of the study is not robust enough to support the Core Strategy. If there is an alternative assessment which is different from the outcome of the Transport Assessment the Council will forward that to the County Council for consideration.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

384 Core Strategy PD

**Representation**

Transport and cycling

In the strategy document Woking's status as a cycle town is mentioned along with the desire to influence a shift in transport choices.

(Text referring to Cycle town inserted)

This is clearly commendable, but it is important to consider how this will be delivered. Merely designating roads as cycle routes, does not make them safe or appropriate. It would also not be advisable to further dissect our limited green space by adding new cycle paths. So a clear strategy for this should be developed. Perhaps, Woking could make better use of existing foot paths, which are by their nature the shortest from one place to another. Cyclists could be encouraged to 'give way' to pedestrians using a Woking cycle 'code of conduct' to alleviate issues. At the same time care needs to be taken to communicate to car drivers the values of Woking being a cycle town and to ensure that they are aware of their conduct whilst driving on roads in the borough. We believe the creation of Woking as a cycle town has been poorly delivered as evidenced by the issues highlighted in the Town Centre and along the canal.

**Representation Changes Necessary**

**Officer Response**

The Cycle Woking partnership project led to a significant increase in cycle journeys across the borough through a combination of infrastructure projects and soft measures between 2008 and 2011. Following the completion of the project in 2011 the Council has resolved to continue the Cycle Woking project at local borough level. Additionally, further investment in the Borough's cycling and pedestrian networks have been secured through the successful Surrey TravelSMART Local Sustainable Transport Fund key component bid. The details of the Cycle Woking and the LSTF strategies are not part of the Core Strategy and therefore these comments and suggestions will be passed to the relevant officers. The implementation of cycle infrastructure will take account of the safety of other road users, other networks such as footpaths and the general environment.

**Council's Proposed Action**

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

410 Core Strategy PD

**Representation**

We therefore request that measures are put in place to deal with:

Transport (both direct energy use and the effects of transport on location decisions and the number and length of trips), which has as great an effect on energy use and carbon emissions as construction. Measures to reduce car use and to reduce the impact of cars on the environment need to be fully set out. The Infrastructure Delivery Plan, the Local Transport Plan, the report on Cycling in Woking for DfI and the London Route Utilisation Study (Rail) all allude to significant and growing difficulties with the transport infrastructure in and around Woking. Yet, with the exception of the western access to Sheerwater, there is no firm indication as to how the problems will be resolved through a combination of investment, management and modal shift.

In parallel to this, the development of high quality cycle and pedestrian routes throughout the Borough and especially to and in the Town Centre.

- We are unsure whether the Proposals Map adequately safeguards sufficient land for the development of the Transport Interchange suggested in the IDP, and the expansion of the station and railway infrastructure foreseen as likely in the RUS. Given that current government policy is to limit the number of development plan documents (and the arrival of neighbourhood plans in the Localism Bill), the Plan should set out sufficient details for the sustainable development of the Town Centre and its infrastructure.

**Representation Changes Necessary**

Instructions should therefore be given for the plan to be immediately reviewed with the following requirements: An integrated land use and transport policy that incorporates the very well-established principles set out in government planning advice over many years and the work of advisory bodies and institutes (also on the community side by the Transition and Low Carbon movements, and in regional planning by the principles of sustainable residential quality). This is also essential given that the Integrated Transport Study shows increasing congestion expected in the town over the next few years, without the huge additional developments proposed.

d.  A credible policy should incorporate a clear hierarchy of priorities building on the transport hub of Woking railway station, providing for the safe movement of pedestrians and cyclists, the provision of comprehensive public transport throughout the Borough at all reasonable times, and significant improvements to the capacity of the railway and the services offered (including the establishment of orbital rail and bus services), coupled with development and management of the existing fabric that prioritises green space over tarmac, reduces the need and opportunity to travel by car when other modes are available (and when fuel prices increase) and provides incentives to low carbon-producing transport where residual individual mobility is needed (by for example the provision of a borough-wide car sharing scheme using electric cars).

5.  To have regard to the impact of and access to major developments near or outside the Borough boundary, especially McLaren, out of centre retail facilities, and St Peter's Hospital, on the environment and infrastructure, and to work jointly with neighbouring authorities to address these issues and plan strategically for sustainable development.

**Officer Response**

The Council is working with Surrey County Council, the Highway Authority for the Borough, to produce transport mitigation options to support development outlined in the Core Strategy. This mitigation work has taken into account the Woking Borough Transport Assessment and the cumulative assessment of future development impacts on the highway network across the Borough. The mitigation options consider a wide variety of transport measures including real time passenger information, bus priorities, cycle and pedestrian routes, as well as new road construction.

In addition Policy CS18 encourages a shift in behaviour away from private vehicles to more sustainable choices of transport including walking, cycling and public transport and requires travel plans for significant traffic-generating developments.

**Policy: CS18 Transp**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

The Core Strategy does not include specific cycle or pedestrian proposals, however Policy CS18 supports the implementation of proposals that deliver improvements and increased accessibility to cycle and pedestrian networks - particularly in the Town Centre.

Through the continuation of Cycle Woking as a Borough Council project and the Local Sustainable Transport Fund the Council and Surrey County County will continue to deliver improved cycle and pedestrian routes across the Borough.

As stated in the IDP it is not yet possible to include details of transport rail and station schemes in the Core Strategy as schemes have not been drawn up. The Council will keep this under review and as stated in paragraph 5.166 will safeguard land required for major highways and transportations schemes through the Sites Allocations DPD.

**Council's Proposed Action**

**Policy: CS19 Socia**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 16	First Name Colin		Last Name Weeks			On Behalf Of		

73 Core Strategy PD No Effective

**Representation**

CS19 is welcomed. However, places should be quickly identified and placed on the CS Proposals Map.

**Representation Changes Necessary**

**Officer Response**

Support noted.

Paragraph 5.173 sets out the Council's definition of social and community infrastructure which is wide-ranging and includes schools, higher education facilities, health centres, GP surgeries, dentists, child care premises, supported accommodation, libraries, museums, community halls, places of worship, church halls, day centres, children's centres, indoor and outdoor recreation and sports.

As this definition is so wide-ranging, and some of the physical sites are small it is not considered practical to include all of them on the Proposals Map. A social and Community Infrastructure Study has been carried out to identify existing infrastructure and their capacity to support proposed development in the Core Strategy. The study is part of the evidence base and is on the Council's website.

**Council's Proposed Action**

**Policy: CS19 Socia**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 64	First Name James		Last Name Clegg				On Behalf Of	

336 Core Strategy PD 98 5.181 Yes Yes

**Representation**

This is a well worded paragraph as it outlines an effective way of ensuring the retention of sites that are required to be used as community facilities.

**Representation Changes Necessary****Officer Response**

Support noted

**Council's Proposed Action**

335 Core Strategy PD 97 5.175 (Policy wording) Yes Yes

**Representation**

The policy is well written as it acknowledges the need to resist the loss of existing social and community facilities or sites. In addition to this paragraph 5.179 recognises the difficulty that community organisations can have in finding sites and therefore the need to resist the loss of such facilities.

**Representation Changes Necessary****Officer Response**

Support noted.

**Council's Proposed Action**

**Policy: CS19 Socia**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	64	First Name	James	Last Name	Clegg	On Behalf Of
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333	Core Strategy PD	97	5.173	Yes	Yes
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**Representation**

The definition of social and community infrastructure includes places of worship. This is in accordance with national policy. PPS1 at page 8 states that: "Plan policies should: ...take into account the needs of all the community, including particular requirements relating to...religion..."

**Representation Changes Necessary**

**Officer Response**

Comments noted.

**Council's Proposed Action**

334	Core Strategy PD	97	5.174	Yes	Yes
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**Representation**

The paragraph is very well worded as it brings to the fore the importance of community facilities and social and community infrastructure, and how these have a direct bearing on the well-being of people. The paragraph also highlights the services performed by faith sectors in contributing to the community.

This is in line with national policy;

'Diversity and Equality in Planning' Page 21, Box - "Definition of Sustainable Communities" states that: "Sustainable communities meet the diverse needs of existing and future residents, their children and other users, contribute to a high quality of life and provide opportunity and choice".

Diversity and Equality in Planning, Page 11, Paragraph 1 states: "Planning should aim to improve the lives of the widest cross-section of society. Society today is made up of diverse individuals of varying...faiths".

**Representation Changes Necessary**

**Officer Response**

Support noted

**Council's Proposed Action**



**Policy: CS19 Socia**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 69	First Name Anthony		Last Name Kremer				On Behalf Of	
356	Core Strategy PD	97	5.174	Yes	No	Effective		

**Representation**

I agree entirely with the sentiments expressed regarding providing accessible and sustainable community infrastructure. But these are seen in the Plan as places for people to meet. Increasingly - and in the future perhaps overwhelmingly - people will be meeting in cyberspace. People's face-to-face social life will be fulfilled as much by Skype as the coffee shop.

This is particularly true of an ageing nation, and one that will be perhaps more infirm that today.

**Representation Changes Necessary**

We therefore need a policy to promote and enable people to receive at least email over their broadband connections. This is not the time or place for me to develop the ideas I have for the policies themselves, but we do need to get the justification for such policies into the Strategy.

**Officer Response**

Support noted.

It needs to be emphasised that the Core Strategy itself emphasises the important of telecommunications for the future development of the Borough. The Council still believe that physical buildings are vital for the community and increased use of the internet for social communication does not remove the need for community facilities for all of the uses listed in the policy definition.

The Council agree that broadband access for all areas of the borough is important. A lot of effort is being made to extend broadband coverage to all areas of Surrey. This is happening outside the Core Strategy. Surrey County Council have launched a superfast broadband project. This seeks to ensure that all Surrey residents can access high speed broadband no matter where they live. The EU universal broadband program has a target to ensure that all households within the EU have access to 30 Mbps Internet speeds by 2020 and that 50% of those have access to speeds of 100Mbps or higher by the same date. Surrey Strategic Partnership wants to leapfrog the currently available broadband speeds and for speeds in Surrey to be amongst the fastest in Europe. Surrey CC are seeking to achieve superfast broadband for Surrey's residents and businesses considerably earlier, by the end of 2013. Given this ambition, they need to discuss with industry what precisely can be achieved on a universal basis, whilst keeping costs to a affordable level for the customer.

Surrey CC has got involved in this project because they are aware that there is likely to be an ongoing gap in the provision of a superfast broadband network in Surrey. The latest published plans still show about one in five Surrey homes and businesses will not have such access by the end of 2013, which would disadvantage about 200,000 Surrey people. There is an important issue of fairness involved. Surrey's public bodies and the county's business and voluntary sectors - working together as the Surrey Strategic Partnership and lead by Surrey County Council - think that it is unacceptable for a section of Surrey society to be excluded in this way

**Council's Proposed Action**

**Policy: CS19 Socia**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 73	First Name Philip		Last Name Stubbs			On Behalf Of		
365	Core Strategy PD	24	2.39	Yes	No	Effective		

**Representation**

The Core Strategy Publication document states that the provision of adequate community facilities and infrastructure are critical as it has a direct bearing on the well-being of the community. This policy statement is not being met in Knaphill given the shortage of school places in the junior schools. Surrey CC plans show a gap between reception classes in junior schools and demand growing.

**Representation Changes Necessary**

The County's education report highlights a shortage of reception places in Woking and for the gap between capacity and demand to grow with Knaphill being a black spot. It requires Woking Borough Council and Surrey County Council to work on a permanent solution not portable classrooms, before any further housing development is approved.

**Officer Response**

Woking Borough Council forms part of a two-tier system of local government with Surrey County Council. Surrey County Council has a number of responsibilities across the whole of the county, including roads and transport, education and social care. The Borough Council work closely with the County Council, for example providing the education team with figures on dwelling completions, planning permissions and the most up-to-date housing trajectory to assist them with planning education provision.

The Council has carried out an Infrastructure Delivery Plan to assess the capacity of existing educational provision and the impacts of the proposed development set out in the Core Strategy. Policy CS16 allows scope for developer contributions to be secured towards the provision of educational infrastructure. The Council will work with Surrey CC to ensure that gaps in provision are met as the Core Strategy is implemented.

**Council's Proposed Action**

**Policy: CS19 Socia**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

200 Core Strategy PD

**Representation**

In relation to this Publication version, we consider that Policy CS19: Social and Community Infrastructure is unsound because it does not represent the most appropriate strategy and is not flexible and deliverable. In the November 2010 draft Core Strategy, an earlier version of the policy (Policy CS1 8 in that document) included the word "or" at the first bullet point. This word has been omitted from the publication version of the policy, which now reads as though both the first and second criteria of the policy have to be satisfied. If this is the case, this would not represent a reasonable strategy that would be flexible and deliverable since if there is no identified need for an existing social or community facility it should not be necessary to provide adequate alternative facilities for the community. We consider that the word "or" should be reinstated in the policy. I have set this out in the attached Appendix.

Policy CS19 Social and community infrastructure

Policy CS19 as it currently reads is unsound because it does not represent the most appropriate strategy and is not flexible and deliverable. In the November 2010 draft Core Strategy, an earlier version of the policy (Policy CS18 in that document) included the word "or" after the first bullet point. This word has been omitted from the publication version of the policy, which now reads as though both the first and second criteria of the policy have to be satisfied. If this is the case, this would not represent a reasonable strategy that would be flexible and deliverable, since if there is no identified need for an existing social or community facility it should not be necessary to provide adequate alternative facilities for the community.

**Representation Changes Necessary**

The word "or" should be re-inserted in the policy after the first bullet/criterion as was the case in the Preferred Strategy consultation draft of November 2010.

**Officer Response**

This is a typographical error. It is proposed the word "or" needs to be inserted after the first bullet point.

**Council's Proposed Action**

It is proposed that policy CS19: Social and community infrastructure (p97) be amended to insert the word "or" after the first bullet point so the policy reads:

The loss of existing social and community facilities or sites will be resisted unless the Council is satisfied that:

- there is no identified need for the facility for its original purpose and that it is not viable for any other social or community use OR
- adequate alternative facilities will be provided in a location with equal (or greater) accessibility for the community it is intended to serve
- there is no requirement from any other public service provider for an alternative social or community facility that could be met through change of use or redevelopment.

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 6	First Name Mike		Last Name McDermott			On Behalf Of		

6 Core Strategy PD

**Representation**

Questions why there is no mention of a street market.

**Representation Changes Necessary**

**Officer Response**

Policy CS2 states that the Council will support improvements to the market to help ensure that it remains attractive and competitive, providing the community with wider consumer choice. The suitability of the current market site will be addressed in the proposed area action plan and site allocations DPD.

No change is proposed to the policy.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	22	First Name	Helen	Last Name	Murch	On Behalf Of
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49	Core Strategy PD					No
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**Representation**

The retail floorspace figures for Woking Town Centre contained in the Roger Tym & Partners Town, District and Local Centres Study 2009 are based on maintaining market share in the face of competition from new developments in competing town centres such as Camberley, Bracknell and Aldershot. This unaggressive, policy neutral approach to the provision of new retailing space is welcomed by Surrey Heath.

The Core Strategy floorspace figures do not reflect this desire to maintain market share as they are proposing levels of new retail floorspace in the order of billions of sqm. This approach is considered to be unjustified by the evidence base and thus the policy is considered unsound.

**Representation Changes Necessary****Officer Response**

Support for retail floorspace figures set out in the evidence base noted. See response to representation 40 with regard to the representation of figures within the policy. No change is proposed to the policy.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 22	First Name Helen		Last Name Murch			On Behalf Of		

40 Core Strategy PD No

**Representation**

Policies CS1, CS2, CS3 and CS4 of the WCSPD make provision for additional floor space in the borough in the form of m2. Floorspace figures are more typically cited in sqm and conversion of the m2 figures to sq m results in floorspace figures that are enormous. In Policy CS1, for instance, the additional retail floorspace proposed across the borough would amount to around 8 billion sqm. In Policy CS4 the additional retail space in Knaphill would be around 9 million. Such levels of provision are clearly undeliverable.

The Roger Tym & Partners Town, District and Local Centres Study, 2009 cites floorspace in sqm, as does the Lambert Smith Hampton Employment Land Review. Surrey Heath queries whether the quoting of the floorspace figures in m2 rather than sq m is an error. Clarification is needed.

As the policies are currently written, Surrey Heath has had to conclude that Policies CS1, CS2, CS3 and CS4 are proposing levels of additional floorspace which are undeliverable and are not backed up by a robust evidence base. As such the policies are not justified or effective and are considered to be unsound.

**Representation Changes Necessary****Officer Response**

Although m<sup>2</sup> is sometimes used to represent sq.m (including in the South East Plan), to ensure best practice and avoid ambiguity all references to m<sup>2</sup> will be changed to sq.m.

**Council's Proposed Action**

It is proposed to change all m<sup>2</sup> references to sq.m.

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 31	First Name Silva		Last Name Griffiths				On Behalf Of	
67	Proposals Map	138		No	No			to be informed of future developments

**Representation**

As the owner/ occupier of No 24 Oriental Road, I am concerned about the implications of the houses opposite mine being considered as town centre and what developments might be allowed as a result of this description.

Oriental Road is an attractive residential road. The wide green verge on the "odd number" side, and the beautiful flowering trees along there in the Spring, are a real asset to the side of the railway and should be maintained for future generations.

**Representation Changes Necessary**

I should like to see much more information about any plans proposed for what should be considered as a purely residential road.

**Officer Response**

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the loss or redevelopment of these properties.

**Council's Proposed Action**

Customer ID 32	First Name Rose		Last Name Freeman				On Behalf Of	
69	Core Strategy PD		4.2					

**Representation**

We have no views as to whether the whole document is legally compliant and sound but support the core strategy publication document with regard to policy CS2 town centre and the acknowledgment at para 4.7 that the town's cultural offer makes a valuable contribution to the vitality of the evening economy.

**Representation Changes Necessary****Officer Response**

Support noted.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	46	First Name	Peter	Last Name	Doyle	On Behalf Of
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279	Core Strategy PD			Yes	No	Justified,Effective		
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**Representation**

Beyond the post office and small shops at the west end of Oriental Road (and excluding the station car park) every property is residential until reaching the retail park. To expose this area to the risk of wider development strikes at the very heart of the enjoyment of this location. I find it incongruous that my home at No 34 is to be regarded as part of the town centre when its major asset is to be close to it but peacefully set apart from it.

**Representation Changes Necessary**

Please remove this area from the defined town centre so as to retain its true residential status without the risk of development, most likely of a multi-occupational and/or high rise nature.

**Officer Response**

The town centre boundary in the vicinity of Oriental Road has remained unchanged from that shown in the Adopted Local Plan 1999. No change is proposed to the policy.

**Council's Proposed Action**

Customer ID	47	First Name	JOHN	Last Name	MONKHOUSE	On Behalf Of
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280	Core Strategy PD			No	No	Consistent with national policy		
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**Representation**

I cannot believe that a residential road quite separate from a town and separated by a railway line from the town can be included in what will be defined as a town centre. My fear is that it could just open the door to high rise buildings which will change the road forever

**Representation Changes Necessary**

**Officer Response**

See response to representation 279.

**Council's Proposed Action**



**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 51	First Name Assud		Last Name Karim			On Behalf Of		
294	Core Strategy PD			No	No	More		

**Representation**

Reclassifying Oriental Road 1-69 and Oriental Close as being part of the town centre seems strange. I live at 32 Oriental Road, and regard the town centre as being on the far side of the railway track from my home. Oriental Road has always been a residential road and should remain. I strongly oppose this change.

**Representation Changes Necessary****Officer Response**

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 52	First Name Peter		Last Name Sanders			On Behalf Of		

296 Core Strategy PD Yes Yes

**Representation**

It is not clear to me that this box is the place to make any comments if not claiming the Core Strategy is unsound, but I can't see anywhere else to comment.

Stated briefly, my main remaining comments are that

- more should be more done to promote walking (not just cycling). This ties in with the views expressed in the Sustainability Appraisal document.
- much more consideration should have been set out as to the effect on the town centre's character of the planned policies (such as promoting high rise buildings/ higher density occupation etc) and how the results are to be managed, in order to promote the kind of environment aspired to in the Core document. Woking at many times and particularly evenings does not have a good character at present in terms of providing or being seen to provide an enjoyable, good quality and safe environment for non-shopping activities and this must limit the scope for development along these lines.

**Representation Changes Necessary****Officer Response**

Policy CS18: Transport and accessibility encourages walking by seeking:

- The location of most new development in the main urban areas served by a range of sustainable transport modes including walking.
- To support proposals that deliver improvements and increased accessibility to pedestrian networks.

Policy CS21: design sets out a comprehensive range of design criteria that all new development should meet. One of the criteria states that new development proposals should create a safe and secure environment, where the opportunities for crime are minimised.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	60	First Name	Lorna	Last Name	Doveton	On Behalf Of
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327	Core Strategy PD	138			No	Justified
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**Representation**

The new boundary for Woking's Town Centre now includes Oriental Road and other roads close-by. Oriental Road, where I have lived for the past 36 years is an attractive, obviously residential area with its own shopping parade. I do not consider it part of the Town Centre and would rather it was kept as it is, a low-key, friendly residential area.

**Representation Changes Necessary**

To take off at least Oriental Road, and possibly one or two neighbouring roads, on the new boundary line for Woking Town Centre.

**Officer Response**

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

**Council's Proposed Action**

Customer ID	61	First Name	Malcolm	Last Name	McPhail	On Behalf Of
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316	Core Strategy PD			Yes	Yes
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**Representation**

We support the identification of Woking town centre as the main focus for residential, employment, retail and cultural facilities in the Borough.

**Representation Changes Necessary****Officer Response**

Support noted.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 65	First Name Julie		Last Name Lewis			On Behalf Of		
337	Core Strategy PD	Appendix 3, Page 138		No	No	Effective		

**Representation**

If we are to create a first class transport hub around the south side of Woking Station with good traffic flow for drop-offs, taxis and the coach link, then it needs to be part of a well thought out scheme involving redevelopment of the whole area. This should include levelling of the concourse in front of the station and redevelopment of the Oriental Road shops plus post office. I am concerned about the hitherto piecemeal development of Woking and do not want to sacrifice my property on Heathside Crescent unless it is to a well conceived and sympathetic plan which allows a gradual buffer between the high rise developments and the houses.

**Representation Changes Necessary****Officer Response**

Policy CS2 sets out that the Council will work with partners to continue to improve public transport facilities in the centre. Given the importance of Woking Town Centre to the future prosperity of the Borough an Area Action Plan will be developed which will set out in detail how the proposed development will be managed to create the vision envisaged for the Town Centre. A Site Allocations' DPD will identify specific sites to deliver the proposals.

All new development should accord with criteria set out in Design Policy CS21, which state that proposals should pay due regard to scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
341	Core Strategy PD	34		Yes	No	Effective		

**Representation**

Refurbishing existing sites is referenced here and in other parts of the CS (e.g., CS 5.126). There are poor sites in the town centre with buildings of poor quality, design, spatial arrangement and landscaping. Preference should be given to redevelop rather than refurbish these sites as this will allow for better designs and more sustainable construction. Example sites are:

- Griffin House & Concord House, Christ Church Way: very poor aesthetic value and no landscaping.
  - Elizabeth House: a prime site for redevelopment.
  - South of the railway station: the exchange, the magistrates court, a demolition site and a collection of junk buildings.
  - The BHS building opposite Christchurch: a rubbish bin area overlooked by an awful dirty-brown featureless wall.
  - Wolsey Place incl. Alexander House: a large poor quality building contrary to the aims of the CS.
- None of these are referenced explicitly in the CS as target sites for redevelopment, although those that are agreed with.

**Representation Changes Necessary**

The best way to fully realise the aims of the CS is to demolish and redevelop as much of the poor quality out-moded town centre buildings as possible. This will allow a more radical remodelling of the town centre to improve the lives of the people intended to live and work there. It will also provide an opportunity for green spaces and buildings of better quality and sustainability.

**Officer Response**

The Council has limited control over the choices landowners make with regard to specific buildings. It is not considered that reference to refurbishment of outmoded sites should be removed from the policy wording as refurbishment may provide the most sustainable and appropriate choice to address certain sites, and in certain instances buildings can be refurbished without the need for planning permission. The Area Action Plan and Site Allocation's DPD will set out in more detail proposals for Woking Town Centre including public realm issues.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 71	First Name Grace		Last Name Brown				On Behalf Of	

395 Core Strategy PD

**Representation**

What developers are the Council going to work with on these new housing plans? Are contracts in place with them?

What retailers are going to come to central Woking? M&S shut down in the centre in the relatively recent past - quality retailers are essential to ensuring the health of the centre of Woking.

**Representation Changes Necessary**

The totality of the Core Strategy creates an attractive environment for businesses to invest. The Council will work with partners to attract quality retailers and other businesses that meet the needs of the community.

**Officer Response**

Where is does not have control over land itself, the Council will work with other partners to bring forward development. Many of the residential development sites that are identified to come forward are promoted by developers themselves. That has been the conventional approach and there is no doubt that development will come forward.

The Council is working with partners to create an attractive shopping environment in Woking town centre. The Council has attendend the British Council of Shopping Centres annual event to promote the town to retailers.

Regarding infrastructure, where there is public sector involvement, such as schools, the Council will work with partners, such as the County Council, to ensure that developmen is matched by infrastructure. The Council is part of established groups such as Transport for Woking, where it works with partners to deliver co-ordinated action to achieve maximum benefits. The entire Core Strategy works to provide a contusive environment, in particular in the main centres, to attract business. Overall the Council is satisfied th the Core Strategy provides an adequate framework for its comprehensive delivery.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	72	First Name	Peter	Last Name	Dines	On Behalf Of
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363	Core Strategy PD			No	No	Effective
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**Representation**

The main thrust of the core strategy, to direct future growth to Woking town centre is supported. However, we consider that the strategy put forward in CS2 will not achieve the aims and objectives of the plan.

Woking Town Centre is of regional importance but has a number of challenges in its current form. Significant regeneration is required for it to fulfil its potential as a key growth point within the Borough. Reference is made at 4.5 to the proposals to transform the Woking gateway area put forward by my client. This is an indication of the importance of the scheme. However, we believe the development parameters set out in CS2 are too restrictive and may lead to significant schemes within the town centre not being fulfilled

In 4.5 our client is mentioned as is their site. We consider that all developers with development agreements or joint ventures with the Council should be identified to give more transparency to the CS2. This is particularly so of the Bandstand site.

**Representation Changes Necessary**

Significant regeneration requires sustainable pump priming development in order to secure a viable scheme. The retail section of CS2 limits the amount of convenience floorspace to 6,700sqm to 20016 for the town centre as a whole. It is our view that this figure for convenience floorspace should increase to 8,000sqm to enable a wider occupier market to invest in the town centre. It should be noted that as currently drafted the convenience floorspace for the whole town centre would make up only some 10% of the proposed total Class A floorspace which is proposed in the plan. A more balanced approach would then enhance the opportunities for sustainable retailing and combine shopping trips in the town centre which is the most accessible location within the Borough.

Policy CS2: the level of retail from 2012-2016 should be increased to 8,000sqm in respect of convenience class A1 retail floorspace.

**Officer Response**

National guidance requires Core Strategy policies to be justified by evidence. Therefore in accordance with Government guidance, the development parameters set out in Policy CS2 derive from the Town, District and Local Centres Study (Roger Tym and Partners). The findings of this study are still considered sound and it is therefore not considered appropriate to amend the policy as proposed. It should be noted that the policy already states that the timetable set out to deliver the proposals is indicative and an proposal which brings forward the redevelopment of the town centre in a comprehensive manner will be considered on its merits.

The proposed breakdown between the need for convenience and comparison retailing is similar to the current profile of retail provision in the Town Centre and is considered reasonable and adequate to encourage and sustain combined shopping trips.

The respondent requests that all developers with development agreements or joint ventures with the Council should be identified in the interests of transparency. However, given that it is not possible to foresee all the developers that may enter into development agreements or joint ventures with the Council over the life of the Core Strategy, instead the reference to Carisbrook will be removed from the paragraph.

**Council's Proposed Action**

**Policy: CS2 Woking**

<b>Rep ID</b>	<b>Which Doc Does Comment Relate To</b>	<b>Page</b>	<b>Paragraph</b>	<b>Legally compliant</b>	<b>Sound</b>	<b>Test Of Soundness</b>	<b>Participate in Exam</b>	<b>Why Participate in Exam</b>
<b>Customer ID</b> 72	<b>First Name</b> Peter		<b>Last Name</b> Dines				<b>On Behalf Of</b>	

It is proposed to amend paragraph 4.5 (p36) which forms part of the reasoned justification to policy CS2, by removing the reference to Carisbrook in the second sentence.

For accuracy it is also proposed to amend the last sentence in paragraph 4.4 (p36) to replace the wording "is about to start" with "will be completed in 2012".



**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	82	First Name	John	Last Name	Hack	On Behalf Of		
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**Representation**

I support the general intention to increase development in the Town Centre, following its identification in the SE Plan, subject to stringent conditions on the design of development and the delivery of measures to ensure the ability of the rail and public transport networks to sustain a high level of growth. However, the present policy is totally infeasible without being properly integrated with transport and infrastructure. There is no evidence whatsoever of its deliverability and no evidence is provided. The Infrastructure Delivery Plan relies on the hope that investment will be made (by others or by some future application of levies) to enable the development to proceed.

Evidence from the recent and current development in the town centre shows that infrastructure is not keeping up with development. For example, the new development south of Victoria Arch has been constructed without making any improvement to the traffic, and especially pedestrian, movement through the Arch. Occupation of the development will therefore be accompanied by increased traffic congestion, and poor environmental quality, safety and pollution for pedestrians. At the very least, a new pedestrian/cycle crossing under the railway should have been provided by the time of the occupation of the development. If this is to be the pattern of development in the future, the quality of the centre as a whole will be reduced and it gives no confidence in the planning process. All development proposals need to be assessed against clear comprehensive policies, not each taken on its merits, if quality is to be established and community confidence restored.

Whether the quantum of development is entirely justified is not made clear as it is difficult to unpick the underlying assumptions in the Roger Tym report, but it should be noted that (i) that report showed that there was in fact a pretty poor take up of retail opportunities amongst prospective retailers; (ii) many major retailers have left the centre or close to it; (iii) since the report was prepared, the general economic situation has deteriorated, affecting growth forecasts and hence expected expenditure, and (iv) out of centre development (both in and outwith the Borough) shows no sign of declining, potentially abstracting trade (nationally, many retailers are still moving out of centre, despite the serious sustainability arguments against this).

For the quantum of development to be justified, a better case needs to be made, based on the attractiveness of the centre and greater restrictions on large out of centre retail areas (on which the plan is silent).

**Representation Changes Necessary**

Please see comments above, but in summary:

Changes to the town centre policy to make growth contingent on the development of a significantly improved railway station and services;

Specific reference to infrastructure and its means of delivery in the plan to support town centre growth, including positive policies for reducing car use;

Reinstatement of the principle of orbital rail services (to replace the previous reference to Airtrack) and policies to ensure that progress is made on the delivery of the necessary infrastructure;

Changes to the reference to the green belt as an area of growth, and

Reformulating policy on housing to clarify the status of green belt and to set clear criteria for an immediate core strategy review to determine the location and form of sustainable development in the longer term (10 years onwards).

**Officer Response**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 82	First Name John		Last Name Hack				On Behalf Of	

See response to representation made by John Hack to Policy CS10.

The present system of plan making requires effective integration of development with infrastructure delivery. An infrastructure Delivery Plan has been prepared to ensure that the development proposals in the Core Strategy are supported by appropriate and adequate infrastructure. Delivery agents are identified and the Council will be working in partnership with them to ensure that identified infrastructure are delivered. Funding for the infrastructure will come from the private sector, public sector and developer contributions. For example, the County Council has recently received £3.93M as part of the Local Sustainable Transport Fund towards sustainable transport improvements in Woking and Guildford.

The Council is aware of the need to improve traffic and pedestrian movement through the Victoria Arch. It is working with the County Council to commission a feasibility study to identify a deliverable solution for the area. Developer contributions continue to be secured towards the implementation of the scheme. The Council believes that the totality of the transport proposals in the Core Strategy will help reduce congestion and pollution and improve highway safety.

The Town, District and Local Centre Study provides sufficient justification for the retail proposals of the Core Strategy. There is capacity at the centre to accommodate the proposals. The Council will work with partners to bring forward the proposals. The Council owns Wolsey Place and has an influential role to facilitate development of the Town Centre.

It is true that the national economy is in a downturn. However, the Core Strategy takes a long term view to 2027 and it is expected that the economic conditions will improve to ensure its comprehensive delivery.

The need for the level of growth set out in policy CS2 is justified by the evidence base, which is outlined at the end of the policy, in particular the Town, District and Local Centres Study undertaken by Roger Tym and Partners.

- (i)  Although it is acknowledged that the response rate from retail operators stating a requirement on the FOCUS database was low, in a number of instances the reason for lack of active interest was not Woking specific, but due to current economic problems resulting in operators not expanding their portfolio at this time. Government guidance is clear that Local Planning Authorities should plan for around a 15 year plan period. It is not possible to have absolute certainty over the direction of the national economy for this period and thus monitoring of the plan will enable any potential issues to be identified and addressed. It should be emphasised that this research was undertaken prior to the recent improvements which are currently being carried out to both the Peacocks and Wolsey Place.
- (ii)  The only major retailers to have left Wolsey Place are Clarkes and Waterstones. Neither of these operators occupied the largest units in the centre, and both are represented in the Peacocks and have thus retained a presence in Woking. Of the two largest stores to vacate the Peacocks centre one store, Woolworths, went into liquidation. Although the vacancy rate has increased in Woking since 2009, current vacancy remains below the national average. In addition, in 2008, CACI research showed that Woking was the 6th most resistant centre nationally to the credit crunch due to the profile of shoppers represented in the catchment.
- (iii)  As stated above, Government guidance is clear that Local Planning Authorities should plan for around a 15 year plan period. It is not possible to have absolute certainty over the direction of the national economy for this period and thus monitoring of the plan will enable any potential issues to be identified and addressed.
- (iv)  Very few out of centre retail developments have occurred in Woking Borough over the last two decades. The plan seeks to concentrate retail development in the Town Centre and District and Local centres. As Government guidance in PPS4 sets out policies to assist in the consideration of out of centre retail schemes it is not necessary for the Core Strategy to duplicate this advice.

It is considered that the Town Centre has the capacity to deliver the level of growth required. The SHLAA details a number of sites which have been put forward by landowners

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	82	First Name	John	Last Name	Hack	On Behalf Of
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as being available for development, including mixed use development; the viability of such schemes having been tested in the Viability Assessment undertaken by Adams Integra. In addition, the Council itself has significant landholdings in the Town Centre, and is working with partners to ensure delivery.

With regard to Victoria Arch, the Council and the Highways Authority (Surrey County Council) have agreed the need for some improvement to Victoria Arch. They are working together to commission a feasibility study to determine options for improvement, with a recommendation for an appropriate scheme to address the problems in the area. The feasibility study will determine the cost of these options which will inform the decision making process. Funding for the scheme will comprise developer contributions and public sector funding. A pool of developer contributions already collected for the scheme will contribute towards funding.

**Council's Proposed Action**

Customer ID	83	First Name	Ryan	Last Name	Johnson	On Behalf Of	West Estates Ltd
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156 Core Strategy PD

**Representation**

Woking Taylor Wimpey West London and West Estates Ltd objects to the omission of a Town Centre non-implementation allowance for such a significant housing allocation in the Woking Town Centre area. It noted in the Housing Topic and SHLAA background papers that a proportion of the 2500 dwelling requirement directed to the Town Centre is yet to be identified and is therefore uncertain. A reasonable non-implementation allowance should therefore be factored into this and added to the residual allowance to be secured from green belt allocations. This will give greater certainty of the plans provisions being delivered within the plan period, as guided by PPS3. Given the acute housing need in the borough, a reactive approach of waiting to see if 2500 units can be delivered and then revising the plan to address this would incur costly delays and could further exacerbate backlogs of unmet need. A proactive approach to land supply provision is therefore suggested by Taylor Wimpey West London and West Estates Ltd.

**Representation Changes Necessary****Officer Response**

See response to representation made by Ryan Johnson to policy CS10.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	87	First Name	H	Last Name	Greenhalgh	On Behalf Of
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178	Core Strategy PD	34		Yes	No	More than 1 selected
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**Representation**

Draft policy CS2 is very restrictive in terms of the retail frontages and in our view does not comply with national policy in terms of encouraging sustainable economic development. Whilst it is accepted that there needs to be some controls in the primary retail frontages to maintain the overall retail function of a town centre, in our view, by removing the flexibility which is found in the adopted local plan to allow some changes of use on the primary frontages it could lead to higher vacancy levels and eventually undermine to the health of the centre. It has long been established that other uses such as cafes and banks form part of the overall make-up of a town centre and that they complement the retail function of these areas, adding to its vibrancy and providing necessary services for people visiting towns. As currently worded, draft policy CS2 only considers favourably changes of use away from A1 in the secondary frontage. It does not appear to allow any such changes, even in a modest form in the primary frontage. This is a step change from the adopted local plan which does incorporate flexibility. This proposed change also seems at odds with national guidance in terms of encouraging the vitality and viability town centres and encouraging economic growth. In view of this we consider it is inconsistent with national policy and should be amended.

**Representation Changes Necessary**

In order to make the policy sound, we consider that it should be reworded as follows: Within the primary shopping area of Woking Town Centre, the council will permit changes of use ground floor units away from A1 to A2/A3/A4/A5, provided the following criteria are met. 1. the proposed use contributes to the vitality and viability of the shopping area attracting visitors during normal shopping hours. 2. the A1 unit does not comprise a large anchor unit. 3. The proposal would not result in an over concentration of non-A1 uses, and 4. other policy relating to residential amenity are met.

**Officer Response**

The primary retail frontage comprises the Peacocks and Wolsey Place shopping centres. Both contain a good complementary mix of A1 units and alternative A use units. In order to maintain this balance and protect the primary retail function of this part of the Town Centre it is considered that the policy as worded is sound.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 89	First Name Lisa		Last Name Bowden				On Behalf Of Royal Mail	

191 Core Strategy PD

**Representation**

Royal Mail supports the principle of this policy and in particular the Council's encouragement of mixed-use, high density development in the Town Centre which makes efficient use of land.

We note and support the removal of the policy requirement (under the previous iteration of the document) for residential and office development being provided above ground floor level in order to retain active frontages. This is because, as stated in our previous representations, we considered that this should only be where appropriate, and not apply to all locations within the Town Centre.

**Representation Changes Necessary**

**Officer Response**

Support Noted.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 90	First Name James		Last Name Stevens				On Behalf Of Home Builders Federation	

186 Core Strategy PD

**Representation**

We note that the town centre is earmarked to provide 2,500 homes over the plan period — a total that constitutes over half the proposed requirement. We note that the Economic Viability Assessment shows that Woking Town centre exhibits the lowest average sales prices and values (page vi). Given the evidence presented in the report it is questionable whether this location is able to sustain a 40% affordable housing target without compromising delivery.

If the Council would like to see more brownfield sites being developed, particularly in its regeneration areas, and if it wishes for such sites to begin to be developed in the earlier years of the plan period, then it is necessary to give serious attention to the question of development viability and the cumulative impact that many policy expectations can have on development values. We suggest that the Council considers setting no affordable housing target in the town centre, and at lower rates in other areas, on the basis of the evidence from its viability assessment on the basis of current market values. The question might be asked whether providing mixed and balanced communities is really the highest priority for these areas. We would respectfully submit that the long-term interests of the Council might be better served if it provided incentives for housebuilders to develop in these areas, rather than leaving these areas undeveloped as the Council holds-out to secure the maximum planning gain to fund some other policy objectives that are perhaps of a less pressing nature.

We would also query whether it is realistic to expect all this housing to come forward in one location. The key to higher housing output — including the development of the Council's favoured brownfield regeneration areas — is to allocate a combination of greenfield and brownfield sites. This is necessary to provide more sales outlets and to provide flexibility in case some sites encounter obstacles to their being built out as anticipated. Providing more sales outlets is also important. It is an unwritten law of residential development that there is a limit to the number of sales that can be achieved in a year from any one sales outlet. The long term average is approximately 35 sales per outlet per year (this rate has fallen to less than 25 sales per year per outlet in all markets outside of London). Therefore, all else being equal, a 50% increase in sales requires not simply a 50% increase in land supply, but a 50% increase in the number of sales outlets.

As stated, the national average annual sales rate per site is 25 sales per year. Even if there were four separate sales outlets in Woking Town Centre, this would only amount to 100 sales per year, and 1,700 over the plan period. This would not meet the target of 2,500 sales that the council hopes for.

Although the current market is slow, developers continue to look for new sales outlets. It does not matter whether a site is greenfield or brownfield provided the financial return is acceptable. The weak nature of the market means that developers have to be careful about the level of risk associated with each site.

Concentrating all future development on a few large strategic regeneration sites, such as Woking Town Centre, would tend to be counter-productive as it will limit the industry's sales capacity. A more effective approach in terms of supporting the pace of new house building activity would be to release many more sites including smaller ones, thereby increasing the number of sales outlets. Ensuring a variety of sales outlets is good for competition and would cater for different sections of the housing market. It would be very much more effective in sales and output terms to encourage a variety of residential land releases across the district, rather than to focus a large proportion of the overall development in a limited number of regeneration areas.

It will be appreciated that the nature of the housing market means purchasers are in a better position to make choices about where to live than they were three years ago.

Planning should avoid a demand control approach to housing supply when the demand element is so weak.

The average density for the town centre (as indicated in policy CS10) appears unrealistically high at above 200 dwelling per hectare. This would mean that all developments would need to be of apartments. We have serious doubts whether there is the demand for such product or the ability of the market to absorb this type of product in the numbers proposed. This will impact on sales and development rates.

**Representation Changes Necessary****Officer Response**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	90	First Name	James	Last Name	Stevens	On Behalf Of	Home Builders Federation	
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With regard to comments on affordable housing targets refer to representation 189 concerning policy CS12: Affordable Housing

**Council's Proposed Action**

Customer ID	93	First Name	Sue	Last Name	Janota	On Behalf Of	Surrey County Council	
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208 Core Strategy PD

**Representation**

The number of transport improvements achieved in Woking town centre and West Byfleet district centre should be included as indicators.

**Representation Changes Necessary****Officer Response**

Indicators should be measurable. The County Council as highways authority should be able to provide the information for the indicator to be measured.

**Council's Proposed Action**

It is proposed that the monitoring and review section of policy CS2 (page 37) should be amended by adding another bullet point to read "Number of transport improvements in the Town Centre". A similar bullet point should be added to the monitoring and review sections of Policy CS3 (page 39) which reads "Number of transport improvements in West Byfleet District Centre".

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 94	First Name Jeremy		Last Name Woolf				On Behalf Of	Martin Grant Homes Ltd
218	Core Strategy PD			Yes	No			To respond to points raised and consider more up-to-date information.

**Representation**

The Policy makes provision for the delivery of some 2,500 dwellings from sites within the Town Centre. As identified in Policy 0510, this implies an indicative density range of in excess of 200dph. However, the LPA is yet to demonstrate that this quantum of development is deliverable and/or developable. Moreover, there is an acceptance by the LPA (see paragraph 5.56 of the CS) that the nature of sites considered to be available in the town centre are likely only to be suitable for high density flatted development. It is clear stated that on the basis of such a strategy:

...the Council will be unable to achieve an appropriate mix of housing types and tenures to meet local need and demand.

In addition to the above, the Council's Strategic Housing Market Assessment (SHMA) shows that the majority of unmet housing need is in the form of family housing.

Notwithstanding this need, the Strategic Housing Land Availability Assessment (SHLAA) reports that the annual monitoring of residential completion trends identifies that the general trend has been for large, high density flatted development. As acknowledged by the Council, a continuation of this trend is unlikely to meet the quantitative need for family homes.

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 such as education, health care, open space and SPA mitigation in the form of SANG5. These essential elements can be provided as integral parts of strategic site releases, planned for at the Masterplan stage.

It remains to be demonstrated through the SHLAA whether the town centre sites are actually deliverable.

**Representation Changes Necessary**

The Council will have to make the site schedules available in order [or conclusions to be made upon the anticipated delivery rates of the components of supply relied upon to deliver the 2,500 dwellings within the plan period to 2027. On the above basis, there is no certainty with which the LPA can rely upon the delivery of 2500 dwellings from sites within the town centre. Moreover, as identified in the evidence base to preparation of the CS, the housing need is for family homes. On the basis of the suggested approach to developing within the urban areas including a significant number of flatted schemes through redevelopment of the town centre the qualitative need for housing is unlikely to be met.

Policy C52 must be informed by a robust assessment of site delivery the details of which are yet to be made available.

**Officer Response**

See response to representations made by Jeremy Woolf to Policy CS10.

**Council's Proposed Action**



**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

383 Core Strategy PD

**Representation**

Economy and employment

In section 2.18 the strategy covers the economy and job creation. We strongly believe that using data from 2004/5 presents a more positive picture than would be seen in 2010/2011. There is currently considerable vacant office space/retail space and the trend down in 2009 should not be used to present an argument for more office/retail space. In particular, Woking needs to decide what type of retail it wants to focus on. At present it is not able to compete with Guildford for high end retailers. As a result, Woking's retail offering services only those with lower incomes and the preference is to go to London or Guildford for special items. Guildford is only a few miles away, so we believe it is fool hardy to try to boost the economy chasing a retail vision in Woking.

**Representation Changes Necessary****Officer Response**

The floorspace figures set out in Policy CS2 derive from the evidence base studies listed in the policy. The Roger Tym and Partners study clearly shows expenditure leakage from the local catchment area. It is not considered sustainable that local residents be required to travel to Guildford to shop on a regular basis. Improvements to the primary shopping area in Woking Town Centre are already underway and further improvements are proposed.

The figures set out in paragraph 2.19 are factual and derived from various sources all of which are clearly stated.

**Council's Proposed Action**

**Policy: CS2 Woking**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

414 Core Strategy PD

**Representation**

We therefore request that measures are put in place to deal with:

In particular, the proposals for growth in housing and in the Town Centre, which appear likely to be infeasible without both significant investment in infrastructure to meet obvious physical constraints and changes in behaviour to reduce the demands of increased activity on the built and natural environment and on the transport system.

**Representation Changes Necessary**

**Officer Response**

The housing and Town Centre proposals are justified to be deliverable. An Infrastructure Delivery Plan has been prepared to assess the infrastructure needs to support the Core Strategy and how they will be delivered.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of		

74 Core Strategy PD No Effective

**Representation**

Westfield Common Residents' Association agrees that history is important, and are pleased to see that certain areas have achieved 'conservation area' status. They strongly believe that additional hidden gems in Woking should be added to the 'protection lists'. For example, new areas should be clearly identified and applications for conservation areas and village green status should be welcomed by the council, a clear sign of the 'community at work, together.' The Core Strategy does not specifically state that this type of protection should be taken into account or encouraged. The danger of the current draft of the strategy is that it only protects existing 'designated' areas as it seeks only to deliver a vision based around building more and more homes and not an overall vision taking into account all the factors that residents and other stakeholders require.

Old Woking and its surrounding commons in particular should be cherished for their history and environment (similar to the protection afforded to Horsell Common, St Johns Lye and areas such as Bookham Common). At this very time, the council are allowing more and more development in this area. It is with regret that the historic pub, the White Hart has been purchased by developers and could be bulldozed to the ground in favour of more housing. The White Hart in the heart of the conservation area, and yet is just within a neighbourhood centre, we hope that it will not fall foul of this trend to allow old buildings to decay (by developers) only to be resurrected with Woking Borough council's agreement to housing development (as is has been the case with Gresham Mill).

Ancient rights of way such as lanes, footpaths and 'green lanes' should be protected and we strongly recommend that new developments are restricted from diverting footpaths. For example, the Gresham Mill development of over 70 apartments, townhouses and car parks has temporarily closed the right of way which enables all from the community to see the mill pond and enjoy the beauty spot. The new owners are swift to prevent walkers approaching the new development by the footpath which runs down the main entrance (the single drive). Walkers are directed to the often water logged (flood plain) path across Mill Moor when the signpost and right of way is still usable. We require a commitment to ensure that access is not prevented to any open spaces by diversions to footpaths from developers or owners who have the money and desire to protect their interests and own a piece of the 'beauty'. There is no mention of the protection of ancient rights of way, a real gem in the borough.

**Representation Changes Necessary**

None put forward.

**Officer Response**

The designation of new Conservation Areas or suggestions for new buildings to be Listed are made through a different process. New Conservation Areas will be considered through Conservation Area Appraisals. The suggested areas will be taken into account whenever the appraisal is carried out. English Heritage has a key role in deciding which buildings or heritage assets should be listed. An application can be made to them in this regard for their consideration. The role of the Core Strategy and policy CS20 in particular is to conserve and/or enhance designated buildings or areas. The policy therefore provides sufficient scope to prevent any adverse impacts of development on the heritage assets of the area.

Much of Old Woking Village Centre is an Area of High Archaeological Potential and a Conservation Area, some parts of the Village are in the flood plain and adjoining the Green Belt. Therefore development may be appropriate in Old Woking Village Centre if it is in keeping with any heritage planning designations or other planning constraints.

In terms of the development at Gresham Mill, any comments on the scheme or landscaping should have been made when the planning application was being considered. The footpath is temporarily being rerouted during the constructions of the apartments, these are due to be restored. As a result of the proposal at Gresham Mill; a site of Suitable

**Policy: CS20 Herti**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
<b>Customer ID</b> 16	<b>First Name</b> Colin		<b>Last Name</b> Weeks				<b>On Behalf Of</b>	

Alternative Natural Greenspace is being provided adjacent to the new apartments, which makes the land accessible to the local community as open space.

The remit of the Core Strategy does not cover Village Greens or Ancient Rights of Way. Rights of Way are dealt with by the County Council.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 97	First Name Peter		Last Name Hill				On Behalf Of	

245 Core Strategy PD

**Representation**

The Core Strategy refers to new housing provision, broad areas of growth, refers to the Thames Basin Heaths Special Protection Areas, Special Areas of Conservation, the Green Belt, other important built features such as Listed Buildings, Conservation Areas and Ancient Monuments. However, the Core Strategy makes scant reference to Urban Areas of Special Residential Character (UASRC) within the borough of which there are seven, including Hook Heath. This is a designation which was adopted in April 2000 by WBC and is supplementary to Policy HSG2O of the Local Development Plan 1999.

The designation is extremely important against inappropriate development and is a material consideration in the determination of planning applications and in defence of its decisions at appeal. It is the absence of specific references to UASRC's within the Core Strategy it appears eminently possible that this designation could disappear

Only two pages focus on Heritage and Conservation, only passing reference to the Character Study 2010. It is noted that the Core Strategy does seek to safe guard Woking's Heritage on pages 100 – 101, along with the Character Study which forms part of the evidence base for policy CS20.

The study identified 'character areas' within the borough including the Hook Heath UASRC contains Conservation Areas at Pond Road and Fishers Hill, the Hook Heath escarpment and locally listed buildings, particularly on Pond Road and Hook Heath Road. However the study fails to make an explicit recommendation in regard to UASRC's. The study states that distinctive Arcadian areas of the borough should be retained and protected from inappropriate development, in line with the UASRC designation.

The abandonment of this designation would be a retrograde step and should be resisted; the retention of the UASRC's, on the other hand, would ensure that WBC met its commitment set out in Para 5.187 (page 100) of the Core Strategy. The UASRC designation is valued and appreciated and contributes to the diversity and attractiveness of the borough more generally.

**Representation Changes Necessary**

A simple amendment by inserting a reference to the maintenance of UASRC within the Heritage and Conservation section (pages 100-101) and ideally also within the CS20 panel (page 100).

**Officer Response**

A policy on UASRC's is not being included within the Core Strategy. Government guidance in terms of heritage and conservation matters has changed greatly since UASRC's were adopted over 10 years ago. Whilst it is accepted that UASRC are special places, each area of the Borough have their own distinctive character which should be protected. There are robust policies to ensure that development respects the character of the locality. This is highlighted by the Character Study.

The Council is committed to preparing a Design SPD. This will cover topics such as character, Conservation and Heritage of the various parts of the Borough.

**Council's Proposed Action**

**Policy: CS21 Design**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of
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90	Core Strategy PD				No	Effective
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**Representation**

These Strategies are fully supported it will be interesting to see however how and if the Town Planners will implement these within the proposed Moor Lane and Brookwood developments. Certainly the new Barret's High rise buildings cannot be classed as aesthetically pleasing and fitting in with the townscape, neither can the hideous canopy!

**Representation Changes Necessary****Officer Response**

Support noted.

**Council's Proposed Action**

Customer ID	25	First Name	R	Last Name	Bloom	On Behalf Of
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57	Core Strategy PD			Yes	No	Effective
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**Representation**

The councils design policy to be efficient needs a high buildings policy. The current distribution of high buildings as approved has produced an incoherent and unlovable visual appearance to the detriment of Woking's townscape. Reliance on the existing approach has led to the submission of an ill-conceived high building proposal at St Dunstan's site White Rose Lane where there appears to have been confusion about what was a gateway. This was not properly addressed either by the applicant or the council's planning officers and was eventually dismissed at appeal resulting in a blighted vacant site. This could have been avoided by clearer guidance on the appropriate location and height of tall towers.

**Representation Changes Necessary**

Declare this aspect of design policy unsound until a High Buildings Policy is consulted on and approved.

**Officer Response**

It is not considered necessary to include a high buildings policy within the Core Strategy. It is not the purpose of the Core Strategy to provide detailed design guidance relating to specific areas of the borough. 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. Furthermore, the Council is committed to preparing a Design Guide to provide detailed design guidance and the issues raised could be considered as part of the above.

**Council's Proposed Action**

**Policy: CS21 Design**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 33	First Name Jean		Last Name Dare			On Behalf Of	Hook Heath Residents Association	

85 Core Strategy PD No More than 1 selected

**Representation**

The borough is not homogenous; it contains many distinct areas whose character is recognised as distinctive and beneficial to the borough as a whole. CS21 (page102) states the need for all new development to make a positive contribution to the street scene and the character of the area in which they are situated. WBC commissioned a Character Study (published October 2010) to describe and illustrate the special characteristics of each area. It is based in part on more detailed evidence submitted by local volunteer groups of which the Hook Heath Residents' Association was one. Although the Core Strategy makes the occasional reference to this document, it should be given greater prominence. CS21 should make it mandatory for developers to demonstrate that proposed developments in these areas are consistent with, and make a positive contribution to the character as defined in the Character Study.

**Representation Changes Necessary****Officer Response**

The Character Study (2010) forms part of the evidence base for this policy and will be useful information when determining planning applications . Policy CS21 states that new development should 'respect and make a positive contribution to the streetscene and character of the area in which they are situated, paying due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land.' In accordance with this policy, and as part of the planning application process individual application will be required to comply with this policy. It would be too prescriptive to make the character study a mandatory material consideration.

**Council's Proposed Action**

**Policy: CS21 Design**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 71	First Name Grace		Last Name Brown				On Behalf Of	

359 Core Strategy PD 102 5.195 to 5.200

**Representation**

Design is of the utmost importance - based on hideous developments in central Woking in the past few years which are unfilled in part, both retail and home ownership, what confidence can local residents have in future central Woking developments.

**Representation Changes Necessary**

**Officer Response**

The Council is satisfied that the Policy provides sufficient basis to ensure high quality design.

**Council's Proposed Action**

Customer ID 78	First Name Heather		Last Name Twizell				On Behalf Of Natural England	
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133 Core Strategy PD No Effective

**Representation**

We are pleased to note that our recommendation regarding biodiversity enhancements associated with new developments has now been incorporated. Renewable and low carbon energy generation

**Representation Changes Necessary**

**Officer Response**

Support noted.

**Council's Proposed Action**



**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	61	First Name	Malcolm	Last Name	McPhail	On Behalf Of
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322	Core Strategy PD			Yes		More
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**Representation**

The Government is working toward a definition of 'zero carbon homes' and the amalgamation of the Code for Sustainable Homes into the Building Regulations. The entrenchment of CSH standards in a planning policy that is meant to endure for 15-20 years is inappropriate; it will rapidly become obsolete as the Building Regulations, relevant standards and building technology moves forward.

Notwithstanding the above comments, moving rapidly forward to CSH code level 4 from April 2013 and code level 5 by April 2016 will adversely affect the viability and delivery residential developments in these difficult economic times for the housebuilding sector. There should be a greater emphasis in the policy wording on viability appraisals to justify/allow achieving a lower CSH rating.

**Representation Changes Necessary**

- 1) The dates for introducing the code level 4 and code level 5 should be pushed back by at least 2 years.
- 2) There should also be a definite commitment (at the end of paragraph 1) to review the policy in the light of any future changes to Government policy on sustainable construction, zero carbon homes and/or amendments to the Building Regulations regime.
- 3) There should be a greater emphasis in the policy wording (in paragraph 2) on viability appraisals to justify/allow achieving a lower CSH rating as well as a higher one.

**Officer Response**

National planning policy requires Local Planning Authorities to set local requirements for a buildings sustainability that is consistent with the Government's Zero Carbon Building Policy. It is therefore appropriate for the Core Strategy to set clear standards for the sustainable construction of buildings in the Borough. Indeed, the Core Strategy will be ignoring its responsibility if it fails to do so. The standards that are set are consistent with national policy and justified by local evidence (Climate Change, Renewable, Decentralised and Low Carbon Energy Evidence Base, 2010 and Economic Viability Assessment) does this.

The Council has been mindful to ensure that the Standards that are set are viable to enable development to come forward. An Economic Viability Assessment (EVA) (July, 2010) has been carried out to demonstrate that the standards are deliverable, realistic and viable. The policy already allows sufficient flexibility for a case to be made based on evidence of viability if an applicant can demonstrate that the requirements of the policy cannot be met on greenfield sites.

The Council is fully aware of the on-going debate on climate change and the work being done about the definition of zero carbon. However, the Core Strategy builds in an effective monitoring and review mechanism to ensure that its provisions are brought up to date to reflect any change in circumstances.

The following is provided as additional supporting information.

Paragraph 5.211 sets out information regarding "Zero carbon homes" and the anticipated improvements to building regulations. The council recognised the links between the two however disagrees with the statement "the amalgamation of the Code for Sustainable Homes into the Building Regulations". The two are not the same and will not be fully amalgamated.

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 61	First Name Malcolm		Last Name McPhail				On Behalf Of	

As set out in paragraph 5.218 the Code for Sustainable Homes (the Code) is the national standard for the sustainable design and construction of new homes. The Code for Sustainable Homes is a set of standards for the design and construction of properties, designed to encourage long term sustainability. The Code aims to reduce carbon emissions and create homes that are more sustainable. The Code for Sustainable Homes covers nine categories of sustainable design: energy and CO2 emissions, water, materials, surface water run-off, waste, pollution, health and well-being (which incorporates Lifetime Home Standards), management and ecology. Each category includes a number of environmental issues. The code has six levels with mandatory requirements at each regarding energy and water usage, surface water run-off and waste. It is comprehensive and considers all aspects of sustainability relating to how a dwelling is constructed and will be used.

Building Regulations have different parts and relate to specific aspects of a buildings construction. Part L relates to Conservation of Fuel and Power and part G relates to hygiene, specifically sanitation, hot water safety and water efficiency. Other parts related to Structure (A), Fire Safety (B), Site Preparation And Resistance To Moisture (C), Toxic Substances (D) , Sound Insulation (E), Ventilation (F), Hygiene (G), Drainage and Waste Disposal (H), Combustion Appliances and Fuel Storage (J), Protection From Falling, Collision and Impact (K), (L), Disabled Access To And Use Of Buildings (M), Glazing (N) and Electrical Safety (P).

In 2008 the Government set out their intention to bring in the energy efficiency improvement equivalent to the Code's energy standards, through stepped changes Part L of the Building Regulations. The first step of this was done in April 2010. Since the introduction of revisions to Part L 2010, the minimum dwelling emission rate standard required by regulation is a 25% improvement on the 2006 target emission rate. This is equivalent to the mandatory standard for energy efficiency required at Code level 3.

Updated standards for Part G of the building regulations come into force on 6 April 2010. These require:

1. All new builds to comply with a new water efficiency standard of 125\* litres per head per day.
2. Baths in new homes to be fitted with a protective thermostatic device, to ensure that the temperature does not exceed 48°C.

The standard of 125 litres per person per day for domestic buildings comprises internal water use of 120 litres per person per day, and in that respect is in line with Code Levels 1 and 2, plus an allowance of 5 litres per person per day for outdoor water use. As set out in table 5 of the Core Strategy, the water consumption specification for increasing Code levels are:

- Levels 1-2 - less than 120 litres/person/day
- Levels 3-4 - less than 105 litres/person/day
- Levels 5-6 - less than 80 litres/person/day

Building Regulations have direct links to two parts of the Code, energy and water usage, but do not cover the remaining seven categories.

The PPS1 Supplement, Planning and Climate Change, states that where local circumstances warrant higher standards of energy efficiency, LZC energy and climate change resilience these must be clearly expressed and evidenced. The Council feel that the Climate Change, Renewable, Decentralised and Low Carbon Energy Evidence Base provides this.

It is agreed that the Council's requirements only run to 1 April 2016 and the plan period runs until 2027, so the stepped requirements do not increase further through the plan period. However in such a rapidly changing area it is difficult if not impossible to plan too far into the future. Also the Government has set the objective for all new houses to be zero carbon by 2016 and non-domestic buildings by 2019. If this is achieved the policy may need to be re-assessed to ensure it is still up to date. As set out in the monitoring and review section of the policy, the Council will prepare and keep under review a Climate Change SPD which will provide detailed information regarding the implementation a delivery of the policy. This will allow it to be kept up to date.

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 61	First Name Malcolm		Last Name McPhail				On Behalf Of	

It is not agreed that the policy will significantly adversely affect the viability of development. In August 2011 the CLG published an updated cost review to the Costs of Building the Code for Sustainable Homes. The majority of the figures in the report relate to the cost above meeting Part L of building regulations against the 2006 baseline but some figures have been updated to relate to 2010 baseline (tables 4, 5 and 24 of the report). This review highlighted that the cost of building to Code Level 3 was adding an average of just £1,128 per home, rather than £4,458 in 2008.

This is because of the improvements for Part L. Building to the energy and CO<sup>2</sup> requirements of Code Level 3 is now statutory. This is the most expensive part of the Code so the costs of meeting the full Code on top of this are fairly low. Since the introduction of revisions to Part L in 2010, the minimum dwelling emission rate standard required by regulation is a 25% improvement on the 2006 target emission rate. This is equivalent to the mandatory standard required at Code level 3. Effectively therefore the cost of meeting the energy and CO<sup>2</sup> categories of Code Level 3 is negligible. The cost of meeting full Code level 3 (the eight other categories) would be just £750 or 1.4% of build cost for a 2-bed flat (city infill, 40 dwellings, 160 dph) and £1,590 or 1.8% of build cost for a 3-bed semi (edge of town, 100 dwellings, 40dph) over the costs of meeting Part L again: the 2010 baseline.

Policy CS22 does not require development on brownfield sites to meet full code requirements, only the energy and CO<sup>2</sup> and water components of it.

The requirements of PPS22 for brownfield sites from 2010 to 2013 will just be the cost of reducing water usage from 125 litres per person per day (pppd) to 105 litres (pppd). The cost of achieving the water element at Code level 3 and 4 (all types of site) is just £250. It is not considered that £250 will “adversely affect the viability of development” as is justified by being in an area of water stress.

The mandatory dwelling emission rate standard at Code level 4 is equivalent to the standard expected to be introduced as the regulatory minimum when the Building Regulations are revised in 2013. Therefore, in the same way that all housing falling under the 2010 revision of Part L must be built to a energy standard equivalent to Code level 3, from 2013 it is expected that all housing will be built to an energy standard that is equivalent to today’s Code level 4 homes. Therefore the additional cost of meeting the energy and CO<sup>2</sup> emission categories of code level 4 from 2013 will be negligible. The only costs involved to meet the requirements of PPS22 on brownfield sites will be to meet the water element of the Code.

If the anticipated improvements to Part L of the Building Regulations go ahead in 2013, the requirements of PPS22 for brownfield sites from 2013 to 2016 will again just be the cost of reducing water usage from 125 litres (pppd) to 105 litres (pppd). It is not considered that this will adversely affect the viability of development and is justified by being in an area of water stress. The cost of achieving the water element at Code level 3 and 4 (all types of site) is just £250. It is not considered that £250 will “adversely affect the viability of development” and is justified by being in an area of water stress.

On this basis it is not considered that there should be a greater emphasis in the policy wording on viability appraisals.

Figure 4 on page 67 is the Council’s Housing and Previously Developed Land Trajectory which is taken from the SHLAA. This shows that over 2000 dwellings are expected to be completed in the borough in the first five years of the plan. Some sites have already been granted planning permission however others are likely to be granted planning permission in the very early stage of the plan period. If the date for introducing Code Level 4 is deferred as suggested, the opportunity to have these dwellings built to a high standard of energy and water efficiency will be missed.

If the Governments objective of all new houses being built to zero carbon by 2016 is achieved, the requirements of PPS22 for brownfield sites from 2016 will again just be the

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 61	First Name Malcolm		Last Name McPhail				On Behalf Of	

cost of reducing water usage from 125 litres (pppd) to 80 litres (pppd). The cost of achieving the water element at Code level 5 (all types of site) is currently £4,750 however by 2016 this may have fallen. This equates to adding (roughly) 6% to build costs. Whilst the Council recognise this does represent an additional cost, it is not considered that this will significantly adversely affect the viability of development and is justified by being in an area of water stress. If the Governments objective of zero carbon homes is not met in 2016 but deferred for a few years, then new dwellings in Woking Borough will be ahead of the national timetable but will be contributing to the target reduction in carbon dioxide equivalent emissions set out in the UK Climate Change Act of at least 34% by 2020.

It is not considered that a further commitment (at the end of paragraph 1) is required to review the policy in the light of any future changes to Government policy on sustainable construction, zero carbon homes and/or amendments to the Building Regulations regime as the policy text already states "The standards set out in the policy will be reviewed to reflect any future change in national standards and/or any equivalent standards that might be introduced.

**Council's Proposed Action**

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
343	Core Strategy PD	106		Yes	No	Effective		

**Representation**

Nowhere in the CS does it mention the benefits of planting trees to absorb carbon dioxide. Given the absorption rates at UK latitudes, trees could be a significant contribution to offsetting carbon dioxide emissions. For example, the boundary trees around my own property make my house essentially carbon dioxide neutral. Since my arrival in Woking, I have witnessed a net loss of mature trees.

**Representation Changes Necessary**

Landscaping new development with trees should be given as a factor to consider in the CS despite the need for more land to accommodate trees and the fact that much of Woking is surrounded by trees. Trees are also an enormous benefit to the street scene and would assist in making the deprived areas more scenic.

**Officer Response**

The Core Strategy does not explicitly mention the benefits of planting trees to absorb carbon dioxide. However the document is positive both about the retention of trees and other vegetation for biodiversity and for helping to mitigate the impacts of climate change. Policy CS21 is an example where trees are mentioned to enhance the amenity value of an area.

The omission of the emphasis on trees for their multiple values is acknowledged. A proposed change to policy CS24 is suggested to overcome this omission.

**Council's Proposed Action**

It is proposed to add the following new paragraph to the policy box of Policy CS24 (p115)

"Trees form an important part of the landscape fabric of the Borough. They provide an important habitat for a variety of species, have a positive impact on the water cycle through their water carrying capacity and slow-down of surface run-off, enhance the amenity of the area, absorb carbon dioxide and other pollutants and provide urban cooling through shading and reducing ambient temperatures. The Council will seek the retention of existing quality trees (except where they are dead, dying or dangerous) and encourage the planting of new ones where it is relevant to do so. New trees must have sufficient root volume availability, appropriate root management, irrigation, drainage and aeration in order for the tree to thrive. The Council's forthcoming Tree Strategy will set out more detail".

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell				On Behalf Of	Natural England

393 Core Strategy PD

**Representation**

Natural England supports the policy commitment to renewable and low carbon energy generation within the Borough.

We note that the intention is still 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 and would value the opportunity to be involved at an early stage. 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.

**Representation Changes Necessary**

**Officer Response**

Support noted.

**Council's Proposed Action**

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

120 Core Strategy PD

**Representation**

Land contamination & There are no policies which explicitly relate to water quality. After considering the risks the Sustainable Construction policy CS22 may be best suited to include a section on Land Contamination. We would seek that following wording is added to policy CS22.

All development, particularly on brownfield land, should seek to remediate contaminated land to ensure that risks to water quality as a result of development are minimised.

And

All development should normally seek to incorporate pollution prevention control measures and Sustainable Urban Drainage Systems to ensure that impacts on water quality by development are minimised and in the long term - are improved.

This would bring the core strategy more in line with the requirements of the Water Framework Directive, but would also ensure that groundwater is adequately protected by the overall strategy and that water quality is regarded as an issue of sustainable construction and not just as an add-on benefit of SUDS.

**Representation Changes Necessary**

All development, particularly on brownfield land, should seek to remediate contaminated land to ensure that risks to water quality as a result of development are minimised.

And

All development should normally seek to incorporate pollution prevention control measures and Sustainable Urban Drainage Systems to ensure that impacts on water quality by development are minimised and in the long term - are improved.

**Officer Response**

Suggested text seems a reasonable addition to the Core Strategy wording. However Officers believe that it fits better with policy CS9: Flooding than CS22. recommend that it is added to CS9: Flooding.

**Council's Proposed Action**

It is proposed that the following text be added to the policy box of Policy CS9: "All development, particularly on brownfield land, should seek to remediate contaminated land to ensure that risks to water quality as a result of development are minimised".

Create a new paragraph within the reasoned justification to support policy CS9 (below 5.50) ."All development should seek to incorporate pollution prevention control measures and Sustainable Urban Drainage Systems to ensure that impacts on water quality by development are minimised and in the long term are improved"

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

116 Core Strategy PD

**Representation**

Policy CS22 - Again, we welcome the inclusion of this policy.

**Representation Changes Necessary**

**Officer Response**

Support noted

**Council's Proposed Action**



**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of	West Estates Ltd

166 Core Strategy PD

**Representation**

West Estates object to the current wording of the policy with respect to greenfield sites. This 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.

**Representation Changes Necessary****Officer Response**

The PPS1 Supplement, Planning and Climate Change, states that where local circumstances warrant higher standards of energy efficiency, LZC energy and climate change resilience these must be clearly expressed and evidenced. The Council feel that the Climate Change, Renewable, Decentralised and Low Carbon Energy Evidence Base combined with the Economic Viability Assessment (EVA) provides this.

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.

On greenfield sites the Economic Viability Assessment modelled up to 60% affordable housing and up to CfSH Level 6 alongside other base assumptions (see 3.12 and figure 15 and table 10b). The study says that to achieve a reasonable greenfield value per ha (elsewhere noted as potentially being between £300k and £500k per ha) whilst providing 50% affordable housing and on the basis of CfSH L5 a level of residential value equivalent to between Value Point 3 and 4 is required. Given that these are identified as typical value levels for the Borough, the study demonstrates that this is a potentially viable scenario (subject to all the caveats and explanations contained in the report). The evidence in the report has been used to support the policy wording of CS22. The policy also contains an acknowledgement of viability issues being taken into account on a site by site basis where required, in particular where an applicant wishes to make a case that the standards could not be achieved.

**Council's Proposed Action**

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 89	First Name Lisa		Last Name Bowden				On Behalf Of Royal Mail	

198 Core Strategy PD

**Representation**

Royal Mail supports the principle of Policy CS22, which sets out the need to reduce carbon emissions and for new developments to minimise energy consumption and production of CO2. Royal Mail also supports the Council encouraging new residential development to meet the requirements of each Code [for Sustainable Homes] level, with particular encouragement for the material and ecology element”.

In our previous representations we supported the Council’s ambitions for ‘Sustainable Construction’ in principle, however, considered parts of Policy CS22 to be onerous, without providing suitable flexibility. Royal Mail previously had reservations regarding the viability of development given the Council’s proposed onerous targets. We therefore support the reworded policy, which now, we note, states (with added emphasis):

The evidence base<sup>15</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’

We particularly support the flexibility that has been built into the Policy given the references to feasibility and viability. We consider this policy approach to consistent with national policy.

We reserve the right to amend or supplement these representations at a later date if necessary. We would be grateful if you could acknowledge receipt of our representations and advise as to the next stages of the Core Strategy and forthcoming Site Allocations DPD.

**Representation Changes Necessary**

**Officer Response**

Support noted.

**Council's Proposed Action**

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 90	First Name James		Last Name Stevens				On Behalf Of Home Builders Federation	

190 Core Strategy PD

**Representation**

Sustainable construction

We object to the policy as it is not supported by an evidence base.

The Council is stipulating that all developments meet the full Code for Sustainable Homes even though the Government's programme to zero carbon homes applies only to the Part L element of the Code (albeit this represents the greatest cost). Requiring developments to meet the full costs of the Code would add significantly to the cost of development. As stated previously, these costs have not been factored into the Council's viability assessment for affordable housing. This has only modelled up to Code 4.

We also object to the requirements that green field developments must meet Code 5, including the Part L component of the Code in advance of the national programme to zero carbon homes from 2016 onwards. The Climate Change Supplement to PPSI requires that where local authorities wish to set policies that anticipate levels of building sustainability in advance of those set out nationally they must be able to demonstrate the local circumstances that warrant this (paragraph 31), having regard to viability of their policy requirement and ensuring that this will not jeopardise the pace of housing development as set out in the council's housing trajectory (paragraph 33). As far as we can detect, the Council has not assembled such an evidence base.

The Council's Climate Change and Decentralised, Renewable and Low Carbon Energy Evidence Base, June 2010, provides evidence on the potential to provide and extend decentralised energy but it does not provide an assessment of the impact of the C822 policy requirements on development viability. While it does assess the cost impact of the water element of the Code and concludes that this would add the cost of £260 extra per dwelling, it does not then go on to assess the impact this would have on development viability. The report simply states that this is not a huge additional cost. In isolation this may be the case, but cumulatively and in conjunction with other elements of the Code and the implications arising from accelerating the national timetable, plus the impact of other policy requirements in the plan, it may very well constitute a significant cost.

**Representation Changes Necessary****Officer Response**

Policy CS22 does not require development on brownfield sites to meet full code requirements, only the energy and CO<sup>2</sup> and water components of it. The claim by the Home Builders Federation is therefore incorrect.

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.

In August 2011 the CLG published an updated cost review to the Costs of Building to the Code for Sustainable Homes. The majority of the figures in the report relate to the cost of building above meeting Part L of building regulations against the 2006 baseline but some figures have been updated to relate to 2010 baseline (tables 4, 5 and 24 of the report). This review highlighted that the cost of building to Code Level 5 was adding 22 – 25% to build costs (edge of town, 100 dwellings at 40dph). (The edge of town, 100 dwellings, 40dph is considered to be the best match for Woking borough. A strategic greenfield release of 2000 dwellings is not expected within the plan period).

On greenfield sites the Economic Viability Assessment modelled up to 60% affordable housing and up to CfSH Level 6 alongside other base assumptions (see 3.12 and figure

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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<b>Customer ID</b> 90	<b>First Name</b> James		<b>Last Name</b> Stevens				<b>On Behalf Of</b> Home Builders Federation	
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15 and table 10b of the study). The study says that to achieve a reasonable greenfield value per ha (elsewhere noted as potentially being between £300k and £500k per ha) whilst providing 50% affordable housing and on the basis of CfSH L5 a level of residential value equivalent to between Value Point 3 and 4 is required. Given that these are identified as typical value levels for the Borough, the study demonstrates that this is a potentially viable scenario (subject to all the caveats and explanations contained in the report). The evidence in the report has been used to support the current policy wording of CS22 and the policy also contains an acknowledgement of viability issues being taken into account on a site by site basis where required.

As set out in paragraph 5.218 the Code for Sustainable Homes (the Code or CfSH) is the national standard for the sustainable design and construction of new homes. The Code for Sustainable Homes is a set of standards for the design and construction of properties, designed to encourage long term sustainability. The Code aims to reduce carbon emissions and create homes that are more sustainable. It covers nine categories of sustainable design: energy and CO2 emissions, water, materials, surface water run-off, waste, pollution, health and well-being (which incorporates Lifetime Home Standards), management and ecology. Each category includes a number of environmental issues. The code has six levels with mandatory requirements at each regarding energy and water usage, surface water run-off and waste. It is comprehensive and considers all aspects of sustainability relating to how a dwelling is constructed and will be used.

Building Regulations have different parts and relate to specific aspects of a buildings construction. Part L relates to Conservation of Fuel and Power and part G relates to hygiene, specifically sanitation, hot water safety and water efficiency.

In 2008 the Government set out their intention to bring in the energy efficiency improvement equivalent to the Code's energy standards, through stepped changes Part L of the Building Regulations. The first step of this was done in April 2010. Since the introduction of revisions to Part L 2010, the minimum dwelling emission rate standard required by regulation is a 25% improvement on the 2006 target emission rate. This is equivalent to the mandatory standard for energy efficiency required at Code level 3.

Updated standards for Part G of the building regulations came into force on 6 April 2010 which required all new builds to comply with a new water efficiency standard of 125\* litres per head per day.

The PPS1 Supplement, Planning and Climate Change, states that where local circumstances warrant higher standards of energy efficiency, LZC energy and climate change resilience these must be clearly expressed and evidenced. The Council feel that the Climate Change, Renewable, Decentralised and Low Carbon Energy Evidence Base combined with the Economic Viability Assessment provides sufficient evidence to justify locally specific standards.

It is not agreed that the policy will "add significantly to the cost of development". In August 2011 the CLG published an updated cost review to the Costs of Building to the Code for Sustainable Homes. The majority of the figures in the report relate to the cost above meeting Part L of building regulations against the 2006 baseline but some figures have been updated to relate to 2010 baseline (tables 4, 5 and 24 of the report).

Building to the energy and CO<sup>2</sup> requirements of Code Level 3 is now statutory. This is the most expensive one of the nine categories of the Code so the costs of meeting other requirements on top of this are fairly low. Since the introduction of revisions to Part L in 2010, the minimum dwelling emission rate standard required by regulation is a 25% improvement on the 2006 target emission rate. This is equivalent to the mandatory standard required at Code level 3. Effectively therefore the cost of meeting the energy and CO<sup>2</sup> categories of Code Level 3 is negligible. The cost of meeting full Code level 3 (the eight other categories) would be just £750 or 1.4% of build cost for a 2-bed flat (city infill 40 dwellings, 160 dph) and £1,590 or 1.8% of build cost for a 3-bed semi (edge of town, 100 dwellings, 40dph) over the costs of meeting Part L against the 2010 baseline. The cost of achieving the water element at Code level 3 and 4 (all types of site) is just £250. It is not considered that £250 will "add significantly to the cost of development".

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 90	First Name James		Last Name Stevens				On Behalf Of Home Builders Federation	

The mandatory dwelling emission rate standard at Code level 4 is equivalent to the standard expected to be introduced as the regulatory minimum when the Building Regulations are revised in 2013. Therefore, in the same way that all housing falling under the 2010 revision of Part L must be built to a energy standard equivalent to Code level 3, from 2013 it is expected that all housing will be built to an energy standard that is equivalent to today's Code level 4 homes. Therefore the additional cost of meeting the energy and CO<sup>2</sup> emission categories of code level 4 from 2013 will be negligible. The only costs involved to meet the requirements of PPS22 on brownfield sites will be to meet the water element of the Code.

The requirements of PPS22 for brownfield sites from 2010 to 2013 will just be the cost of reducing water usage from 125 litres per person per day (pppd) to 105 litres (pppd). The cost of achieving the water element at Code level 3 (all types of site) is just £250. It is not considered that this will adversely affect the viability of development and is justified by being in an area of water stress.

If the anticipated improvements to Part L of the Building Regulations go ahead in 2013, the requirements of PPS22 for brownfield sites from 2013 to 2016 will again just be the cost of reducing water usage from 125 litres (pppd) to 105 litres (pppd). The cost of achieving the water element at Code level 4 (all types of site) is just £250. It is not considered that this will adversely affect the viability of development and is justified by being in an area of water stress.

If the Governments objective of all new houses being built to zero carbon by 2016 is achieved, the requirements of PPS22 for brownfield sites from 2016 will again just be the cost of reducing water usage from 125 litres (pppd) to 80 litres (pppd). The cost of achieving the water element at Code level 5 (all types of site) is currently £4,750 however by 2016 this may have fallen. This equates to adding (roughly) 6% to build costs. Whilst the Council recognise this does represent an additional cost, it is not considered that this will significantly adversely affect the viability of development and is justified by being in an area of water stress.

**Council's Proposed Action**

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

416 Core Strategy PD

**Representation**

We therefore request that measures are put in place to deal with:

Policy on trees. This is inconsistent since the Climate Change Strategy Action Plan now includes a specific reference to the management of trees and their contribution to climate change objectives, temperature control, CO2 absorption, pollution interception, flood management, biodiversity, and as a resource for renewable energy

**Representation Changes Necessary**

**Officer Response**

The Core Strategy does not explicitly mention the benefits of planting trees listed above. However the document is positive both about the retention of trees and other vegetation for biodiversity and for helping to mitigate the impacts of climate change. Policy CS21 is an example where trees are mentioned to enhance the amenity value of an area.

The omission of the emphasis on trees for their multiple values is acknowledged. A proposed change to policy CS24 is suggested to overcome this omission.

(See response to representation made by Peter Cannon to policy CS22).

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

409 Core Strategy PD

### Representation

We raised other more detailed matters in the previous consultation, included below, but generally they were not accepted by the Council. Reading the Publication Plan we have become more aware of the overall deficiency especially in spatial policies and refer to these in the list below. However, we consider them to be a systematic failure of the limited approach to the Core Strategy and the concentration on a land use document rather than a spatial plan bringing together infrastructure and management with clear evidence of a joint approach with those responsible for implementation. As a result, we consider that it would be compounding the problem to attempt to relate each of our concerns to the existing specific policies of the plan.

We therefore request that measures are put in place to deal with:

- The approach to energy conservation throughout the Borough, especially for existing buildings, which make up the bulk of the built form

### Representation Changes Necessary

Instructions should therefore be given for the plan to be immediately reviewed with the following requirements: Ensuring reductions in energy demands in households and enterprises (including existing properties), including greater insulation, the provision of renewable facilities and energy networks, building on the corporate experience of Woking's estate, and reductions in the need for energy intensive travel;

### Officer Response

It is outside the scope of the Core Strategy to require additional energy conservation measures for existing buildings in the Borough which are not currently within the planning process. However policy CS22 states that:

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 Council did not feel that the evidence base supported the policy wording to go any further than "encourage".

Policy CS22 also states that:

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.

Actio2n Surrey is managed by the Energy Centre for Sustainable Communities Ltd which is a Thamesway Group Company. Thamesway Energy Ltd is wholly owned by Woking Borough Council. Action Surrey offers advice to residents, schools and businesses on how to reduce energy and water consumption. As part of Action Surrey, there is an energy and water efficiency show home that is free to visit, a walk-in low carbon advice centre and an online community that is available to residents and members of the public. Actio2n Surrey is able to access grants which enable cavity wall insulation and loft insulation to be installed for around £129-149 each. Actio2n Surrey also manages a network of trusted, local and experienced installers who can install insulation, replace boilers and are experts in solar and other microgeneration technology. The installers can provide no-obligation, free quotes for homeowners interested in energy efficiency or renewable technology.

The Council's Climate Change Strategy includes a number of targets associated with reducing emissions across existing buildings. E.g. addressing fuel poverty in private homes; a target of improving energy efficiency by 3% per annum in council owned property; improving SAP ratings in Council owned properties etc; promoting low carbon living to homes across the Borough.

Targets relating to our own buildings are progressed in consultation / partnership with Asset Management and Housing.

**Policy: CS22 SusCon**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

Targets relating to private homes are progressed through Action Surrey (see below).

The Private Sector Housing Assistance Policy was adopted by the Executive on 30/6/11. Its objective is to assist private homeowners and tenants to help repair, maintain and adapt their home. The policy includes help with energy efficiency and improving the thermal comfort of a property with grants of up to £6,000 available through Warm Front. Loans for renewable energy are also available up to £10,000 through South Coast Money Line. Both funding streams are subject to eligibility and works criteria.

Action Surrey is a key advice service facilitated by ecsc/Thamesway which helps homeowners, businesses and schools to reduce energy and water consumption and to reduce fuel bills. Action Surrey offers advice, free energy audits (in partnership with LA21) and signposting to available grants for the installation of efficiency measures. It is a key service in addressing the Climate Change Strategy's actions around community engagement and helping residents and businesses to do their bit in reducing the Borough's carbon emissions. Action Surrey is also able to recommend accredited installers / suppliers of energy efficiency measures and renewables.

Carbon Calculator and Carbon Reduction Fund - Coming soon - Tool available through Action Surrey website to enable users to measure their carbon footprint by entering household energy consumption, travel, etc. Advice to be tailored giving tips on how to reduce carbon footprint. Will also facilitate donations to a carbon reduction fund for the installation of local renewable energy projects.

Corporate projects which will reduce emissions of Council owned projects include:

- Honeywell project - Audit of corporate buildings to identify suitable energy improvement measures, their associated costs and their likely payback.
- PV programmes - Installation of PVs on Council owned buildings in two phases. Phase 1 = 2.1 MW; £6.7m investment; circa 870t CO2 saving pa; Phase 2 = 2.9 MW; £9.1m investment; circa 1,200t CO2 saving pa.

**Council's Proposed Action**



**Policy: CS23 Renew**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	43	First Name	Robert	Last Name	Palgrave	On Behalf Of
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273	Core Strategy PD			Yes	No	Effective
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**Representation**

Table 6 gives sub-regional targets for renewable energy from policy NRM14 of the South East Plan, 2009. This target is meaningless for Woking, as it covers such a large geographic area. The energy figures are not categorised as electricity or heat, and are not given any context.

The evidence base is deficient. Studies published by DECC in 2010 assess the renewable energy potential across England to 2020 and then to 2030. The review of the South East Region\*, shows RE potential by technology, and by Local Authority Area. For example, Solar PV in Woking has a potential of 27MW by 2020

\* The June 2010 Review of Renewable & Decentralised Energy Potential, for the SE Planning Partnership Board:

[http://webarchive.nationalarchives.gov.uk/20100908090945/http://se-partnershipboard.org.uk/pdf/nat\\_res/potential\\_re\\_in\\_se.pdf](http://webarchive.nationalarchives.gov.uk/20100908090945/http://se-partnershipboard.org.uk/pdf/nat_res/potential_re_in_se.pdf)

While the figures in this study are not targets, they are a good indication of the levels of RE needed across the UK to aggregate up to the EU requirement of 15% by 2020.

**Representation Changes Necessary**

Including more detailed and up to date 'aspirational targets' for renewable energy to 2020 and 2030 in Woking will help the CS deliver objective 6 of the Spatial Vision (para 3.3)

**Officer Response**

The sub-regional targets for renewable energy from policy NRM14 of the South East Plan are not county or borough specific but at the time of writing form part of the Regional Strategy for the south east and have undergone examination and been found sound. The source of table 6 is clearly stated so the Council disagrees that the figures 'are not given any context'. The targets are not categorised as electricity or heat but the table is taken directly from the South East Plan. They remain the sub-regional targets until the SE Plan is revoked.

The DECC study quoted is the 'Review of Renewable and Decentralised Energy Potential in SE England' which was prepared for South East Planning Partnership Board by Land Use Consultants and TV Energy. They were commissioned in 2010 to review the potential for renewable and decentralised energy within the South East. The study sought to re-examine the existing evidence base for the potential for renewables within the region. It was originally intended that this would be used to shape the preparation of the new Regional Strategy for the South East and the review of the regional renewable energy targets. During the preparation of the study the new Coalition Government declared its intention to revoke Regional Strategies (RS) and is seeking to return decision making powers on planning to local councils. In the light of these changes it was suggested the findings of the study could be used to assist local authorities to prepare targets and strategies for renewable energy development at the local level.

As the response highlights, the figures in this study are not targets or even recommended targets but a 'resource assessment which identifies the theoretically accessible resource, not the deployable resource' (para 4.3, p95).

'The accessible resource is the total amount of potential that is theoretically available... (It does) not represent what could be practically achieved and delivered within the region. Further assumptions and scenario testing would need to be undertaken to refine the results i.e. considering deployment, supply chain and planning constraints and opportunities' (para 3.2, p62).

The Woking borough data from appendix 3.1 of the report is summarised in the table below. The table draws the same conclusions as the Climate Change and Decentralised, Renewable and Low Carbon Energy Evidence Base, that the key opportunities for the borough are considered to be medium-large scale wind energy, combined heat and power (CHP) and solar heat and photovoltaic (PV).

The 'Review of Renewable and Decentralised Energy Potential in SE England' needs to be added to the list of evidence which supports the Core Strategy as it is a useful piece

**Policy: CS23 Renew**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	43	First Name	Robert	Last Name	Palgrave	On Behalf Of
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of research that provides useful local authority level information, however because the document does not include targets but a resource assessment, it is not considered to include these in the Core Strategy. It is also not considered appropriate to include 'aspirational targets' in the Core Strategy. Policy CS23 sets out the Councils positive view on renewable and low carbon energy generation and states:

The Council recognises 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.

The policy is informed by the outcome of the locally specific study commissioned by the Council.

Policy CS23 contains monitoring indicators MW of new renewable energy installations permitted and installed will be will be monitored each year.

**Council's Proposed Action**

It is proposed that a the "Review of Renewable and Decentralised Energy Potential in SE England, 2010, produce by Land Use Consultants and TV Energy for the South East England Partnership Board" be added to the list of evidence which supports the Core Strategy (p114 and appendix 1, p125.)

Customer ID	77	First Name	Marianne	Last Name	Meinke	On Behalf Of
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103	Core Strategy PD			No	Effective
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**Representation**

Community based projects for energy generation may work well.

However, if not properly managed or installed, they may also have to leave council tax payers in the position of having to take legal action for failure to manage sites appropriately. E.g. in terms of noise, safety and security.

**Representation Changes Necessary**

None put forward

**Officer Response**

The policy provides particular support for community based and owned projects. Any community owned renewable energy installation is likely to require planning application. The DM process ensures that the design and construction of schemes are in accordance with the Building Regulations and associated legislation.

Noise issues (for example in relation to a wind turbine) would be dealt with at the planning application stage and appropriate conditions applied to the planning permission. At a later stage, if the noise level was greater than that set out in the condition this could be addressed by the planning enforcement team or by Environmental Health who investigate any noise complaints. Overall there are effective systems in place to ensure that the advance impacts of any scheme are mitigated.

**Council's Proposed Action**

**Policy: CS23 Renew**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 88	First Name H		Last Name Payne				On Behalf Of	Thomas Roberts Estate Ltd
183	Core Strategy PD		5.238	Yes	Yes			

**Representation**

The encouragement given in policy CS23 to the development of standalone energy installations in the borough is fully supported. It is noted that all such proposal will be considered on their individual merits with regard to scale, location, technology type and cumulative impact are also supported.

Para 5.238 is supported in that there is potential within the borough to generate adequate biomass to meet a significant growth in biomass-based energy supply and greater encouragement for facilities could be provided.

Para 5.239 is also supported in so far as it notes that there may be opportunities to divert suitable wastes from existing waste collection and disposal arrangements to be used in anaerobic digestion to generate biogas.

**Representation Changes Necessary****Officer Response**

Support noted.

**Council's Proposed Action**

**Policy: CS23 Renew**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

415 Core Strategy PD

**Representation**

We therefore request that measures are put in place to deal with:

Renewable and low carbon energy generation in the longer term. Table 6 gives sub-regional targets for land-based renewable energy from policy NRM14 of the South East Plan, but it is unclear what these represent, as they refer to a larger subregional area and is not expressed in useful terms. Studies published by DECC in 2010 assess the renewable and decentralised energy potential across English Regions through to 2020 and then to 2030 by technology and by local; authority area. So it should be possible to craft a more precise target of installed capacity.

**Representation Changes Necessary**

**Officer Response**

The sub-regional targets for renewable energy from policy NRM14 of the South East Plan are not county or borough specific but at the time of writing form part of the Regional Strategy for the south east and have undergone examination and been found sound. The source of table 6 is clearly stated so the Council disagrees that the figures 'are not given any context'. The targets are not categorised as electricity or heat but the table is taken directly from the South East Plan. They are formal sub-regional targets.

The DECC study quoted is the "Review of Renewable and Decentralised Energy Potential in SE England" which was prepared for South East Planning Partnership Board by Land Use Consultants and TV Energy. They were commissioned in 2010 to review the potential for renewable and decentralised energy within the South East. The study sought to re-examine the existing evidence base for the potential for renewables within the region. It was originally intended that this would be used to shape the preparation of the new Regional Strategy for the South East and the review of the regional renewable energy targets. During the preparation of the study the new Coalition Government abolished Regional Strategies, revoked Regional Spatial Strategies (RSS) and is seeking to return decision making powers on planning to local councils. In the light of these changes it was suggested the findings of the study could be used to assist local authorities to prepare targets and strategies for renewable energy development at the local level.

As the response highlights, the figures in this study are not targets or even recommended targets but a "resource assessment which identifies the theoretically accessible resource, not the deployable resource" (para 4.3, p95).

"The accessible resource is the total amount of potential that is theoretically available... (It does) not represent what could be practically achieved and delivered within the region. Further assumptions and scenario testing would need to be undertaken to refine the results— i.e. considering deployment, supply chain and planning constraints and opportunities" (para 3.2, p62).

The Woking borough data from appendix 3.1 of the report is summarised in the table below. The table draws the same conclusions as the Climate Change and Decentralised, Renewable and Low Carbon Energy Evidence Base, that the key opportunities for the borough are considered to be medium-large scale wind energy, combined heat and power (CHP) and solar heat and photovoltaic (PV).

The "Review of Renewable and Decentralised Energy Potential in SE England" needs to be added to the list of evidence which supports the Core Strategy as it is a useful piece of research that provides local authority level information, however because the document does not include targets but a resource assessment, it is not considered to include these in the Core Strategy. It is also not considered appropriate to include "aspirational targets" in the Core Strategy. Policy CS23 sets out the Councils positive view on renewable and low carbon energy generation and states:

**Policy: CS23 Renew**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

“The Council recognises 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”.

Policy CS23 contains monitoring indicators MW of new renewable energy installations permitted and installed will be will be monitored each year.

**Council's Proposed Action**

**Policy: CS24 Lands**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 16	First Name Colin		Last Name Weeks			On Behalf Of		

91 Core Strategy PD No Effective

**Representation**

These Strategies are fully supported. It will be interesting to see however how and if the Town Planners will implement these within the proposed Moor Lane and Brookwood developments. Certainly the new Barrat's High rise buildings cannot be classed as aesthetically pleasing and fitting in with the townscape, neither can the hideous canopy!

**Representation Changes Necessary**

None put forward.

**Officer Response**

Support noted.

A wide range of Core Strategy (and in time Development Management DPD) policies will be considered in evaluating a wide range of developments; including Moor Lane and Brookwood Farm. For example:

- CS1 Spatial Strategy
- CS20 Heritage and Conservation
- CS21 Design
- CS24 Landscape and Townscape
- Relevant employment, housing and environmental policies

For large schemes the Council will prepare a design brief, which stipulates amongst other things what development is appropriate, key design attributes and the setting of the proposal in landscape and townscape terms.

**Council's Proposed Action**

**Policy: CS24 Lands**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 24	First Name Tom		Last Name Crisp				On Behalf Of	Woking Constituency Labour Party

386 Core Strategy PD

**Representation**

The development of New Central and the recently submitted proposals on sites south of the train station have further highlighted the need to achieve a balance between the existing character of the area and the design of new development - particularly high rise development.

We do not consider that high rise development is of itself necessary to achieve the high density development that is required to meet the plan objectives. There seems to be a presumption that high density must mean high rise. We do not believe this is the case.

We believe that there has to be a presumption against high rise development to ensure that proposals coming forward properly consider the possibility of delivering high density development which is well designed and in conformity with the local landscape and streetscape.

There are a number of objections to high rise:

There remains a question mark over their sustainability. More complex construction methods and the need for the provision of lifts and other services require the dedication of more resources.

The damage to the rural/suburban/urban landscape of much of north west Surrey in which Woking sits. Woking does not have a solely urban landscape and streetscape, and its essential character flows from this variety. Tall buildings emphasis the "urban" character of the town and detracts from the town's "suburban" and "rural" character. Even the urban character of the town centre is being damaged by high rise that is poorly designed. The greater visual impact of tall buildings means that if they are to be built they must be designed to a considerably higher standard in terms of design if they are to be acceptable.

There is a demonstrable need for the Core Strategy to address in more detail the impact of tall buildings on the town's landscape and streetscape, something that is lacking in the document as currently drafted. We therefore feel the Council's current approach is not justified. Developers who assume that high density means high rise must be made to think and work harder at high rise proposals - and the Core Strategy policies must point them in this direction.

**Representation Changes Necessary**

None put forward.

**Officer Response**

The town centre is a suitable location for development to meet the needs of the community in a sustainable manner. Mixed use, high density development is acceptable in this regard to maximise the efficient use of land. Tall buildings could play a role in meeting the development needs. It will be acceptable if it is well designed and enhances the character of the wider locality. The Council is committed to preparing a Development Management DPD, and Area Action Plan for the town centre and a Design SPD for the Borough. Specific detailed guidance on tall buildings may be provided in these documents.

Tall buildings are referred to within the policy text of CS1 A Spatial Strategy for Woking (paragraph 3).

There is nothing about tall buildings in CS2 Woking town centre policy.

**Policy: CS24 Lands**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 24	First Name Tom		Last Name Crisp				On Behalf Of	Woking Constituency Labour Party

**Council's Proposed Action**

Customer ID	First Name	Last Name	Palgrave	On Behalf Of
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441 Core Strategy PD 115 Yes No Effective

**Representation**

In this policy, there is no mention at all of trees. This is significant since local authorities through Development Control have considerable impact on how trees are managed, both on their own land and on non-Council land. The policy sees fit to identify particular animal species like bats, badgers and newts and habitats like heathland but is silent about trees in general. This is inconsistent in itself, and more so since the Climate Change Strategy Action Plan now includes a specific reference to the management of trees, viz:

Monitor and promote the Council's approach to tree management with reference to relevant policy (e.g. Defra Strategy for England's Trees, Woods and Forests) and good practice, and the Council's climate change objectives. Advocate tree management practices that recognise the contribution of trees to temperature control, CO2 absorption, pollution interception, flood management, biodiversity, and as a resource for renewable energy

**Representation Changes Necessary**

None proposed.

**Officer Response**

Please see response to representation made by Peter Cannon to policy CS22.

**Council's Proposed Action**



**Policy: CS24 Lands**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 77	First Name Marianne		Last Name Meinke			On Behalf Of		

104 Core Strategy PD No Justified

**Representation**

The first page is reassuring but the justification somewhat undermines all of this. First paragraph suggests that change will happen and negative impact will be minimised. More reassuring would be a suggestion that there would be attempts to avoid negative impact.

**Representation Changes Necessary**

None put forward.

**Officer Response**

The overall thrust of the policy is to ensure that development provides positive benefits/s to landscape and townscape character. It therefore seeks to prevent negative impact of development. However, if they were to occur, they should be fully investigated.

**Council's Proposed Action**

Customer ID 78	First Name Heather	Last Name Twizell	On Behalf Of Natural England
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394 Core Strategy PD

**Representation**

Natural England supports the inclusion of a specific policy which covers landscape. We welcome the intension to conserve and enhance the character of key landscapes, to guide change and the focus on the urban fringe environment.

We are aware that the Character Study undertaken to provide the key evidence base is focused on the built environment and would like to reiterate our advice to the Council to carry out a Landscape Character Assessment (LCA) as this would provide a comprehensive landscape evidence base to underpin planning and management decisions.

**Representation Changes Necessary**

None put forward.

**Officer Response**

The Core Strategy concentrates most development in the urban area, at least for the first ten years after the adoption of the Core Strategy. The Character Study is therefore appropriate research to provide evidence to support the overall spatial strategy. Thus, whilst an LCA is not ruled out completely, it is not a priority that is immediately needed for the Core Strategy. Paragraph 5.10 of the Core Strategy identifies LCA's as part of the Green Belt boundary review.

**Council's Proposed Action**

**Policy: CS3 WestB**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

210 Core Strategy PD

**Representation**

The number of transport improvements achieved in Woking town centre and West Byfleet district centre should be included as indicators.

**Representation Changes Necessary**

**Officer Response**

Indicators should be measurable. The County Council as highways authority should be able to provide the information for the indicator to be measured.

**Council's Proposed Action**

It is proposed that the monitoring and review section of policy CS3 (page 39) should be amended by adding another bullet point to read "Number of transport improvements in West Byfleet District Centre".

**Policy: CS4 Local**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	8	First Name	Pauline	Last Name	Marshall	On Behalf Of
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8      Core Strategy PD      132

**Representation**

I believe the Core Strategy should have additions to the town, district and local boundaries Appendix 3 Knaphill for the reasons given below.

Sainsbury's and Homebase have caused people interested in renting or buying a shop to think twice. There is a huge development still to be done there in both stores and new people think that their money will go down the drain. If some of the necessary items can't be bought in the village purchases will go down to Sainsbury's where everything is not available. It takes quite a long time for a village to decrease because of the Superstore and possibly because people find things they have at Sainsbury's and paid for the... The supermarket has monopolised the buses so that a lot go to the supermarket before going to the village.

**Representation Changes Necessary**

The shop Griffiths on the corner of Queens road/ Broadway should be included in the local centre as it sells school uniforms that draw people into Knaphill. Also the computer shop on the corner of Anchor Hill and Highclere road all have parking outside the shop and on the highway. People shopping in Knaphill can be people who live there and shop during the day. Others want to pick up milk, bread, cleaning library and post office and don't want to be there 5 mins. Local shops need parking very near. People from perhaps this side of Guildford and other Woking areas use Knaphill because they can quickly access banks. It is also flat for disabled.

**Officer Response**

Griffiths by Valentino is located at 23-27 Broadway. It was included within the boundary of Knaphill village centre in the Local Plan 1999 but consultants Roger Tym and Partners recommended a revised boundary in their 2009 Town, District and Local Centres Study. The consultants put forward revised boundaries for many of the centres including Knaphill. The boundary was drawn along the Queens Road and the shop fell just outside the revised boundary. On consideration it would seem appropriate to retain this part of the Knaphill centre boundary as it is in the Local Plan 1999, with the A1 comparison unit within the centre boundary.

The same issue has arisen with the computer shop on the corner of Anchor Hill and Highclere Road. It fell within the boundary in the Local Plan 1999 but the consultants recommended that the road was used as the centre boundary and so the shop referred to falls just outside. The road is fairly busy and although there are A1 units on Victoria Road/Lower Guildford Road they do feel peripheral to the centre.

**Council's Proposed Action**

It is proposed that the Knaphill centre boundary, shown on the Proposals Map Inserts, be revised to include 23-27 Broadway, so the eastern end of the boundary remains as it does in the Local Plan 1999.

**Policy: CS4 Local**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	8	First Name	Pauline	Last Name	Marshall	On Behalf Of
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65	Core Strategy PD			No	No	
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**Representation**

I believe Knaphill has all the necessary elements to be a District Centre. I think the Council are only thinking of the Borough use. The people that use Knaphill come from Guildford Borough and Surrey heath.

1) Knaphill has banks, 2) no station but has 22 buses an hour to Woking and Brookwood Station. Residents can walk or cycle to Brookwood Station, the buses run late into the evening, most other larger towns, Guildford, Camberley, Bagshot and Farnborough are easily accessible by public transport. 3) There is an OAP centre at the Vyne, because there is transport available this facility is used by people from Guildford Borough and Surrey Heath. 4) There is a medium size supermarket in the village, the Co-op and the planners said the village could only support one of this size when the library was relocated to the old Budgens Swards store. There would now appear to be a medium size Sainsbury's but this is not in existence yet. There is a large Sainsbury's supermarket just down the Broadway and also a Homebase. Both of the latter two have outstanding planning permission for enlargement which is deterring smaller shops in the supermarket before getting to the village which is a problem for storekeepers. 5) Churches etc - there is a Buddhist temple, CE church, Methodist Baptist and the Catholic. 6) Schools - there is St Johns Primary School, Knaphill First and Middle, there are also nursery schools and playgroups. 7) Medical - there is a Dr's group near the Vyne, an optician in the High Street and about three different dentists. 8) Library - there is a very well used library. 9) Post Office - a very busy place. 10) Pubs - there are 5 pubs/food is served. 11) Shops and services - bike shop, second hand furniture, electrical goods and white goods, cake making and decorations, garage, clothes and uniform shop. Newsagents, chemists, florists, bakers, 2 dry cleaners, printers as well as Solicitors, accountants, financial advisors etc. There were a lot more but are wary of expensive rents and undeveloped planning application also sports shop and 2 pet shops. 12) Two computer shops. 13) Hairdressers, both sexes and several of these. 14) Charity shops, 15) Jewellery shop, 16) Hospitals - there are two - The Priory and Alpha Hospitals. There are also many houses for accommodating the mentally ill although none for ordinary OAP's.

Knaphill is used by people from Pirbright (no shops). The Rifle Association accommodation and The National Shooting Centre and the camp, Bisley, West End, Chobham, Worplesdon and this side of Guildford. Someone from Guildford said it was quicker to come to Knaphill to bank if you worked from home as you could shop etc. all in the hour which you could not do if you had to go to Guildford and park , go to bank and then the reverse. Knaphill being on the flat was ideal for people with walking difficulties, heart problems etc. The car park was a great advantage, it did seem that more entrances onto the High Street were not necessary as they were dangerous for pedestrians. The people liked the idea of the dropped kerb that predominates in the village as it seems pedestrians are looked after. The village is in a lorry ban area and has no A roads going through it only C class roads. However traffic seems to go through the village and there are large holdups at times. However there are 3 zebra crossings, 1 light controlled crossing and crossings on the Anchor Hill traffic lights and the Garibaldi traffic lights. There has been an enormous amount of development in Knaphill with more pending on Brookwood Farm. Unfortunately places identified for social facilities have been used for other things as no money to support them. Hence Knaphill is short of meeting places etc. When you build houses you also need places for people to meet, go to school and enjoy the environment etc. I am concerned that Brookwood Farm houses are too near Bisley Common which has nesting birds. Bisley Common is Surrey Heath but abuts Woking development area called Brookwood farm.

**Representation Changes Necessary****Officer Response**

Knaphill and Byfleet are considered to be the largest of the local centres and both have a good range of shops and service functions such as convenience stores, banks, post offices, pubs, libraries, churches, etc. The definition was based on a Local Service Provision Audit (fig 3.2, paragraphs 3.71 to 3.75 and appendix 4 of the Town, District and

**Policy: CS4 Local**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	8	First Name	Pauline	Last Name	Marshall	On Behalf Of
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Local Centres Study). The Co-op convenience store referred to is considered to be a small supermarket by Roger Tym as it is just 535 sqm (gross) (262 sq m net) compared to Waitrose in West Byfleet 1,700sqm (gross). The Local Service Provision Audit separates top-up convenience from supermarkets using a sales area threshold of 500 sqm. Local Service Provision Audit gave West Byfleet a total weighted score of 63, significantly ahead of Knaphill (46) and Byfleet (44). Neither Byfleet or Knaphill have a station in the centre but both have one fairly close (Byfleet and New Haw and Brookwood respectively). Knaphill was designated as a local centre because it does not offer the level of services that are provided in West Byfleet and does not have a railway station.

**Council's Proposed Action**

Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of
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28	Core Strategy PD				No	Justified
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**Representation**

This strategy purely focuses on the immediate neighbourhood commercial centre and thus fails to take into account the concept of developing a vibrant distinct unit. In Westfie for example the main focal point is Westfield Common the area of open land between Kingfield and Mayford around which the existing population live and maybe a further 1000+ within the next five years. It is therefore important that the Westfield Neighbourhood Centre takes in Westfield Common, a SNCI, together with the houses around it a number of which date back to the 17th Century. It is also important that any new development takes this into account, such that buildings facing Westfield Common are built in accordance with the current HSG5 Policy

The backup data for Westfield needs to include the historic buildings and the fact that Westfield Common is a SNCI.

**Representation Changes Necessary****Officer Response**

The purpose of the centre boundaries is to definite a suitable location for town centre uses, as set out in PPS4. This includes:

1. retail development (including warehouse clubs and factory outlet centres)
2. leisure, entertainment facilities, and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls)
3. offices, and
4. arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

The importance of Westfield Common to the identify of Westfield is recognised, however as common land and an SNCI, the Common is not considered to be a suitable locatio for this type of development. Therefore it has been excluded from the centre boundary.

**Council's Proposed Action**

**Policy: CS4 Local**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 23	First Name John		Last Name Brooks				On Behalf Of	

46 Core Strategy PD

**Representation**

Objection - the phrase "town centre uses" used in the first line and in the 3rd paragraph of the policy should be deleted and replaced with the phrase "local convenience and service uses". Reason - the term "town" introduces a lack of clarify about what is intended in the village centre and appears at odds with the description of the role of local centres such as Horsell provided in table 2 on Page 32 of the Strategy. This refers to such centres being for local convenience and service uses. Use of the phrase "town centre uses" suggest uses appropriate to Woking town centre would also be appropriate in a local centre which it would not. The phrase lacks clarify about what is actually intended and should be amended as suggested.

**Representation Changes Necessary**

**Officer Response**

The term "town centre uses" is used in PPS4 and defined in paragraph 7. It applies to town, district and local centres.

1. retail development (including warehouse clubs and factory outlet centres)
2. leisure, entertainment facilities, and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls)
3. offices, and
4. arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Policy CS2 contains a footnote to explain that the term "town centre uses" is defined in PPS4. For clarity an identical footnote will be added to this policy.

Paragraph 8 of PPS4 states: 'References to town centre(s) or to centre(s) apply to all types of centre defined in Annex B to this PPS which are identified in development plans. Annex B includes City, Town, District and Local Centres.'

**Council's Proposed Action**

**Policy: CS5 Priority**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 16	First Name Colin		Last Name Weeks			On Behalf Of		
29	Core Strategy PD		1.27		No	Effective		

**Representation**

The aims of this Policy are supported; however the February 2011 Surrey CC Report – Families in Poverty Needs Assessment clearly show that the wards of Kingfield & Westfield and Old Woking also need to be included in this Strategy. There is also a very high risk that if WBC progress the building of 440 New Homes on the Moor lane site that they will overnight create another Area of Deprivation for Woking.

Paragraph 1.27 of the Core Strategy indicates that there is a need for an additional 499 Affordable Homes to be built each year over the next 15 years i.e. 7585 additional homes. WBC's strategy is to build 1737 new affordable dwellings (CS 1) of which 440 are planned to be in Westfield and 300 in Brookwood Farm (5.66 page 65). Based on the deprivation issues of Sheerwater and Lakeview considerable care will be needed in the design of these new Estates to make sure that Woking does not generate two further 'pockets of deprivation'. The Social issues already existing in the Kingfield & Westfield and Old Woking Wards are highlighted in the February 2011 Surrey Co's Children in Poverty Assessment.

## Top three Wards:

Lowest Life Expectancy

Maybury &amp; Sheerwater 73.3

Old Woking – 75.8

Kingfield &amp; Westfield – 75.9

Woking Ave – 81.3

## Highest Teenage Conception -

Kingfield &amp; Westfield 61.7

Maybury &amp; Sheerwater 57.1

Old Woking 37.8

Woking Ave 28.8

## Living in workless/low income -

Maybury &amp; Sheerwater 18%

Households Old Woking 15%

Kingfield &amp; Westfield 14%

Woking Ave 7.8%

## Distribution of Children in Poverty -

Maybury &amp; Sheerwater 25.7%

Kingfield &amp; Westfield 19.9%

Old Woking 18.8%

Woking Ave 11.4%

## Policy: CS5 Priority

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of
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Households in Need (SHMA) -  
Goldsworth East 6.5%  
Maybury & Sheerwater 6.1%  
Kingfield & Westfield 4.8%  
Woking Aver 2.6%

### Representation Changes Necessary

It is requested that WBC in conjunction with the Resident Associations of Westfield, Kingfield and Old Woking draw up action plans to tackle the current and anticipated future Social Issues in these areas and that CS 5 is amended accordingly

### Officer Response

There has been extensive study and assessment in the area through a number of action plans to identify the priority places. The priority places and the need to direct resource there has been recognised by the Surrey Strategic Partnership and the Woking Partnership.

Maybury and Sheerwater have been identified as one of four Priority Places in Surrey. The Surrey Strategic Partnership (SSP) identified the four Priority Places in Surrey, based on a range of need indicators, which provide a focus for action and intervention, and the potential to co-ordinate partner resources to the areas of most need in Surrey.

The four places identified are:

- Merstham (Reigate & Banstead)
- Stanwell North/Ashford North (Spelthorne)
- Westborough (Guildford)
- Sheerwater & Maybury (Woking).

One of the Super Output Areas in Maybury and Sheerwater rank as the most deprived in Surrey. The area in general also fits into the general characteristics set out in the Index of Multiple Deprivation (IMD), produced by the CLG.

Through the work of the Woking Partnership, the Lakeview Estate area of Goldsworth Park has also been identified as a Priority Place to which resources should be targeted. It also ranks highly in the IMD and fits into the general definition which has been used to identify the priority places.

There is no such body of information for the Council to use to justify identifying Kingfield and Westfield in the category of a priority place. However the comments will be passed on to Woking Partnership and Surrey Strategic Partnership to consider and if proven to be the case they will identify resources to address any issues in the area.

It needs to be emphasised the fact that some areas are not identified as priority places does not mean their needs will be ignored. The Council will continue to work with all of its partners to ensure inequalities in all areas of the Borough and any disparity within the area are addressed.

### Council's Proposed Action



**Policy: CS5 Priority**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
345	Core Strategy PD	48	4.49	Yes	Yes			

**Representation**

I actually agree with this paragraph and the need for high quality new development in areas of deprivation. My comments are in regard to the extent of measures required to change the fortunes of deprived areas. The CS does not go far enough, only identifying cases to develop where opportunities may arise. But all of the deprived areas are already reasonably high density and there is little scope to make a real qualitative change unless there is an active policy to replace existing poor quality housing.

**Representation Changes Necessary**

The difficulties of replacing poor standard housing are obvious and manifest, especially if the units are owner-occupied. But, to encourage a broader mix of dwellings and people, and attract professional people into the deprived areas, there must be a more robust and pro-active intent to replace as much of the poor housing stock as practicably possible.

**Officer Response**

Support noted.

It is considered that the current policy wording is adequate and will encourage a broader mix of dwellings and people and also attract professional people to Maybury and Sheerwater because of the job opportunities being provided in the area. Encouraging larger family homes and also intermediate rent and shared ownership will bring a wider range of people to the area. Due to the small size of Lakeview it is felt the deliverability of significant changes to housing stock is limited. The policy identifies a number of existing garages for redevelopment and improvements to the public realm. The continued effects of these measures will improve the general environment of the area.

The current policy wording states:

"The Council will enable the provision of around an additional 250 new homes in Maybury and Sheerwater between 2010 and 2027".

In providing this scale of housing provision, it will also seek to redress the current tenure imbalance in Maybury and Sheerwater by requiring new affordable dwellings in the area to be family homes (2+ bedrooms) and giving priority to the intermediate rent and shared ownership tenure to encourage and attract a diverse range in the social mix of the community.

**Council's Proposed Action**

**Policy: CS5 Priority**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 72	First Name Peter		Last Name Dines			On Behalf Of		
364	Core Strategy PD			No	No	Justified		

**Representation**

Policy CS5 deals with priority places and identifies support in principle for the development of a convenience retail outlet in Sheerwater. The type and floorspace for this unit is not identified as this is left for a later assessment. This is not the approach taken by the strategy to Woking town centre additional floorspace. The approach to the town centre is that an explicit assessment of floorspace is given.

It is our view that the statement in CS5 is too wide and could give rise to a range of retail uses and floorspaces which themselves could impact on Woking town centre. This is particularly so given that the wording of the policy would allow direct competition.

**Representation Changes Necessary**

In respect of policy CS5 the paragraph on retail should state clearly that any proposed retail offer in Sheerwater shall be in support of local neighbourhood needs in the interest of achieving a sustainable pattern of retailing within the Borough.

**Officer Response**

The retail section of policy CS5 is based on an identified need for convenience retail in Sheerwater. A new retail convenience store is part of a package of measures to address multiple deprivation in the area.

Policy CS2 states that there is potential for up to 75,300m<sup>2</sup> of additional A class floorspace including 67,600 of A1 retail made up of 59,300m<sup>2</sup> of comparison and 8,300 m<sup>2</sup> of convenience floorspace in the town centre. The identified need in Sheerwater is for convenience floorspace so it was not felt that there was need for a detailed breakdown in the policy.

Whilst it is not the role of the Core Strategy to restrict competition the Council through the development management process will ensure that any proposal for convenience floorspace that comes forward will not have an adverse impact on trading in the town centre.

Paragraph 10 of PPS4 states:

To help achieve sustainable economic growth, the Government's objectives for planning are to:

- reduce the gap in economic growth rates between regions, promoting regeneration and tackling deprivation
- promote the vitality and viability of town and other centres as important places for communities. To do this, the Government wants:
  - o  competition between retailers and enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres, which allow genuine choice to meet the needs of the entire community (particularly socially excluded groups)

Providing an improved retail convenience offer in Sheerwater will provide some genuine choice in Sheerwater and if one of the budget price multiples comes to the area then local people, many of who do not have cars. will be able to access a supermarket with a much larger range and probably lower prices than the current small convenience stores which are more suited to top-up shopping. Such a provision would help to meet the needs of socially excluded groups, so be supported by PPS4.

PPS4 goes on to state in EC2.1

Regional planning bodies and local planning authorities should ensure that their development plan:

**Policy: CS5 Priority**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 72	First Name Peter		Last Name Dines				On Behalf Of	

a)  sets out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth identifying priority areas with high levels of deprivation that should be prioritised for regeneration investment

PPS4 defines deprived as typically those within the most deprived 10% of 'super output areas' (SOA) as identified in the English Indices of Deprivation and defined by the Index of Multiple Deprivations (IMD). One of the SOA in Sheerwater is in the 14% most deprived nationally and is the most deprived SOA in Surrey so is considered to meet this criteria.

The Council does not believe that this policy will undermine the overall strategy for Woking Town Centre. The policy has the caveat that any proposal will be fully assessed and the impact on other centres fully considered as part of the Development Management process

**Council's Proposed Action**

**Policy: CS5 Priority**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

207 Core Strategy PD

4.52

**Representation**

The wording of paragraph 4.52 should be updated to include a reference to the 'Local Sustainable Transport Fund package' in the second sentence, and to move and reword the reference to the 'Cycle Woking programme' to the end of the paragraph, as follows:

"Lakeview is within easy cycling distance of the town centre if the necessary infrastructure is provided. The Local Sustainable Transport Fund package Cycle 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 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, building on the success of the Cycle Woking programme.

A suitable explanation of the Local Sustainable Transport Fund could be drawn from the following:

"The County Council has been successful in obtaining £3.93M of Grant Funding through the Local Sustainable Transport Fund (Key Component) bid (July 2011) which has been focused generally in the Woking and Guildford (urban) areas. In addition, further funding could be obtained through the Large Bid of the same fund (June 2012). The Local Sustainable Transport Fund has two key objectives; firstly to support the local economy and facilitate economic development, for example by reducing congestion, improving reliability and predictability of journey times or enhancing access to employment and other essential services; secondly to reduce carbon emissions, for example by bringing about an increase in the volume and proportion of journeys made by low carbon, sustainable modes including walking and cycling."

**Representation Changes Necessary**

Include a reference to the 'Local Sustainable Transport Fund package' in the second sentence, and to move and reword the reference to the 'Cycle Woking programme' to the end of the paragraph, as follows:

"Lakeview is within easy cycling distance of the town centre if the necessary infrastructure is provided. The Local Sustainable Transport Fund package Cycle 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 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, building on the success of the Cycle Woking programme."

**Officer Response**

The suggested addition of 'Local Sustainable Transport Fund package' and 'building on the success of the Cycle Woking programme' is accepted.

The text regarding the bid will be added to paragraph 5.160 (reasoned justification to support policy CS18.)

The explanation of the Local Sustainable Transport Fund will be added to the glossary.

**Council's Proposed Action**

It is proposed to add suggested text "Local Sustainable Transport Fund package" and "building on the success of the Cycle Woking programme" to paragraph 4.52 (p49) of the Reasoned Justification of policy CS5: Priority Places.

**Policy: CS5 Priority**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

Add additional sentence at the end of paragraph 5.169: "Local Sustainable Transport Fund: Surrey County Council has been successful in obtaining £3.93M of Grant Funding through the Local Sustainable Transport Fund (Key Component) bid (July 2011) which has been focused generally in the Woking and Guildford (urban) areas. In addition, further funding could be obtained through the Large Bid of the same fund (June 2012)".

Add definition/explanation of the Local Sustainable Transport Fund to the glossary (p122-124). "Local Sustainable Transport Fund: has two key objectives; firstly to support the local economy and facilitate economic development, for example by reducing congestion, improving reliability and predictability of journey times or enhancing access to employment and other essential services; secondly to reduce carbon emissions, for example by bringing about an increase in the volume and proportion of journeys made by low carbon, sustainable modes including walking and cycling".

206 Core Strategy PD 4.44

**Representation**

New access road through Monument Way East and Monument Way West

The wording of policy CS5 should be altered to replace 'bring forward' with 'consider', as follows:

"In order to improve accessibility into and out of the Maybury and Sheerwater area, the Council will work with Surrey County Council to consider proposals for a new access road through Monument Way East and Monument Way West, as indicated on the Proposals Map.

This highway scheme has been proposed by the Borough Council and has not been formally considered by the County Council. Its delivery is dependent upon agreement by the County Council and the completion of a feasibility study. The County Council is in the process of reconsidering the future of several highway schemes in Woking that were previously safeguarded in the Woking Local Plan and will need to consider whether the Borough Council's proposals are compatible with county transport policy and decide its effect on and compatibility with the existing proposed scheme. The last sentence of the policy may also need to be modified to reflect this position.

**Representation Changes Necessary**

The wording of policy CS5 should be altered to replace 'bring forward' with 'consider', as follows:

"In order to improve accessibility into and out of the Maybury and Sheerwater area, the Council will work with Surrey County Council to consider proposals for a new access road through Monument Way East and Monument Way West, as indicated on the Proposals Map."

**Officer Response**

The need for the road has been established in policy CS5 and has been agreed by the County Council to form an essential part of the transport strategy for the area. The County Council has agreed to work in partnership to put in a planning application for the scheme and that process has already started. As such the scheme has passed the 'consider' stage and is something both authorities support.

It should be emphasised that a variation of the scheme is already adopted in the Woking Borough Local Plan 1999. The County Council has agreed to review the current proposal in the Local Plan 1999 for that area and replace it with the revised scheme.

On that basis it is proposed that the wording is retained.

**Council's Proposed Action**

**Policy: CS5 Priority**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

367 Core Strategy PD

No

**Representation**

1. Deprivation in south Woking

In Paragraph 1.3 the strategy states:

That 'pockets of deprivation at Sheerwater, Maybury and Lakeview' have been identified for priority action and investment. We recommend that Westfield is included in this 'priority' list given that according to the Surrey Families in Poverty Needs Assessment Old Woking, Kingfield and Westfield also have the same issues. Kingfield & Westfield having the second highest distribution of Children living in Poverty (19.9% vs a Woking Average of 11.4%) and a teenage pregnancy rate 3.5 times the Surrey average and nearly twice the Regional Average.

According to NHS research, alcohol and smoking related issues in Kingfield and Westfield are also higher than the national average.

**Representation Changes Necessary****Officer Response**

There has been extensive study and assessment in the area through a number of action plans to identify the priority places. The priority places and the need to direct resource here has been recognised by the Surrey Strategic Partnership and the Woking Partnership.

Maybury and Sheerwater have been identified as one of four Priority Places in Surrey. The Surrey Strategic Partnership (SSP) identified the four Priority Places in Surrey, based on a range of need indicators, which provide a focus for action and intervention, and the potential to co-ordinate partner resources to the areas of most need in Surrey.

The four places identified are:

- Merstham (Reigate & Banstead)
- Stanwell North/Ashford North (Spelthorne)
- Westborough (Guildford)
- Sheerwater & Maybury (Woking).

One of the Super Output Areas in Maybury and Sheerwater rank as the most deprived in Surrey. The area in general also fits into the general characteristics set out in the Index of Multiple Deprivation, produced by the CLG.

Through the work of the Woking Partnership, the Lakeview Estate area of Goldsworth Park has also been identified as a Priority Place to which resources should be targeted. It also ranks highly in the IMD and fits into the general definition which has been used to identify the priority places.

There is no such body of information for the Council to use to justify identifying Kingfield and Westfield in the category of a priority place. However the comments will be passed on to Woking Partnership and Surrey Strategic Partnership to consider and if necessary they will identify resources to address any issues in the area.

It needs to be emphasised the fact that some areas are not identified as priority places does not mean their needs will be ignored. The Council will continue to work with all of its partners to ensure inequalities in all areas of the Borough to address any disparity within the area

**Policy: CS5 Priority**

<b>Rep ID</b>	<b>Which Doc Does Comment Relate To</b>	<b>Page</b>	<b>Paragraph</b>	<b>Legally compliant</b>	<b>Sound</b>	<b>Test Of Soundness</b>	<b>Participate in Exam</b>	<b>Why Participate in Exam</b>
<b>Customer ID</b> 98	<b>First Name</b> Nicola		<b>Last Name</b> Cull				<b>On Behalf Of</b> Westfield Common Residents Association	

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	9	First Name	Last Name	On Behalf Of Burhill Group Ltd				
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12 Core Strategy PD

**Representation**

Burhill understands and supports the Council's objective to restrict inappropriate development on land in the Green Belt and father fully agrees with the Council's approach to reviewing the Green Belt land in the future for appropriate residential development. Burhill is pleased to note that allowing "appropriate" residential development on sites in Green Belt will need to be undertaken.

The Council have two major development site within the Green Belt where infilling and redevelopment for employment floorspace will be acceptable in principle and

**Representation Changes Necessary**

Encourage the Council to consider a similar approach to the developed sites employment sites for other sites in the Green belt which can be identified for residential development. The Council should acknowledge there may be instances where a strategic release of land from the Green Belt could actually be a more sustainable form of development than housing development on non-Green Belt Brownfield land.

**Officer Response**

The comments and support are noted. The Major Developed sites are existing major employment sites identified within the Green Belt, to allow for redevelopment and infill in principle. National policy supports this. The Council does not intend to extend this type of designation (except the Village of Mayford which is washed over by Green Belt) to residential development because it does not want to consolidate unsustainable activities at unsustainable locations. In terms of new residential development, the Core Strategy has identified the Green Belt as a broad location for future housing growth and the Site Allocations DPD will be the appropriate document to identify specific sites to be released from the Green Belt.

**Council's Proposed Action**



**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of
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30	Core Strategy PD					Justified
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**Representation**

Within this Strategy there is little evidence that protection of the Green Belt and other areas is going to be actively managed. There is no mention of working with local stakeholders such as Surrey Wildlife Trust to better manage and protect existing common land which has fallen into neglect since WBC ceased to employ a specialist team to maintain green areas.

It is appreciated that some Green Belt maybe required to meet future Housing Needs. In accordance with the new Localism Bill, the decision for such release of land should be made in conjunction with the local Residents Association.

**Representation Changes Necessary**

This Strategy therefore adds a sentence to state - This Strategy will be further reviewed following the introduction of the new Localism Bill and the outcomes of the Mole Valley Localism Pilot being developed in conjunction with the Surrey Strategic Partnership.

The proposals map designates areas in Westfield as 'urban' yet the Local Development Plan describes them as semi-rural. This should be corrected. Figure 3, Page 30 Areas identified for growth does not exclude Conservation areas; SNCI's; Flood Plains; Common Lands and Areas identified under CS19. Both this map and the Core Proposals Map should be updated

**Officer Response**

The overriding aim of the Green Belt policy is the retention of its openness, including the purposes of the Green Belt set out in PPG2. It is not for this document to set out specific management strategy regarding the maintenance of the land, particularly as the majority of this land is within private ownership. The policy provides sufficient framework to prevent inappropriate development that could be harmful to the integrity of the Green Belt.

The issues regarding the maintenance of common land is a separate matter, which is not appropriate to be addressed through the Core Strategy.

The Council is committed to carrying out a review of the Green Belt boundary. The Green Belt review will not occur until 2016. The Council will ensure that there is the appropriate public involvement when the review is carried out.

The identified areas for growth on the map, shown on figure 3 identifies the Green Belt as a broad area for growth. It is an area of search, from which specific sites will be identified. The requirements of policies CS7, CS8, CS9 and CS17 will ensure that designated sites and other environmentally sensitive sites are protected when the review is carried out.

As areas outside of the Green Belt, including Westfield, are by definition within the urban Area.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	21	First Name	Alfred	Last Name	Vice	On Behalf Of		
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**Representation**

It is national policy that Green Belt land and Recreational land selected for development should be replaced by similar area, Woking is unusual in having several areas of common land adjacent to the built up area, it would therefore be appropriate that replacement land should be chosen in all possible cases adjacent or very close to common land and added to the common. Thus the protection from further development accorded by inclusion in the Green Belt would be enhanced by its additional status s common land.

**Representation Changes Necessary**

After reference to the allocation of Green Belt status to land selected to replace an area of green belt taken for development there should be added the following, or similar:- such land will wherever reasonably possible be neighbouring or adjoining a present area of common land and will be added to such common and accorded the status of common land.

**Officer Response**

There is nothing within PPG2 or other relevant national planning policy which requires that any Green Belt Land lost as part of a Green Belt release is replaced by a similar are However, as set out in policy CS17 the lost of public open space (including recreational land) will not be permitted unless adequate or equivalent provision is made available in the vicinity, or if such open space could be enhanced. Furthermore there is a presumption against the loss of recreational land.

The Green Belt review will be informed by a comprehensive study to ensure that the parcels of land to be released will not compromise its integrity and purpose. Therefore any Green Belt release will not compromise the integrity and continued protection of the Green Belt. Due to this it is unlikely that any further mitigation methods, such as additional areas of common land would be considered necessary.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 22	First Name Helen		Last Name Murch				On Behalf Of	

47 Core Strategy PD No

**Representation**

In Policy CS10 the WCSPD seeks to meet the South East Plan (SEP) annual housing target for Woking of 292 dwellings. Surrey Heath Borough Council welcomes Woking's the intention to deliver the SEP housing targets.

It is noted that Woking has only been able to identify a 13 year supply of sites in its SHLAA and two Broad locations for Future Growth have been identified to help overcome the shortfall in the later part of the plan period; namely, Woking Town Centre and the Green Belt. Policy CS6 confirms that a green belt review will be carried out in 2016/17 to enable the Borough to identify land to meet the development requirements of the Core Strategy. Policy CS10 indicates that green belt sites will be released after 2012/22 to assist in providing for around 550 homes.

The SEP identified in Policy LF3 that selective reviews of the green belt may possibly be needed in Woking. The SEP directs the possible green belt releases to sustainable urban extensions. The WCSPD intention to release green belt to provide new sites for housing is understandable in light of the SEP policy and the fact that Woking is heavily constrained by Green Belt and urban areas. However, unlike the SEP policy, the Woking Core Strategy does not indicate where in the borough these releases may take place or identified what approach/criteria will be used to select them. Explanatory text at Para 5.56 indicates that the specific locations of the release will be determined through the Site Allocations DPD. It is considered that the broad location of the green belt releases is a matter that the Core Strategy should properly address. Without this direction Surrey Heath, and other interested parties, are unable to properly assess whether the policy will have an impact on their matters of interest.

Policies S6 and CS10 also suggest that Woking may be departing from the requirements of Policy LF3 of the SEP for green belt releases to be sustainable urban extensions. This is not clear but if it is the case then adequate justification has not been given for the policy relating to green belt releases and the provision of new housing.

At present the policy on green belt release is considered to be too ambiguous in terms of dealing with the location and nature of future green belt releases and not in accordance with regional policy. As such policies CS6 and CS10 are considered to be ineffective, inconsistent with national policy and thus unsound.

**Representation Changes Necessary****Officer Response**

PPS3 sets out that the Council is required to identify housing supply of specific, developable sites for years 1-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated. The Core Strategy has identified the Green Belt as a broad location for housing growth to meet housing need between 2022 and 2027 and intends to undertake this review in 2016/17. The Council 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.

It is true that policies LF3 and SP5 of the South East Plan highlighted a selective review of the Green Belt boundary, possibly an urban extension 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. The approach is necessary to ensure that the permanency of the Green Belt boundary is assured.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 26	First Name Rhian		Last Name Powell				On Behalf Of McLaren Group Limited	
58	Core Strategy PD	51		Yes	Yes			given the importance of the McLaren group to Woking, we consider we would be able to contribute to the examination debate.

**Representation**

Although the CS appears legally compliant and sound we consider the effectiveness of policy CS6 can be improved by referring to the special importance of the McLaren group as an established employment site within the green belt, and as one of the largest employers within the borough.

**Representation Changes Necessary**

Policy CS6 should include a paragraph to state 'the McLaren group operations headquarters is established within the green belt, north of Woking. This is a unique situation in recognition of the very special circumstances arising from McLaren group operations and their particular accommodation requirements, which cannot always be met in existing industrial estates or urban employment sites within the Borough. The council will continue to work with McLaren to seek to accommodate the groups specific requirements within the Borough.'

**Officer Response**

It is not considered that the site meets the criteria for a Major Developed Site in the Green Belt, set out in Annex C of PPG2. Any 'Very Special Circumstances' for future development of the site will be determined on the individual merits of a proposed development through the planning application process.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID 33	First Name Jean		Last Name Dare				On Behalf Of	Hook Heath Residents Association
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87	Core Strategy PD	51			No	More than 1 selected		
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**Representation**

CS6 states that the Green Belt will be protected from harmful development, but then is compromised by stating a requirement to review its boundaries in the period 2016/17 to identify land to meet the assessed need for affordable housing that will not be met by the levy on affordable housing.

This is a sleight of hand whereby the Green Belt will be protected by redefining it within ever smaller boundaries and building primarily social housing on the land removed from protection. This is a perverse strategy. It would be both economically and ecologically more sound to concentrate affordable housing in or close to the town centre where support can be provided more easily and at the same time the need for road travel reduced.

The now defunct southeast plan identified the land south of the Hook Heath Escarpment and Mayford Village as a potential site for future development. The Hook Heath Residents' Association would be strongly opposed to any attempt to resurrect this proposal, or indeed any proposal to encroach upon the Green Belt. With the increasingly high densities proposed for future development within the existing built up area the need for open spaces for recreational and environmental purposes becomes more important. The purpose of the Green Belt was and remains to prevent the unchecked expansion of urban areas. When the urban areas suitable for building have all been used, the only new construction permitted should be that which replaces or refurbishes existing buildings. Admittedly future growth would be restricted, but only a strategy of this kind is sustainable in the long term and consistent with the Council's green credentials.

**Representation Changes Necessary****Officer Response**

Officers do not see any 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.

The Local Authority's preference would be for any Green Belt release to help meet the boroughs family housing need, however such release has not been identified purely for affordable housing. Whilst the Council would prefer to locate new housing development within the urban area, close to the existing Town Centre, the Council's evidence base, which informs this policy clearly identifies that the future housing for the borough, particularly the need for family housing cannot be met within the existing Urban Area.

Policy SP5 of the South East Plan never specifically identified the land south of the Hook Heath Escarpment and Mayford Village as a potential site for future development. It does however 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. The Site Allocations DPD will be the appropriate document to identify specific sites for development. The Green Belt boundary review will inform this process.

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID 33	First Name Jean		Last Name Dare				On Behalf Of	Hook Heath Residents Association
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**Council's Proposed Action**

Customer ID 40	First Name Ronald Dawes		Last Name Mayford Village Society	R			On Behalf Of	
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258	Core Strategy PD	51	5.1.	Yes	No	Justified,Effective		
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**Representation**

Paragraph CS6 - Green Belt - needs an additional paragraph to state more clearly why Mayford is important in the protection of the Green Belt.

**Representation Changes Necessary**

Mayford is regarded as an important strategic gap between Woking and Guildford which needs to be retained as undeveloped Green Belt to prevent the coalescence of the two towns. This will be the Council's continued policy as it has been in the past.

**Officer Response**

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. The Village of Mayford is washed over by the Green Belt. It has been identified as an infill only settlement. The policy sets out clear criteria to guide development in the area. This same approach was adopted by the Woking Borough Local plan (1999). The Council is satisfied that this is a reasonable policy approach to take for Mayford.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	41	First Name	Louise	Last Name	Morales	On Behalf Of		
261	Core Strategy PD		Pg 51	CS6	No	No	Justified, Consistent with national policy	

**Representation**

Previously Carters Lane Sewage treatment works was GREENBELT - not a "major development within greenbelt" - nothing has changed, the sewage works are still discretely hidden behind hedges with only a few vehicular visits, very few staff, inconsistent of any "major development" description. It has fewer car visits and employs fewer staff than most golf courses or horticultural nurseries which are far more significant "developments"  
This new designation of the land does not reflect the low level of development on the site.

**Representation Changes Necessary**

Redesignate the land as green belt. Not a major development

**Officer Response**

The Sewage Treatments Works remains within the designated Green Belt, however it has been identified as a Major Developed Site within the Green Belt. Annex C of PPG2 has a list of examples of what could constitute a major developed site. This includes sewage treatment works. Only 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.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 49	First Name Douglas		Last Name Bellworthy				On Behalf Of	
283	Core Strategy PD	51	5.1 inset CS6	Yes	No	Effective		

**Representation**

Section 5.1 inset CS6: Green Belt paragraph 3 provides for Mayford Village to be designated as an infill only settlement in line with the previous designation in the LDF. Such development has already been carried out to the extent that the boundary of the settlement area as defined on the Proposals Map provides little opportunity for such development to be undertaken in line with the nature and character of the existing residential development.

**Representation Changes Necessary**

The boundary of the Mayford Settlement Area should be extended to include adjacent sites, specifically the Sunhill House site which is clearly part of residential area of "Mayford Village" and provides limited residential development opportunity without compromising the integrity of the Green Belt.

**Officer Response**

The Mayford Village settlement is identified as an infill only settlement. It is not intended to expand the existing village settlement boundaries to accommodate further development. The Village boundaries will therefore not be expanded as part of the Core Strategy.

**Council's Proposed Action**

Customer ID 50	First Name Mark		Last Name Carter				On Behalf Of	
290	Core Strategy PD	51		No	No	More		

**Representation**

Paragraph CS6. Insufficient housing land has been identified to fulfil regional requirements, meet housing need and provide flexibility in housing supply. The Green Belt boundary will have to be reviewed.

**Representation Changes Necessary**

Review the Green Belt boundaries.

**Officer Response**

The Council is committed to carrying out a review of the Green Belt boundary.

**Council's Proposed Action**



**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 52	First Name Peter		Last Name Sanders			On Behalf Of		

295 Core Strategy PD Yes Yes

**Representation**

The Green Belt's protection should be overriding, subject only to Government policy. When considering any one case for use of the Green Belt, consideration should be given to the impact on overall policy, and the precedents this sets in terms of adjacent areas or comparable areas, and not just to the case itself taken in isolation.

**Representation Changes Necessary**

**Officer Response**

The comments are noted. It is the purpose of the Core Strategy to set out the strategic aims for the Borough. Individual cases are considered through the planning application process.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 56	First Name David		Last Name Lander				On Behalf Of	David Lander Consultancy Ltd

306 Core Strategy PD 51 No No More

**Representation**

This objection is consequent upon our objection to Policy CS1 and relies on that representation

**Representation Changes Necessary**

The reference to the identification of the Green Belt as a potential future direction for growth should be deleted, leaving reference only to the intention to carry out a Green Belt review.

**Officer Response**

See response to policy CS1. For reasons set out within this response, the Council do not considered that the Green Belt should be removed as a future direction for housing growth.

**Council's Proposed Action**

307 Core Strategy PD 51 Yes No More

**Representation**

The identification of the Sewage Treatment Works as a major developed site is only justified in terms of its importance as a utility facility serving the town. The proposed wording allows for infilling and redevelopment without limitation to ancillary uses. In other words, the policy would allow non-ancillary uses which is wholly unacceptable in term of long-standing practice and national Green Belt policy. The final sentence of the policy is insufficient to overcome this problem.

**Representation Changes Necessary**

The designation of major developed site in respect of the sewage treatment works should be deleted. Alternatively, the allowance for infilling and redevelopment should be qualified as relating solely to purposes ancillary to sewage treatment.

**Officer Response**

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. As clearly set out in paragraph 5.5 it has been designated for the purposes of a sewage works and not for any other use. Any proposal for ancillary uses will have to relate to the identified use of the site. The development management process will ensure that this is the case.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 58	First Name Lynne		Last Name Coetzee				On Behalf Of	
310	Core Strategy PD	51		Yes	No			

**Representation**

Broadoaks, Parvis Road, West Byfleet and the Thames Water Sewage Treatment Works, Carters Lane, Old Woking are designated as Major Developed Sites in the Green Belt. This designation will allow limited infilling and redevelopment of the sites, without compromising the integrity of the Green Belt.

This land was previously designated greenbelt. I personally feel this new designation looks like the Council now think they might be able to build unlimited "redevelopment" etc on the site - which they have marked out as ALL the land owned by Thames Water, not just the area currently covered by the actual sewage farm buildings currently. ( see proposals map for details of how huge this area is).

**Representation Changes Necessary**

Please review and use integrity and try to be fair.

**Officer Response**

These identified Major Developed Sites still remain within the Green Belt. With specific regard to the Sewage Works, 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. In designating the site as a major developed site in the Green paragraph 5.5 of the Core Strategy is clear to restrict only infill and redevelopment opportunities largely to the footprint of the existing structures.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 76	First Name Alex		Last Name Chapman				On Behalf Of Terence O-Rourke Ltd	
95	Core Strategy PD	51			No	Justified		Ace Marcelle has an interest in the land at The Mount for redevelopment.

**Representation**

Object to policy CS6 as it does not require a Green Belt boundary review to be carried out until 2016/17 which will prohibit land being released from the Green Belt at the start of the plan period to meet the borough's development requirements. This finding that Green Belt housing sites will not be required until 2022-2027 does not appear to have been justified by the available evidence. A more appropriate strategy which would provide more certainty on appropriate locations for development would be for the Green Belt boundary review to proceed now to consider site suitability with the timing of release being subject to further scrutiny. This is in line with paragraph 138 in the draft National Planning Policy Framework which highlights that "The appropriateness of existing Green Belt boundaries should only be considered when a local plan is being prepared or reviewed". We also object to policy CS6 as there is no provision for affordable housing developments in the Green Belt. Policy CS6 should include such a provision to support the Council's stated position at paragraph 5.89:

"On the basis of the results of the SHMA and the SHLAA it is clear that the Council will not be able to deliver sufficient affordable housing to meet the level of identified need. The Council will therefore explore opportunities to deliver affordable housing from other sources of sites. On a limited number of occasions, the Council has approved applications for residential development which are exceptions to the adopted policies. On any future exception sites the Council will expect a substantially higher percentage of affordable housing as the primary benefit to balance the policy objection. The details will be determined on a site by site basis through negotiation. The council's policy position on exception sites should be clearer".

**Representation Changes Necessary**

'The Green Belt has been identified as a potential future direction of growth to meet housing need, in particular, the need for family homes between 2022-2027. A Green Belt boundary review will be carried out in 2011 2016/17 with the specific objective of identifying land to be released from the Green Belt to meet the development requirements of the Core Strategy as soon as is required. Affordable housing developments in the Green Belt may represent very special circumstances to justify inappropriate development subject to the application of relevant tests set out in PPG2: Green Belts and accordance with other policies in the Local Development Framework.'

**Officer Response**

The 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. The Council 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. The Council is fully aware of the significant unmet need for affordable housing. However, it is important that any target that is set has a realistic chance of being delivered. The Council recognises that the level of affordable housing provision set out in policy CS12 is not sufficient in the context local need that is estimated at about 499 new affordable homes per year. However, this is what can be realistically achieved without constraining the overall delivery of housing or damage to the environment. The Site Allocations DF will be the appropriate document to identify specific sites for development. The Green Belt boundary review will inform this process.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell			On Behalf Of	Natural England	

123 Core Strategy PD No Effective

**Representation**

We note that a Green Belt boundary review will be carried out in 2016/17 with the objective to identify land to meet the ongoing development requirements of the Core Strategy and welcome the commitment to ensure that any release of Green Belt land has no significant impacts on internationally designated nature conservation sites. Natural England would welcome early involvement in this review and we would remind the Council that sites within the Green Belt may have significant value for biodiversity which should be protected even if they are not covered by an international designation.

**Representation Changes Necessary**

**Officer Response**

Comments noted.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 80	First Name Kevin		Last Name Wilcox				On Behalf Of Crest Nicholson	
136	Core Strategy PD	51		No	No			It is considered that the issues raised are imperative to the soundness of the CS

**Representation**

Support the inclusion of a Green Belt Review as identified within the emerging CS. However, the timeframe is too late to provide a clear strategy for housing delivery over a 15 year period. At present it is uncertain whether there is potential to release Green Belt land in the future given various constraints likely to be. PPS12 states that the CS must be able to identify the resources required and have a realistic prospect of them being provided in the life of the strategy. If this is not the case then the strategy will be deemed undeliverable. It is unclear whether indeed any sites are deliverable in the Green Belt, therefore necessary for the Council to undertake the review, to ensure that a realistic prospect of housing delivery over the entire 15 year period. The draft NPPF, states that local plans should set out "opportunities for development and clear guidance on what or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan". The current approach is inconsistent with existing and emerging NPP and PPS12. There are appropriate sites within the Green Belt that are developable and deliverable in the short to medium term, which must be recognised in order to maintain a flexible housing supply.

**Representation Changes Necessary**

It is proposed that the Council undertakes its greenbelt review prior to submission of the CS to the Secretary of State. This will ensure that the identified broad location for housing delivery within the greenbelt to meet housing requirements from the 11 year period is achievable. At present the evidence base does not demonstrate a robust approach, which festively results in a CS to 2017 not 2027, and is therefore unjustified and would prove unsound at Examination.

**Officer Response**

PPS3 sets out that the Council is required to identify housing supply of specific, developable sites for years 1-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated. The Core Strategy has identified the Green Belt as a broad location for housing growth to release sites for development between 2022 and 2027 and intends to undertake a Green Belt boundary review in 2016/17. The Council 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 for 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. This approach is therefore compliant with both PPS3 and PPS12.

The Government has published its draft NPPF for consultation. The consultation period expired on 17 October 2011. It is likely that amendments will be made before it is finally published. However, it is expected that its main thrust will remain. It should be noted that the draft NPPF states that in relation to housing provision, the Council's are only required to identify specific developable sites or broad locations for growth for years 6- 10 and where possible, for years 11- 15.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 82	First Name John		Last Name Hack			On Behalf Of		
146	Core Strategy PD				No	More than 1 selected		To elaborate the points above, if requested, given extensive experience in the strategic planning field.

**Representation**

Based on the representation regarding housing (see policy CS10)

**Representation Changes Necessary**

delete the reference to the green belt as an area of growth

**Officer Response**

A comprehensive response to the respondents concerns are set out under policy CS10

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of	West Estates Ltd

158 Core Strategy PD

**Representation**

Whilst Taylor Wimpey West London and West Estates support the need to release green belt land to meet housing needs within the plan period, particularly family homes; they object to the Council's intention to reactively plan for this post 2016. PPS3 (para. 55) requires broad locations to be shown on the Key Diagram. This creates certainty and a policy hook for future DPD and SPD for these areas. This also allows the Council to release green belt land at an earlier phase if performance on SHLA sites is slower than anticipated in the early phases of the plan. This flexibility is required in Taylor Wimpey West London and West Estates view for the plan to be sound. It is noted that the Council have revised the Core Strategy (Nov 2010) to now include broad search areas in the policy and on the Key Diagram. However, the policy still defers consideration of this important forward land supply issue to 2016/17. There is no national planning policy justification for this approach given the uncertainty over some of the windfall sources of supply the Council rely upon to meet their housing requirements. This emphasises the importance of proactively planning for such releases in the emerging LDF.

**Representation Changes Necessary**

The policy should be amended to state a review will be undertaken and sites identified through the subsequent Site Allocations DPD.

**Officer Response**

The Core Strategy sets out a clear target for housing provision that is justified by evidence. The Council has carried out a Strategic Housing Land Availability Assessment to demonstrate that there is sufficient deliverable sites to deliver at least 13 years supply of housing. This is 3 more years worth of housing land supply than is identified in the Core Strategy to address any contingencies such as non-implementation. As such, the Council has a clear view about the quantity of housing development that it will have to release Green Belt land to deliver. This is estimated to be about 550 new dwellings. A Green Belt boundary review will be carried out in 2016/17 to release land to meet housing need between 2022 - 2027. The date of the review is about 5 years before the site(s) will be needed for development. This is sufficient enough to address all matters that will be necessary to be considered to ensure that the purpose of the Green Belt is not compromised by the release of the sites. It will also enable appropriate public involvement in the process.

**Council's Proposed Action**



**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 86	First Name Mike		Last Name Smith				On Behalf Of Woking Football Club	

175 Core Strategy PD

**Representation**

Policy CS6 should facilitate a review of green belt boundary significantly ahead of 20 16/17 to ensure that proper delivery mechanisms are identified in the Core Strategy. Failure to review the boundaries ahead of this time will cause unnecessary uncertainty in the ability of other policy objectives (such as sport and recreation) to be delivered.

**Representation Changes Necessary**

In summary, we believe that there are no suitable places within the urban area in which to relocate the football club and stadium and on that basis the opportunity should be taken in the plan to re-designate the Egley Road land for the purpose. This would enable the club and other sports to provide more modern facilities and for the community football teams and other clubs to continue to expand alongside the stadium. It would also remove concerns about local parking on match days.

**Officer Response**

See response to 'unclassified' representation made by the Football Club.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID 88	First Name H		Last Name Payne			On Behalf Of	Thomas Roberts Estate Ltd	
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180	Core Strategy PD			Yes	Yes			
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**Representation**

Policy CS6 is supported in principle; since the green belt clearly serves various key functions and it is important that it continues to be protected. It is also important to ensure, however, that housing needs and requirements are met and that within the plan period, sufficient available housing land is identified to enable requirements to be met. Policy CS10 sets out housing provision and distribution within the borough and identifies the need for approximately 550 dwellings to be provided within the green belt in the period post 2010. Accordingly, it is right that this need is also acknowledged within policy CS6.

Policy CS6 also states that there is a need to undertake a review of green belt boundaries and this is fully supported. However, it is not scheduled to take place until 2016/17.

**Representation Changes Necessary**

Given the issues that this is likely to raise; the consultation period likely to be required and the potential need to consider green belt land release before 2021 (or at the very least to have properly planned for its release well in advance), it is considered that the green belt review should be brought forward.

**Officer Response**

The Core Strategy proposes to review the Green Belt boundary to release land for housing development between 2022 and 2027. It intends to undertake a review of the Green Belt boundary in 2016/17. The Council 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.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 90	First Name James		Last Name Stevens				On Behalf Of Home Builders Federation	

187 Core Strategy PD

**Representation**

The policy is unsound as it is ineffective. The review will occur too late and needs to be carried out in tandem with the Core Strategy. We have concerns about the ability of Woking Town Centre to accommodate the scale of flat development and support the Council's intention to carry out a Green Belt review and its boundaries to ensure that the housing objectives can be secured.

We have not reviewed the SHLAA and the deliverability of the sites but would question whether the Council will be able to meet all its development needs on brownfield sites within the settlements and areas. This is especially true in the case of Woking Town Centre and a risk of market over-saturation and an over-supply of flats.

Woking has assessed that it has sufficient land for housing up to 2022 but it will require Green Belt release to accommodate a residual balance of 550 units post 2022. Rather than wait until 2016-17 this review must be brought forward as the Council must provide sufficient evidence that it can achieve the delivery of housing.

The wording of the policy on the Green Belt is inadequate for a 17 year plan as it does not amount to a firm commitment to review the Green Belt boundaries to meet the residual housing need post 2022 or to provide for alternative development options in case delivery on the brownfield sites does not occur .

The Council's review should be robust and that if it transpires that they are not achieving the housing land supply, then there is an opportunity for the policy to be flexible to bring forward Green Belt development prior to 2022.

Beyond 2025 the Council will be reliant solely on Green Belt land to supply its future residential needs. Accordingly the Core Strategy should acknowledge this and commit to identifying the specific sites necessary to support this target.

PPSI2 encourages matters of a strategic nature to be addressed in core strategies which will need to make clear spatial choices about where developments should go in broad terms. Consequently on the matter of the Green Belt review the Core Strategy needs to be more specific. It will need to specify the locations that will be assessed for boundary adjustment.

**Representation Changes Necessary**

The last paragraph of the policy is amended to read:

The Council's evidence base demonstrates that Green Belt development will be necessary to accommodate some of the Council's overall housing need, in particular the need for family homes. It is the Council's intention that there will be no Green Belt release prior to 2022 but it may prove necessary to bring forward the release of Green Belt sites before this date if delivery in the main development areas (outlined in Chapter 4) does not occur at the pace we anticipate. A Green Belt boundary review will be carried out in 2012 with the specific objective to identify the sites that are needed to meet the development requirements of the Core Strategy. The Council will ensure...

**Officer Response**

PPS3 sets out that the Council is required to identify housing supply of specific, developable sites for years 1-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated. The Core Strategy has identified the Green Belt as a broad location for housing to

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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<b>Customer ID</b> 90	<b>First Name</b> James		<b>Last Name</b> Stevens				<b>On Behalf Of</b> Home Builders Federation	
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release sites for development between 2022 and 2027 and intends to undertake a review of the Green Belt boundaries in 2016/17. The Council 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 for 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. This approach is therefore compliant with PPS3, PPS12 and also that contained within the draft National Planning Policy Framework.

Also see response to Home Builders Federation representation to Policy CS10.

**Council's Proposed Action**

<b>Customer ID</b> 92	<b>First Name</b> Barbara		<b>Last Name</b> Beck				<b>On Behalf Of</b> Campaign to Protect Rural England - Woking	
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209	Core Strategy PD	51		Yes	Yes			
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**Representation**

In general we support this policy on the Green Belt, but as amended by our objections and suggested rewording set out under Policy CS1.

CPRE Woking Branch believes the Council should protect and enhance the Green Belt. Reluctantly accept minor adjustments to the boundary after 2022 to meet the needs for family housing and including a large proportion of affordable housing.

We support the Council's decision to carry out a Green Belt review only when needed. Woking has sufficient developable housing land available in the first 5 to 10 years. Support the statement that any Review will not undermine "The Green Belt's purpose and integrity" and as one of the plan's objectives.

Resist the Green Belt Review occurring now. The CS is the Strategic planning document whose purpose is to set out the overall strategy and vision for the next 15 years. It is not the correct document for detailed site specific "allocations"

In order for any Green Belt sites to be identified in more than sufficient time to be available for development from 2022, the Council has set a very reasonable date of 2016 for undertaking a Green Belt review. This leaves more than enough time, for sites, which have been identified in the review, to be subject to consultation and the process of inclusion in a subsequent DPD.

**Representation Changes Necessary****Officer Response**

Comments and support noted. The points raised regarding the rewording of policy CS1 will be addressed under that policy.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 94	First Name Jeremy		Last Name Woolf			On Behalf Of	Martin Grant Homes Ltd	
220	Core Strategy PD			Yes	No	More than 1 selected		To respond to points raised and consider more update information.

**Representation**

Object to the content of the policy as drafted. We have consistently set out the need and justification for a local review of the Green Belt to the south of the Woking urban area. The suggestion that the boundaries could be reviewed at some future point in time is unsound and is contrary to the provisions set out in PPS12.

Policy SP2 of the South East Plan (SEP) identifies Woking as a regional hub and requires Local Development Documents to include policies and proposals that support and develop the role of the regional hubs and focusing new housing development and economic activity in locations close to or accessible by public transport to hubs. Policy SP5 sets out a review of Green Belt boundaries to the south of Woking.

Representation has referred to paragraphs 20.59, 20.60 and 20.83 SEP Panel's Report which sets out the merits of a Green Belt release on land to the south of the Woking urban area, along with Recommendation 9 of the Barker Review of Land Use Planning (Dec 2006).

The CS fails to undertake the appropriate assessment in accordance with the requirements set out in PPG2. The LPA were in the process of undertaking a Green Belt review in 2010 but is yet to be made available. This is major omission in the evidence base to preparation of the CS. For the reasons set out in response to Policy CS1, we do not accept that the approach to the Green Belt review, set out in Policy CS6 accords with the provisions set out in PPS12. Representation refers to Paragraph 2.12 of PPG2 which require that any proposals affecting Green Belts should be related to a time scale which is longer than that normally adopted for other aspects of the plan and that authorities should satisfy themselves that Green belt boundaries will not need to be altered at the end of the plan period. In terms of the CS we are referring here to a time period beyond 2026. PPG2 identifies the need for potential safeguarding of land between the urban area and the Green Belt which may be required to meet longer term development needs.

The CS must be based upon a thorough assessment of the housing land supply position and a review of the Green Belt to include land to the south of Woking, consistent with PPG2, paragraph 2.12 and Annex and Policies 5P5 and LF5 of the SEP.

The draft NPPF sets out a similar approach to the control and review of land within the Green Belt, making it clear that Green belt boundaries should be reviewed when the LDI is under review and at that time the LPA should consider the boundaries having regard to their intended permanence in the long term, so they should be capable of enduring beyond the plan period.

PPG2 and NPPF guidance is not being followed in relation to preparation of the Core Strategy as it relates to the boundaries of the Green Belt.

A local review of the Green Belt boundary should also be undertaken as an integral part of the CS, consistent with relevant national planning policy and the emerging RSS. The LPA has failed to substantiate and/or justify that there is no such requirement for a local Green Belt review now. There are major uncertainties as to the ability of the Council to meet even the SEP housing requirement let alone the higher figures implied by local research without the need for Greenfield releases. The CS should set out clear guidance upon the need for a review of the Green Belt, including reference to the need for an urban extension to be provided to the south of Woking. As a minimum the broad area to the south of Woking should be identified in the CS, including the circumstances in which the broad area would be released for development in helping to meet identified housing needs and allow for consideration of the same through the site allocations DPD and/or subsequent SPD. This will provide for the exploration of the acceptability of otherwise of broad areas of search as part of the pre-submission consultation process and thus identify the most appropriate and most suitable locations adjoining the urban area to the south of Woking to provide for the necessary urban extension(s).

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 94	First Name Jeremy		Last Name Woolf				On Behalf Of	Martin Grant Homes Ltd

The CS enables the merits of broad/strategic locations to be reviewed and assessed in terms of their suitability in providing for an urban extension(s). This is the only way in which the Council can meet its strategic housing requirement is through the expansion of Woking on Green Belt land to the south of the urban area. This policy approach should be given principal consideration including through preparation of a Green Belt review which should be undertaken to support preparation of the CS and should not be undertaken as a second tier document. This approach is supported by paragraph 4.5 of PPS12.

Representation referred in detail to Windsor and Maidenhead Borough Council CS and Inspector reported upon Windsor and Maidenhead's CS in 2007 which was found to be unsound. Consider that the case for a Green Belt release at Woking is even more compelling given the strategic role of the town as a Hub and its role in the wider London Fringe sub-region as identified in the South East Plan.

Our clients have a controlling interest in land west of Saunders Lane (SHLAA Site Ref: SHLAAMSGO16). They also own land to the north of Saunders Lane (SHLAA Ref: SHLAAMSGO17) which extends to approximately 10.3ha and has the potential to provide open space and/or SPA mitigation as part of the development of site SHLAAMSGO1

The land is available for development and can come forward in helping to meet identified housing needs in a sustainable location during the plan period. We are in undertaking a number of technical reports as well as preparing a masterplan for the site. A Transport Statement prepared in support of the site and submitted to the LPA with our SHLAA representations in June 2011 confirms the suitability of the site for development in transport terms. The site can be accessed satisfactorily off Saunders Lane. The traffic generated by the proposals can be accommodated on the surrounding road network; and has good accessibility to a range of facilities and services. It is therefore concluded that there are no highways or transport constraints that prevent the site from being allocated for residential uses.

**Representation Changes Necessary**

The wording of the policy could be as follows:

LAND TO THE SOUTH OF WOKING, AS SHOWN ON THE KEY DIAGRAM, IS IDENTIFIED FOR A SUSTAINABLE URBAN EXTENSION TO PROVIDE UP TO AROUND 250 DWELLINGS TOGETHER WITH ASSOCIATED INFRASTRUCTURE PROVISION. THE URBAN EXTENSION WILL BE BROUGHT FORWARD FOR DEVELOPMENT IN THE PERIOD PRIOR TO 2022 IF THERE IS DEMONSTRATED TO BE A SHORTFALL IN THE FIVE YEAR HOUSING LAND SUPPLY POSITION. THE DETAILED BOUNDARIES OF THE BROAD LOCATION TOGETHER WILL BE A MATTER TO BE DETERMINED THROUGH THE SUBSEQUENT SITE ALLOCATION DPD PROCESS. THE ASSUMPTION WILL BE THAT THE BROAD LOCATION WILL DELIVER A MINIMUM OF AROUND 250 DWELLINGS.

**Officer Response**

PPS3 requires the Council to identify specific, developable sites to meet years 1-10 of its housing supply, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated. The Core Strategy has identified the Green Belt as a broad location for housing growth to release land to meet housing need between 2022 and 2027. It intends to undertake a Green Belt review in 2016/17. 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 Core Strategy to deal with contingency that will arise from lack of specific sites coming forward. Consequently, the Council is satisfied that its policy approach is robust to enable its housing requirement to be delivered. The Housing Position Statement, the SHLAA and the assessment of housing need provides sufficient justification to support the approach taken. It needs to be clarified that there is nothing within PPS3 or PPS12 which compels Woking Borough Council to carry a Green Belt boundary review at a specified date. This approach is therefore compliant with both PPS3 and PPS12

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 94	First Name Jeremy		Last Name Woolf				On Behalf Of	Martin Grant Homes Ltd

The Government has published its draft NPPF for consultation. The consultation period expired on 17 October 2011. It is likely that amendments will be made before it is finally published. However, it is expected that its main thrust will remain. It should be noted that within the draft NPPF states in relation to housing provision, that Council's are only required to identify specific developable sites or broad locations for growth for years 6- 10 and where possible, for years 11- 15. The approach adopted by the Core Strategy is therefore not at odds with Draft NPPF.

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 potential suitable sites. It is not considered that the policies of the South East Plan object in principle to forming a comprehensive approach to the review.

In terms of the highlighted SHLAA sites. 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 is not a policy document and it will be for the Site Allocations DPD to allocate specific sites for development. As a principle, the Core strategy does not identify specific sites for development. For it to identify the proposed sites for development will compromise the outcome of the Green Belt Boundaries Review and/ or the Site Allocations DPD.

For these reasons it is not proposed to either change the date of the review of the Green Belt boundary or identify the proposed sites in the Core Strategy for residential development,

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

380 Core Strategy PD

**Representation**

We note that the strategy seeks to 'protect the integrity of the Green Belt'. There is little evidence that protection of the green belt and other areas is going to be managed.

In several cases the boundary of the green belt is inaccurately recorded in the maps, e.g. On Moor Lane the green belt actually extends to the northern boundary of Moor Lane where it joins seamlessly with the Common Land. It does not stop at the southern boundary of the road.

There is limited recognition of the Westfield Common as registered common land (registration record CL121) and that planning policies need to be adjusted accordingly to protect the common land and only permit lawful development under section 38 or section 16 of the Common Land Act.

The maps included in the core strategy document are materially inaccurate and fail to record the correct extent and boundaries of Westfield Common. (Map supplied) This shows the accurate boundary of Westfield Common to the north side of Moor Lane, extending to edge of the boundary of the house names 'Withays'. (Map supplied)

Woking Borough Council have a statutory duty to protect the common from inappropriate development and it is therefore beholden upon you to ensure that the maps included in the consultation document are accurate enough for policy development.

The consultation document curiously applies different policies to different parts of Westfield Common with the northern part designated Urban Open Space and the southern part as SNCI. This is incorrect – both areas are SNCI.

The official SNCI map for this area as supplied by Surrey Wildlife Trust (records all of Westfield Common as SNCI. (Map supplied). There is no justification for bifurcating Westfield Common into two areas and applying different planning policies to each. As registered Common Land, both areas are subject to the same requirements in terms of protection and allowable development. The northern part of Westfield Common has lost its SNCI status despite the fact that nationally important Great Crested Newts are recorded in its ponds. Surely this must remain SNCI to afford protection for Wildlife and Nature.

In particular care must be taken to ensure that no inappropriate permanent developments on Westfield Common are signed off at the local planning committee without the consent of the Secretary of State. Such development would be unlawful and could be challenged in Court at great expense to local tax payers.

The Council's policies must recognise that they are only the registered keepers of Westfield Common (a statutory duty to protect the common); that the land is not owned by Woking Borough Council and it is not theirs to exploit for development whether small scale or large scale.

We strongly require the core strategy to include and name the following SNCIs and their natural green state to actively protect them for the future enjoyment of the residents: Westfield Common, Mill Moor Common, Whitmoor Common.

We also strongly require the core strategy to recognise the requirement to provide statutory protection for registered common land and that the planning policies proposed recognise their status as such.

Protection of these areas must be included as part of the core strategy. Building high density developments adjacent to these sites will place an irrecoverable burden on these



## Policy: CS6 Green

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

areas which have been poorly managed by the council for decades.

The Westfield Common Residents' Association vision is to protect Westfield Common and its surrounding commons, in their entirety, from further erosion by unwanted demand for space by the council. We are working in conjunction with SWT (Surrey Wildlife Trust) and we run regular clean ups (a council responsibility), social gatherings and nature interest walks for the community. None of this vision, has been taken into account by the council or its representatives whose 'ward' boundaries dissect this precious common land.

In particular the impact of the vast developments at Gresham Mill, Hoe Valley and Moor Lane will all have a significant detrimental affect on the flora and fauna adjacent to the SNCIs. None of these developments or data including their impact has been taken into account in putting together the core strategy.

In the strategy document, golf courses are noted to be a main occupier of green space. Retaining golf courses are preferable to using these areas as brown field sites for development. We also respectfully remind the council that they approved the use of green belt for golf courses and have effectively created a future source for development needs. One of our key issues is access to open areas, as developers and new owners will seek to restrict natural footpaths and 'close off' their new desirable homes.

We also note that the proposals map designates areas in Westfield as 'urban' yet the Local Development Plan describes them as semi-rural.

### Representation Changes Necessary

#### Officer Response

This representation, whilst it refers to the integrity and maintenance of the green belt has largely raised issues regarding Common Land. The designation and maintenance of Common Land is a separate procedure, which is outside of the scope of the Core Strategy.

The land to the north of Moor lane is designated 'Urban Open Space' in the existing Proposals Map which forms part of the Local Plan 1999. The area to the south is designated as Green Belt. These boundaries have not been changed from the Local Plan nor has the areas designated as Sites of Nature Conservation importance. Through policy CS7 the Council seeks to protect SNCI from adverse impact of development. The SNCI are identified in the proposals map. It is unnecessary to highlight particular areas (such as certain commons) which fall under this designation. The Council has engaged Surrey Wildlife Trust to carry out a rolling programme of the review of SNCI sites. The Council will ask them to review this site in the context of the representations that have been made.

The points raised about the boundaries on the Proposals Map, this has been reviewed and the green belt boundary does not stop at the southern boundary and does extend to the northern boundary of Moor Lane. It is agreed that the Common Land boundary should be extended to the edge of the boundaries of the 'Withays' houses (as shown in Figure 1 of the representation). The northern part of Westfield Common is already designated as SNCI on the Core Strategy Proposals Map. The SNCI boundaries were supplied as electronic GIS layer files by the Surrey Wildlife Trust. The northern part of Westfield Common is also designated as urban open space, this designation is not able to be applied to the southern part of the Common as it is not within urban area.

Comments regarding Golf Clubs are noted, matters of rights of way are considered though the Development Management process.

All areas outside of the Green Belt are by definition in the Urban Area.

### Council's Proposed Action

It is proposed that the Proposals Map be amended to extend the Common Land boundary to the edge of the boundaries of the 'Withays' houses (as shown in Figure 1 of the representation from Westfield Common Residents' Association).

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

408 Core Strategy PD

**Representation**

In addition, we feel that the description of policy given in CS1 and Figure 3 which identifies the Green Belt as a “Broad Location for Growth” is both highly misleading and technically incorrect. It directly contravenes the very long standing policy in PPG2 and carried forward in the Draft NPPF that green belts should be permanent, be altered only exceptional circumstances and be capable of enduring beyond the plan period. It also seems inconceivable that a broad description of growth of the extent proposed would be able to meet the SEA Directive without localional specificity and the examination of alternatives. Therefore, a boundary review should be undertaken as part of a review of the development plan, and not all areas of green belt not covered by specific restrictive designations identified as possible for growth. The wording of the policy and the relevant diagram should be amended. We are also concerned that:

There appears to be a misunderstanding of the concept of green belt in the Plan, evidenced by the Proposals Map including the land on which a car factory and research centre stands (McLarens) as designated Green Belt, and

Inadequate or inaccurate descriptions of the policy will attract unnecessary planning applications throughout the green belt, causing unnecessary planning uncertainty, wasting council and community resources on processing applications and appeals and risking significant environmental harm in and beyond the Borough.

**Representation Changes Necessary**

**Officer Response**

The Council do not see any 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. PPS3 sets out that the Council is required to identify housing supply of specific, developable sites for years 1-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated. The Core Strategy has identified the Green Belt as a broad location for housing growth to release sites for development between 2022 and 2027 and intends to undertake this review in 2016/17. The Council 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 for 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. This approach is therefore compliant with both PPS3, PPS12 and also that the draft National Planning Policy Framework.

It is not considered that there is any misunderstanding regarding the concepts of the Green Belt within the Core Strategy. The broad location identified in Figure 3 is an area of search from which specific site will be identified. There are robust polices and as polices CS6, CS7, CS8 and CS9 to ensure that environmentally sensitive sites, including those covered by the SEA Directive are protected when the Green Belt boundaries review is carried out.

The departure from the Development Plan to allow the McLaren Head Quarters was a previous decision taken by the Secretary of State, in which it was considered that Very Special Circumstances existed to outweigh the harm to the Green Belt.

It is considered that this policy is in line with National Planning Policy and individual planning applications are required to be determined in accordance with these policies.

**Council's Proposed Action**

**Policy: CS6 Green**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 100	First Name Carmelle		Last Name Bell			On Behalf Of	Thames Water Utilities Ltd	

431 Core Strategy PD Yes Yes

**Representation**

Thames Water fully support the identification of Woking Sewage Treatment Works (STW) as a major existing developed site (MDS) in the Green Belt.

**Representation Changes Necessary**

**Officer Response**

Comments of support noted.

**Council's Proposed Action**

**Policy: CS7 Bio**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	8	First Name	Pauline	Last Name	Marshall	On Behalf Of		
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**Representation**

The area between Chobham Road/Guildford Road and borough boundary with Surrey Heath should be a conservation area. Also Waterer's Park, Barley Mow Woods. The land on the Mount between Chobham Road and public footpath past the Priory has a large badger sett, bats etc on it. I understand this piece of woodland at the top was ancier woodland. The trees here have been left where they fell and therefore there would be very interesting bugs there. Although this land is green belt it needs something else to protect the protected species etc. I gather the Woodland Trust would have preferred this land to the one they were given because it was much more interesting.

**Representation Changes Necessary**

None proposed.

**Officer Response**

Policy CS7 Biodiversity and Nature Conservation covers flora and fauna and aims to conserve and improve habitats.

Badgers and badger sets are protected by the Countryside and Wildlife Act 1981, therefore there is existing guidance in place to protect them.

No representations on the Core Strategy Publication Document have been received from the Woodland Trust regarding this particular issue.

Policy CS20 deals with Heritage matters in Woking Borough, such as Conservation Areas and Listed Buildings.

The designation of new Conservation Areas or the review of existing ones will be done by the Council through Conservation Area Appraisals. The representation could be considered as part of this process.

**Council's Proposed Action**

**Policy: CS7 Bio**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of		

31 Core Strategy PD Justified

**Representation**

This Core Strategy is welcomed as to date there is little evidence that this has been followed by WBC. To ensure this does happen, particularly for SNCI's it is requested that the Core Strategy include and name the following SNCI's and their natural green state to actively protect them for the future enjoyment of the residents:

- Westfield Common
- Mill Moor Common
- Whitmoor Common

Protection of these areas must be included as part of the Core Strategy. Building high density developments adjacent to these sites will place an irrecoverable burden on these areas which have been poorly managed by the council for decades. The Westfield Common Residents' Associations vision is to protect Westfield Common and its surrounding commons, in their entirety from further erosion by unwarranted demand for space for development. The Residents Association is working in conjunction with SWT and run regular clean ups (currently a council responsibility), social gatherings and nature interest walks for the community. In particular the impact of the vast developments at Gresham Mill, Hoe Valley and Moor Lane will all have a significant detrimental affect on the flora and fauna these adjacent SNCI's. None of this vision has been included within the Woking 2027 documentation

**Representation Changes Necessary**

None proposed.

**Officer Response**

It is not clear what the respondent regards 'there is little evidence that this has been followed by WBC.'

The Core Strategy offers in principle protection of SNCI, it does not list every designated site in the Borough. However, SNCI are identified on the Proposals Map, with a range of other environmental designations and policy CS7 refers to that. The policy as worded is therefore sufficient to protect those designated sites..

SNCI's are evaluated on behalf of the Council by the Surrey Wildlife Trust, in a rolling programme.. As a result some sites are removed as SNCIs and further sites can be added as having SNCI status.

In terms of the sites cited, the development management process will ensure that proposed development will not have adverse impacts on them and/or any impacts are fully mitigated.

**Council's Proposed Action**

**Policy: CS7 Bio**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	43	First Name	Robert	Last Name	Palgrave	On Behalf Of
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275	Core Strategy PD			Yes	No	Effective
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**Representation**

In this policy, there is no mention at all of trees. This is significant since local authorities through Development Control have considerable impact on how trees are managed, both on their own land and on non-Council land. The policy sees fit to identify particular animal species like bats, badgers and newts and habitats like heathland but is silent about trees in general. This is inconsistent in itself, and more so since the Climate Change Strategy Action Plan now includes a specific reference to the management of trees, viz:

Monitor and promote the Council's approach to tree management with reference to relevant policy (e.g. Defra Strategy for England's Trees, Woods and Forests) and good practice, and the Council's climate change objectives. Advocate tree management practices that recognise the contribution of trees to temperature control, CO2 absorption, pollution interception, flood management, biodiversity, and as a resource for renewable energy.

**Representation Changes Necessary**

None proposed.

**Officer Response**

The importance of trees has been emphasised in Policy CS24 by adding the following amendment:

"Trees form an important part of the landscape fabric of the Borough. They provide an important habitat for a variety of species, have a positive impact on the water cycle through their water carrying capacity and slow-down of surface run-off, enhance the amenity of the area, absorb carbon dioxide and other pollutants and provide urban cooling through crating shade and reducing ambient temperatures. The Council will seek the retention of existing quality trees (except where they are dead, dying or dangerous) and encourage the planting of new ones where it is relevant to do so. New trees must have sufficient root volume availability, appropriate root management, irrigation, drainage an aeration in order for the tree to thrive. The Council's forthcoming Tree Strategy will set out more detail".

It is not intended to repeat this in policy CS7. However, it will be helpful if the biodiversity value of tress can be highlighted in the reasoned justification to the policy.

**Council's Proposed Action**

It is proposed that paragraph 5.25 (of the reasoned justification to policy CS7, p57) should be amended by adding the following text:

"The Council recognises the importance of trees in providing habitat for a number of species and will seek to retain existing tress and encourage planting of new ones where it is necessary and appropriate to do so".

**Policy: CS7 Bio**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell				On Behalf Of	Natural England
124	Core Strategy PD			Yes	Yes	Effective		

**Representation**

CS7: biodiversity and nature conservation

Natural England strongly supports the inclusion of this policy and we have greatly appreciated the opportunity to work closely on it with Council officers over the last eighteen months. We are pleased by the number of positive additions which have been incorporated when compared to earlier drafts. Overall the policy has moved away from a narrow focus on the protection of designated sites and now goes much further towards addressing the need to conserve and enhance biodiversity across the Borough as a whole.

**Representation Changes Necessary**

None proposed.

**Officer Response**

Comments welcomed.

**Council's Proposed Action**

**Policy: CS7 Bio**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of	Environment Agency

110 Core Strategy PD 57 5.27

**Representation**

We welcome the inclusion of Surrey Biodiversity Opportunity Areas.

**Representation Changes Necessary**

None

**Officer Response**

Comments welcomed. Paragraph 5.27 sets out the importance of Biodiversity Opportunity Areas.

**Council's Proposed Action**

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113 Core Strategy PD 5.24

**Representation**

Great Crested Newts should be mentioned here, instead of just newts.

**Representation Changes Necessary**

Great Crested Newts should be mentioned in Policy CS7.

**Officer Response**

Policy CS7 Biodiversity, great crested newts will be added to paragraph 5.24.

**Council's Proposed Action**

It is proposed that the second sentence of paragraph 5.24 (p56), which forms part of the reasoned justification of policy CS7, be amended by adding 'Great Crested' before newts.



**Policy: CS7 Bio**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

115 Core Strategy PD 5.25

**Representation**

It is not entirely clear whether the information a developer must provide on biodiversity relates to what would be perceived as a Phase I or Phase II study. This should be quantified and we suggest the following amendment included in the changes necessary box.

**Representation Changes Necessary**

Add to the sentence: 'including species and habitats surveys where necessary' so the sentence reads: 'The council will require the prior assessment of the development site by the developer to provide information on species, including species and habitats surveys where necessary, and features of the landscape important to Woking's Biodiversity.'

**Officer Response**

For consistency the proposed changes are acceptable.

**Council's Proposed Action**

It is proposed that the last but one sentence of paragraph 5.25 will be amended to read: 'The council will require the prior assessment of the development site by the developer to provide information on species, including species and habitats surveys where necessary, and information on features of the landscape important to Woking's Biodiversity.'

400 Core Strategy PD 57 5.26

**Representation**

We support the inclusion of paragraph 5.26 and the mention of river corridors and buffer zones. These form important landscape and biodiversity corridors and is in accordance with PPS9 - paragraph 12. Also this paragraph and the supporting policy CS17 go further than national policy by specifying distance and will provide additional support once PPS9 is withdrawn.

**Representation Changes Necessary**

None put forward.

**Officer Response**

Comments welcomed. Woking Borough recognises the importance of river corridors and associated buffer zones.

**Council's Proposed Action**

**Policy: CS8 SPA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
342	Core Strategy PD	59	5.35	Yes	No	Effective		

**Representation**

Almost the whole of Woking is within 5km of a SPA and the entire town centre is comfortably within 5km of the largest SPA on Horsell Common, most of it half this distance. Since the town centre has been designated an area for high-density high-rise housing, mitigating measures green spaces MUST be provided in the town centre itself. Many of the existing trees and planting beds in the town centre are of poor quality and there are no existing green spaces in the town centre, contrary to CS 5.132 Definition of Infrastructure, CS 5.146, CS 5.150 and SA 5.2.

**Representation Changes Necessary**

The town centre is to a large extent cut off from the surrounding town by the railway line, the Basingstoke canal, and Victoria Way, a busy dual carriageway with limited crossing points. Therefore, the green spaces nearby the town centre are not as accessible as they would otherwise be. The only solution is to provide green space within the town centre as part of its redevelopment (no more young performers dancing on concrete in the town square or playing in an out-of-the-way bandstand amongst indifferent lunchtime smokers). Such recreational areas would be transformational for the town centre and hugely improve its experience for residents, visitors and shoppers. Green space(s) could be accommodated as part of a robust redevelopment programme.

**Officer Response**

All of Woking Borough is within 5 kilometres of an SPA or designated as SPA.

The mitigating green space is known as Suitable Accessible Natural Greenspace (SANG). SANG has to meet the requirements of Natural England; the Government's advisory body. Any open space within Woking town centre would not meet the space threshold as set out by Natural England.

Policy CS17 open space, green infrastructure, sport and recreation sets out the importance of open spaces across the Borough.

An Area Action Plan is being prepared for the town centre, the environment of Woking town centre will be incorporated as part of this work.

**Council's Proposed Action**

**Policy: CS8 SPA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID 78	First Name Heather		Last Name Twizell			On Behalf Of	Natural England	
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107	Core Strategy PD				No	Consistent with national policy		
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**Representation**

Policy CS8 does not clearly reflect all key elements of Policy NRM6 of the South East Plan.

The SE plan is proposed to be revoked once the localism bill is enacted. This will leave the specific strategy solution which ensures that further residential development will not have a significant adverse effect on the Thames Basin Heaths SPA not covered by any national or regional policy. Without the support of the tier of planning policy it is vital the comprehensive policy protection of the TBH SPA is embedded in the CS. We recognise the commitment that the Council has already made in including Policy CS8 but we believe this needs to be strengthened in certain areas to effectively fill the policy gap which will be left by NRM6 on revocation of the RS.

**Representation Changes Necessary**

To make the CS sound additions need to be made to CS8 and the HRA needs to be extensively revisited. Natural England is committed to working with the Council to resolve these issues as soon as possible.

**Officer Response**

It is unfortunate that Natural England do not highlight any issues that they consider are contained in South East Plan policy NRM6 and are missing from Policy CS8. Particular as representation 112 from Natural England states that policy CS8 'captures many of the key aspects of NRM6....' They have also suggested some changes to make it SEP compliant, which the Council has responded to (see response to representation ID 112).

Policy NRM6: Thames Basin Heaths Special Protection Area from the South East Plan has been distilled into policy CS8 in the Core Strategy. The South East Plan policy NRM6 has been reviewed in comparison to CS8. It is considered that all of the key issues in the policy box have been thoroughly covered in CS8. Obviously in the supporting text of policy NRM6 there is a great amount of detail, this is included in the introduction to the Core Strategy SPA policy, reasoned justification and the delivery strategy.

SPA is a complex subject. A strategic document such as the Core Strategy cannot cover all of the matters of detail. Therefore Policy CS8 signposts people to the Council's TBHSPA Avoidance Strategy which gives in depth information regarding what the SPA designation is, the mitigation in the form on Suitable Accessible Natural Greenspace (SANG), the tariff and when the SPA Strategy will be reviewed.

The representative from Natural England that made the above comment and the consultants that undertook the Habitats Regulation Assessment (HRA) on behalf of Woking Borough Council are meeting to discuss the content of the Habitats Regulations Screening and the assumptions that have been made in the Assessment.

This objection to the HRA may be withdrawn once the discussions have taken place. The consultants have provided further clarification to address their concerns.

**Council's Proposed Action**

**Policy: CS8 SPA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell			On Behalf Of	Natural England	

106 Core Strategy PD No More than 1 selected

**Representation**

The supporting HRA is not sufficiently clear for it to be ascertained that the Core Strategy will not adversely affect the integrity of any European site.

It is our view that this lack of effective assessment under the Habitats Regulation means that the Core Strategy is unsound. It is not justified as it is not founded on a robust and credible evidence base nor is it effective because of this lack of evidence is an impediment to delivery.

**Representation Changes Necessary**

None proposed.

**Officer Response**

The representative from Natural England that made the above comment and the consultants that undertook the Habitats Regulation Assessment (HRA) on behalf of Woking Borough Council are meeting to discuss the content of the report and the assumptions that have been made in the HRA.

This objection to the HRA may be withdrawn once the discussions have taken place.

**Council's Proposed Action**

**Policy: CS8 SPA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell				On Behalf Of	Natural England

112 Core Strategy PD No Effective

**Representation**

Overall we are pleased with the work that the Council has put into drawing up this policy. It captures many of the key aspects of NRM6 and we are pleased to see reference to the Council's Avoidance Strategy, the TBH SPA Delivery Framework and the precautionary principle. It is our view that with some small additions this policy will suitably fill the gap that will be left by NRM6 when the RS is finally revoked. These alterations are in the changes necessary box.

**Representation Changes Necessary**

The last sentence of the boxed policy text can be removed as this duplicates the legislation and the policy states earlier that only development which will not give rise to an adverse effect on site integrity will be permitted.

It should be stated explicitly that avoidance measures must be delivered prior to occupation and in perpetuity.

Although the policy makes reference to currently accepted mitigation measures (such as SANG) being agreed with Natural England it should also advise that any use of differing standards (such as alternative mitigation measures or revised distance thresholds) must also be agreed with Natural England. This will be important to ensure consistency between relevant authorities once the RS is gone.

**Officer Response**

The Council is pleased that Natural England are content with the policy.

In terms of the alterations:

The last paragraph of the policy sets out that proposals with potential significant impacts will be subject to Habitats Regulations Assessment, to determine the need for Appropriate Assessment. It is common for key themes to be repeated in the policy and reasoned justification supporting the policy. Many applicants are not familiar with the complex legislation that covers SPA. It would be helpful to retain the sentence to emphasise this requirement.

The policy already refers to mitigation measures being agreed with Natural England. The last sentence of the second paragraph clearly emphasises that mitigation measures to address the adverse impacts of development on the SPA will have to be agreed with Natural England. No further purpose will be served by repeating this in the policy. Furthermore, Paragraph 5.39 states that information about SANG land and financial contributions is set out in greater detail in the SPA Avoidance Strategy. There is much more information in the SPA Avoidance Strategy about mitigation measures and the role that Natural England has in their development.

Natural England has suggested, and this has been agreed by the TBH Joint Strategic Partnership Board that it will require a twin strategy of SANG provision and Strategic Access Management and Monitoring (SAMM) to mitigate the adverse impacts of development on the SPA. Natural England has a programme of works to be implemented with SAMM contributions. Not all of the works will be carried out prior to occupation and it will be misleading to put that caveat in the policy without further clarification about this. Regarding SANGs, contributions are secured as planning applications are granted consent. Planning applications are often not supported when there is not SANG capacity to accommodate them. This is clarified in the Avoidance Strategy.

**Council's Proposed Action**

**Policy: CS8 SPA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 80	First Name Kevin		Last Name Wilcox			On Behalf Of	Crest Nicholson	
145	Core Strategy PD	58		No	No	More than 1 selected		It is considered that the issues raised are imperative to the soundness of the CS

**Representation**

Savills, on behalf of Crest Nicholson, is concerned that the current approach to preventing adverse effects of the TBHSPA from planned development is not robust or based on credible evidence and is therefore not justified in PPS12 terms. The TBHSPA Avoidance Strategy 2010-15 does not identify a suitable amount of SANG to account for total housing allocations over the plan period. It is not sufficient to simply recite Natural England guidance on the approach to mitigate measures required to prevent any adverse effects on the TBHSPA. The approach defined in policy CS8 and the Avoidance Strategy 2010-15 does not accord with Natural England requirements to demonstrate that the impact of residential development on the TBHSPA can be effectively mitigated. It is also likely to be contrary to PPS9: Biodiversity and Geological Conservation.

Within the TBHSPA Avoidance Strategy produced by the Council page 5 indicated that the whole of the Borough falls within the Outer Exclusion Zone of the SPA which is with 400m -5km of an identified TBHSPA. This means that any proposal for housing development will need to demonstrate avoidance measures such as SANG provision. However the Strategy states "the avoidance measures required, location, programme of works, timetable and funding will therefore be known on submission of a planning application, and relevant residential development will therefore only be permitted if it conforms to the agreed Avoidance Strategy" para 2.13.

Although there are sites shown as areas for SANG provision across the Borough the Strategy recognises that there is currently insufficient funds to bring them up to SANG standard whilst much of the land is already used for recreational purposes and would therefore require a percentage of discounting. It is clear therefore there is not a comprehensive strategy that demonstrates appropriate provision of SANG to mitigate the impact of proposed housing over the Plan Period. The absence of these "key decisions" and strategic approach to delivery puts at risk the required delivery of development.

The SPA Avoidance Strategy does not provide an appropriate timetable to the delivery of identified SANG provision. The strategy therefore does not accord with the Habitat Regulations test, Natural England or the Thames Basin Heath Joint Strategic Partnership Board advice. Paragraph 4.14 of the SPA Avoidance Strategy explicitly states "there must be certainty that the identified avoidance measures will be taken". Savills on behalf of Crest Nicholson, therefore questions the approach to preventing adverse effects on the TBHSPA through the core strategy which puts into question the soundness of the plan.

**Representation Changes Necessary**

To ensure that the Core Strategy is found sound at examination it is important that the Council formulates a robust strategy and timeframe to mitigate the impact of proposed development in TBHSPA. It is important that the Council can demonstrate that housing numbers over the plan period, which are likely to have significant effect on the integrity of the TBHSPA, can be mitigated against. If this is not achieved then the inspector can not find the CS sound as there is no certainty that the specified amount of housing can be delivered. There is therefore a risk that the Council is not able to demonstrate a five or fifteen year housing land supply.

Further work must be undertaken to identify appropriate SANG for the quantum of housing proposed over the Plan period. The current TBHSPA avoidance strategy 2010-15 should be updated to provide a robust approach to the management of the SPA. It is important that the updated document includes a programme of implementation with planning proposals linked to specific works required to bring forward SANG land which mitigates the impact often proposed development. There is a grave concern that not to do so will jeopardise the soundness of the CS at Examination.

**Policy: CS8 SPA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 80	First Name Kevin		Last Name Wilcox				On Behalf Of Crest Nicholson	

**Officer Response**

Woking Borough Council's current approach to TBHSPA and policy CS8 is considered to be robust and based on credible evidence.

All of the requirements of the Thames Basin Heaths Delivery Framework (agreed by the JSP Board 27/3/08) including the aims, objectives and key principles have been met. The Council is an active member of the Joint Strategic Partnership Board regarding TBHSPA matters. Woking Borough Council takes a similar approach to the other SPA affected LPAs.

In terms of policy CS8 and the Avoidance Strategy not according with Natural England's requirements to demonstrate the impact of residential development on the SPA can be effectively mitigated. Natural England; the Government's advisory body on SPA matters are happy with the content of CS8 and have been involved in the content and development of the policy from the Core Strategy's issues and options stage. Natural England have commented at every consultation stage of the Core Strategy, following each comment the majority have been incorporated into the Core Strategy regarding SPA, biodiversity and water courses. For example at the request of Natural England the biodiversity policy was split into a biodiversity policy and a separate policy for TBHSPA.

The respondent states that Policy CS8 is likely to be considered contrary to PPS9, unfortunately the respondent does not explain how it is contrary to the national guidance. Woking Borough Council deems that the requirements of PPS9 have been met. None of the specific consultation bodies have responded that PPS9 has not been satisfied.

Paragraph 2.13 of the SPA Avoidance Strategy explains that the avoidance measures required will not be known until a planning application is submitted. The Avoidance Strategy explains that as different SANGs may be used across the Borough, new SANGs are added, the Retail Price Index increases or decreases each year and other variables. The following paragraph goes on to explain that the Council will accept offers of land that if acceptable with NE can be used as SANG. Until it is known the type of mitigation that is being agreed for a particular site.

The respondent goes on to write that there are sites shown as areas for SANG provision and the Strategy recognises that there are insufficient funds to bring them up to SANG standard. This quote provided by the respondent cannot be found in the SPA Avoidance Strategy. There are financial costs in ensuring that SANGs are brought up to the standard that NE requires. However this cost is met by the SPA tariff that is paid by developers for each new housing unit.

There is no requirement to provide sufficient SANG land over the plan period. The aforementioned Thames Basin Heaths Delivery Framework states at paragraph 12.5 'sufficient SANG should be provided in advance of housing occupation to ensure that there is no likely significant effect on the SPA....' Sufficient SANG is open for interpretation by each Council; no hectares, timeframes or quantum is provided in the Framework.

Page 4.10-4.13 on page 14 of the Avoidance Strategy sets out proposed SANGs and timescales where the Council is in advanced level discussions with the landowners:

- Martins Press
- Heather Farm
- Hoe Valley Scheme

Since the Strategy was adopted 3 further SANGs are in the pipeline and will be part of the Council's SANG portfolio. The SANGs that are currently in development have a low recreational usage; therefore a small amount of discounting is required.

**Policy: CS8 SPA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 80	First Name Kevin		Last Name Wilcox				On Behalf Of Crest Nicholson	

The SPA Avoidance Strategy is not required to provide a timetable for the delivery of new SANG provision.

It is not set out in any planning guidance that Local Authorities have to provide enough SANG for the life of a DPD. The Council regards that it can demonstrate that sufficient SANG can be found to support the housing number over the plan period of the Core Strategy.

In terms of the respondent's comments about updating the SPA Strategy, section 6 titled 'reviewing the interim strategy' on page 23. At paragraph 6.2 of the Avoidance Strategy it states 'the Council will monitor the sites to ensure that sufficient SANGs area can be provided.' It goes on to provide detail on monitoring of SPA and SANGs, how the tariff will be reviewed (paragraph 6.3), and it will look at providing avoidance measures in a reasonable time (para 6.4). This section sets out that once the Core Strategy is adopted the Council will prepare a Supplementary Planning Document relating to SPA, SANG and SAMM.

As at 15 September 2011, there is 10.56 years worth of SANG, this is based on the three existing SANG and three SANG which are to be adopted by the Council in the next year. Woking Borough Council is in advanced discussions about acquiring further SANGs across the Borough. Obviously if these come forward there will be more SANG capacity. The process of identifying and adopting new SANG is an ongoing process.

It is not anticipated that all of the housing will be delivered at the same time, looking at the housing trajectory all of the SANG will come on stream before the development will occur. Natural England will object to proposals if that is not the case.

In terms of the changes put forward by the respondent, Woking Borough Council disagrees that the amount of SANG land the Council will supply to 2027 could make the Core Strategy unsound.

**Council's Proposed Action**



**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 15	First Name Douglas		Last Name MacDonald			On Behalf Of		
24	Core Strategy PD			Yes	No	Effective		I would be happy to help/contribute, but do not feel it is necessary

**Representation**

Given the high level of flooding risk in many streets I do not think that the CS proposals for development and relationship with developers to be robust enough. Developers can be very "fickle" to ensure commercial objectives are achieved. The 2 zone approach sounds too loose and may lead to loopholes being exploited leaving tax payers future cost/funding misery and damage to environment.

Ensure all proposals checked by independent experts as well as environment agency/current checks.

Flat refusal to develop flood zones 2&3.

If proposals agreed in zone 1, the developer must show detailed plans and actions they will take to minimise risk to the development and surrounding area. These should be billed and contractually binding.

**Representation Changes Necessary**

None provided.

**Officer Response**

There is not a 2 zone approach to the Core Strategy, the approach set out in PPS25: Flooding has been adhered to. This includes zones 1, 2, 3a and 3b. There is detailed advice in national guidance PPS25 regarding best practice for flooding, this document is referred to in CS9.

Policy CS9 has been redrafted following comments and suggestions from the Environment Agency which makes the policy more robust.

**Council's Proposed Action**

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 36	First Name Frank		Last Name Winter			On Behalf Of		

78 Core Strategy PD 2.4 Yes Yes

**Representation**

No mention of phase 2 Hoe Valley Flood Prevention Scheme.

**Representation Changes Necessary**

None put forward.

**Officer Response**

When the Council approved the existing Hoe Valley scheme it stated that if finance allowed it would consider an extension to the scheme both up and down stream but didn't give any commitment to scope or timescale. It is therefore not considered to be a firm commitment to be included in the Core Strategy.

**Council's Proposed Action**

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 41	First Name Louise		Last Name Morales			On Behalf Of		

352	Core Strategy PD	61	5.45	No	No	More		
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**Representation**

Strategies to reduce surface water run off in CS9 only impact on large developments and take no account of the Strategic Flood risk assessment - which would suggest that all the worst area are in the south of the town and so ALL new development should be included in surface water run off prevention strategies.

**Representation Changes Necessary**

NO planning permission should be given to significant development in the areas identified as having the most serious surface water run off problems, ( i.e. more than 10 effected properties in the last 10 years) until such time as the drainage system in the area has been upgraded and the SFRA no longer considers the area high risk.

**Officer Response**

Surface water is included in paragraph 5.45 of CS9 as one of the contributory factors to flooding.

The fourth paragraph in the policy box sets out that 'a flood risk assessment will be required for development proposals within or adjacent to areas of surface water flooding as identified in the SFRA. To further reduce the risk from surface water flooding, all new development should work towards mimicking greenfield run-off situations.'

Paragraph 5.48-5.50 in the policy reasoned justification cover surface water run-off.

The emerging Surface Water Management Plan prepared in conjunction with the County Council is referred to in the delivery strategy; paragraph 5.51.

Paragraph 5.218, covering Sustainable Construction, sets out the requirements for meeting the Code for Sustainable Homes, the code has mandatory requirements regarding energy, water usage, surface water run-off and waste.

There is not a Borough Council surface water runoff prevention strategy.

**Council's Proposed Action**

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	68	First Name	David	Last Name	Wilde	On Behalf Of
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354	Core Strategy PD	61		No	No	
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**Representation**

The core document is not following it's own policy as a) it gives no measures to reduce or prevent sewage overrun & b) surface water drainage measures only effect "significant development" not ALL development. The document is illegal as it has not consulted residents in this part of Woking - as none of our local residents associations were consulted only inactive & defunct organisations such as OCAG and the Old Woking village association. & displays and publicity only took place in the town centre, Byfleet & all the areas north of the town centre. ( i.e. nowhere near us)

**Representation Changes Necessary**

Planning permission should be required. At present NO PLANNING PERMISSION will be granted for development that will need new connections to sewage the system in most at risk area / areas of more than 10 sewage overrun properties per zone until the water authority has taken action to remedy the problem.

**Officer Response**

The Core Strategy publication document consultation exceeded the minimum national regulations and guidance in terms of the consultation undertaken.

The Water Framework Directive and water quality will be added to the policy introduction. The Water Framework Directive will also be added to the key evidence base box.

'All development should seek to incorporate pollution prevention control measures and Sustainable Urban Drainage Systems to ensure that impacts on water quality by development are minimised and in the long term - are improved.' Will be added to the policies reasoned justification, SUDs are one of the indicators included in the monitoring and review section.

Land contamination is dealt with during the Development Management process. It is not considered that an individual policy on contamination is necessary in the Core Strategy This will be considered as part of the Development Management policies DPD..

Policy CS9 will be re-titled "Flooding and Water Management" to incorporate matters such as contamination, water quality etc.

Please see responses and resulting proposed changes to the policy made in response to policy CS9 by the Environment Agency, Surrey County Council and Thames Water.

**Council's Proposed Action**

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

426 Core Strategy PD

**Representation**

There are no policies which explicitly relate to water quality. After considering the risks the Sustainable Construction Policy CS22 may be best to include a section on land contamination.

**Representation Changes Necessary**

Recommend that the following wording is added: 'All development, particularly on brownfield land, should seek to remediate contaminated land to ensure that risks to water quality as a result of development are minimised.'

And

'All development should seek to incorporate pollution prevention control measures and Sustainable Urban Drainage Systems to ensure that impacts on water quality by development are minimised and in the long term - are improved.'

**Officer Response**

It is considered that the above comments regarding water quality should be added to policy CS9 Flooding.

'All development, particularly on brownfield land, should seek to remediate contaminated land to ensure that risks to water quality as a result of development are minimised.' Will be added to the reasoned justification.

'All development should seek to incorporate pollution prevention control measures and Sustainable Urban Drainage Systems to ensure that impacts on water quality by development are minimised and in the long term - are improved.' Will be added to the policies reasoned justification, SUDs are one of the indicators included in the monitoring and review section.

**Council's Proposed Action**

It is proposed to add the suggested text to policy CS9: "All development, particularly on brownfield land, should seek to remediate contaminated land to ensure that risks to water quality as a result of development are minimised".

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

402 Core Strategy PD

5.47

**Representation**

As you state that all housing can be accommodated on land which is not within flood zones 3a or 3b we are surprised that the policy is not more strict regarding net new housing in land which is affected by flooding. This should be clarified. The overall justification needs to better marry up to the policy beforehand.

**Representation Changes Necessary**

None put forward.

**Officer Response**

As stated in other responses to CS9 Flooding, greater detail is being included in the policy box and at paragraphs 5.47-5.49 of the reasoned justification about flood zones.

**Council's Proposed Action**

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

118 Core Strategy PD

**Representation**

WATER QUALITY / WATER FRAMEWORK DIRECTIVE (WFD).

There is a disappointing omission in the core strategy in respect of protecting water quality and ensuring the aims and requirements of the WFD are met. There appears to be little mention of WFD through the whole document and we are concerned land contamination which may be present in the borough is also not accounted for in any of the policies. This is important because the overall protection offered by PPS25 may be withdrawn upon adoption of the National Planning Policy Framework and it is important to ensure that water quality is protected so the overall aims of WFD can be delivered.

**Representation Changes Necessary**

We consider that the following additions to the Core Strategy should resolve these concerns: reference to the Thames River Basin Management Plan. A statement could be added to suggest that the Council will support development which delivers measures towards achievement of the Water Framework Directive.

**Officer Response**

As said in the response to the Environment Agency's comments to policy CS17 the Thames River Basin Management Plan will be added to the introduction to the policy, below paragraph 5.46.

The Water Framework Directive and water quality will be added to the policy introduction at paragraph 5.46. The Water Framework Directive will also be added to the key evidence base box.

A reference to the "Flood and Water Management Act 2010" will be added to the introduction of the policy, following the reference to the Water Framework Directive and the document will also be added to the key evidence base box. (See response to representation made by Surrey CC).

Land contamination is dealt with during the Development Management process. It is not considered that an individual policy on contamination is required, as this is not a strategic issue. There may be a policy in the subsequent Development Management DPD regarding land contamination.

The policy wording will be amended regarding the incorporation of pollution prevention control measures.

Policy CS9 will be re-titled Flooding and Water Management to incorporate matters such as contamination, water quality etc.

**Council's Proposed Action**

A reference to the Water Framework Directive will be added to the start of paragraph so it reads "all proposals must conform with the Water Framework Directive 2000" and the document will also be added to the key evidence base box.

It is proposed that a sentence be added to paragraph 5.50 which states: "All development should seek to incorporate pollution prevention control measures and Sustainable Urban Drainage Systems to ensure that impacts on water quality by development are minimised and in the long term are improved."

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

122 Core Strategy PD

5.47

**Representation**

The policy references the determination of applications in accordance with the guidance in Planning Policy Statement 25. However, there is no guarantee that this Policy Statement or its objectives will remain throughout the plan period. Indeed the draft National Planning Policy Framework identified a number of changes to the national policy or development and flood risk which may require further detail being required within a Development Management policy document.

We would not expect a Core Strategy policy to outline the full requirements of PP525 but some changes to the policy should be adopted to ensure that it delivers rhetoric set out in the reasoned justification:

The second paragraph of the policy has not reflected our previous concerns. We believe it needs to also be clear that a sequential approach is applied for all developments in Flood Zone 3 and areas at risk of flooding from sources other than river. We appreciate that this is the council's intention behind the policy, but the current wording could be perceived by some as introducing a loophole by explicitly specifying a sequential approach in Flood Zone 2, but not stating it elsewhere.

The second paragraph should also explicitly state that development in flood zone 3b will normally only be acceptable when it is either water compatible, essential infrastructure or if brownfield, does not increase the net number of residential units I business floor space AND improves local flood risk.

As you state that all housing can be accommodated on land which is not within flood zones 3a or 3b we are surprised that the policy is not more strict regarding net new housing in land which is affected by flooding. This should be clarified. The overall justification needs to better marry up to the policy beforehand.

**Representation Changes Necessary**

Included within the above summary of representation.

**Officer Response**

In accordance with national guidance, policy CS9 refers applicants to PPS25, as there is far greater detail about flooding and related matter in the PPS.

Woking Borough Council is obviously aware that the Government is likely to introduce the National Planning Policy Framework (NPPF) before April 2012. The NPPF is referred to in paragraph 1.19 of the Core Strategy under the Context for the Core Strategy section. Unfortunately the Council cannot pre-empt every planning issue that may be included in the NPPF.

In terms of the two comments regarding the second paragraph of the policy box the following text will be added to the paragraph, if necessary a new paragraph may be created 'A sequential approach is applied for all developments in Flood Zone 3 and areas at risk of flooding from sources other than river.'

'Any development in flood zone 3b will only be acceptable when it is either water compatible, essential infrastructure, or if brownfield land, does not increase the net number of residential units or business floor space and improves local flood risk.'

**Council's Proposed Action**



**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

It is proposed to re-title the policy "Flooding and Water Management".

It is proposed that the second paragraph of policy CS9: Flooding (p61) be amended to add the following text to the paragraph:  
"A sequential approach will apply to all developments in Flood Zone 3 and areas at risk of flooding from sources other than river".

"Any development in flood zone 3b will only be acceptable when it is either water compatible, essential infrastructure, or if brownfield land, does not increase the net number of residential units or business floor space and improves local flood risk."

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126 Core Strategy PD 5.48

**Representation**

The use of the word 'considered' remains in paragraph 5.48 despite previous comments. This could be misinterpreted by those proposing development to mean that they have to decide whether there is benefit in undertaking an assessment rather than the requirements set out in paragraph E9 of Planning Policy Statement 25. A Flood Risk Assessment which is proportionate to the nature and scale of the development should be undertaken when instances of flooding are present, developers should not have to consider whether to undertake one or not.

**Representation Changes Necessary**

None proposed.

**Officer Response**

In the context of paragraph 5.48 'considered' means that the Case Officer will review the circumstantial evidence submitted. It is not intended that an SFRA is optional. In order that there is no confusion, replace the word considered with evaluated.

**Council's Proposed Action**

It is proposed that paragraph 5.48 (p62) which forms part of the reasoned justification to support policy CS9: Flooding, line 3, be amended by replacing the word "considered" with "evaluated".

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

128 Core Strategy PD

5.132

**Representation**

In the fourth paragraph of this policy it would have been good to reference the forthcoming surface water management plan. However, it might be possible to overcome this by linking the surface water management plan outputs into the strategic flood risk assessment. It would also be better to reference all forms of flooding rather than just surface water here as you ask developers to consider an ERA for all forms of flooding later on in the supporting text.

**Representation Changes Necessary**

Reference the forthcoming surface water management plan.

**Officer Response**

Woking Borough Council has been working with Surrey County Council and consultants to produce a Surface Water Management Plan (SWMP) for the Borough. However, this study is not complete, this is why it is not included or referenced within the policy box.

There is a reference to the SWMP within the third bullet point of the policy's Delivery Strategy this stipulates 'A SWMP is being prepared with Surrey County Council. The plan aims to identify viable options to manage the risk of surface water flooding, for the benefit of Woking and Byfleet and its people, both now and in the future.'

**Council's Proposed Action**

401 Core Strategy PD

5.46

**Representation**

The sentence seems incomplete or out of place? This could potentially be moved to the biodiversity section of the document and enhanced to include better reference to the Water Framework Directive.

**Representation Changes Necessary**

This could potentially be moved to the biodiversity section of the document and enhanced to include better reference to the Water Framework Directive.

**Officer Response**

Please see response to other representations made by the Environment Agency regarding CS9 for the proposed amendments to the policy to overcome the issues raised.

**Council's Proposed Action**

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

211 Core Strategy PD

**Representation**

The text should include a reference to the Flood and Water Management Act 2010.

**Representation Changes Necessary**

Reference in the policy to the Flood and Water Management Act 2010.

**Officer Response**

Comments noted. A reference to the Flood and Water Management Act 2010 will be added to the introduction of the policy and the key evidence base box.

**Council's Proposed Action**

It is proposed that a reference to the Flood and Water Management Act 2010 will be added to the introduction of the policy at paragraph 5.46 (p61), following the reference to the Water Framework Directive. The Flood and Water Management Act 2010 will also be included in the key evidence base box (p62)of policy CS9.

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 100	First Name Carmelle		Last Name Bell				On Behalf Of	Thames Water Utilities Ltd

432 Core Strategy PD No More than 1 selected

**Representation**

Thames Water generally support the policy, but consider that it could be improved in relation to flooding from sewers as pluvial flooding is particularly significant in urban areas

PPS25: Development and Flood Risk states at paragraph 14 that a sequential approach should be used by local planning authorities in areas to be at risk from forms of flooding other than from river and sea. Annex C lists the forms of flooding and now includes: "Flooding from Sewers". Policy CS8 should therefore include 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.

It is vital that sewerage/waste water treatment infrastructure is in place ahead of development if sewer flooding issues are to be avoided. It is also important not to underestimate the time required to deliver necessary infrastructure, for example:

- local network upgrades take around 18 months
- sewage treatment works upgrades can take 3-5 years

This therefore increases the importance for Thames Water's proposed changes to Policy CS16 regarding sewerage/waste water infrastructure to be taken into account.

Thames Water support the use of sustainable drainage systems in appropriate circumstances. It is also supported that it is recognised that sustainable drainage systems are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage.

A well maintained and managed sustainable drainage system is also required to prevent it becoming ineffective, potentially increasing overland flows, and consequently having an impact on the sewerage network.

**Representation Changes Necessary**

The policy should make specific reference to flooding from sewers and developers should be required to show that as a result of their development that Pluvial flooding will not occur either on or off site further down the catchment.

**Officer Response**

There is already a reference to sewer inundation in paragraph 5.45 'the most serious are river, surface water flooding and sewer inundation.' There is therefore a recognition of this as an issue to be addressed.

The comments regarding SUDs are welcomed. SUDs are highlighted in the policy box, paragraph 5.50 and the number of developments incorporating SUDs is an indicator in the monitoring and review section.

It is noted that SUDs are not appropriate for use in all areas; however it is not fitting to include the parameters where SUDs are not suitable in a Core Strategy policy. This detail may be included in a Supplementary Planning Document or pre-application discussions with a Case officer for an application.

A reference to flooding from sewers and the suggested text will be included at paragraph 5.48. Additional information from the Environment Agency (about flood zones) will also be included at paragraph 5.48.

**Policy: CS9 Flood**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	100	First Name	Carmelle	Last Name	Bell	On Behalf Of	Thames Water Utilities Ltd	

Comments about delivery of sewerage/waste water treatment infrastructure relates to infrastructure delivery and is comprehensively dealt with by policy CS16. Paragraph 5.13 acknowledges the importance of timing when it comes to infrastructure delivery. In particular, the need in certain circumstances to put in place the necessary infrastructure before development commences. The Council is satisfied that this concern is comprehensively addressed by policy CS16.

**Council's Proposed Action**

The following wording is proposed to be added to paragraph 5.48 (p62), "developers will be required to demonstrate that as a result of their development, pluvial flooding will not occur either on or off site further down the catchment".

## Policy: Introduction

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 60	First Name Lorna		Last Name Doveton				On Behalf Of	
326	Core Strategy PD	7	1.13	No				

### Representation

I believe it is not legally compliant as it is 22nd Sept 2011 and myself and all neighbours I have spoken to in Oriental Road, Woking where I live have only heard about these proposals in the last few days, when a concerned neighbour put a letter through the letterboxes of people in the area. There does not appear to have been any notification officially.

### Representation Changes Necessary

Obviously more time is now needed for everyone to respond as the official deadline is tomorrow. It would have been good to send postal notification a long time ago so if possible to do so now whilst also changing the deadline date.

### Officer Response

The Core Strategy was published for a period of nine weeks instead of the usual six weeks to take into account the summer school holidays. During this period, the Council has been concerned to ensure that all efforts were taken to publicise the document and to give the public the opportunity to be informed about the Core Strategy. Officers are satisfied that enough time and effort was made to engage the local community to respond to the consultation. It is therefore not proposed to extend the consultation period. No change is recommended.

### Council's Proposed Action

**Policy: Introduction**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

202 Core Strategy PD

1.33

**Representation**

The reference to the Proposals Map in the last sentence could be interpreted as relating to the Surrey Waste Plan, although this does not have its own Proposals Map. Therefore, it would be helpful if the last sentence of the paragraph were amended to read, "In particular, the Key Diagram and Site Maps identify the allocated sites that are safeguarded for waste purposes, and the existing sites in waste use also safeguarded for waste development are identified in the latest Minerals and Waste Annual Monitoring Report. Alternatively, the paragraph could clarify that it is the Proposals Map published alongside the Core Strategy and include appropriate amendments to reflect the comments relating to paragraph 1.37.

**Representation Changes Necessary****Officer Response**

An amendment to the last sentence of paragraph 1.33 is proposed to highlight the fact that reference to Proposals Map is in regard to the Proposals Map associated with the Core Strategy rather than the Surrey Waste Plan.

**Council's Proposed Action**

It is proposed that the last sentence of paragraph 1.33 (p13) be amended to read "In particular, the Proposals Map published alongside the Core Strategy identifies safeguarded sites and designated safeguarding areas identified in the Minerals and Waste Development Framework".

## Policy: Introduction

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

204 Core Strategy PD

1.37

### Representation

We also have a number of concerns that principally relate to updating the document and the accompanying Proposals Map to reflect the most recently adopted version of the Surrey Transport Plan (the Third Local Transport Plan), the Surrey Waste Plan and the Surrey Minerals Plan. These suggested minor amendments, which we do not consider as being so significant as to raise issues of soundness, are included in the Appendix.

This paragraph explains that the Proposals Map should safeguard 'sites' identified in the Minerals and Waste Development Framework, but there is no reference to designated safeguarding areas included in the Surrey Minerals Plan. The following minor amendment is therefore suggested to the second bullet point in paragraph 1.37: safeguarded sites and designated safeguarding areas identified in the Minerals and Waste Development Framework.

In relation to the Surrey Waste Plan, the Core Strategy Proposals Map should be amended to include the existing sites in waste management use safeguarded under Surrey Waste Plan Policy DCI and listed in Appendix 2 of the Minerals & Waste Annual Monitoring Report 2009/10. These sites include the recently expanded Martyrs Lane Community Recycling Centre and Woking Sewage Treatment Works off Carters Lane. Pdf and shape files indicating the boundary of these two sites can be provided on request. It is not considered necessary to include Mimbridge Nurseries as, although the site has a CLEUD for soil processing, the waste use ceased in 2010 and the land owner has no intention of resuming waste activity in the future. As the Surrey Minerals Plan was adopted on 19 July 2011, it may not have been possible to include the designated Mineral Safeguarding Areas (which equate to the Mineral Consultation Areas) on the Core Strategy Proposals Map. It is noted that the Core Strategy Proposals Map (and Woking Town Centre Inset Map, in part) do include the safeguarded rail aggregate depot at Woking, but the boundary is incorrect and will require amendment. Furthermore, the two Mineral Safeguarding Areas (MSAs) in the north and south east of the Borough will need to be included on the Core Strategy Proposals Map. We will provide shape files showing the designated MSAs in due course.

### Representation Changes Necessary

#### Officer Response

The proposed amendment to the second bullet point is acceptable to ensure consistency with other proposed amendments. Specific propose amendments to the Proposals Map itself will be addressed under Proposals Map.

#### Council's Proposed Action

It is proposed that the second bullet point of paragraph 1.37 (p15) should be amended to read "safeguarded sites and designated safeguarding areas identified in the minerals and waste development framework".



**Policy: Introduction**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

203 Core Strategy PD

1.34

**Representation**

The Surrey Minerals Plan does not allocate any sites within Woking Borough for minerals development. Therefore, we would suggest that the last sentence be amended to, "The Proposals Map illustrates designated Mineral Safeguarding Areas within Woking Borough."

**Representation Changes Necessary****Officer Response**

This is a factual statement that is acceptable. The last sentence of paragraph 1.34 should be amended accordingly.

**Council's Proposed Action**

It is proposed that the last sentence of paragraph 1.34 (p13) should be amended to read "The Proposals Map illustrates designated Minerals Safeguarding Areas within Woking Borough".

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 8	First Name Pauline		Last Name Marshall				On Behalf Of	

17 Proposals Map

**Representation**

Two mis-represented items

- 1) A "clinic" in the lane coming off north of Chobham Road is mislabelled as a "hospital"
- 2) A "Residential property" on Chobham Road heading towards Guildford Road and on the Borough boundary is incorrectly noted as a "warehouse".

**Representation Changes Necessary****Officer Response**

The two mis-represented items on the Proposals Map relate to the base map. This is supplied to the Council from OS and unfortunately cannot be altered by the Council. The Proposals Map utilises the most up to date base map supplied by OS and will continue to be updated with any new releases from the OS. It is hoped the information provided in this representation to the OS will lead to an update.

**Council's Proposed Action**

## Policy: Proposalsmap

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of
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390 Proposals Map

### Representation

As indicated above I find the draft Proposals Map are incomplete in that they do not show the Flood Plain of the River Wey and Hoe; and do not show the Westfield Neighbourhood including the historic buildings around Westfield Common which should be preserved according to CS20.

They also need to show the Protected areas envisaged under CS19.

### Representation Changes Necessary

### Officer Response

It has been agreed with the Environment Agency that the Proposals Map should not include areas at risk of flooding. This information is contained in the Strategic Flood Risk Assessment and any future advice and/or new information that will be provided by the Environment Agency. This approach is necessary to enable the flood risk data to be updated when required.

There is a significant number of social and community facilities, that keep changing over time. It will be unhelpful to show everything on the Proposals Map. A Social and Community Infrastructure Study has been carried out to identify such facilities. It is a useful source of information to support the Core Strategy. A link to it is on the Council's website.

### Council's Proposed Action

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32	Proposals Map	No	Effective
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### Representation

The CS is welcomed, however it is noted that the Proposals map does not indicate the areas at risk of flooding as required in the HCA Planning Policy 12 Paragraph 8.1 Specifically the flood plain on the north side of Moor Lane and Mill Moor Common should be shown.

### Representation Changes Necessary

### Officer Response

It has been agreed with the Environment Agency that the Proposals Map should not include areas at risk of flooding. This information is contained in the Strategic Flood Risk Assessment and any future advice and/or new information that will be provided by the Environment Agency. This approach is necessary to enable the flood risk data to be updated when required.

### Council's Proposed Action

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 18	First Name Patrick And Jennifer		Last Name Gilmartin			On Behalf Of		
35	Proposals Map	138		No	No	Justified		To make sure all consideration is given to local residents.

**Representation**

Very serious issue over town centre boundary when changed and with or by whom.  
Not consistent with discussions heard in council meetings.  
Particularly St Dunstan's site objections and Oriental Road proposals.  
Heathside Crescent and White Rose Lane are very residential and not town centre.  
Tower blocks should be on another site and not suitable for White Rose lane.  
An area off Goldsworth Road has been changed not to be town centre and yet it is not very residential.

**Representation Changes Necessary**

Necessary for council/inspector to visit roads, houses and amazing gardens in all of those listed as 4/5 bed family homes. These forms were not very accessible, library had no demand for them, not because no one knows what's going on, go online and can not get form to complete, give up not really understanding future impact on Woking.

**Officer Response**

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

**Council's Proposed Action**

## Policy: Proposalsmap

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
36	Proposals Map	138		No	No	Justified		to make sure consideration is given to points raised.

### Representation

Unsound because present town centre boundary is wrong and should be revised as it does not take into consideration recent decisions or Woking Council planning inspectorate which include Heathside Crescent, White Rose Lane numbers 5-9 Oriental Close and 13-69 and 4-8 Oriental Road in the residential and not the town centre as 2011 proposal map.

See Woking Council PLAN/2009/0934( 15 storey tower St Dunstan's Church site), rejected 17-10-2009 for adverse affect on the whole residential area including 5,7 and 9 White Rose Lane.

Planning Inspectorate Bristol ( after appeal re above decision), inspectors decision report 25/2/11 APP/A3655/A/10/213/743/NWF rejected including detrimental impact street scene.

Woking Council PLAN/2011/0371 St Dunstan's Church site, rejected 6/9/11, impact on environment White Rose Lane and Heathside Crescent etc.

### Representation Changes Necessary

Visit by inspectors/officer vital to appreciate the environment. 2011 proposals map WBC core strategy (appendix 3, town and district local centre boundaries) should be revised to show the town centre boundary not including White Rose Lane5-9, Heathside Crescent, Oriental Close and Oriental Road 13-69 and 4-8. This pleasant area of houses, gardens with beautiful established trees is a feature of Woking. Also please note my address is listed regarding the finalising of this planning stage but I had no information about this only was alerted about it a few days ago. I am sure many residents of Heathside Crescent would be terrified to learn they were considered as town centre.

### Officer Response

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

### Council's Proposed Action

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 23	First Name John		Last Name Brooks				On Behalf Of	

396 Proposals Map

**Representation**

2) Proposals Map Status

Object - the status of the Proposal Map published with the Core Strategy does not appear to comply with Regulation 30 of the Town and Country Planning Regulations 2004/2204 in that it has not been explicitly described as a "submission proposals map". Reason - Regulation 30 deals with the submission of documents and information to the Secretary of State for examination as required by Section 20 (3) of the Planning and Compulsory Purchase Act 2004. Para (b) refers to the inclusion of the "submission proposals map if the adoption of the DPD would result in changes to the adopted proposals map". The inspector appointed to examine the DPD's will need to come to a view whether the proposals map is in a form that could be lawfully submitted for examination.

**Representation Changes Necessary****Officer Response**

Comments noted. It is accepted that the Publication Proposals Map was not explicitly described as a "submission proposals map".

**Council's Proposed Action**

It is proposed that the title of the Proposal Map will be amended to read "Submission Proposals Map".

397 Proposals Map

**Representation**

3) Proposals Map - Horsell Inset - land to rear of 103 to 109A High Street

Object - this allocation is unlawful because it does not relate to a proposal within the submitted core strategy. It should be deleted. Reason - the submission proposal map should only contain matters identified within submitted DPDs which will result in a change to adopted proposals map. In this case there is no mention of an allocation for this site within the Core Strategy which explains what the proposal is, justifies it by any evidence or shows that it has been subject to sustainability appraisal and by inclusion to the Core Strategy subject to public consultations. It is also of note that PPS12 Para 4.6 to 4.7 allows core strategies to allocate strategic sites for development. However there is r explanation whether allocation is strategic and would have in any case met this requirement.

**Representation Changes Necessary****Officer Response**

The 103 to 109A High Street, Horsell allocation has been included on the Proposals Map an it is an extant scheme from Policy MV11 of the WBC 1999 Local Plan. Information regarding these schemes has been outlined within Policy CS18 paragraph 5.171 and within the current IDP to support the Core Strategy.

**Council's Proposed Action**

## Policy: Proposalsmap

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 23	First Name John		Last Name Brooks				On Behalf Of	

398 Proposals Map

### Representation

Horsell inset - boundary of local centre:

Object - inclusion of Queen Elizabeth gardens within local centre boundary does not accord with description of functions of local centres in Core Strategy or submitted evidence base in document "Town, district and local centres Study" 2009 produced for the council. Reason - the role of local centres is clearly set out in Table 2 page 32 as meeting local shopping and service needs. Reference Horsell a boundary has been drawn to include a significant part of the park that is separated from the shopping area by residential properties at No 113/115 High Street. This park has no function relating to shopping and service role of the village. It is already protected as urban open space and part is also included within a conservation area. The Roger Tym Study includes map at each end of the document recommending a boundary for the village centre which excludes this park. Inclusion of this detached area introduces a lack of clarity and therefore uncertainty as to what the Council's true intentions are. It suggests development aspirations but which are not explained in Core Strategy. If there are development intentions these should have been stated in accordance with Regulation 30.

### Representation Changes Necessary

### Officer Response

Consultants Roger Tym & Partners were commissions to produce a Town, District and Local Centre's study. They put proposed boundaries for all of the centres. The Council considered the boundaries proposed but also used other information such as local knowledge. It was considered that for some of the centres (such as Horsell) the proposed boundary had been done from a retail perspective and did not consider the other uses. The Local Plan 1999 boundary for Horsell included Horsell First School and extended out as far as St Mary's Church to the east. It was felt that this boundary was too extensive but that the two pubs and the Parish Hall very much formed part of the village and were so closely located to the shops it made sense to include them in the centre boundary. The Gardens and bowling green have been included in the boundary because they are in between the shops and Parish Hall.

As stated it is protected as an Urban Open Space

### Council's Proposed Action

## Policy: Proposalsmap

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 25	First Name R		Last Name Bloom			On Behalf Of		
55	Proposals Map			Yes	No	Justified		

### Representation

We support the Council's decision to reduce the area designated as Woking Town Centre on the proposals map. However, we don't think it has gone far enough in the area south east of Woking Rail Station. The defined Woking Town Centre here includes a substantial number of family - sized (3 or 4 bed properties with small gardens), and only 1 substantial commercial property. The inclusion of this number of residential properties is likely to result in the loss of the type of residential accommodation most in demand in the Borough and is therefore unsound.

Any replacement commercial activity is likely to increase traffic in the area. Because of the close proximity of the Rail Station in this area already suffers high levels of congestion at peak times. It is a key policy of the plan to seek to support the rail station and reduce traffic congestion in this area. Including a designation which allows high intensity commercial activities is therefore unsound and in conflict with the plan.

In the current state of the market, which is likely to last for much of the initial period of the plan, there is unlikely to be such demand for new retail or office space. What demand there is, should be concentrated in the traditional core central area to aid the renewal of that area or be located on redundant sites like the Court building. Retaining this boundary is likely to give rise to undesirable hope value. An example of this has already arisen nearly with the demolition of the St Dunstons Roman Catholic Church following the refusal of an hotel tower block scheme. The policy is likely therefore to be ineffective and detrimental.

### Representation Changes Necessary

Re draw the Town Centre boundary to exclude 4, 6 and 8 and 13 -69 Oriental Road, Oriental Close, the north side of Heathside Crescent between Oriental Road and White Rose Lane and 5 -9 White rose Lane.

### Officer Response

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

### Council's Proposed Action



**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 36	First Name Frank		Last Name Winter			On Behalf Of		

436 Proposals Map Yes Yes

**Representation**

Proposals Map does not include detailed maps on the 3,500 homes in the borough that are liable to flooding.

**Representation Changes Necessary**

**Officer Response**

It has been agreed with the Environment Agency that the Proposals Map should not include areas at risk of flooding. This information is contained in the Strategic Flood Risk Assessment and any future advice and/or new information that will be provided by the Environment Agency. This approach is necessary to enable the flood risk data to be updated when required.

**Council's Proposed Action**

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	41	First Name	Louise	Last Name	Morales	On Behalf Of		
262	Proposals Map				No	No	Justified,Consistent with national policy	

**Representation**

Previously Carters Lane Sewage treatment works was GREENBELT - not a "major development within greenbelt" - nothing has changed, the sewage works are still discreetly hidden behind hedges with only a few vehicular visits, very few staff, inconsistent of any "major development" description. It has fewer car visits and employs fewer staff than most golf courses or horticultural nurseries which are far more significant "developments"  
This new designation of the land does not reflect the low level of development on the site.

**Representation Changes Necessary**

Redesignate the land as green belt. Not a major development

IF you can't do that then at least ensure the "major development" area covers the current buildings NOT the entire site owned by Thames water, leaving the rest of open land behind designated as green belt

**Officer Response**

The Proposals Map reflects the MDS land designation as outlined in Policy CS6.

Policy CS6, para 5.5 clearly emphasises that any redevelopment for the site should not be significantly larger than the footprint of the existing structures. Furthermore, the Green Belt policy and the requirements of PPG2 (or the NPPF) will apply to any development of the site.

**Council's Proposed Action**

## Policy: Proposalsmap

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
268	Proposals Map	138			No	Justified		

### Representation

We do not believe that there has been evidence of participation of the local community and others having a stake in the area. There are many residential roads that are to be included in the town centre (e.g. Oriental Road, Oriental Close, White Rose Lane, Heathside Crescent) that do not want to participate as living in the zone marked as "Town Centre". The roads are residential, consisting of residential houses, and the zone that they are in should reflect that.

In addition, we have not been adequately informed of these zone changes. We only found out about the proposed zone changes a few days before the deadline from a neighbour. We have received no notice from the council and have not seen any zone change notices posted anywhere in the area.

### Representation Changes Necessary

The residential roads such as Oriental Road, Oriental Close, White Rose Lane, Heathside Crescent should not be included in the Town Centre zone.

### Officer Response

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

The Core Strategy has evolved through various stages and public involvement has been a critical part of each stage (see the Consultation Statement). It is therefore incorrect that the public had not been consulted in the Core Strategy process, in particular, the designation of the town centre boundary.

### Council's Proposed Action

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	45	First Name	David	Last Name	Pennant	On Behalf Of
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278	Proposals Map		Appendix three			Justified
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**Representation**

Reclassifying Oriental Road 1-69 and Oriental Close as being part of the town centre seems odd to me. Living at 30 Oriental Road, I regard the town centre as being on the far side of the railway track from my home. Ours is a residential road. I oppose this change.

**Representation Changes Necessary****Officer Response**

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

**Council's Proposed Action**

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
293	Proposals Map			No	No	More		

**Representation**

The 'Major Highway Improvement Schemes' on the Proposals Map do not seem to have been updated since the previous Local Plan of 1999 and are not justified in the Draft Core Strategy. These are largely out of date and they should be reviewed now and not left until later as stated in Paragraph 5.171. If retained they will stifle beneficial development which could otherwise come forward. In particular Local Plan route MV25 designed in 1993 some twenty years ago is shown to continue to be retained but it will not come forward.

**Representation Changes Necessary**

Review the 'Major Highway Improvement Schemes' on the Proposals Map. Delete Chertsey Road/Monument Road Link.

**Officer Response**

Policy CS5 is proposing revising the MV25 scheme which both the County Council and the Borough Council feel will best address the transport issues in that area. A revised scheme has been approved by the Council and authority has been to officers to submit a planning application for the scheme. The outcome of that application is not yet known but will be taken into account in the Core Strategy when that is decided.

The County Council is now in the process of going through all the extant transport proposals in the Local Plan that are no longer feasible and will formally recommend to the Council as to whether they need to be withdrawn. Once those decisions are made the Council will formally reflect the Proposals Map to review that.

**Council's Proposed Action**

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 53	First Name Sharad		Last Name Karia				On Behalf Of	

297 Proposals Map

**Representation**

I strongly object to extending Woking town centre boundaries to include 5-9 White Rose Lane; north side of Heathside Crescent; 4-8, 1-69 Oriental Road and Oriental Close as this would bring high rise development into an established residential area and will have a detrimental impact on an area far wider than the Proposals Map.

**Representation Changes Necessary**

Restrict Woking town centre boundaries extensions to the Broadway and Maybury Road side of the railway lines where there are already a number of established commercial organisations within the residential areas.

**Officer Response**

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

**Council's Proposed Action**

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	59	First Name	Gilda	Last Name	Hooker	On Behalf Of
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312	Proposals Map				No	Justified
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**Representation**

Reclassifying Oriental Rd 1-69 & Oriental Close as being part of the Town Centre is not justified. This is a residential area & must remain so. Although there are a scattering of business premises on the Oriental Rd side of the station, there should be no further development of businesses, high density housing etc in this road.

The town centre is on the north side of the railway track & must remain so

The level of edge of town family housing in Woking is being eroded & is having a detrimental effect on the demographics of the area encouraging a transient & undesirable element into the local community.

Traffic in the area is already approaching gridlock at peak times of the day as there are only 3 places to cross the railway track in the town centre. this problem will be exacerbated if there is more development in this road & it will pose a threat to children traversing this road on their way to local schools.

This proposal will not have local support. I am opposed to this change.

**Representation Changes Necessary**

The town centre re classification lines should be redrawn to remove established residential housing.

**Officer Response**

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

**Council's Proposed Action**

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 61	First Name Malcolm		Last Name McPhail				On Behalf Of	

323 Proposals Map Yes Yes

**Representation**

We welcome the inclusion of land south of Woking station within the town centre boundary and the retention of the Goldsworth Road and Chertsey Road areas within the boundary.

**Representation Changes Necessary**

**Officer Response**

Support noted, no change required.

**Council's Proposed Action**



## Policy: Proposalsmap

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	62	First Name	Robin	Last Name	Doveton	On Behalf Of
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325	Proposals Map		Appendix 3	No	No	Justified
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### Representation

failure to consult/inform

These remarks refer to the redrawing of the Town centre boundary to include part of the Oriental Road/Heathside Crescent area. This is an established residential area with its own parade of shops and a lively community spirit.

Residents have not been specifically consulted about this redrawing of the map, for which there is no stated justification. Neither have they been informed as to the potential consequences in terms of redevelopment. It appears that radical changes could be made, possibly piecemeal, to our built environment, but what these changes could legally be it is up to the Council to explain to the layman whom they may affect.

Whilst the change could possibly result, in the long term, in an increase in land values, in the shorter term they will result in uncertainty and planning blight.

The Council must put this change on hold until they have made clear to residents the intention, purpose and consequences of this change to the area included in the Town Centre.

### Representation Changes Necessary

The timing of general consultation on the entire document has been very poor, both at the draft and present stages. It is hard not to escape the conclusion that (not for the first time) public meetings and deadlines for objections have been timed to coincide with school holidays - periods of time when a substantial number are likely to be away on family holidays and have their eye off the ball regarding local matters, thus reducing the number of objections.

### Officer Response

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

The Core Strategy has evolved through various stages and public involvement has been a critical part of each stage (see the Consultation Statement). It is therefore incorrect that the public had not been consulted in the Core Strategy process, in particular, the designation of the town centre boundary.

### Council's Proposed Action

## Policy: Proposalsmap

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 63	First Name John		Last Name Roberts			On Behalf Of		
328	Proposals Map			Yes	No	Justified		

### Representation

We believe that the Core Strategy is not justified because the area of the town centre shown on the map does not reflect the boundaries of the current town centre. The map includes, within the town centre boundary, existing housing which is an integral part of the established residential area south of the railway line.

The housing we refer to is:-

Oriental Road numbers 4 to 8 and 13 to 69

Oriental Close

Heathside Crescent (north east section)

White Rose Lane numbers 5 to 9

Please see further discussion in Proposals Map section below.

### Representation Changes Necessary

Re-draw the town centre boundary to exclude the residential housing listed above, and classify that housing as "Urban Area".

If our suggested change to the boundary will limit town centre development too much over the next 15 years, then there are other areas which would be more suitable. These include areas which were designated as town centre on the 1999 map but have been dropped from the town centre in the current proposal. An example is area south of Heathside Road, including the community hospital.

### Officer Response

The part of the town centre boundary referred to remains unchanged from the 1999 Local Plan boundary. Heathside Crescent and Oriental Road have been used as boundaries. Part of the north side of Oriental Road and Oriental Close have been included within the town centre since 1999 and this has not resulted in the lost or redevelopment of these properties.

### Council's Proposed Action

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 69	First Name Anthony		Last Name Kremer			On Behalf Of		
357	Proposals Map	120	6.18	Yes	No	Effective		

**Representation**

The Core Strategy appears to me too evolutionary, building on practices that have applied for some years. Clearly we are in the midst of a technological revolution in which IT and digital communications are changing virtually every aspect of our lives, and I believe that any strategy for the next 15 or so years must try to take advantage of this. Indeed part of the strategy should be to enable all parts of our community to benefit, to counter any 'digital divide'.

**Representation Changes Necessary**

I believe that the Core Strategy should be re-visited every five years to allow the Council to take into account and gain advantage from the expected continued rapid development of IT and digital communications, social networking tools and the nature of local engagement in Neighbourhood Planning.

**Officer Response**

Comments noted

**Council's Proposed Action**

## Policy: Proposalsmap

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 75	First Name		Last Name				On Behalf Of	The Buy to Let Business
89	Proposals Map				No			Requires detailed discussions, funding method etc and alternatives.

### Representation

Representation submitted respecting Monument Rd/Walton Rd highway improvement scheme allocation. It is the view that this allocation should be removed as there is no realistic prospect of it being implemented, continued allocation will only serve to stifle regeneration and environmental improvements.

Lots of background information follows - officer please refer to letter.

In the case of the proposals for Monument Road/Walton Road highways improvements these are not based upon a clearly set out and defined rationale within Core Strategy or timetable for delivery. They are simply a carry over from the previous local plan which is part of a feasibility list of possible highway schemes to address perceived highway problems. The landowners who are essential for delivery of the proposals are not signed up to it but in fact have objected and are objecting to proposals. Added to this and as pointed out previously the new road would cross Green Belt land, pass through Conservation Area and affect common land which further complicates matters. So in this respect there are conflicts with other policy objectives within Core Strategy.

### Flexibility

The policy guidance goes on to state that a strategy is unlikely to be effective if it cannot deal with changing circumstances. In the arena of the built and natural environment many issues may change over this time. Plans should be able to show how they will handle contingencies. The guidance accepts that it may not always be possible to have maximum certainty about the deliverability of the strategy. However it advises that in such cases the Core Strategy should show what alternatives have been prepared to hand this uncertainty and what would trigger their use. In this particular case it is simply an allocation on plan without any clear consideration of alternative strategies to achieve the same ends. Draft National Planning Policy Framework which was recently published is clear that Local Plans should be aspirational but realistic (para 2.2). Specifically on infrastructure it states that "It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion (para 43)". In the case of the Monument Road/Walton Road highway improvements there is no indication as to the timeframe for delivery or that there is a reasonable prospect that it will be delivered. This is an aspirational project based upon a feasibility study undertaken over twenty years ago. It is not based upon any agreement with the landowners concerned and there is no clear audit trail of alternative delivery strategies having been explored in any depth. If anything time and the audit trail has shown that is implementation is not really realistic.

### CONCLUSION

The highway improvements have been included as a local plan proposal for over 20 years. Within this period no realistic proposals have been tabled or constructive attempts have been made to implement the proposals. More importantly no funding has been allocated. It is an aspirational project only based upon some initial feasibility proposals. The only outcome of the allocation has been to blight the area and to deter investment and regeneration. In many respects the policy/allocation has been extremely negative. Accordingly, in our opinion, given the lack of any clear justification, consideration of the alternatives and the lack of a clear delivery programme the allocation with the Core Strategy is unsound and fails to meet the guidance set out within National Planning Policy and Guidance. It is our view that the allocation should be removed from the proposal map and core strategy.

### Representation Changes Necessary

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 75	First Name		Last Name				On Behalf Of	The Buy to Let Business

**Officer Response**

Policy CS5 is proposing a revised scheme which both the County Council and the Borough Council feel will best address the transport issues in that area. A revised scheme has been approved by the Council giving authority for officers to submit a planning application for the scheme. The outcome of that application is not yet known but will be taken into account in the Core Strategy when that is decided.

The County Council is now in the process of going through all the extant transport proposals in the Local Plan that are no longer feasible and will formally recommend to the Council as to whether they need to be withdrawn. Once those decisions are made the Council will formally review the Proposals Map.

**Council's Proposed Action**

## Policy: Proposalsmap

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 87	First Name H		Last Name Greenhalgh			On Behalf Of		

179	Proposals Map			Yes	No	More than 1 selected		
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### Representation

We note the emerging Core Strategy has a new proposals map with respect to the retail frontages. We consider that 63-75 Commercial Way (our clients site is at 71 Commercial Way) should be reclassified as falling within the secondary frontage. This end of the town is not pedestrianised and being away from the core shopping centre and the peacocks centre, it functions as a secondary retail pitch. The southern part of commercial way opposite our clients site is as secondary frontages rather than the primary. We suspect that the only reason 63-75 have been retained in the primary frontage is because BHS sits just to the east. As this part of the town is no longer a prime retail area then we do not consider the proposals map is justified or effective.

### Representation Changes Necessary

In order to make the core strategy compliant we consider that the retail frontages on the proposals map should be amended to reflect the current circumstances and that 63-75 commercial way and BHS should be removed from the primary and reclassified as secondary frontage.

### Officer Response

The part of the primary frontage boundary remains unchanged from the 1999 Local Plan boundary. BHS is located at 81 Commercial Way and is a 2,240sqm (gross) and is one of the larger units in Woking town centre, possibly the largest unit outside the two main shopping centres. As a large comparison unit it is appropriate that it lies within the primary frontage and is considered to be an anchor unit. 63-75 Commercial Way comprises the following:

63 = Café Nero

65 = Oxfam

67-69 = Aston Mead

71 = British Heart Foundation/vacant

73 = Poppins Café

75 = Vacant

Although none of these form key units as part of the primary shopping frontage they are not inappropriate within the primacy frontage. It is not felt that the boundary needs to be revised.

### Council's Proposed Action

**Policy: Proposalsmap**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

381 Proposals Map

**Representation**

5. Flood Plains

The strategy document states:

(text from paragraph 2.4 inserted)

The residents' association also note that the proposals map does not indicate the flood plain areas within the growth area. In particular, the flood plain on the north side of Moor Lane and on Mill Moor Common.

**Representation Changes Necessary**

**Officer Response**

It has been agreed with the Environment Agency that the Proposals Map should not include areas at risk of flooding. This information is contained in the Strategic Flood Risk Assessment and any future advice and/or new information that will be provided by the Environment Agency. This approach is necessary to enable the flood risk data to be updated when required.

**Council's Proposed Action**

**Policy: SA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
338	SA	21	8.2 Transport	Yes	No	Effective		

**Representation**

This section is the Sustainability Appraisal is the only mention of the Airtrack rail link to Heathrow. It was championed extensively in the draft CS report but has disappeared completely from the final draft of the CS. It is understood that the Airtrack project to the South West was cancelled in April 2011, in part due the withdrawal of central government money and in part due to public protest at potential traffic flow problems at level crossings. However, to be consistent with CS4.9, and the objectives to attract business and improve the environment, Airtrack must be resurrected as a crucial element in the future prosperity of Woking and further afield. The benefits to Woking and the South West, and to road congestion around Heathrow, far outweigh the adverse consequences outlined in the protests for which remedial action, although perhaps costly, could be implemented.

**Representation Changes Necessary**

Airtrack is undoubtedly one of the cornerstone infrastructure projects to enhance the long-term prosperity of Woking, especially given the CS directive to recognise Woking as a transport hub and the proximity of Woking to London by rail and to the M3, A3, M4 and M25. Without Airtrack, and with increasing globalisation of industry, the appeal of Woking as an ideal business destination will be much diminished. If the desire to get people out of cars and promote business is real, then there should be an explicit commitment in the CS to do everything possible to implement Airtrack within the lifetime of Woking 2027.

**Officer Response**

Airtrack schemes has been withdrawn. It is therefore unlikely that the scheme will be implemented. No purpose will be served by retaining it in the Core Strategy and that it why it was deleted from the Core Strategy. The Council will however work in partnership with transport providers to seek improved links to Heathrow airport.

**Council's Proposed Action**



**Policy: SA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
349	SA	42	16.2.4	Yes	No	Effective		

**Representation**

It is difficult to justify Wolsey Place being described as a "modern" shopping centre; it is so only in the sense that it is not a collection of older streets. The 60 stores at ground level are a poor use of land within a very short walk of the railway station and opposite the proposed Woking Gateway project. In addition, although the main entrance from the town square is currently undergoing a much-needed and welcome facelift, much of what remains is in need of similar remedial treatment.

**Representation Changes Necessary**

A "brave" policy should exist to redevelop Wolsey Place, including the removal of Alexander House and the terraced flats. Ideally, the covered walkway between Church Street and the town square should also be removed, although current efforts at the Wolsey will obscure some of it. Space for retail, housing and offices can all be accommodated at such a prime site as Wolsey Place and this will much improve the town centre. Enough land may also be released for an additional green space.

**Officer Response**

The Core Strategy sets out the overall level of development anticipated over the plan period. In the case of Woking Town Centre it states there is the potential for up to 75,300m<sup>2</sup> of additional A class floorspace including up 67,000m<sup>2</sup> of A1 retail. It is not the role of the Core Strategy to allocate sites for development or redevelopment. This will inevitably lead to a significant change in the centre. The town centre policy requires an Area Action Plan to be prepared to set out details of the proposed changes and how they will be managed in a coherent manner. The views that are expressed by the representation will be considered as part of this process. It should be emphasised that the public will have the opportunity to be involved in the preparation of the Area Action Plan.

**Council's Proposed Action**

**Policy: SA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

132 SA

**Representation**

We have not undertaken a comprehensive review of the sustainability appraisal in areas where we generally support the core strategy as one should assume that generally positive impacts would be reported. However, we have reviewed the Sustainability Appraisal in the area of Flood Risk and have the following comments:

Sustainability Appraisal Appendix 4 - Policy CS9 We are not convinced that it will have a positive impact on objectives I & 7, as the policy places constraints to the land available for development. However, we appreciate that the supporting evidence identifies that, when considering a sequential approach to locating development, it is considered that there is not a need to develop within high probability flood risk areas to deliver the development sought.

Sustainability Appraisal Appendix 4 - Policy CS15 - Not sure what the justification is here for a positive impact for flood risk? Whilst urban centres in Woking Borough Council a mainly away from fluvial flood risk areas, further development could increase the risk in flooding from surface water runoff if not adequately mitigated

Sustainability Appraisal Appendix 5 - It would be beneficial to demonstrate what the supporting evidence is for assessing this against flood risk. Again it is not clear how in general further development is being justified as being complimentary to reducing flood risk, especially when the Core Strategy vision, objectives and policy is only actually requiring mitigation of detrimental impacts as opposed to overall improvement?

**Final Comments**

We trust that you have found these comments useful and that our suggested changes can be made to the submission document prior to the examination in public taking place. We would be prepared to attend the examination to discuss further these points if it is considered necessary. The suggested changes would resolve our outstanding concerns and we would then in principle support the submission version of the core strategy.

**Representation Changes Necessary****Officer Response**

Impact assessments are often based on the underlining assumptions used to assess the impacts. Policy CS9 puts strong policy requirements in place to prevent housing development from areas at risk of flooding. With adequate mitigation, a number of residential properties that are not fit for occupation can be brought into habitable standard. An example is the Hoe Valley scheme where flooding mitigation measures are making improvements to homes that were previously liable to flooding. The policy can therefore have a positive effect on housing provision depending of what is applied. The policy will also encourage a sequential approach to development, where the Council will put in the effort to encourage effective and more use of previously developed land. Again, the policy can have positive impacts in that regard. The same comments apply to issues raised with Appendix 5.

The comment relating to Appendix 4 the impact of Policy CS15 on risk of flooding is noted. The score will change to negative. The policy proposes to concentrate employment development on existing employment sites. This could have impacts on surface water run off. Policy CS9 has been strengthened to mitigate such negative impacts.

**Council's Proposed Action**

It is proposed that Appendix 4 of the SA Report be amended by changing the score of the impact of policy CS15 on 'reduce risk of flooding' from positive (+) to negative (-)

**Policy: SA**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

404 SA

**Representation**

Further, we do not consider it helpful to try to unpick the Sustainability Appraisal. If the appropriate strategies and futures are not considered in the first place, the Appraisal becomes no more than an attempt at justifying the only strategy offered at great length on the basis of tick boxes. There have been a number of reports published by government and its agencies pointing out the need for a proportionate and relevant approach to appraisal.

**Representation Changes Necessary**

**Officer Response**

A Sustainability Appraisal is a statutory requirement. It has been carried out in accordance with good practice guidance and takes into account the SEA Directive. It meets the requirements specified by national policy and the SEA Directive. How it does that is clearly set out in the early stages of the SA Report.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 16	First Name Colin		Last Name Weeks				On Behalf Of	
26	Core Strategy PD	30			No	Justified		

**Representation**

Table 1 - SWOT Analysis is amateur in the extreme. This is highly selective in what has been included for example:

Weaknesses should include:

No places of higher education

One of the highest public debts in the Country

Lack of space for housing & added Vale Development

Few, if any Local facilities for younger adults

4th Highest RSL rent in England

High level of vacant Office Space

One of only 3 Surrey Boroughs to reduce its UK's Local Competitiveness Index dropping from 24 to 28 (2010 compared to 2008)

Strengths should include:

Has McLaren located in the Borough - A world leader in automotive technology

Has a number of other multinational companies with their HQ in Woking (list)

Has Thamesway, A leading renewable Energy Company, as part of WBC

The Above should be classed as strengths not opportunities

Threats should include:

Traffic Pollution in Woking Centre is approaching EEC limits

Railway capacity is outside of WBC control

Roads are running close to capacity at peak times

Increase in Social Housing will increase demand on Social Services

This table should therefore be broken down and applied to each of the SA Framework Objectives listed on Page 30 of the SA report.

**Representation Changes Necessary****Officer Response**

The Council is satisfied that the SWOT analysis is a good representation of the strengths, opportunities, weaknesses and threats of the area. Indeed, a number of the suggestions, which the respondent claims should have been included are already set out in the analysis. Examples are lack of land for development, high house prices, pocket of congestion, the importance of McLaren, the benefits to be derived from Thamesway etc. A number of the suggestion such as the Council's dept are not considered relevant to the purpose of the analysis because the delivery of the Core Strategy will be mainly done by the private sector and other agendas.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	16	First Name	Colin	Last Name	Weeks	On Behalf Of
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391 Core Strategy PD 30 Fig 3

**Representation**

Page 30 – Areas identified for growth does not exclude Conservation areas; SNCI's; Flood Plains; Common Land and Areas identified under CS19. Both this map and the Core Proposals Map should be updated.

**Representation Changes Necessary****Officer Response**

There are clear policies to prevent inappropriate development in environmentally designated areas. The SHLAA excludes these sensitive areas from housing development. The Green Belt boundary review will take account of these sensitive areas.

**Council's Proposed Action**

Customer ID	26	First Name	Rhian	Last Name	Powell	On Behalf Of	McLaren Group Limited
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56 Core Strategy PD 26 table 1 Yes Yes given the importance of the McLaren group to Woking, we consider we would be able to contribute to the examination debate.

**Representation**

An additional opportunity should be identified within the borough SWOT analysis on page 26, identifying the potential to build on the Borough's reputation for high-technology innovation. The work of the McLaren group. And their commitment to Woking are considered to contribute towards this aim.

**Representation Changes Necessary**

The opportunities on page 26 could include a bullet point 'opportunities to build on Woking's international reputation as a centre for high-technology innovation and investment'.

**Officer Response**

Opportunities for high technology industries is already identified.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 43	First Name Robert		Last Name Palgrave				On Behalf Of	
269	Core Strategy PD	26	Table 1 (para 2.41)	Yes	No	Effective		

**Representation**

The Core Strategy identifies a number of threats which are valid, but I feel are not considered sufficiently, if at all, in the subsequent policies. They are:

- a) Increasing levels of car use and its consequent implications on climate change
- b) Global economic circumstances and implications on public sector investment to create the necessary environment for local businesses to thrive
- c) Continuous increase in carbon footprint and waste production
- d) Complacency of economic position
- e) Risk of increased energy and food prices and the uncertainties in their supply

**Representation Changes Necessary**

The Spatial Objectives in para 3.3 could include an objective to build resilience to counter these threats

More monitoring should be incorporated to track the development ( or not ) of these threats so they can be applied to revisions of the CS.

**Officer Response**

The threats are addressed by the policies of the entire Core Strategy. For example, Policy CS18 shifts emphasis on car use to environmentally friendly alternatives such as walking, cycling and public transport to minimise adverse impacts on climate change. The Core Strategy also concentrates most new development at the main centres to minimise the need to travel. It sets high standards for sustainable construction of building and protects sensitive environmental designation. These are only few examples of how the Core Strategy seeks to minimise the Borough's ecological footprint.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
339	Core Strategy PD	20	2.18	Yes	No	Effective		

**Representation**

This comment also apply to SA P51, 20.1 Table 4, Item 27.

These paragraphs are representative comments in support of education made in various places in the CS and SA (see, for example, CS 5.132 'Definition of Infrastructure', CS 1.32 last bullet, SA 8.2 'Infrastructure and Services'). They call for improved access to education for all, particularly for adults to improve job prospects and benefit from long-term learning, but the reports recognise the lack of education facilities. Existing learning facilities at Woking College, for example, are in a relatively poor location in terms of access and appeal. SA 20.1 Table 4, Item 27 mentions education only in passing and the CS makes it clear that education is the primary measure to relieve deprivation in the Lakeview Estate. However, although focus is given to education in the CS, it falls far short of saying what facilities are required in Woking and how they will be provided. Education is key to the future viability of the Borough.

**Representation Changes Necessary**

It would be wonderful to have a small university at the heart of Woking offering high quality education to aspiring young people and adults of all ages. It would also bring a very welcome academic and cultural mix of creative young people to the town and enrich the evening experience. It is therefore highly recommended that the CS is more 'bullish' in regard to providing education facilities and could provide a university close to the areas of deprivation in Sheerwater and Maybury. At the very least, more tangible policies should be given for the provision and extent of education facilities.

**Officer Response**

Policy CS16 provides the policy justification to secure contributions towards infrastructure delivery. An Infrastructure Delivery Plan has been prepared to demonstrate the capacity of existing infrastructure provision and what will be needed to support growth identified in the Core Strategy. The Council will work with the County Council to ensure that investment is put into educational provision to support the Core Strategy.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
340	Core Strategy PD	19	2.14	Yes	No	Justified		

**Representation**

Likely error in affordability indicator.

A figure of £24,570 is cited as the average earnings in Woking Borough in 2008. This figure is also given in SA 8.2 Housing. However, in 2007, a figure of £36,342 is used (SA 9.0, SA 10.3 Economy). It seems unlikely that average earnings in the Borough dropped by £11,772 between 2007 and 2008. £24,570 is, in fact, very close to the median wage for the country as a whole, very likely less than that for Woking, and a figure nearer to £36,000 seems more likely. On this basis, the average house price is 9.5 times the average wage rather than the 13.6 figure cited in both the CS and SA reports. Whilst 9.6 is still very high, it is much less acute than 13.6 and the problem has therefore likely been over-stated.

**Representation Changes Necessary**

If a figure of 9.5 is more accurate, then all relevant paragraphs of the CS and SA reports should be amended.

**Officer Response**

One of the figures relates to household income and the other to individuals earnings. The council recognises it may be confusing that both figures are used and both should have stated household or individual.

Section 9.0 and 10.3 of the SA quote the figure £36,342. This is the median household income for the borough, quote in the West Surrey Strategic Housing Market Assessment (SHMA)- Housing Needs and Market Assessment Survey was produced for the Council in February 2009. That report states the mean income for the borough was £52,322. The source of this was a 2007 WBC household survey. Paragraphs 5.1 to 5.9, figure 5.1, 5.2 and 5.3 and table 5.1 show that both income and savings varies considerably by housing tenure within the Borough.

It is likely the other lower figures quoted come from the Annual Survey of Hours and Earnings (ASHE). These figures are produced as both earnings by residence or earnings by workplace so again the source should be quoted. The ASHE figures are quoted as gross weekly or gross hourly pay and also related to median earnings. These figures are updated each year so are a useful indicator.

**Council's Proposed Action**

It is proposed that paragraph 2.14 (p19) be amended to quote both the individual and household incomes. Due to the changing nature of the data, it is proposed to provide up to date data closer to the Examination to reflect the situation at the time.



**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 66	First Name Peter		Last Name Cannon			On Behalf Of		
350	Core Strategy PD	19	2.4	Yes	No	Effective		

**Representation**

There is an unresolved issue in the CS, identified in SA 19.3, between providing 2,000 (small) flats in the Town Centre (>200 dph) and identifying that most of the affordable housing need is family housing. The over-emphasis on affordable housing (contradicting, for example, the sentiments made in regard to housing for all sections of the community in SA 7.1.1 and CS 2.15, 5.64, 5.71) means that the town centre will be less attractive, less vibrant and less mixed, at least if assessed on an economic basis or against the potential overall diminishment of the town centre build quality. This point is made not to remove the priority for affordable housing, but, rather, it is intended to illustrate an apparent conflict of interest in policy. The same point is raised in regard to family homes being built in the green belt (CS6) and 53% of homes being 3 or 4+ bedroom (CS 5.72, agreed to be a fair distribution).

**Representation Changes Necessary**

This appears a particularly thorny issue to resolve in the town centre. To be consistent with policies for sustainable development and green belt protection, and assuming the majority of town centre build will be flats, the only resolution would seem to be to provide a proportion of larger flats in the town centre, both for families and for professional people who may wish to live in the town centre in larger accommodation but who have been "planned" by the CS to live in suburban houses to the detriment of the town centre vibrancy. If the Council accept that such larger accommodation is required, then the CS does not make clear how it can be provided, especially in the town centre.

**Officer Response**

The Town Centre is a suitable location for high density mixed use development, including residential development. This is necessary to maximise the efficient use of land, reduce the need to travel especial by the car and distance travelled to access key services and facilities. Policy CS11 deals with the housing mix that the Council expects development to achieve. The Council will ensure that this mix is reflected in schemes that come forward for development. Part of this will be suitable accommodation for families, professionals and key workers in general.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 78	First Name Heather		Last Name Twizell			On Behalf Of	Natural England	

114 Core Strategy PD 2.40 Yes Yes

**Representation**

Natural England welcomes the continued commitment to working with partners to protect the Thames Basin Heaths Special Protection Area (TBH SPA).

**Representation Changes Necessary**

**Officer Response**

Comment noted.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 92	First Name Barbara		Last Name Beck			On Behalf Of Campaign to Protect Rural England - Woki		
219	Core Strategy PD	30	Fig 3		No	More than 1 selected		

**Representation**

The wrong impression on the amount, and geographical extent, of future growth intentions is compounded when immediately below the word box of CS1 the Map entitled "Figure 3: Areas identified for growth" indicates the vast majority of the Green Belt area, outside the built up area, as hatched and described in the Key on the right of the map : a "Broad location for growth".

We object to this misleading labelling, as it is clearly not compatible with GB policy guidance as contained in PPG2 or what, we believe, the Council itself intends. In Green Belt proposals for development are considered inappropriate unless very special circumstances that can be demonstrated. A reference to a "location for growth" covering the great majority of Woking's Green Belt is simply not consistent with the thesis put forward in the PPG Note which has been in existence since 1995.

We presume that the Woking Green Belt as been defined by the council as an area of search, in order to identify one or a limited number of sites for the required residential development, following a green Belt review in 2016, and to be available only in the last 5 years of the plan. But anyone looking at figure 3 would not be given that impression.

We suggest therefore that to clarify the situation and remove any suggestion that the whole of the Green Belt is subject to, or available for, future growth.

The key to Fig. 3 on page 30 is amended to delete the words "Broad Locations for growth" and replaced with an appropriate and accurate wording: "Areas subject to a Green Belt review in 2016 to identify the most sustainable locations for the required limited housing development."

**Representation Changes Necessary****Officer Response**

It is already proposed to amend the last sentence of Policy CS1 to emphasise that the area of the Green Belt identified as future direction of growth is only an area of search from which specific sites will be identified. No change is proposed, except as explained above.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of	Surrey County Council

205 Core Strategy PD 28

**Representation**

The Surrey Transport Plan objective to foster reliable transport should be reflected in the first sentence of objective 10.

**Representation Changes Necessary**

**Officer Response**

Policy CS18, paragraph 5.162 clear and appropriately emphasises the need for Woking Borough Council to work in partnership with the County Council to achieve the aims of the Surrey Transport Plan. No purpose will be served by repeating this in Objective 10.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

382 Core Strategy PD

**Representation**

History and neighbourhood

In section 2.6 the strategy covers the historic nature of Woking. (Text from para 2.6 inserted)

The residents' association agrees that history is important, and we are pleased to see that certain areas have achieved 'conservation area' status. We strongly believe that additional hidden gems in Woking should be added to the 'protection lists'. For example, new areas should be clearly identified and applications for conservation areas and village green status should be welcomed by the council, a clear sign of the 'community at work, together.' The core strategy does not specifically state that this type of protection should be taken into account or encouraged. The danger of the current draft of the strategy is that it only protects existing 'designated' areas as it seeks only to deliver a vision based around building more and more homes and not an overall vision taking into account all the factors that residents and other stakeholders require.

Old Woking and its surrounding commons in particular should be cherished for their history and environment (similar to the protection afforded to Horsell Common, St Johns Lye and areas such as Bookham Common). At this very time, the council are allowing more and more development in this area. It is with regret that the historic pub, the White Hart has been purchased by developers and could be bulldozed to the ground in favour of more housing. The White Hart is in the heart of the Old Woking conservation area, and yet is just within a neighbourhood centre; we hope that it will not fall foul of this trend to allow old buildings to decay (by developers) only to be resurrected with Woking Borough council's agreement to housing development (as is has been the case with Gresham Mill).

Ancient rights of way such as lanes, footpaths and 'green lanes' should be protected and we strongly recommend that new developments are restricted from diverting footpaths. For example, the Gresham Mill development of over 70 apartments, townhouses and car parks has temporarily closed the right of way which enables all from the community to see the mill pond and enjoy the beauty spot. The new owners are swift to prevent walkers approaching the new development by the footpath which runs down the main entrance (the single drive). Walkers are directed to the often water logged (flood plain) path across Mill Moor when the signpost and right of way is still usable. We require a commitment to ensure that access is not prevented to any open spaces by diversions to footpaths from developers or owners who have the money and desire to protect their interests and own a piece of the 'beauty'. There is no mention of the protection of ancient rights of way, a real gem in the borough.

We are concerned that the original Westfield Neighbourhood Area dated 21/4/09 has shrunk on the Proposals Map and now excludes the Grade II and Historic Buildings facing Westfield Common. Recognising the intent of WBC to develop Moor Lane we recommend that the council seeks to discuss this neighbourhood area with the residents' associations across the common (as outline in the initial section covering community involvement). Westfield Common and Westfield are important areas which need to have a cohesive identity for all the community, not just an arbitrary line.

It is extremely curious that Woking Borough Council does not attach any particular importance to Westfield Common as a historic feature of Woking. As you are aware Westfield Common is contemporaneous with the historic medieval manors and village of Old Woking. The existence of Westfield Common was first recorded in writing in 1546 thus it predates the existence of modern Woking by hundreds of years.

By way of illustration we enclose a copy of John Remnant map of 1719 which is held at the Surrey History Centre. The boundaries of Westfield Common can be observed clearly.

(Map inserted - Figure 3 - John Remnant map, 1719)

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

The extract below shows Westfield Common and the outline of Rosebank Cottages more clearly.

(Map Inserted)

Westfield Common should be a cherished part of Woking's heritage and it is bewildering that planning policies are not being adopted to enhance and protect the area from inappropriate development.

It is also worth enquiring why there is no conservation status attached to Rosebank Cottages; there are very few areas left in Surrey where historically intact former agricultural housing is preserved in its original landscape setting.

Please find the additional extract from the LDP which supports the protection of this historic area:

(Text inserted)

**Representation Changes Necessary**

**Officer Response**

The designation of new Conservation Areas or suggestions for new buildings to be Listed are made through a different process to that of the Core Strategy. New Conservation Areas will be considered through Conservation Area Appraisals. The suggested areas will be taken into account whenever the appraisal is carried out. English Heritage has a key role in deciding which buildings or heritage assets should be listed. An application can be made to them in this regard for their consideration. The role of the Core Strategy and policy CS20 in particular is to conserve and/or enhance designated buildings or areas. The policy therefore provides sufficient scope to prevent any adverse impacts of development on the heritage assets of the area.

Much of Old Woking Village Centre is an Area of High Archaeological Potential and a Conservation Area, some parts of the Village are in the flood plain and adjoining the Green Belt. Therefore development may be appropriate in Old Woking Village Centre if it is in keeping with any heritage planning designations or other planning constraints.

In terms of the development at Gresham Mill, any comments on the scheme or landscaping should have been made when the planning application was being considered. The footpath is temporarily being rerouted during the constructions of the apartments, these are due to be restored. As a result of the proposal at Gresham Mill; a site of Suitable Alternative Natural Greenspace is being provided adjacent to the new apartments, which makes the land accessible to the local community as open space.

The remit of the Core Strategy does not cover Village Greens or Ancient Rights of Way. Rights of Way are dealt with by the County Council.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

375 Core Strategy PD

**Representation**

Paragraph 2.14 requires rewriting to bring it up to date and use consistent data. According to the ONS data Woking now has the 2nd lowest Median House Price value in Surrey (£248,000) compared with a Median Value of South East England of £217,000 and Surrey Median Value of £290,000. The figures used in Sections 2.12 to 2.15 should be adjusted accordingly and brought up to date.

Data supplied regarding - ONS Tables 581 & 582 show the following data for Mean/Median Property Prices:

o It makes the presumption that the correct strategy in today's Housing Climate is for first time buyers to purchase property at a time that average mortgage advances are in excess of 3 times disposable income. The SHMA Report S11 highlights the fact that Families renting are far more mobile than those purchasing with 68.2% Woking renters moving within the past 2 years. I.e. renting facilitates a more dynamic workforce.

o Uses average earnings in the Borough as a comparison with average House Purchase Prices. SHMA Paragraph 5.17 indicated that the Average (Mean) Household Income in Woking was around £52000 whereas the average of newly formed households was £15405 thus  $\frac{£345,674}{52000} = 6.6$  not 13.6. It is suggested it may be better to use ONS Table 572 which shows the Median Earnings vs. Median House Price and Table 576 shows the 15% Quartile vs. Mean Lower Earnings as an indicator of "Affordability" for New Households.

**Representation Changes Necessary****Officer Response**

The figures quoted are from the CLG (Communities and Local Government) and are based on Land Registry data. The source is not ONS. However the figures are not disputed.

It is accepted that the median prices are lower than mean prices. However prices fluctuate by year and by quarter. The median of £245,000 in Q1 of 2011 has risen to £249,000 in Q2 of 2011.

In the last four years median prices in the borough have been fairly stable but remained high:

Median prices - 2007 = 250,000, 2008 = 250,000, 2009 = 235,000 and 2010 = 263,000

Average earnings compared to house prices continue to be very high in the Borough. House prices are higher than can justify a mortgage for an average property price in the borough (whether mean or median price is used). Consequently the need for affordable housing continues to be very high. Whilst not providing the entire picture, the number of people on the housing register is an indicator of the level of affordable housing need and the number continues to be high.

There is no doubt in the available evidence available that there is significant unmet need for affordable housing which will need to be met. Whilst there may be differences in the figures used based on the sources of information and the time periods used, the underlying fact whichever figures are used points to the conclusion that the average earnings to house-price ratio makes it unaffordable for many people to own their own property. Consequently it is not proposed to change the overall level of affordable housing provision.

**Council's Proposed Action**

**Policy: SpatialPortOrKeyIssues**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

407 Core Strategy PD

**Representation**

We note that a few of our concerns about resources and threats to a sustainable future have been incorporated in the SWOT analysis. However, as the council notes in the report on Representations, they have not been taken further forward into the Plan and its policies. Neither is there any consideration of contingencies or resilience which should be demonstrated if the plan is to be sound in terms of flexibility to deal with changing circumstances (PPS12 para 4.46). On the basis of evidence such as that listed above, we do not believe that the threats can be ignored so easily. We request that greater emphasis is given to the threats of:

- Increasing levels of car use (and their consequent implications on the use of land and climate change), particularly if the sub-regional issues of dispersed development and economic activity and the lack of suitable transport alternatives (especially for orbital movements in the SE context) are not addressed
- Global economic circumstances and their implications on public and private sector investment to create the necessary environment for green and sustainable businesses. Recent economic forecasts cast increasing doubt on the deliverability of the optimistic growth assumptions underlying the proposals for the Town Centre and the balance between centre and out of centre development and their differing sustainability consequences.
- Continuous increase in carbon footprint and waste production and barriers to renewable energy
- The embedded energy and carbon in the goods and services we consume. Proposals for significant increases in retailing in the Borough need to be examined against the direct and indirect environmental impacts. Growth in purchasing impacts on climate change and on resource depletion.
- The assumption of continuing economic growth through consumption. We believe that UK carbon emissions are significantly under-stated because of the high level of imports of manufactured goods and foodstuffs. This has implications for the use of land for food production and local sourcing and distribution. The baseline assumption in the plan is that Woking's economy should grow and shopping facilities will be provided to support that growth. Economic growth unavoidably means increased consumption of material goods, services and energy. LA21 does not accept this is a valid starting point for Woking's future development
- The cumulative effects of continuing housing growth on the areas explicitly protected (including but not confined to the Thames Basin Heaths SPA). Because there is only a vague approach to longer term housing delivery, and it is explicitly not spatial, it is not possible to assess
  - o Whether the current policy for Sustainable Accessible Natural Greenspace (SANGS) set out in the SE Plan Policy NRM6 will be sufficient to maintain adequate protection for these environmental assets and their biodiversity over the longer term, and
  - o What effect potentially dispersed housing growth will have on physical and community infrastructure, and on the biodiversity of the Borough and its surroundings generally.

**Representation Changes Necessary****Officer Response**

See response to representations made by John Hack to Policy CS1.

**Council's Proposed Action**



**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 5	First Name Ina		Last Name Steel			On Behalf Of		

5 Core Strategy PD Yes Yes

**Representation**

Have read the literature and can find nothing to object to.

**Representation Changes Necessary**

**Officer Response**

Comments Noted.

**Council's Proposed Action**

Customer ID 11	First Name Claire		Last Name Streather			On Behalf Of The Coal Authority		
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15 Core Strategy PD

**Representation**

confirm that we have no specific comments to make on this document at this stage.

**Representation Changes Necessary**

Policy documents to be sent electronically.

**Officer Response**

Comment noted.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 14	First Name Peter		Last Name Coxhead				On Behalf Of	

22 Core Strategy PD

**Representation**

A senior member of the Canal Society, namely Hathryn Dodington, will be commenting in my place.

**Representation Changes Necessary**

**Officer Response**

Information noted.

**Council's Proposed Action**

**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	20	First Name	David	Last Name	Thompson	On Behalf Of
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44	Core Strategy PD				No	More than 1 selected	Disabled.
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**Representation**

Point 5 - Legitimacy

All the required public documents and acts of consultation will have been assuredly carried out correct. This issue is not about form but substance. Although the Council will have spent considerable resources on the formality of local resident consultation that in itself does not justify the formal outcome if the management of that work has been inefficient or misleading. In the earlier public consultation at the tail end of 2009 the council received only 401 responses of which I am advised 69% were in support of the council's central recommendations. With a population of 92,000 that means that less than 0.5% of the adult electorate endorsed the council's direction. And remember that this was on the basis of a flawed presentation not providing all the alternative options.

**Representation Changes Necessary**

**Officer Response**

The Council is satisfied that there has been adequate public involvement at each stage of the process. A Consultation Statement will be published to demonstrate the effort made by the Council to engage the community in the Core Strategy process.

**Council's Proposed Action**

43	Core Strategy PD				No	More than 1 selected	Disabled.
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**Representation**

Point 4 - Failure to communicate lucidly and unambiguously

Any local resident who is pressed for time is going to take the council's assurances at face value. The council's summaries for instance assure the reader that they will protect the integrity of the greenbelt whilst further reading makes it very clear that the greenbelt is seen in the longer term as a source of housing development.

**Representation Changes Necessary**

**Officer Response**

The Council is clear about the need to release Green Belt land to meet long term need for housing. It is also committed to ensure that any release of Green Belt land will not undermine its purpose and integrity. No change is proposed.

**Council's Proposed Action**

**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 20	First Name David		Last Name Thompson			On Behalf Of		

41	Core Strategy PD				No	More than 1 selected		Disabled.
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**Representation**

Point 3 - Lack of intelligence etc.

The detailed plan shows that the council anticipates or intends to promote a significant change in the socio-economic makeup of the Borough. In summary the present council/affordable dwellings makes up about 13% of the housing stock. Such a potential change in the economic makeup of the borough has major implications for local services and the council taxpayers.

**Representation Changes Necessary**

**Officer Response**

There is no evidence to suggest that the policies of the Core Strategy will have an adverse impacts on the socio-economic make up of the Borough or put unnecessary burden on local tax payers. No change is proposed.

**Council's Proposed Action**

**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 20	First Name David		Last Name Thompson			On Behalf Of		

39	Core Strategy PD				No	More than 1 selected		Disabled.
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**Representation**

Point 2 - lack of intellectual and professional rigour -

In the wider global/national context man-made climate change impact is a primary consideration. The Working documents make many references to the targets for the reduction in greenhouse gases over the period of the plan. There are, as you would imagine, local targets. Question - has Working Council as part of normal professional discipline undertaken any scenario assessments to evaluate the potential climate change impact of their proposed growth targets in dwellings and individuals on the Borough's carbon footprint?

**Representation Changes Necessary**

**Officer Response**

The Council is required to carry out a Sustainability Appraisal of the Core Strategy to assess the social, economic and environmental implications of the Core Strategy. The appraisal concluded that the implementation of the Core Strategy will improve the well-being of the community. It has also carried out a Climate Change Study to inform its Climate change related policies. The Council will consider any further evidence about the impact of the Core Strategy on the Borough's carbon footprint if one is submitted. No change is proposed.

**Council's Proposed Action**

**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 20	First Name David		Last Name Thompson			On Behalf Of		

37	Core Strategy PD				No	More than 1 selected		Disabled.
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**Representation**

Lack of intellectual and professional rigour.

Governance and professionalism in strategy requires unprejudiced foundations and research for an informed comparison of potential alternatives and the subsequent development/recommendation of policy to the local people for endorsement. Yet Woking's approach from the outset is predicated on unquestioned assumptions and disconnected reasoning which automatically reject and debar the consideration of such other alternatives meaning that local residents are not given an informed choice. The starting point for this misconception appears to be a misconstrued extrapolation from the prerequisite for sustainability - a primary need in development a practical plan. A community may be sustainable just as easily in the status quo. Woking Council has effortlessly transferred their fallacious sustainability interpretation across to create a new administrative planning prejudice of sustainable development which is a totally different concept to sustainability. However the professional failure is not simply at the foundation stage but extends throughout the executive governance process.

**Representation Changes Necessary**

**Officer Response**

The Core Strategy is supported by robust evidence. The Sustainability Appraisal of Options have considered alternative options before the preferred strategy was selected. An Issues and Options consultation was carried to seek public input to that stage of the process and comments taken into account before a Draft Core Strategy was published. No change is proposed.

**Council's Proposed Action**

**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 37	First Name Anne		Last Name Ansell				On Behalf Of	

79 Core Strategy PD

**Representation**

Blank online submission.

**Representation Changes Necessary**

**Officer Response**

**Council's Proposed Action**

Customer ID 38	First Name Michael		Last Name Paternoster				On Behalf Of	
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80 Core Strategy PD Yes Yes

**Representation**

Blank online form submitted

**Representation Changes Necessary**

**Officer Response**

**Council's Proposed Action**

**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 39	First Name David		Last Name James				On Behalf Of	

81 Core Strategy PD Yes Yes

**Representation**

Blank online form submitted

**Representation Changes Necessary**

**Officer Response**

**Council's Proposed Action**

Customer ID 41	First Name Louise		Last Name Morales				On Behalf Of	
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259 Core Strategy PD All consultation No No More than 1 selected

**Representation**

All public consultation for the Core document was ENTIRELY to the north and east of the town - with no parts of south Woking included in the consultation. Public consultation document includes organisations that have been defunct for at least 4 years - Old Woking Community Association, Rydens Way Residents Steering Group & Old Woking Village Association no longer function as representative bodies. The only active residents associations in Old Woking, the Gloster Road and Priors Croft residents association, Rydens Way Action Group and the palace way residents association were not informed of the consultation.

**Representation Changes Necessary**

Hold consultations with residents of Old Woking, and include local community groups in this new Consultation.

**Officer Response**

The Council organised a number of public events, including seminars that everyone was invited to attend. The Council will take the comments into account in future consultative exercises.

**Council's Proposed Action**



**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 70	First Name James		Last Name Robertson				On Behalf Of	Hockering Residents' Association

392 Core Strategy PD

**Representation**

Your documentation makes it clear that you want to encourage groups of people to respond. Your on-line form gives no scope for group responses!

Contribution AF24006 comes from the Hockering Residents' Association committee which represents nearly 100 houses in Woking. I would be grateful if you could assure me that the representation is given the consideration that a 100 house Residents' Association deserves.

**Representation Changes Necessary**

**Officer Response**

The representation has been noted as on behalf of Hockering Residents' Association committee. The number of members of Hockering Residents' Association is also noted.

**Council's Proposed Action**

Customer ID 77	First Name Marianne	Last Name Meinke	On Behalf Of
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105 Core Strategy PD No Effective

**Representation**

The equality act - everyone should be treated equally and provided with similar support and consideration when planning decisions are made. Woking's tendency to support specific groups favourably in planning decisions ay be a breach. The plans should state clearly that Council decisions will be transparent, in accordance with the Act and there will be no bias or preference towards minority groups.

**Representation Changes Necessary**

None put forward.

**Officer Response**

An Equalities Impact Assessment has been completed, this sets out the different groups that make up Woking Borough. It goes on to review each Core Strategy policy and evaluate if any group has been adversely affected by the policy. Consider adding the EIA to the Evidence Base as listed at Appendix 1 of the Core Strategy.

No proposed action.

**Council's Proposed Action**

**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 82	First Name John		Last Name Hack			On Behalf Of		
144	Core Strategy PD				No	More than 1 selected		To elaborate the points above, if requested, given extensive experience in the strategic planning field.

**Representation**

This objection has to be couched in a rather general way, as the Core Strategy as presented is not a spatial plan following the policy set out in PPS12 and the relevant guidance and advice published by the Planning Inspectorate, the Planning Advisory Service and others. It is predominately a and use plan, leaving most of the main decisions and justification of delivery to other documents some of which, like the recently published Infrastructure Delivery Plan, are extremely vague, or to other council groups (like the climate change strategy). It is therefore extremely difficult to have much confidence in the delivery and impact of the proposals on the town. Soundness cannot be demonstrated in terms of justification, delivery and alternatives.

In representations on the draft Core Strategy, I put forward a number of points that should be considered to make it an effective plan, and an alternative approach, but the published plan has made no advance on the draft. Hence this objection repeats the main thrust of my previous representations, but avoids too much detail as it is the strategic deficiency that needs to be addressed.

**Representation Changes Necessary**

Please see comments above, but in summary:

Changes to the town centre policy to make growth contingent on the development of a significantly improved railway station and services;

Specific reference to infrastructure and its means of delivery in the plan to support town centre growth, including positive policies for reducing car use;

Reinstatement of the principle of orbital rail services (to replace the previous reference to Airtrack) and policies to ensure that progress is made on the delivery of the necessary infrastructure;

Changes to the reference to the green belt as an area of growth, and

Reformulating policy on housing to clarify the status of green belt and to set clear criteria for an immediate core strategy review to determine the location and form of sustainable development in the longer term (10 years onwards).

**Officer Response**

See response to representations made by John Hack to Policies CS10 and CS1.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID	85	First Name	Genevieve	Last Name	Thompson	On Behalf Of		

170 Core Strategy PD No

**Representation**

- 1) Still based on southeast plan which is due to be revoked, this document was driven by wider regional pressures and vanities which were not solely reflective of the local needs of Woking. Consequently our local plan needs to be rebased on our specific vision for the future which can discount some of the grandiose conceits being peddled by the council that our future is determined by our competitiveness with surrounding boroughs.
- 2) the current plan is unjustified in that its potential implications have not been clearly put to local residents. Being honest how many residents do the council think have time to trawl through hundreds of pages?
- 3) The aim of the plan seems only to be to achieve greater status and prestige for the council at the expense of the existing resident's quality of living. There is an executive's presumption within the council that greater urbanisation equals greater satisfaction. Most research shows the contrary. How does the council justify their position?
- 4) Finally there is a description that Woking will be an "exemplar" in achieving sustainable growth. When was growth made an object of desire in its own right? There is an important distinction between notional growth (inflation) and real on the ground physical expansion. Many towns and even countries enjoy a prosperous and satisfying existence without excess urbanisation/commercialisation. There is even a government document on sustainability without growth.

On this basis I consider the current plan unsound.

**Representation Changes Necessary**

**Officer Response**

The Core Strategy is justified by evidence that reflects local circumstances. The Council has prepared the document with the full knowledge of the Government's intention to revoke Regional Strategies. It is satisfied that the proposals are necessary to address local needs.

The social, economic and environmental implications of the Core Strategy has been fully assessed through a Sustainability Appraisal.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 86	First Name Mike		Last Name Smith				On Behalf Of	Woking Football Club

174 Core Strategy PD

### Representation

The strategy, while supporting the need for additional leisure and community activities, goes on to ignore the need for provision in terms of space, and in particular in the green belt, except in very limited circumstances. There is no intention to review the green belt boundaries where such provision might be possible for a number of years. Section 3.3.0.4 seeks to protect the green belt to “harness its recreational benefits for the community” yet parts of the green belt alongside the present urban area are not available for recreation or leisure.

The plan says one thing about community and leisure space needs and yet does not facilitate provision. The land immediately south of the urban area between Egley Road, the railway line and the nursery land in south Woking would provide an ideal space for this type of activity. Football in the community has is important and Woking Football Club h itself made a very significant contribution to this in the borough. The club activity support the community, but is constrained by its urban location to develop its football-related activities. There are concerns about access on larger match days, impact on local residents and parking difficulties.

The Egley Road site should be re-designated as leisure land with the additional provision of a new football stadium and could also provide a home for other Woking sports clubs. This is a sustainable location and would provide the opportunity for the much-needed community and football activities, helps fight against obesity, but encourages discipline and structure in the lives of young people, supporting the Council’s aspirations for a healthier and more cohesive community.

It has become increasingly difficult and costly to find pitches for football in the community activities. The only alternative therefore is in the current green belt.

Use of this area for sport and recreation would serve two other valuable purposes; it would define the limit of the urban area between the town and Mayford Village, thus protecting and preserving the village identity; and it would connect with and enhance the recreational experiences on offer through The Hoe Valley.

### Representation Changes Necessary

In summary, we believe that there are no suitable places within the urban area in which to relocate the football club and stadium and on that basis the opportunity should be taken in the plan to re-designate the Agley Road land for the purpose. This would enable the club and other sports to provide more modern facilities and for the community football teams and other clubs to continue to expand alongside the stadium. It would also remove concerns about local parking on match days.

### Officer Response

The representation made by Woking Football Club is largely directed at the release of a specific site within the Green Belt in order to provide a new football club and a sports stadium. The Core Strategy does not allocate sites for development. The proposal will be considered as part of the Sites Allocation DPD. The site is in the Green Belt. A Green Belt boundary review is scheduled for 2016/17. The suitability of the proposed site for development will be considered as part of the process.

### Council's Proposed Action

**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID 92	First Name Barbara		Last Name Beck			On Behalf Of Campaign to Protect Rural England - Woki		
199	Core Strategy PD			Yes	No	Consistent with national policy		

**Representation**

This matter is not an objection, but a concern over the "Soundness" of the Plan, resulting from the recent Government's proposed changes to the NPPF and whether the Publication CS conforms to the aspects the Draft NPPF.

We sympathise with those officers who are responsible for compiling the publication document, as the Government's Draft NPPF has been made public after the Woking CS was written.

We have concerns however that the CS, as it now exists, does not fully conform to the Draft NPPF, which is already a material consideration. WBC therefore needs to take decisions quickly as to how they address this important issue and what changes they make to their Draft CS document at this late stage, in order to make sure that there is no possibility of the Examination Inspector finding it "unsound" because it fails to conform to all aspects of the (by then adopted) NPPF.

**Representation Changes Necessary**

**Officer Response**

The Draft National Planning Policy Framework has just been through public consultation. It is likely that parts of it will be amended before it is finally published. However, the Council has carried out a self assessment of how the Core Strategy Publication Document is conforming to its requirement. The Council is satisfied that at this stage there is nothing in the Draft NPPF that will require further changes to the policies of the Core Strategy.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 96	First Name Tony		Last Name Kremer				On Behalf Of	

244 Core Strategy PD

**Representation**

My broad point in relation to the Core Strategy is that it appears to me too evolutionary, building on practices that have applied for some years. Clearly we are in the midst of a technological revolution in which IT and digital communications are changing virtually every aspect of our lives, and I believe that any strategy for the next 15 or so years must try to take advantage of this. Indeed part of the strategy should be to enable all parts of our community to benefit, to counter any "digital divide".

To this end I have submitted a separate comment for the Inspector's attention regarding the Social and Community infrastructure (C819).

I do want to make a related point in this letter about how the Council and its residents can effectively work together as is expected of them under the Localism agenda. This point is much more about "infrastructure" than communications policy. I simply do not believe that the standard ways of communicating with residents will deliver the kind of community engagement required of Woking in the future, i.e. advertising consultation meetings, visiting residents' associations, using the local Councillors' newsletters, etc. There needs to be a much more comprehensive, accessible and (in their eyes) relevant method found. I have a proposal to make in this regard.

The reason I became involved in the Neighbourhood Watch movement is because I saw in it the embryonic solution to this lack of infrastructure. It has what I believe are the essential characteristics required, namely:

- a bottom-up structure, based on streets, care homes and small estates like Graylands. We call these Watches

This means that people are asked to be engaged at a level that they actually know a lot about their own neck of the woods. Upon that level of engagement one can build a concern with the village and the town around them.

- the communications fan out from a 'Street Coordinator', someone known and trusted by his/her neighbours.

This allows volunteers to commit to a level that is not too demanding of their scarce time and avoids involvement in committees and other forms of bureaucracy.

Letter from Tony Kremer 22 September 2011.

- the communications are almost all by email, but only the Street Coordinator has to be on-line

This method of communication down the road is preferably by email.

However, ideally those not on-line can arrange to get hard copies through

one of their near neighbours, a practice we encourage but cannot compel Watches to follow

- the underlying administration is light, as only the Street Coordinators' contact details are captured centrally while the details of those on each street are known only to the Street Coordinator. No-one wants a Big Brother solution!

While Neighbourhood Watch has only 250 streets/estates covered, Woking would need a structure four or five times bigger. I suggest the way in which further recruitment is achieved might be as follows:

- the Council should explain why it wants to 'connect up Woking' and create some level of public awareness of the opportunities ahead

- the Council would issue a high-profile appeal for would-be Street Coordinators to come forward

- at the same time the Council could contact all 'active citizens', Residents Associations, etc. to publicise the idea

- a mailing might be necessary to every street with no potential Coordinator 'this would be an attractively art worked message: 'will you be the Coordinator for your street?'

- meetings would be held in each of Woking's nine areas with the volunteers to brief them and arm them with leaflets and other material to recruit their neighbours into a Watch (maybe by then a different term would be used)

- volunteers would accompany these new Coordinators as they go out to start up the Watches in their street

In my view the relevance to the upcoming Neighbourhood Planning environment is to add legitimacy and oversight to the deliberations and conclusions of the local team engaged in the planning decisions. All too often a so-called representative body is unable to look beyond its committee for input on the issues before it, simply because of the logistics and cost involved. The scheme I propose is a low cost solution to this challenge.

It is everyone's expectation that the march of technology will continue, and in particular the mechanics of social networking will grow. There will undoubtedly be tools available

**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 96	First Name Tony		Last Name Kremer				On Behalf Of	

for crowd-sourcing ideas and embracing Wikipedia tools to harness the knowledge and insight of wide disparate groups of people. Working needs to prepare the ground for this, piloting new tools and looking openly at new ways of encouraging community engagement. I hope these thoughts can provide some stimulus to your efforts in this direction

**Representation Changes Necessary**

**Officer Response**

The comments and information provided are helpful and noted. They will be passed on to the Corporate Policy Team to consider and fed into strategies about how the Council does its business.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

256 Core Strategy PD No More than 1 selected

**Representation**

Westfield Common Residents' Association have reviewed the core strategy consultation document and find it unsound; in many instances it is neither justified nor effective.

Our strong recommendation is that before finalising the core strategy, Woking Borough council should rethink its vision for delivering affordable housing in already deprived areas (such as Westfield) and consider alternative ways to improve the economy by cherishing our green open space, Woking's history, by working with existing key stakeholders such as McLaren and Mercedes Benz World and seeking to protect our special leafy pocket of Surrey.

The Government inspector requires detailed, thorough and up to date facts be used in determining the strategy and it also requires that the views of local communities are taken into account. We strongly believe that producing over 600 pages of detailed 'statements of intent' and using out of date statistics does not meet this requirement. Even resident with the brain power required to fully understand the statements cannot be expected to fully understand the impact of this strategy on the area that they have chosen as their home.

We further strongly recommend that WBC adjust the plan in the light of data from:

- Surrey Local Economic Assessment - This gives an overview of Woking's comparative economic performance compared with other Surrey Boroughs and International Cities and the areas Woking needs to address to further increase its competitiveness
- Surrey CC Families in Poverty Needs Assessment February 2011 This provides further information on the wellbeing of Woking residents and the issues WBC needs to address
- NHS Woking Health Profile June 2011 – This further highlights the Social issues that need to be addressed in Woking
- Guildford Retail & Leisure Study May 2011 This provides very detailed information on the strengths & weaknesses of Woking's Retail Centre. It highlights opportunities for growth that will not be obtained by just having more retail space and a railway station.
- Housing Strategy Consultation Residents Survey – January 2011 – This provides an update to the data used in the SHMA
- BCSC Study Paper – Empty Shops- What does the future hold for Town Centres September 2011 – This provides an indication that voids in Town High Streets and Shopping Centres will continue to grow. It therefore casts doubt on the economic merit of increasing Woking's Retail Floor space by 75,000 square metres.
- More accurate data is taken into account in determining housing need and the changing requirements of Woking's population.

Whilst we appreciate that Government policy is encouraging councils to build our way out of recession, we strongly recommend that the council reconsider its plans for development across the borough. The impact of over development will render Woking a less than attractive place to live, with a high density of homes, over used areas of natural green space, high rise blocks, more vacant office and retail space, more areas of deprivation and more low quality retail outlets. The approach to develop a retail centre to compete with neighbouring Guildford is fundamentally flawed without persuading stores such as John Lewis and Marks and Spencer's to open Premium Retail Outlets here.

**Representation Changes Necessary****Officer Response**

The Core Strategy seek to provide a balanced mixed of dwelling types and tenures to meet local need. It is also an objective of the Council to ensure an even distribution of affordable housing across the Borough. The application of the affordable housing policy will be sensitive to this objective.

The Council is satisfied that the Core Strategy is supported by up-to-date and robust evidence, including its population data. A Population Topic Paper has been prepared to



**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

provide information about the changing nature of the population of the area. The need for policies to be evidenced is a requirement of national policy. Many of the information that are suggested for consideration have already been taken into account.

The environmental, social and economic implications of the Core Strategy has been assessed. Overall, it is anticipated that the implementation of the Core Strategy will improve the well-being of the community.

**Council's Proposed Action**

434 Core Strategy PD

**Representation**

We believe that Woking's economy has some key valuable assets in the businesses which have set up major sites here, McLaren in particular. However the core strategy focussing on building retail and more offices, rather than focussing on those business that can really create a focus for the areas economy, if you like deciding who our 'Target Market Employers' should be.

**Representation Changes Necessary**

**Officer Response**

The importance of local businesses such as McLaren has been emphasised in the Core Strategy. However, there are also other needs of the community such as retail, housing that also needs to be addressed.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

368 Core Strategy PD No

**Representation**

Lack of community involvement

In Paragraph 1.13 the strategy states:

Five key principles underpin the preparation of the Core Strategy.

Effective involvement of key stakeholders and the general public at all relevant stages of the process in accordance with the Statement of Community Involvement.

Corporate approach to its preparation, hence the involvement of all service areas of Woking Borough Council with strong support of the Corporate Management Group.

Robust, credible and up-to-date evidence to justify policies and proposals.

Appropriate scrutiny and involvement of Councillors through relevant committees of the Council. In particular, a cross-party working group has been established to oversee the preparation of the Core Strategy.

Efficient management of the process in accordance with the Local Development Scheme.

Whilst the consultation document is well written, we believe that it has not been proactively debated outside of the council. The Citizen’s panel were invited to respond, however the impacts of this policy are so wide-ranging, and the issues so dependent on having a good understanding of the data supporting the policy, the majority of Woking residents remain ignorant of the impact this strategy could have.

We believe that data from the 2007 WBC Household Survey where you asked residents if they would like more affordable housing (which was not defined as per HCA PPS3 June 2011), has provided statistics which did not set the question in context. It is therefore, being used for the wrong purpose. For example, you asked if people wanted more affordable housing, and the answer was clearly a resounding ‘yes’. However, if you asked those same people are you happy to use green belt land, erode existing common land, designate SNCIs as ‘urban open space, and have tower blocks in the town centre so you can buy a cheaper house – the answer could be entirely different.

The residents’ associations of Woking and individual residents should have been invited to detailed sessions to build an overall understanding of the impact of the strategy to enable them to fully understand and provide alternative options and solutions to the housing issues a solution built through thorough and robust consultation. We strongly recommend that Woking BC implements the intentions of the new Localism Bill and meets with the various residents’ associations on a regular and inclusive basis to ensure that all stakeholders needs are met.

Whilst we appreciate that events for the public at large have been held; these were within the holiday month of August and when children went back to school. Best practice does not approve of using known busy times to hold such drop in presentations. In addition, it would be impossible for an attendee to fully appreciate the impact of the plans from an informal drop in session.

By using surveys for ‘general’ questions we believe the council is basing its strategy for its own gain, rather than for the benefit of all residents.

At one of the first citizens panels, the speaker who created the initial document was unable to adequately answer questions regarding Woking’s inability to manage SANGs already designated (and yet the core strategy does nothing to address this poor management). The speaker was also unable to answer questions from the group regarding the Local Development Plan recommendations and it was apparent that the core strategy at that point, and its later iterations, have been restricted to the one need to convince people (invited stakeholders) that overdevelopment is required.

The SWOT analysis in the core strategy document is extremely biased and does not take into account other stakeholders views in any way. In such a vital document covering the next 15 years, we would have expected a far more detail SWOT analysis, perhaps on each of the individual Core Strategy Issues. The council should seek to work with all

**Policy: Unclassified**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 98	First Name Nicola		Last Name Cull				On Behalf Of	Westfield Common Residents Association

stakeholders and the public to ensure that needs are met, viewpoints understood and objectives agreed.

**Representation Changes Necessary**

**Officer Response**

The Core Strategy has evolved through a number of stages with extensive public involvement at each stage. A number of events were organised for local resident associations. The Council is satisfied that much has been done to involve local people in the process.

Furthermore, the Council has been concerned to ensure that there is sufficient and up-to-date evidence base to justify each of the policies of the Core Strategy.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

405 Core Strategy PD

### Representation

An additional issue raised by the current government planning proposals is that up to now, local authorities have been able to rely on the Regional Spatial Strategy (RSS) to provide the strategic framework and policies dealing with climate change and sustainability. Indeed, policy has been that RSS policy should not be repeated in Local Development Documents as the RSS and Development Plan Documents together form the statutory development plan. In the future, if the Localism Bill is enacted as anticipated, this will no longer be the case, and the relevant development plan policies will need to be set out in the Core Strategy, the local planning authority articulating strategic planning (in co-operation with neighbouring authorities through the Duty to Cooperate). Whilst LA21 would not expect the current Core Strategy to be able to do much more than repeat the current RSS, we do expect that it will explicitly endorse the relevant policies (that have gone through the full statutory process to publication) and show how the Borough Council, working with others, will implement these policies and carry them forward. If these policies are not endorsed and carried forward, there will be significant gaps in the policy framework governing development. This is a general issue for many of the more strategic aspects of the Core Strategy, for example the general directions of growth, transport, other infrastructure, biodiversity and open space.

We note that this approach (to rely on the RSS analysis and policy) has been taken in respect of the highly contentious subject of housing numbers (with the exception of the locational component of the longer term housing supply — please see below). However, we request that the Examination considers means to incorporate all the cross-cutting policies of the South East Plan relevant to sustainability following its abolition (or alternatively their reformulation) as part of the adopted plan. In respect of climate change, we are particularly concerned that reference to climate change has been removed from Policy CS1 (from the previous Consultation Draft), and request the re-insertion of policies that reflect in particular the following subjects (policy numbers from the South East Plan):

- Policy CC1 — sustainable development
- Policy CC2 — climate change
- Policy CC3 — resource use, and
- o The relevant parts of CC4 — sustainable design and construction, insofar as they do not appear as detailed policies in the Publication Core Strategy.

### Representation Changes Necessary

We therefore propose that the plan:

- Specifically incorporates the relevant published policies from the South East Plan as an interim measure, so there is no vacuum on that plan's abolition, especially in respect of the complete understanding of sustainability (as set out in the government SD strategy). It should be possible to do this as the policies have gone through all the statutory processes, including meeting the SEA Directive.

### Officer Response

The Core Strategy provides a local strategic planning policy framework from which other Local Development Documents will be prepared. It is not intended to be a typical development management policies document. However, the Council is committed to prepare a Development Management Policies DPD. The timetable for this is set out in the Local Development Scheme. This document will pick up on detailed policies that the Council may wish to have that are not covered by the Core Strategy.

### Council's Proposed Action

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

417 Core Strategy PD

**Representation**

We therefore request that measures are put in place to deal with:

Incorporating specific measures to secure better health and the avoidance of obesity, which is now an important component of development plans, relating to the provision of and acces to primary health facilities, other community infrastructure, open space, leisure facilities, the location of development, design, layout and the transport infrastructure by all modes.

**Representation Changes Necessary**

**Officer Response**

The Core Strategy is supported by adequate infrastructure, many of which will contribute towards addressing obesity. An Infrastructure Delivery Plan has been prepared to identify the infrastructure needs to support the Core Strategy and how they will be delivered.

**Council's Proposed Action**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 99	First Name John		Last Name Hack				On Behalf Of Woking LA21	

406 Core Strategy PD

**Representation**

Evidence on the need to build in the means to a more sustainable future includes:

- \*the body of work leading up to PPS1 and the Supplement on Climate Change (para 7 refers to the urgent need for action)
- \*the work done on the Regional Strategic Development Framework and for the South East Plan
- \*The large and growing body of evidence (from government, parliament and international bodies to professional and financial institutions and the energy industries themselves) that business as usual is not an option.
- \*The work being undertaken in several authorities and areas (eg Bristol, Greater Manchester) examining the implications of Peak Oil and explicitly applying this to spatial planning policies. The RTPi has been undertaking a study of Peak Oil and how to take it into account in planning policy (Planning, 20 August 2010)
- \*Foresight reports, particularly on food security and on land use
- \*The supporting work to the National Policy Statements on energy infrastructure
- \*The actions and webpages of the Sustainable Development part of DEFRA (and the Sustainable Development Commission before it was abolished) in setting out the framework of action on sustainability,
- \*The OECD report on Green Growth (endorsed by DECC)
- \*Identification of the factors contributing to sustainable development, eg the paper Hallmarks of a sustainable city by CABE (one example amongst many)
- The actions of Low Carbon Communities, Low Emissions Strategies and Transition Towns in demonstrating the need and the means for more sustainable living
- Academic papers, eg Peak Everything — the end of non-renewable resources by Richard Heinberg (presented to Ecobuild in March 2011, and publications such as Prosperity without growth by Tin, Jackson.

**Representation Changes Necessary**

**Officer Response**

Reference to the information that are suggested are noted. A number of them has been considered in developing the evidence to support the Core Strategy.

**Council's Proposed Action**

**Policy: Vision**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 76	First Name Alex		Last Name Chapman			On Behalf Of	Terence O-Rourke Ltd	
92	Core Strategy PD	28	3.3		No	Effective		Ace Marcell has an interest in the land at The Mount to development.

**Representation**

Obj 4 should recognise that there is a need to release land from Green Belt to meet the borough's development needs. Given that policies CS6 and CS10 provide for land to be released from Green Belt it is important that this is recognised in obj 4 as policies flow from them. This will ensure that there is a clear trail from the objectives to the policies that will help ensure the Core Strategy is deliverable.

**Representation Changes Necessary**

"To protect the integrity of the Green Belt whilst meeting the Borough's development requirements and to harness its recreational benefits for the community".

**Officer Response**

The need to release Green Belt land for housing development is adequately covered by policies CS1, CS6 and CS10. No further benefit will be served by repeating this in objective 4.

**Council's Proposed Action**

**Policy: Vision**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	77	First Name	Marianne	Last Name	Meinke	On Behalf Of
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99	Core Strategy PD		3.0		No	Effective		
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**Representation**

Woking gives support to various faith groups and whereas an approach that is fair to everyone is needed. We are not a secular society community facilities might be better run by the Council.

**Representation Changes Necessary****Officer Response**

The Core Strategy seeks to meet the needs of all sections of the community if it is justified to do. The Council has carried out a Social and Community Infrastructure Study to identify the need for social and community infrastructure. That study assesses the needs of all groups, including faith groups. Having said that, there is no specific support to any particular faith group in Section 3.0 as indicated by the representation.

**Council's Proposed Action**

97	Core Strategy PD				No	Effective		
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**Representation**

Should we not see more comments about the Council itself? Perhaps cost issues such as:

Over ambitious approach to sustainable development

Possibility of failing to manage new build leading to expenditure on rework e.g. canopy

Focus on becoming an exemplar of sustainable development may be at a cost to fundamentals such as litter collection, general maintenance which services give a town a feel good factor

management of business partnerships. Difficulties in comfortable relationships arising which could act to the detriment of the Council coffers

Ensuring that Equality Act is complied with and discrimination avoided.

**Representation Changes Necessary****Officer Response**

The Core Strategy does not deal with the Council's income and expenditure, in particular, how it sets its priorities for investment. The comments will be passed on to the appropriate officers to consider.

**Council's Proposed Action**



**Policy: Vision**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 77	First Name Marianne		Last Name Meinke			On Behalf Of		

93 Core Strategy PD No Justified

**Representation**

Little Riding doesn't fall within 1.2 miles access to green space for the disabled, vulnerable people or those walking alone. The Bedser trail is nearby and attractive, but this is a wooded area. The canal is nearby but access is difficult for those with mobility issues and there are the usual dangers in such areas. There is nowhere to sit that is traffic free.

**Representation Changes Necessary****Officer Response**

The comments raised are noted. The Council makes significant effort to improve conditions for the disabled and vulnerable groups. The Core Strategy provides sufficient framework for the provision of open spaces for recreation to the benefits of all sections of the community. The Council will continue to work to ensure that community assets and facilities are accessible to all, including the disabled and vulnerable groups. This effort goes beyond the input of planning and require all service areas of the Council to work in partnership with their stakeholders to achieve this objective.

**Council's Proposed Action**

98 Core Strategy PD 3.0

**Representation**

Unity cabinets are being placed on small areas of verge in Oriental Road which does nothing to add to the feeling of a green borough where people will have easy access to open spaces or enjoy the leafy character of the area.

**Representation Changes Necessary****Officer Response**

This matter is outside the scope of the Core Strategy. However, it will be passed on to the appropriate officer to consider it.

**Council's Proposed Action**

**Policy: Vision**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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Customer ID	77	First Name	Marianne	Last Name	Meinke	On Behalf Of
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94	Core Strategy PD				No	Justified		
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**Representation**

There is perhaps too much concentration on cycles at the expense of children, the disabled and vulnerable people.

**Representation Changes Necessary****Officer Response**

The provision of cycle infrastructure is an essential part of the Council's transport strategy. It has significant benefit for reducing congestion and pollution. Ensuring safe cycling has benefits for children and those without access to private car. The Council is acutely aware that its effort to encourage cycling should not be to the detriment of other road users, including pedestrians, disabled and vulnerable groups. In particular, it is always concerned to ensure that the safety of other road users are not compromised.

**Council's Proposed Action**

96	Core Strategy PD				No	Effective		
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**Representation**

Are the Council's approach and outcomes (costs in terms of investments, salaries, etc) taken into account in our pursuit of becoming sustainability champions?

**Representation Changes Necessary****Officer Response**

The Council makes significant effort towards achieving sustainability and are recognised for its effort. It strikes a good balance between the competing demands on its finances and is confident that it can continue to deliver on its targets to achieve sustainability.

**Council's Proposed Action**

**Policy: Vision**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
Customer ID 77	First Name Marianne		Last Name Meinke			On Behalf Of		
100	Core Strategy PD		3.0		No	Justified		

**Representation**

Is there recent research demonstrating absolute deprivation in Sheerwater and Maybury? I could find a recent report on the Surrey site but data was collected in 2004. This may not be justified. Unemployment is recorded in some recent reports is between 1 and 2 per cent.

**Representation Changes Necessary****Officer Response**

Useful information to justify the designation of Sheerwater and Maybury as Priority Places include:

- \* Indices of multiple deprivation;
- \* Priority Places Action Plan; and
- \* Sheerwater and Maybury Action Plans.

Officers have already left a message for the respondent with further information. It was felt that this will be helpful to the respondent as her representation was just a request for information.

**Council's Proposed Action**

**Policy: Vision**

Rep ID	Which Doc Does Comment Relate To	Page	Paragraph	Legally compliant	Sound	Test Of Soundness	Participate in Exam	Why Participate in Exam
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<b>Customer ID</b> 78	<b>First Name</b> Heather		<b>Last Name</b> Twizell				<b>On Behalf Of</b> Natural England	
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117	Core Strategy PD		3.0		No	Effective		
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**Representation**

3.0: Spatial vision, objectives and strategy

We are particularly in support of the aspirations towards a Borough of high environmental quality and a green borough with easy access to good quality green spaces.

We are also encouraged that many of our key areas of interest remain stated explicitly within the objectives to achieve the vision for Woking. However, we remain disappointed that Objective 10 (transport system) is less ambitious than in previous drafts in that it has lost the statements "Most people who live further away from Woking Town Centre car get to it by good, frequent public transport" and "Using a car is a choice not a necessity."

**Representation Changes Necessary****Officer Response**

The support expressed are noted. The Core Strategy, in particular, Policy CS18 - Transport and Accessibility supports proposals that deliver improvements to walking, cycling and public transport. However, it is also recognised that the car has a role to play in a package of transport measures to deal with the transport problems of the Borough. There are some people that the car is a necessity and not a choice because of the specific nature of their circumstances. Accepting the suggested wording will not reflect the needs of all sections of the community.

**Council's Proposed Action**

<b>Customer ID</b> 79	<b>First Name</b> John		<b>Last Name</b> Woodhouse			<b>On Behalf Of</b> Environment Agency
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109	Core Strategy PD	27/28	3.3			
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**Representation**

The mention and inclusion of an objective to protect and enhance biodiversity.

This has now been strengthened and the justifications are sound.

**Representation Changes Necessary****Officer Response**

Comment noted.

**Council's Proposed Action**