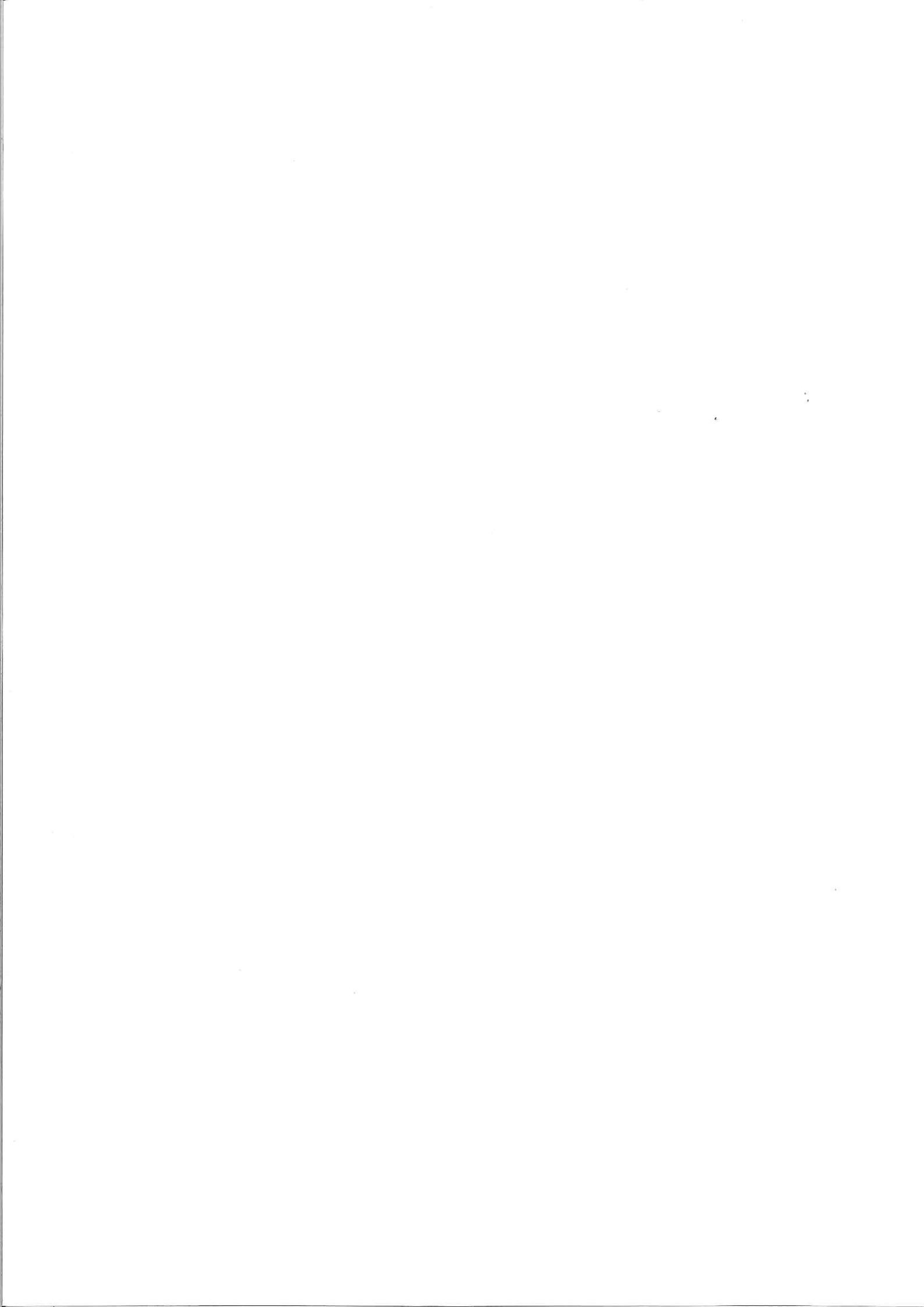




**Proposed changes to Core Strategy
Publication Document
December 2011**



**Proposed Changes to the Core
Strategy Publication Document
(2011) based on
Representations made.**

Introduction

The preparation of the Core Strategy Publication Document has evolved through various stages. Throughout all the stages of the Core Strategy process, the Council has been concerned to ensure that public involvement is central and has valued and taken into account comments received at each consultation stage. The Core Strategy Publication Document, the Sustainability Appraisal Report and the Proposals Map were published for consultation between 25 July 2011 and 23 September 2011. Overall, about 350 representations were received from 87 individuals, resident groups and organisations. The Council considered the representations at its meeting on 8 December 2011 and proposes to make the following changes for the Inspector to consider as part of the Independent Examination. Also attached are a few minor changes that that Council wish to make to enhance the quality of the Core Strategy Publication Document.

Policy Consultation Report

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 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 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.'

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	16	First Name	Colin	Last Name	Weeks	On Behalf Of			

33 Core Strategy PD No Justified

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

Rep 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: 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 13	First Name David		Last Name Williams				On Behalf Of	McCarthy and Stone Retirement Lifestyles
21	Core Strategy PD		5.83		No	Justified		

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
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
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Customer ID 80	First Name Kevin		Last Name Wilcox				On Behalf Of Crest Nicholson	
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- 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 late 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'.

Customer ID 83	First Name Ryan		Last Name Johnson				On Behalf Of West Estates Ltd	
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163	Core Strategy PD		5.86					
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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 th: there is a need for 70% of new affordable dwellings to be in social rented tenure and 30% at intermediate level (including shared ownership)".

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: 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
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Customer ID	28	First Name	Steve	Last Name	Staines	On Behalf Of		
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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 GTAA's 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 2106. 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 can corroborated by evidence from other sources, can be used to provide a more realistic, minimum pitch needs figure to 2012. We have used the principles set out in Chapter 2, and earlier in this Chapter, to estimate additional locally arising need to 2016.

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 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 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 a 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.' Anew 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: 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 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	

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 20101 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 100	First Name Carmelle		Last Name Bell				On Behalf Of Thames Water Utilities Ltd	

430 Core Strategy PD

No More than 1 selected

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: 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	

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: 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."

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 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 m² is sometimes used to represent sq.m (including in the South East Plan), to ensure best practice and avoid ambiguity all references to m² will be changed to sq.m.

Council's Proposed Action

It is proposed to change all m² 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
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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

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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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".

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: 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	66	First Name	Peter	Last Name	Cannon	On Behalf Of
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343	Core Strategy PD		106	Yes	No	Effective		
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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 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: 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

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.)

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
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Customer ID 93	First Name Sue		Last Name Janota				On Behalf Of Surrey County Council	
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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
Customer ID 8	First Name Pauline		Last Name Marshall				On Behalf Of	

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 on 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: 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
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Customer ID	93	First Name	Sue	Last Name	Janota	On Behalf Of	Surrey County Council	
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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".

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: 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 43	First Name Robert		Last Name Palgrave			On Behalf Of		
275	Core Strategy PD			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

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 and 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 trees 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 trees 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 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.'

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: 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	

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 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
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Customer ID	100	First Name	Carmelle	Last Name	Bell	On Behalf Of Thames Water Utilities Ltd		
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432	Core Strategy PD				No	More than 1 selected		
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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 data 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 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: 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 proposed 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
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Customer ID	93	First Name	Sue	Last Name	Janota	On Behalf Of Surrey County Council		
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202	Core Strategy PD		1.33					
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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: 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".

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
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Customer ID 79	First Name John		Last Name Woodhouse				On Behalf Of Environment Agency	
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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: 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.

Minor Changes Proposed by Woking Borough Council

Page	Section	Issue	Amendments required	Notes
27	Spatial vision box	Box has an incorrect title. It says "Spatial vision, objectives and strategy".	Amend title to "Spatial vision".	
30	Figure 3: Areas identified for growth	Missing copyright	Include text - <i>"Reproduced from the Ordnance Survey Mapping with the permission of HMSO crown copyright and database right 2010. Unauthorised reproduction infringes crown copyright and may lead to prosecution or civil proceedings. Licence No. 100025452."</i>	
33	Key diagram	Star indicating the Potential new access road dropped.	The star should lie directly above its current location, above the railway line and between the two employment areas. Please see updated diagram.	
36	CS2 Woking	Para 4.4	For accuracy it is 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".	
44	CS5: Priority Places - Accessibility	The proposed new access road in Sheerwater is not shown on the proposals map, and thus reference to such should be deleted.	In order to improve accessibility into and out of the Maybury and Sheerwater area, the Council will work with Surrey County Council to bring forward proposals for a new access road through Monument Way East and Monument Way West, as-	The Proposals Map indicates current Local Plan 1999 road schemes. The proposed new access road, outlined in CS5 does NOT show such proposal.

Page	Section	Issue	Amendments required	Notes
			indicated on the Proposals Map.	
51	para 5.1	Reference to the Green Belt being a significant spatial issue.	Should be changed to a spatial 'factor'.	
51	CS6: Green Belts	The policy refers to PPG2 3 times, each time the policy is reference differently	All should be referred to as 'PPG2: Green Belts'	
70	CS12: Affordable Housing	Third bullet states two different percentage targets	In the third bullet of the policy change reference to 10% to 20%	
79	CS14 Gypsy	5.113	Line 5 replace the year 2011 with 2012.	
82	CS15: Sustainable economic development	Reference to policy CS18 needs amending to CS19	CS19	
90	CS17	Reference to PPG17	Should refer to the title of this policy in Capitals 'Open Space, Sport and Recreation	
90	CS17	Sentence starting 'Allotment numbers'	Should read 'the Number of allotments'	
90	CS17	The word 'in-principle'	This should either be in quotes or italics " <i>in-principle</i> "	
93	CS18: Transport and accessibility	Policy needs a semi-colon	This will be achieved by taking the following steps:	
95	CS18: Transport and accessibility	Footnote 14 is on page 94	Footnote 14 should be on page 95.	
100	CS20: Heritage and conservation	Referred to a listed building with and without capitals differently within the same para	Should be in lower case consistent with the act and English Heritage	

Page	Section	Issue	Amendments required	Notes
105	para 5.207	The PPS	Need to be amended to 'This supplement to the PPS'	
125	Appendix 1: Evidence base supporting the Core Strategy	Economic Viability Assessment and Transport Assessment are listed twice	Remove one of the references to each study.	

