



Topic Paper

Self Assessment of the Conformity of the Core Strategy Publication Document with

National and Regional Policy

Woking and Surrey Sustainable Community Strategies

Key Priorities of the Council

December 2012



Produced by the Planning Policy Team

For further information please contact:

**Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square,
Woking, Surrey, GU21 6YL.**

Tel: 01483 743871. Email: planning.policy@woking.gov.uk

TOPIC PAPER

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Woking and Surrey Sustainable Community Strategies

Key Priorities of the Council

1.0 The following report provides statements on:

- How the Core Strategy will deliver the objectives of the Woking Sustainable Community Strategy.
- How the Core Strategy vision is compatible with the objectives of the Surrey Sustainable Community Strategy.
- How the Core Strategy will deliver the key priorities of the Council.
- A statement of conformity of the Core Strategy with national and regional planning policy.

2.0 How the Core Strategy will deliver the objectives of the Woking Sustainable Community Strategy

2.1 Woking Partnership is responsible for the preparation of the Woking Sustainable Community Strategy. The Woking Sustainable Community Strategy sets out six key aims, the following three of which are directly relevant to the Core Strategy:

- a transport system that is linked and accessible, recognising Woking's potential as a transport hub;
- access to decent affordable housing for local people and key workers; and
- personal health and well-being.

2.2 The Core Strategy vision, objectives and policies are aligned to deliver the aspirations of the local community, as expressed in the Woking Sustainable Community Strategy. With specific regard to the three aims set out above, the Core Strategy delivers the following:

- Transport policy (CS18) seeks to link people to jobs and community facilities in a sustainable manner. The role of public transport is particularly emphasised, and the policy seeks to minimise the need to travel and distance travelled by locating most development in the main urban centres which are served by sustainable transport modes.
- Housing policies (CS10 – 13) seek to ensure that there are sufficient homes built in sustainable locations that people can afford and which meet the needs of the community. Policy CS12: Affordable housing sets the overall target for affordable housing provision at 35% of all new homes.
- A number of policies in the Core Strategy support the delivery of improved personal health and well-being for local residents, however policies CS17 and CS19 specifically aim to improve the well being of Borough residents. The purpose of policy CS17: Open space, green infrastructure, sport and recreation, is to provide opportunity for people to participate and enjoy sports and recreation and to facilitate effective access to the countryside and the amenity it offers. Policy CS19: Social and community infrastructure aims to promote the use of social and community infrastructure and ensure adequate provision of new facilities to accommodate growth in the local population.

2.3 The Vision for the Core Strategy was considered and approved by Woking

Partnership to provide an overarching direction for the policies of the Core Strategy and to lay a sound basis for delivering the aspirations of the local community (see Minutes of Partnership meeting on 16 April 2010). The Partnership played an active role in developing the policies of Core Strategy from the beginning to its submission. It had sought to ensure that the policies of the Core Strategy are providing the necessary framework for delivering the objectives of the Core Strategy. The Core Strategy had been an item for discussion at each of the Partnership meetings. The Minutes of the meetings are available for evidence. An assessment of the extent to which the Core Strategy will be assisting in delivering the aspirations of the Sustainable Community Strategy was approved by Council at its meeting on 8 December 2011.

3.0 How the Core Strategy vision is compatible with the objectives of the Surrey Sustainable Community Strategy

3.1 The Borough Council and partner organisations, through the Woking Partnership are committed to working with the Surrey Strategic Partnership to contribute to all ten identified priorities in the Surrey Sustainable Community Strategy. The Core Strategy is relevant to the following seven priorities:

- Improve learning, health and employment outcomes for children and young people, particularly the vulnerable and disadvantaged.
- Promote healthy lifestyles, particularly targeting groups and communities at most risk.
- Improve the global competitiveness of Surrey's economy through sustainable growth, underpinned by appropriate infrastructure.
- Make Surrey's economy more inclusive
- Help people in Surrey to achieve more sustainable lifestyles.
- Achieve better standards of development to deliver more social, environmental, and economically sustainable benefits.
- Strengthen local communities through targeted public and voluntary sector activity, active citizenship and work to tackle inequalities. Work will focus on delivering the above in identified 'priority community' areas of the borough.

3.2 The remaining three priorities concern safeguarding of young and vulnerable people, support for independent living and improving public confidence in the ability of public services to keep Surrey safe. The Core Strategy will assist in the delivery of all the above priorities. However, Policy CS5: Priority Places specifically aims to ensure that resources are targeted at the most disadvantaged and vulnerable communities in the Borough to tackle issues relating to housing, employment opportunities/skills, retail provision, accessibility, infrastructure and public realm and design.

4.0 How the Core Strategy will facilitate delivery of the key priorities of the Council and Council Strategies and documents

4.1 Woking Borough Council has four key priorities. These are:

- decent and affordable housing;
- the environment;

- health and well-being; and
 - economic development.
- 4.2 The Core Strategy Publication Document takes these into account and provides a strong policy framework for their delivery. For example, it set clear targets for the delivery of affordable housing. An Economic Viability Assessment has been carried out to ensure that the affordable housing targets do not prevent general market housing from coming forward for development. The Core Strategy also ensures that there is an appropriate quantity and range of employment land in the Borough to enable the local economy to function efficiently and enhance its competitiveness. It sets high standards for carbon reduction, which will have positive effects on climate change. A Sustainability Appraisal has been carried out, which concluded that overall, the Core Strategy will improve the well-being of the community. The adoption of the Core Strategy is therefore fundamental to the delivery of the Council's key priorities.
- 4.3 The Core Strategy is one of a number of Council Strategies and documents that seek to achieve a similar goal of sustainable development in the Borough. In this regard, the Core Strategy does not sit in isolation but should be looked at in the context of the Council's overall drive to create a sustainable community for Woking. The Core Strategy has strong links with many of these documents and a number of them are listed in the delivery sections of the Core Strategy because they are identified as delivery mechanisms for the Core Strategy. Others such as the Sustainable Community Strategy provide a context for the preparation of the Core Strategy. A list of the relevant ones includes:
- Sustainable Community Strategy
 - Housing Strategy.
 - Climate Change Strategy.
 - Pitch and Play Strategy.
 - Green Space Development Strategy.
 - Cultural Strategy.
 - Public Art Strategy.
 - Town Centre Management Initiative.
- 4.4 Paragraph 6.14 of the Core Strategy Publication Document emphasises the linkages of the Core Strategy to the above.
- 5.0 A statement of conformity of the Core Strategy with national and regional planning policy**
- 5.1 The sustainability appraisal of alternative options was carried out in accordance with Section 16(2) of the Planning and Compulsory Purchase Act 2004. The options were refined prior to appraisal to take into account responses from a public consultation exercise. A significant material consideration during the appraisal was the extent to which the options met the requirements of national and regional planning policy. The preferred options identified as a result of the sustainability appraisal were found to be in general conformity with national and regional planning policy and have directly informed the policies in the Core Strategy. The SA of Options is a key evidence base to support the Core Strategy. In this regard, it is not intended to repeat this assessment in the topic paper. The assessment lists

the relevant policies in the South East Plan, Planning Policy Statements, Planning Policy Guidance Notes for which the preferred options are in general conformity with.

Regional Policy

- 5.2 The SEP sets strategic policy for:
- Housing, including affordable housing
 - Protection of the environment, including the SPA and Green Belt
 - Economic Growth, and
 - Climate change
- 5.3 The Core Strategy is underpinned by locally and objectively assessed evidence base. It sets clear targets for climate change, a housing target with a significant proportion to be affordable housing, a commitment to review the Green Belt boundary and a separate policy for the Thames Basin Heaths Special Protection Areas (SPA). All these are in general conformity with the requirements of the SEP. Furthermore, the evidence used to determine the overall housing target in the SEP for Woking has been used to inform the housing target of the Core Strategy. The Council is of the view that the evidence is up-to-date, credible and has been subject to scrutiny in the SEP Examination.
- 5.4 The Council is aware of the Government's intention to revoke Regional Strategies, in this case the South East Plan. The Localism Act 2011 received its Royal Assent on 15 November 2011. Part 6, Chapter 1 – Plans and Strategies repeals sections of the Local Democracy, Economic Development and Construction Act 2009 (interpretation and effect of Regional Strategies) and the remaining of Part 5 of the Act (Regional Strategies). This is likely to be effective from 1 April 2012.
- 5.5 The Government has also published the Environmental Report on the revocation of the South East Plan (October 2011) for consultation. This document assesses the social, economic and environmental implications of the revocation of the South East Plan. The consultation period ends on 20 January 2012. In publishing the document, the Government have said that it will consider representations received during this consultation before the revocation of Regional Strategies takes effect. The Council had taken account of the intentions of the Government and had carried out locally specific evidence base to support the policies of the Core Strategy. Whilst the policies of the Core Strategy are in general conformity with the South East Plan, it has also looked ahead and taken into account the requirements of the emerging Draft National Planning Policy Framework (NPPF). The Council is satisfied that the Core Strategy is in general conformity with both the South East Plan and the Draft NPPF.

National Policy

- 5.6 The policies of the Core Strategy have been assessed against current planning policy statements and planning policy guidance notes. They are proven to be in general conformity with this guidance. The Sustainability Appraisal of options provides the evidence to support this. However, since the publication of the Draft Core Strategy, the Government has proposed a number of changes to the planning system. These are either set out in the Localism Act or by ministerial statements and other publications. They form part of the context within which the Core Strategy has been prepared.

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

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

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

- Local Authorities should prioritise growth and jobs. In this regard, the Secretary of State has written to Local Authorities setting out clear expectations to prioritise growth and jobs.
- A new presumption in favour of sustainable development as set out in the emerging National Planning Policy Framework.
- There will be a legal requirement to carry out an economic viability assessment to justify the rate at which CIL tariff is set.
- Businesses will be able to bring forward neighbourhood plans and neighbourhood development orders.
- The national target on development on previously developed land is removed.
- A review of the Use Classes Order to make it easier to convert commercial premises to residential has been subject to public consultation.
- The duty to co-operate has been strengthened.

5.9 A key part of the emerging changes to national planning policy is the publication of the Draft National Planning Policy Framework (NPPF) (25 July 2011). The Draft NPPF combines the various existing Planning Policy Statements and Planning Policy Guidance Notes into one concise document that is easy to read and understand. The NPPF has been through public consultation, which ended on 17 October 2011. It is likely that it will be amended before it is finally published. However, it is expected that its main thrust will be retained. The NPPF includes a number of requirements. The Council have carried out a self assessment of how the Core Strategy is meeting the requirements of the NPPF. Of the approximately 80 - 90 different requirements set out in the Framework, it is the Council's view that all are satisfied by the Core Strategy. (See Appendix 1 for a table showing how the Core Strategy is meeting the requirements of the NPPF). This assessment was approved by the Council at its meeting on 8 December 2011.

Appendix 1

ASSESSMENT OF THE GENERAL CONFORMITY OF THE CORE STRATEGY PUBLICATION DOCUMENT TO THE NATIONAL PLANNING POLICY FRAMEWORK

The Government has published its Draft National Policy Framework (NPPF) (July 2011) for consultation. The consultation period expired on 17 October 2011. Paragraph 26 of the document emphasises that 'it will be open to local planning authorities to seek a certificate of conformity with the Framework'. There are no details about how and from whom the conformity should be sought.

Woking Borough Council is about to submit its Core Strategy to the Secretary of State for Examination. The Council has approved a submission date of December 2011. The Publication version of the Core Strategy was published (25 July 2011) just about the same time that the NPPF was published. It is possible that the NPPF will not be adopted by the time that the Core Strategy is submitted to the Secretary of State for Examination. The Council has therefore assessed the requirements of the NPPF and how they are being met by the policies of the Core Strategy Publication Document. Table 1 provides detailed assessment of how the Core Strategy Publication Document conforms to the requirements of the NPPF. Overall, it is concluded that if the Draft NPPF were to be published in its current form, the Core Strategy Publication Document will be in general conformity with its requirements. It is likely that the Draft NPPF will be amended to take into account representations received during the consultation period. However, it is anticipated the main thrust of the document will remain.

The Council has committed to prepare a separate Site Allocations Development Plan Document and Development Management Policies Development Plan Document in its adopted Local Development Scheme. These documents will also contribute to meeting the requirements of the NPPF when they are adopted.

Table 1

NPPF – Para No	Requirement of the National Planning Policy Framework	How the requirement has been covered by the Core Strategy
14	Ensure that objectively assessed development needs can be met, with sufficient flexibility to respond to rapid shifts in demand or other economic changes;	There is clear demonstration that the housing, including affordable housing and employment targets are objectively assessed. The Strategic Housing Land Availability Assessment (SHLAA), Employment Land Review (EMR), Population Topic Paper and the Economic Viability Assessment provide evidence of how need has been assessed and delivery, in particular, the identification of sufficient land to deliver targets. An IDP prepared has been to demonstrate how necessary infrastructure to support proposed development is to be achieved. Each policy has a section about how it will be delivered (see policies CS2, CS3, CS4, CS5, CS10, CS12, CS13, CS14, CS15 for examples of policies with specific targets for development and how they will be delivered. Policies have sufficient flexibility to adapt to change. Requirement met
15	Plans should be based upon and contain the presumption in favour of sustainable development as their starting point, with clear policies that will guide how the presumption will be applied locally;	Core Strategy makes specific reference to the presumption in favour of sustainable development. The adoption of the Core Strategy itself will be a significant starting point to meeting this requirement. Requirement will significantly be met with the adoption of the Core Strategy – However there will need to be further clarification of what the Government’s expectation is to be confident that this requirement has been fully met. The Site Allocations DPD and the Development Policies DPD will also contribute towards meeting the entire requirements of the NPPF. The entire Core Strategy Publication Document is useful evidence to demonstrate that the requirement has been met.
19	Provide a positive long-term vision for the area, which is kept up-to-date and provides a practical framework for making decisions;	The Core Strategy includes a clear long-term vision for the area up to 2027. The vision is positive about the future, in particular, a commitment to meet the needs of all sections of the community.

NPPF – Para No	Requirement of the National Planning Policy Framework	How the requirement has been covered by the Core Strategy
		Vision is stated in page 27 of the Core Strategy Publication Document. Requirement met
19	Take account of local circumstances and market signals, such as land prices, commercial rents and housing affordability;	The Core Strategy is locally distinctive and the evidence base to support it takes account of local circumstances. The Economic Viability Assessment, in particular, takes account of local market circumstances when assessing the burden of cost on development viability. Examples in the Core Strategy to demonstrate this are the Spatial Portrait, policies CS12 and CS22. Requirement met
19	Take account of the environmental quality (current or potential) of land, in making land use decisions, regardless of its current or previous use;	There is a clear objective to protect the environment. Assessment of land for development takes account of the environmental quality of land such as the Special Protection Area (SPA), Special Area of Conservation (SAC), Greenbelt and areas at risk of flooding (see policies CS6, CS7, CS8, CS9, CS17, and CS24). Requirement met
19	Protect and enhance environmental and heritage assets of real importance;	There are clear policies to protect and enhance heritage assets (see Policies CS20, CS21, CS6, CS7, CS8, CS9, CS17, and CS24). Requirement met
19	Promote mixed use developments, encourage multiple benefits from the use of land (wildlife, recreation, flood risk mitigation, carbon storage, food production, etc.), re-use existing resources and encourage renewable resources, make the most of public transport);	Core Strategy promotes efficient use of land and encourages mixed use development. It concentrates development in the main urban areas where key services and facilities are readily available. This will significantly reduce the need to travel and distance travelled. Furthermore, the Core Strategy seeks to maximise the re-use of existing resources by encouraging development to connect to the existing Combined Heat and Power (CHP) network to reduce carbon emissions (see Policies CS2, CS3, CS4, CS22 and CS23). Requirement met
19	Policies should enable the re-use of existing	The overall spatial strategy is clear to emphasise that most new

NPPF – Para No	Requirement of the National Planning Policy Framework	How the requirement has been covered by the Core Strategy
	resources;	development will be directed to previously developed land. The Sustainable Construction policy seeks to maximise the use of the existing CHP network (see policies CS1 and CS22). Also see comments above. Requirement met
19	Policies should actively manage patterns of growth to make fullest use of public transport, cycling and walking;	The vision, objectives and the overall strategy encourages pattern of development that maximise the use of public transport, walking and cycling. Policy CS18 amplifies this objective. Woking is a dedicated cycle town. Consequently, there has been and continue to be a number of schemes to improve cycle infrastructure and promote cycle use. Requirement met.
19	Policies should support local strategies to improve health and wellbeing for all;	SA Report assesses the impacts of the policies of the Core Strategy on the well-being of the community. It concludes that overall, the Core Strategy will have positive impacts on the well-being of the community. The Core Strategy also provides a positive framework to improve the well-being of the community by providing decent housing to meet all needs, jobs, Green Infrastructure, walking and cycling and open spaces. Examples of evidence are Policies CS10, CS12, CS15, CS16 and CS17. Requirement met
19	Policies should seek a good standard of amenity for existing and future occupants of land and buildings.	The design, open space and other policies allow scope for this requirement to be met. Furthermore, the open space policy will enhance the amenity of existing and future residents (see Policies CS17, CS21). Requirement is met
20	Restrict development only where the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework,	Development management decisions will also contribute to meeting this requirement. Generally, the Core Strategy is positive about development with clear target about what it needs to provide to meet projected needs. Harmful development will be resisted and

NPPF – Para No	Requirement of the National Planning Policy Framework	How the requirement has been covered by the Core Strategy
	taken as a whole;	the Core Strategy is clear about that too. Also, development is restricted from environmentally sensitive areas such as the SPA, SACs and the Greenbelt (see Policy CS1, CS6, CS7, CS8 and CS9). Requirement met
21	Additional development plan documents must be clearly justified;	The Local Development Scheme (LDS) justifies the number of Local Development Documents that the Council is committed to prepare (see approved LDS). Requirement met.
21	Supplementary planning documents should only be necessary where their production can help to bring forward sustainable development at an accelerated rate, and must not add to the financial burdens on development;	Supplementation can play a significant role if it helps clarify details of a policy, which otherwise could not be included in a strategic document such as a Core Strategy. The Council will ensure that this requirement will be met when preparing Supplementary Planning Documents (SPD). Requirement noted and will be met.
22	Only decisions that provide a clear indication of how a decision-maker should react to a development proposal should be included in the plan;	The policies of the Core Strategy are designed to achieve this requirement. Requirement met.
23	Plan should set out strategic priorities for the area, covering: * housing and economic development requirements; * the provision of retail, leisure and other commercial development; * the provision of infrastructure for transport, minerals, waste, energy, telecoms, water supply and water quality; * the provision of health, security, community infrastructure and other local facilities; * climate change mitigation and adaptation,	The Core Strategy includes clear policies to meet housing, employment, climate change and infrastructure requirements. The requirements/targets that are set for these needs are justified by robust evidence (see IDP, Social and Community Facilities Study. SHLAA, SHMA, ELR). Requirement met

NPPF – Para No	Requirement of the National Planning Policy Framework	How the requirement has been covered by the Core Strategy
	protection and enhancement of the natural and historic environment, including landscape, and where relevant coastal management.	
24	<p>Local plans should:</p> <ul style="list-style-type: none"> * plan positively for the development and infrastructure required in its area; * preferably cover a 15-year time horizon, take account of longer-term requirements and be a living document that is kept up to date; * show broad locations for strategic development on a key diagram and land use designations on a proposals map; * allocate sites to promote development and flexible use of land, providing detail on form, scale, access and quantum of development where appropriate; * identify areas where it may be necessary to limit freedom to change the uses of buildings, and justify it; * identify land it is genuinely important to protect from development, for example because of its environmental or historic value; and * contain a clear strategy for the environmental enhancement of the area. 	<p>The Core Strategy has a 15 year time horizon, identifies broad locations for development, protects environmentally sensitive areas and enhances the general environment of the area. A Site Allocations DPD will be prepared to allocate specific sites for development. The timescale for this is set out in the LDS. (See policies CS1, CS6, CS7 and CS8)</p> <p>Requirement met.</p>
25	Widespread and early engagement with the community is essential.	Public involvement has been at the heart of the Core Strategy process throughout all of its stages, including the Issues and options, Draft Core Strategy and Publication stages. A Consultation Statement has been prepared to provide evidence and detail of this.

NPPF – Para No	Requirement of the National Planning Policy Framework	How the requirement has been covered by the Core Strategy
		Requirement met
26	Gives local authorities the option of seeking a certificate of conformity with the Framework	Whilst the NPPF gives the option for Local Authorities to seek a certificate of conformity, it does not provide any details about who to seek the conformity from. This table is intended to demonstrate conformity with NPPF. It should be emphasised that this is a self assessment carried out by officers of the Council. Requirement is met
27	Is the plan based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects for the area? Strategies for housing, employment and other uses need to be integrated and take account of market and economic signals like land prices.	The Core Strategy is based on adequate, robust and up-to-date evidence. Appendix 1 is a list of the evidence base. Planning Advisory Service (PAS) has carried out an assessment of the evidence against a set of criteria, including the adequacy and currency of the evidence base. They have concluded that the evidence base satisfies recommended requirements. PAS Report is available on request. Requirement met
28	Plan should be underpinned by a Strategic Housing Market Assessment (SHMA), produced cooperatively to cover the housing market area, identifying the scale and mix of housing and the range of tenures that the local population is likely to require. This should: meet household and population projections, taking account of migration; address the need for all types of housing, including affordable housing; cater for housing demand and the scale of housing supply necessary to meet it. The authority should also prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and likely viability of housing land.	The Council has prepared an up-to-date SHLAA (2011). It has also prepared SHMA in partnership with others. The approach taken to prepare the SHLAA has been independently reviewed by an independent consultant and found to be credible. Requirement met

NPPF – Para No	Requirement of the National Planning Policy Framework	How the requirement has been covered by the Core Strategy
29	Local authorities need a clear understanding of business needs in their area. They should work closely with County and neighbouring district authorities, and with LEPs, to develop a robust evidence base, to understand both existing business needs and likely changes in them. They should work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability	The business community has been involved at each stage of the Core Strategy process and their comments taken into account before the document was published. An audit trail exists to demonstrate their involvement (see Consultation Statement). Woking is part of the Enterprise M3 Local Enterprise Partnership (LEP). The LEP is at its initial stages but so far Woking is playing an active role. The Council will keep under review and take into account the work of the LEP. Requirement met
30	Authorities should use this evidence base to: assess requirements for different types of land and floorspace, including for retail and leisure development; the adequacy of existing land supplies (this review to take place alongside the SHLAA); review the role and function of town centres and their capacity to take new growth; assess areas of deprivation needing remedial action; the needs of the food production industry and any barriers to investment that planning can resolve.	The Core Strategy sets clear targets to meet development needs and identifies sufficient land to meet the requirements. The distribution of development reflects the role and function of the main centres of the Borough. There is a clear hierarchy of centres with defined functions. This is set out in Table 2 of the Core Strategy Publication Document. The definition of the hierarchy of centres is informed by the Town, District and Local Centres study. There is a Priority Places policy to address pockets of deprivation in the area (see Policies CS2, CS3, CS4, CS5, CS10, CS12, CS15 and Table 2). Requirement met
31	Work with other authorities and providers to assess infrastructure requirements, including the need for nationally significant infrastructure within the area.	An Infrastructure Delivery Plan has been published. This has been prepared with significant stakeholder involvement (see IDP). There are other grouping such as Transport for Woking, Transport for Surrey, which Woking is an active member that seeks to coordinate infrastructure provision and share vital information. Requirement met
32	Maintain an understanding of the extent and locations of mineral reserves in the area and the projected demand for their use.	The preparation of the Minerals Plan is the responsibility of the County Council. However, its provisions are reflected in the Proposals Map and referenced in the Core Strategy. The Council

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		fully understands its responsibilities regarding this matter and considers it as part of the development plan for the area. Requirement is met.
33	Take into account the most up-to-date information about defence and security needs in the area.	This has been considered but there are no significant issues to address. On a general basis, Policy CS21 - Design seeks to create a safe and secure environment where the opportunity for crime are minimised. Requirement is met.
34	Prepare a sustainability appraisal as an integrated part of the plan process;	A Sustainability Appraisal (SA) has been carried out as an integral part of the Core Strategy process (see SA Report, SA of Options Report and Habitats Regulations Assessment). The SA has been prepared in accordance with national regulations and the European Directive. Requirement met
35	Other assessments (Habitats Regulations, SFRA, etc) should use the same evidence base where possible.	Habitats Regulations Assessment of the Thames Basin Heath Special Protection Area (SPA), RAMSAR sites and Special Area of Conservation (SAC) has been carried out. Strategic Flood Risk Assessment (SFRA) has also been carried out (see Appendix 1 of Core Strategy for list of evidence base). Reports to the above studies are available on request and are on the website. Requirement met
36	Assessments should be proportionate to the plan and should not repeat the assessment of higher level policy. They should be started early in the process and include stakeholder consultation.	Requirement noted. The evidence base work has been undertaken with this principle in mind. Requirement is met
37	Need evidence about their historic environment – a historic environment record.	Character Study and Heritage of Woking Study has been carried out to provide useful information about the built environment. There is a record of Conservation Areas and Listed Buildings. Requirement met. However, further clarification is needed about

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		what comprise a historic environment record.
38	Need to work with health organisations to understand the health status and needs of the local population including expected future changes, and any relevant information about barriers to improving health and wellbeing	The impacts of the Core Strategy on the health needs of the community have been assessed as part of IDP (see IDP). Requirement met
39	Need to ensure that the obligations and policy burdens to which designated sites are subject are not such as to render them unviable.	Economic viability Assessment has been carried out to assess the impacts of planning requirements on the viability of various types of development. The Viability Assessment is an evidence base to support the Core Strategy and is on the website. Requirement met
40	Need to include a policy on local standards. Where practical, CIL charges should be worked up alongside the local plan. These should support and incentivise development, by giving local communities “a meaningful proportion”.	There are a number of policies such as Policy CS22, which sets out locally specific standards for the sustainable construction of development. The Council has committed to adopt CIL as the main mechanism for securing developer contributions. It is intended that this will be adopted soon after the Core Strategy is adopted. The principle of giving a meaningful proportion of CIL contribution to local neighbourhoods where development occurs has been acknowledged. Requirement met
41	Need to ensure that development will be facilitated across the economic cycle and that the cumulative financial impact of policies and standards will not prejudice this.	The Housing trajectory of Policy CS10 and Policy CS2 are examples of how development will come forward over time. The Economic Viability Assessment takes into account assumptions about future market/economic conditions. Requirement met
43	Need to draft development and infrastructure policies at the same time	IDP has been integral part of the Core Strategy process (see IDP and Core Strategy). Requirement met
44	Duty to cooperate with neighbouring public bodies on strategic priorities and to provide evidence of	Partnership working has been an essential part of the Woking’s Core Strategy process, in particular, joint working to carry out

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	having done so.	<p>evidence base work. The following are key examples:</p> <ul style="list-style-type: none"> • Gypsy and Traveller Accommodation Assessment – carried out with Elmbridge, Runneymede and Spelthorne. • Strategic Housing Market Assessment – carried out with Guilford and Waverley. • Surrey Infrastructure Capacity Study – carried out with all the authorities in Surrey. • Work with Surrey Heath on Strategic Flood Risk Assessment. • Methodology for assessing accommodation needs of Gypsies and Traveller – developed by all the authorities in Surrey. • Guilford and Woking Integrated Transport Study – This is coordinated by the County Council. • Thames Basin Heaths Joint Strategic Partnership Board – provides strategic guidance for SPA authorities and ensures consistency in the protection and management of the SPA. <p>There are existing groups to facilitate close working relationship amongst the Surrey authorities, other neighbouring authorities and organisations. This includes:</p> <ul style="list-style-type: none"> • Planning Working Group – a group of Surrey Planning Policy Managers. It meets bi-monthly to discuss and resolve cross boundary issues. For example, the Group is now developing a common methodology to assess the needs of Gypsies and Travellers. • Surrey Planning Officers Association – It comprise all the Heads of Planning in Surrey. They meet monthly to agree joint working arrangements, considers matters of cross

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		<p>boundary significance and all other issues of Pan Surrey interests.</p> <ul style="list-style-type: none"> • West Surrey Group – A group of Planning Policy Managers in West Surrey. The group meets bi-monthly to deal with issues of sub-regional interest. It feeds into discussions at the Planning Working Group • Transport for Woking – A group of transport providers with interest in transport in Woking. It comprises organisations such as Woking Borough Council, the County Council, South west trains, Network rail and Highways Agency. The group seeks to coordinate limited resources for maximum benefit, share vital information and feed into transport policy development. • Transport for Surrey – A similar group to Transport for Woking but with Surrey-wide interest. It looks at strategic transport issues across Surrey. • Woking Partnership – This is the Woking Strategic Partnership. It brings together the private, voluntary and the public sector to think strategically about the area and help deliver services effectively and efficiently. It coordinates resources and targets them to deliver the needs of the community. The Planning Policy Manager attends all its meetings and there is a standing item on its agenda for Local Development Framework. It has a sub group to oversee the preparation of the Infrastructure Delivery Plan to support the Core Strategy. • Thames Basin Heaths Joint Officer’s Group – It coordinates strategic policy approach to mitigating and managing the impacts of development on Special Protection Areas. • Local Enterprise Partnership (LEP) – Woking is part of the

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		<p>Enterprise M3 LEP. It is set up to coordinate resources for economic growth.</p> <p>The Council consults its neighbouring authorities on all key issues of cross boundary interests. It works with them to achieve bilateral objectives. For example, it is presently working with Surrey Heath to identify a common Suitable Alternative Natural Green Space that will serve the two authorities. As evidenced above, Woking Borough Council is already fully engaged with other partners to work together to achieve common goals and address issues of cross boundary significance. With the structures that Woking Borough Council is already part of, it is also well placed to respond to the duty to cooperate as envisaged by the NPPF.</p> <p>Requirement met</p>
46	Specifies what constitutes successful cooperation (joint committee, joint strategy, memorandum of understanding, and continuous process of engagement throughout, delivering the necessary infrastructure).	See response to paragraph 44 above. Requirement met
47	Consider producing joint policies with neighbours on strategic matters.	See response to paragraph 44 above. Requirement met
48	Inspector's criteria for soundness: * Positively prepared plan; * justified; * effective; and * consistent with national policy.	Criteria noted.
49 - 52	Sections 49 to 52 deals with rules for	The Core Strategy provides in-principle support for Neighbourhood

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	Neighbourhood plans	Plans and set out the requirements for their preparation and consideration. (See paragraph 1.21 – 1.25 of Core Strategy Publication Document. Requirement met
73	Restates need for a clear economic vision and strategy that positively encourages sustainable economic growth; set out criteria, or identify sites, to deliver that strategy; need to support existing business sectors and plan for new ones; encourage clusters; identify priorities for regeneration or other investment; and facilitate new working practices, such as live/work.	The Core Strategy has a positive vision for economic growth and policies to deliver that. Policy CS15 supports existing businesses; live/work etc (also see policies CS2, CS3, CS4 and CS15). Requirement met
75	Avoid the long-term protection of employment land or floorspace in the face of pressure for other uses.	The Employment Land Review include employment land appraisal. It assesses and identifies employment land that is worth retaining and those that can be redeveloped for alternative uses. There has been a logical approach to meeting this requirement. The Council has been concerned to ensure that only land that is necessary to contribute towards the delivery of its economic strategy is retained. This evidence will be regularly reviewed. Requirement met.
76	Define a network and hierarchy of town centres that is resilient to anticipated future economic changes; define the extent of the town centre and its primary and secondary retail frontages; allocate a range of retail sites, based on an assessment of the need to expand the town centre; encourage town centre residential development; allocate appropriate edge of centre sites if town centre sites not available; set policy for sites outside town centre and edge of	The Core Strategy has a clearly defined hierarchy of centres with their respective functions, a defined town centre boundary and defined primary and secondary frontages for the town centre. It also sets out clear targets for retail development for the various centres and encourages mixed use development of the main centres that includes housing. A Site Allocations DPD will allocate specific sites for development. Requirement met

NPPF – Para No	Requirement of the National Planning Policy Framework	How the requirement has been covered by the Core Strategy
	centre.	
77 - 78	Apply a sequential approach to retail/leisure applications outside town centre/edge of centre	The Council follows national policy regarding this matter and the Core Strategy confirms this approach in assessing sites for retail use.
79	If application is outside town centre or undesignated, require an impact assessment if the scheme is above 2,500sq m (or whatever local threshold the plan sets).	The Council follows national policy regarding this matter and the Core Strategy confirms this approach in assessing schemes above this threshold.
80	Sets rules for assessing the impact of retail and leisure proposals.	The Council follows national policy regarding this matter and the Core Strategy confirms this approach in assessing sites for retail and leisure uses.
81	Set a strategy to maintain a prosperous rural economy, including: * supporting sustainable rural businesses; * promoting the diversification of agriculture; * supporting rural tourism and leisure.	Woking is predominantly an urban area. Advice noted.
83 - 88	Locate development so as to encourage sustainable patterns of transport and minimise need to travel	The Core Strategy concentrates development at the main centres where key services and facilities are relatively available to minimise the need to travel and distance travelled. (See policies CS1, CS2, CS3, CS4 and CS18). Requirement met
85	Work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure needed to support sustainable economic growth, including large-scale facilities like freight exchanges.	The Council has been working with the County Council and other stakeholders to identify the infrastructure needs of the Borough and other strategic infrastructure with cross boundary implications. Also see response to paragraph 44 above. Examples for cross organisational/boundary working are Transport for Woking and Transport for Surrey. (Also see IDP)

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		Requirement met
86	Require travel plans from all generators of significant amounts of traffic.	Policy CS18 requires development proposals that generate significant traffic to be accompanied by a travel plan. Requirement met
89	Plan and locate development to: * facilitate delivery of goods; * give priority to pedestrians and cyclists and access to good public transport; * create safe and secure layouts to minimise conflict between motorists and others; * incorporate facilities for low-emission vehicles; * consider the needs of the disabled.	The design and transport policies allow scope for this to be delivered. The general measures to facilitate improved accessibility to the main centres will help achieve this aim. Specific details to address the issues can be set out in the Development Management Policies DPD, Design Guide SPD and other strategies of the Council such as the Climate Change Strategy. Requirement met
91	Aim for a balance of land uses in the authority's area, so as to minimise journey lengths.	See response to paragraphs 83 – 88 above. Requirement met
92	Promote mixed uses, especially in larger developments, as a way of minimising travel.	See response to paragraph 19 above Requirement met
93	Ensure parking standards promote sustainable transport choices.	Policy CS18 sets out clear guidance about using parking standards as a tool to encourage sustainable travel modes. Requirement met
94	Identify and protect sites and routes which could be critical in developing transport infrastructure to widen transport choice.	Policy CS18 is clear to safeguard land for transport infrastructure to ensure that they are not compromised by other development. These are identified by the Proposals Map. (See Proposals Map. Requirement met
96	Support the expansion of electronic communications (but minimise the number of masts by making efficient use of them).	Policy CS15 promotes the expansion of IT infrastructure and recognises the potential of IT to future businesses. Each proposal for a mast will be treated on their merits. Requirement met

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97	No blanket bans on masts.	See response to paragraph 96 above. Requirement met
101 - 106	Identifies a series of criteria for authorities preparing minerals local plans	This is a matter for the County Council.
109	Use an evidence-base to ensure plans meet the full requirements for market and affordable housing in the housing market area, including identifying critical key sites that are crucial to delivering the strategy; maintain a rolling 5-year supply of specific deliverable sites, with an addition of at least 20% extra to ensure choice and competition; identify a supply of specific, deliverable sites, or broad locations for growth for years 6-10 and, where possible, years 11-15; do not include windfall sites in the first 10 years of supply or the rolling 5 year supply unless there is compelling evidence of genuine local circumstances to justify it; produce a housing trajectory to illustrate delivery and a market housing implementation strategy to maintain a five year supply; set out the local approach to housing density; identify and bring back into use empty homes.	The Council has identified a 5 year housing supply with a surplus requirement of about 144 dwellings. The 144 surplus requirements is less than the required extra 20%. The Council will be making representations to the Government about this requirement. The situation will be assessed again when the NPPF is finally published. Requirement partially met
111	Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community; identify the size, type, tenure and range of housing needed in different locations; where affordable housing required, achieve it on site where possible, unless equivalent value can be obtained off-site and the	There is a clear policy on housing mix to reflect the needs of the Borough. This is justified by the SHMA. The affordable housing policy sets clear targets for affordable housing and emphasises that affordable housing provision should be provided in-situ unless other material considerations dictate otherwise. The conditions when this will apply are highlighted. (See Policy CS12) Requirement met

NPPF – Para No	Requirement of the National Planning Policy Framework	How the requirement has been covered by the Core Strategy
	proposal contributes to the objective of achieving mixed and balanced communities.	
112	In rural areas, plan for local (particularly affordable) housing needs. Consider using some market housing to cross-subsidise it.	Woking is predominantly an urban area.
113	Sets out exceptions criteria for isolated dwellings in rural areas.	See response to paragraph 112 above.
116	Local plans (and neighbourhood plans) should set out robust and comprehensive design policies, based on the stated objectives for the future of the area and an assessment of its present characteristics.	Policy CS21 is a sufficiently robust and comprehensive design policy to ensure that development enhances the character of the area. The Character Study and the Heritage of Woking Study will provide useful information to support the application of the policy. A design guide is also going to be prepared for the area as an SPD. Requirement met
117	Design policies should avoid excessive detail, and concentrate instead on overall scale, density, massing, height, landscape, layout and access. (118) Design policies should not impose architectural styles or tastes, or stifle originality.	The design policy (Policy CS21) is appropriately pitched to provide sufficient guidance on design principles to be met. It allows flexibility for creativity and innovation. Requirement met
125	Planning policies need to “facilitate social interaction and inclusive communities”.	There is a locally distinctive policy on Priority Places to address pockets of deprivation in the area. There is a Social and Community Facilities Study to inform the provision of Community Facilities. Furthermore, there is an IDP to identify the infrastructure needs of the community. The combined effects of the policies of the Core Strategy will have positive impacts on social inclusion. Requirement met
126	Planning policies need to deliver community	See 125 above.

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	facilities and local services.	Requirement met
128	Planning policies need to identify specific needs for or shortfalls/surpluses of open space, sports and recreational facilities and set local standards.	IDP, PPG17 Audit identifies shortfall in open space provision. Policy CS17 seeks the provision of open space to support development. Contribution is also sought for the provision of SANGs. Requirement met
130	Provides for areas to be designated as Local Green Space in local plans.	There is a network of urban green space identified by the Proposals Map. This will be regularly reviewed. (See Proposals Map). Requirement met
136	New Green Belts should only be identified in exceptional circumstances.	A Greenbelt boundary review is proposed to be undertaken in 2016/17 with the aim to identify suitable sites to meet shortfall in future housing land supply. The review will be comprehensive to ensure the permanency of the boundary into the future. (See Policy CS6) Requirement met
137	Local plans should set Green Belt boundaries and only alter them in exceptional circumstances.	There is a clear boundary for the Greenbelt, which is defined by the Proposals Map. Also see response to paragraph 136 above. Requirement met
138	Green Belt boundaries should not be reconsidered between local plan reviews.	It is not intended to review the Greenbelt in between the review of the Core Strategy. The Core Strategy establishes the principle of the review. The details of the review are part of the Core Strategy process. The Site Allocations DPD will be updated to take account of the outcome of the review. Requirement will be met
140 - 141	Set out criteria for reviewing Green Belt.	The criteria will be followed when the Greenbelt boundary is reviewed. Requirement will be met
143 - 145	Set out criteria for appropriate and inappropriate	Policy CS6 sets guidance on acceptable development within the

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	development in the Green Belt.	Greenbelt. Planning Policy Guidance (PPG) Note 2 is also a material consideration. The NPPF seeks to take on board the key principles of PPG2 and there is expected to be continuity in approach for the protection of the Green Belt. Requirement met
150	Locations and forms of development should reduce greenhouse gas emissions. Local requirements for building sustainability should follow the Government's zero carbon buildings policy and adopt nationally described standards.	There is a sustainable construction policy – Policy CS22 which sets clear standards for the sustainable construction of buildings. The standards are in general conformity with national guidance and aims towards the Government's target for zero carbon buildings. There is also a policy on Renewable Energy (Policy CS23). Policy CS1 and CS18 seeks to reduce the need to travel and distance travelled by concentrating most development at the main centres. The combined effects of the policies in the Core Strategy will have significant positive impacts on carbon emissions. Requirement met
152	Need for a strategy to promote renewable and non-carbon energy.	Policy CS23 promotes renewable energy. Requirement met
154	Development should be planned to avoid increased vulnerability to climate change.	Policies CS18, CS21, CS22 and CS23 seek to minimise the adverse impacts of development on climate change and how development will adapt to climate change. Requirement met
155	Plans should be supported by a Strategic Flood Risk Assessment and have policies to manage flood risk.	Strategic Flood Risk Assessment has been carried out to inform planning decisions about location and constraints to development. Policy CS9 is a policy on flooding and provides guidance about the relationship of development and the risk of flooding. Requirement met
156	Plans should apply a sequential, risk-based approach to the location of development to avoid flood risk as far as possible.	Policy CS9 applies a sequential risk based approach to the location of development to avoid flood risk. Requirement met

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159	Coastal authorities need to take account of marine plans and apply Integrated Coastal Zone Management.	Not applicable to Woking.
160	Coastal authorities need to identify Coastal Change Management Areas where physical change is likely.	Not applicable to Woking.
165	Local plans should minimise risk to the natural environment, and should allocate land with the lowest environmental or amenity value.	See other comments above. Requirement met
166	There should be criteria-based policies against which proposals on or affecting protected sites are judged.	Policy CS6 – Greenbelt, Policy CS7 – Biodiversity and nature conservation, Policy CS8 – Thames Basin Heaths Special Protection Areas and CS9 – Flooding are all criteria based policies to inform decisions about protected sites. All the policies of the Core Strategy have been reviewed to take account of the recommendations of the Habitats Regulations Assessment. An SA has been carried out to assess the impacts of the policies of the Core Strategy on protected sites. Requirement met
167	Local plans should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of green infrastructure; they should maintain the character of the undeveloped coast; they should take into account the economic benefits of the best agricultural land; give particular protection to designated areas.	Policies CS8 and CS17 meets this requirement. Requirement met

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168	Policies should: <ul style="list-style-type: none"> * Take account of the need to plan for biodiversity at a landscape-scale across authority boundaries; * promote and protect priority habitats and priority species; * identify and map components of the local ecological networks; * prevent harm to geological conservation interests. 	See response to paragraphs 166 and 167 above.
171	Local policies need to prevent unacceptable risks from pollution and land instability.	Policies CS1, CS18, CS22 and CS23 seek to minimise carbon emissions. Policy CS21 is proposed to be amended to deal with noise pollution, vibration, smell and other releases. Requirement met – further work needed to assess if anything else is required by this requirement.
173	Planning policies need to avoid noise or other health impacts and should support compliance with EU limits for pollutants.	Noise pollution and other sources of pollution are covered by a proposed amendment to Policy CS21. Requirement not met
178	Authorities should set out a strategy for the conservation and enjoyment of the historic environment	Policy CS20 – Heritage and Conservation seeks to protect and enhance the heritage of the area for the enjoyment of the community. Requirement met