



The Planning
Inspectorate

Report to Woking Borough Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 26th July 2012

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO

WOKING LOCAL DEVELOPMENT DOCUMENTS CORE STRATEGY JULY 2011

LOCAL PLAN

Document submitted for examination on 19th December 2011

Examination hearings held over 5 days between 20th March and 6th April 2012

File Ref: PINS/A3655/429/6

Main Abbreviations Used in this Report

CIL	Community Infrastructure Levy
CS	Core Strategy
DMDPD	Development Management Development Plan Document
ELR	Employment Land Review
EVA	Economic Viability Assessment
GB	Metropolitan Green Belt
GTAA	Gypsy and Travellers Accommodation Assessment
IDP	Infrastructure Capacity Study and Delivery Plan
LDS	Local Development Scheme
LP	Local Plan
MDS	Major Developed Site in the Green Belt
MM	Main Modification
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal
SANG	Suitable Alternative Natural Greenspace
SEP	Regional Spatial Strategy/South East Plan
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	West Surrey Strategic Housing Market Assessment
SPA	Thames Basin Heath Special Protection Area
The Study	The Town, District and Local Centres Study

Non-Technical Summary

This report concludes that the Woking Local Development Documents Core Strategy (CS) provides an appropriate basis for the planning of the Borough over the next 15 years providing a number of modifications are made. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the plan. Many of the modifications were proposed by the Council before and after the Hearing sessions and were expressed in publicly available documentation. I have recommended their inclusion after due consideration of all factors including any comments from other interested parties.

The modifications can be summarised as follows:

- To bring forward the timing of the proposed review of the Metropolitan Green Belt to ensure the effective supply of housing land;
- To express the housing supply intentions for the Borough as a minimum to maximise the effective delivery of sustainable development;
- To introduce greater flexibility into the potential economic uses of Broadoaks, West Byfleet to enable the effectiveness of the plan in securing its employment objectives;
- To refine the Council's policy on affordable housing to ensure clarity and its effectiveness;
- To refine Policy CS 14 to ensure the Council's approach to pitch provision for gypsies, travellers and showpeople is based on robust evidence over the entire plan period;
- To include adequate information within the appendices of the Plan to ensure legal compliance, the adequacy of monitoring indicators and clarity of the town centre boundary;
- To ensure the CS reflects the National Planning Policy Framework in relation to Green Belt and sustainable development; and
- To ensure the CS reflects the need for allotments as part of green infrastructure.

Introduction

1. This report contains my assessment of the Woking CS in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the plan's preparation has complied with the 'duty to co-operate', in recognition that there is no scope to remedy any failure in this regard. It then considers whether the plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF paragraph 182) makes clear that to be sound, a Local Plan (in this instance a Core Strategy) should be positively prepared; justified; effective and consistent with national policy. For the purposes of this report and for clarity, references to the CS may be treated as synonymous with the term Local Plan as indicated by the NPPF.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the publication document entitled 'Woking 2027 – Planning the Future of our Borough – Woking Local Development Documents Core Strategy Publication Document July 2011' and the Council's 'Proposed Changes to the Core Strategy Publication Document, the Sustainability Appraisal Report and the Proposals Map' dated December 2011. These have been subject to consultation prior to submission.
3. My report deals with the main modifications that are needed to make the plan sound and legally compliant and they are identified in bold in the report (MM). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The Council considers¹ that the main modifications recommended do not alter the substance of the submitted CS or its policy principles and therefore do not require further public consultation or additional sustainability appraisal.

Assessment of 'Duty to Co-operate'

5. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by Section 33A of the 2004 Act in relation to the plan's preparation. Prior to the submission of the CS for examination, albeit following the main stages of plan preparation, Section 33A of the 2004 Act came into force. Core Document Ref WBC/01 (as amended), in support of the Council's Self Assessment Topic Paper², affirms the approach taken by the Council in actively pursuing constructive processes of plan making on necessary strategic issues which have sought engagement with relevant bodies such as neighbouring local authorities and the County Council.

¹ CD/48 Assessment of the necessity for a further SA and public consultation on the modifications proposed - 21st June 2012

² Self Assessment of the Conformity of the Core Strategy Publication Document with National and Regional Policy Dec 2012

6. With due regard to the provisions of Section 33A (7) there is limited guidance as to how the duty to cooperate should be complied with. The available evidence indicates that there have been, and continues to be, mechanisms and processes in place to enable suitable cooperation to be developed upon strategic spatial issues such as, for example, housing, the economy and transport. Indeed, whilst issues of housing are dealt with in greater detail later in this report, the West Surrey Strategic Housing Market Assessment (SHMA) builds upon the evidence underpinning The South East Plan (SEP) and is indicative of an effective evidence gathering approach to sub regional housing issues.
7. Such mechanisms and processes will require further refinement to ensure an adequacy of future strategic planning across relevant administrative areas, particularly if the intention to revoke the SEP comes to fruition. Effective processes will need to ensure effective outcomes where the needs of an area can, as far as constraints may allow, demonstrably be met. Nonetheless, the Council's evidence indicates the joint working it has engaged upon in preparing the submitted plan and there is no reason to doubt the verbal evidence provided during the hearing sessions that, due to the existence of the SEP and the different stages of plan preparation that nearby Councils were at, that joint strategies and policies between Woking and its neighbours were not practical. The evidence indicates that processes have been employed adequately to discharge the 'Duty to Cooperate' notwithstanding further discussion below as to the effectiveness of the resulting outcomes.

Assessment of Soundness

Preamble

8. During the examination hearings the NPPF was introduced which replaced Planning Policy Statements and Guidance Notes. The Council produced a topic paper³ which analysed the implications arising for the submitted plan and the resulting modifications which are necessary. An opportunity to make representations in relation to the topic paper, the modifications and the NPPF in general was provided. Regard has been had to all submissions made on these matters.
9. The government has announced an intention to revoke the SEP. With due regard to the NPPF, it is an extant part of the development plan which provides a regional strategic context for the planning for Woking Borough. As such it remains of material relevance to the examination and the CS should be in general conformity with its content. It is appropriate to take its contents into account albeit within the local context of Woking and the bespoke evidence which has been prepared.
10. The objectives of the CS and its supporting evidence are indicative that the plan has been positively prepared and is in compliance with the NPPF in such regards. There is no persuasive evidence to the contrary.

³ WBC/37 – Statement on the Implications of the NPPF

Main Matters and Issues

11. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified eight main 'Matters' upon which the soundness of the Plan depends. Each of these is examined in turn and follows the order in which the public hearing sessions were held.

Matter 1 – With due regard to its means of production, does the CS provide the most appropriate spatial strategy for sustainable development within the context of the Borough? Does it contain clear objectives for the plan period in accord with the aims of national planning policy?

Is the evidence in relation to the settlement hierarchy and the intended levels of development robust? Does the evidence support the effectiveness of the CS in these regards?

12. The CS has been prepared during a period where the SEP has been progressed to adoption. The SEP sets out a clear vision for the south east region and identifies the role of Woking as a sub regional hub within this context (as part of an identified area known as the London Fringe). The CS draws upon the evidence base that has informed the SEP and the content of the latter informs the former as evidenced particularly by Section 1 of the submitted plan⁴. The CS conforms with the approach of the SEP in that Woking itself is identified as the focus for growth within the Borough consequently contributing positively to the regional economy. The Council has indicated how the CS is consistent with the content of the SEP⁵ and, when considered as a whole, there is no persuasive evidence to indicate otherwise.
13. The CS has been produced in accordance with the Council's Statement of Community Involvement (SCI) and Local Development Scheme (LDS) and, as evidenced by Section 1, it has been informed by the content of the Sustainable Community Strategy and the Surrey Strategic Partnership Plan; there is no evidence of significant discord between the LP and these community based documents. Section 2 of the CS indicates adequately how the locally distinctive characteristics of the Borough have informed the spatial approach contained within the plan itself, addressing key issues such as local character, population growth, housing and the economy. Subsequently, the settlement hierarchy is robustly identified, focussed upon Woking town centre, alongside the potential constraints to future development and a range of cross cutting considerations such as, for example, the environmental value of the Thames Basins Heath Special Protection Area (SPA).
14. Consequently the CS presents a clearly stated spatial vision, with objectives and a strategy that seeks to make Woking an exemplar of sustainable growth, a vibrant focus for economic prosperity in the region and a 'green' borough with a balanced transport system and supporting infrastructure. This vision and the overall thrust of the submitted CS, which the Council proposes to supplement by the appropriate addition of Policy CS25 clarifying the approach

⁴ Local Plan Paragraph 1.26 et al

⁵ Ref CD/1

to sustainable development, are squarely in line with the aims of the NPPF. I recommend the addition of Policy CS25 as a main modification (MM1) to ensure the effectiveness of the plan and its consistency with national planning policy.

15. The CS and its vision have evolved through an iterative process of Sustainability Appraisal (SA) which is evidenced primarily within the submitted SA Report⁶. Whilst the Environment Agency and the Council have agreed upon a need to amend the approach of the SA in relation to flood risk matters, there is no substantive evidence to suggest that the preferred options or any alternative approaches were not considered adequately. The Council has confirmed that the SA adequately sets out the reasons why alternative options were rejected and that the justifications for such actions remain valid. There is no substantive reason to disagree.
16. Due to the strategic nature of the CS, the Council has liaised with partners and bodies beyond the Borough boundaries. Whilst reservations have been expressed in relation to the effectiveness of the CS to secure certain levels of development to meet the needs of the Borough, for example housing, there is insufficient evidence to conclude that the approach of the CS is not founded on suitable evidence or that the stated approach to growth is not robust. The Council's reliance upon data from the Office of National Statistics is not flawed and the evidence contained within the Population Topic Paper updated in 2011 is adequate to underpin the spatial approach of the CS for the plan period, notwithstanding the alternative methodologies which can be employed to secure population forecasts.
17. The Council has reasonably developed an Infrastructure Delivery Plan (IDP) to secure the suitable and timely delivery of necessary infrastructure to support the levels of intended growth; this is a sound approach which is discussed in greater detail in relation to Matter 8 (below).
18. Policy CS1, in accord with the thrust of the NPPF, seeks to balance the three components of sustainable development. I heard cogent submissions from the Council and other interested persons on the balance which the CS strikes and the extent to which environmental concerns are addressed adequately. With regard to the available evidence, the policy identifies in broad terms the intended levels of growth and its distribution within the Borough whilst identifying the need to recognise fully a range of environmental and social infrastructure considerations. The policy identifies adequately how development will be brought forward with due regard to further necessary actions such as the publication of a Site Allocations DPD and a review of the Green Belt. Such an approach draws upon a proportionate and robust evidence base and is both rational and sound.
19. With due regard to its means of production, the CS provides the most appropriate spatial strategy for sustainable development within the context of the Borough with clear objectives for the plan period in accord with the aims of national planning policy.

⁶ Core Strategy Publication Document Sustainability Appraisal Report

Woking

20. Policy CS2, whilst rather lengthy, crystallises the strategic approach of the CS by indicating how Woking town centre will be the focus for the intended levels of growth identified for the Borough. The preferred option has been considered adequately against reasonable alternatives as demonstrated by the SA process and Report. The Policy sets out clear strategic intentions in relation to what levels of development are intended to occur, when and in what form whilst making clear reference to an intended Area Action Plan (AAP) which will, in conjunction with the Sites Allocation DPD, assist in delivering the vision for the town. The policy is supported by a proportionate range of key evidence sources, including the Town, District and Local Centres Study (the Study) and the Strategic Housing Land Availability Assessment (SHLAA), which have, where necessary, considered the regional context and the evidence which has informed the SEP.
21. Policy CS2 takes an evidence based approach to the amount of development proposed over the plan period including retail provision, the delineation of primary retail frontages and the mix of uses which will help to create a balanced and vibrant centre. Such an approach appears sound and is supported by the evidence. Simultaneously, the CS recognises the need for suitable supporting infrastructure, particularly transport. Issues pertaining to housing and development density are discussed in relation to Matter 7.
22. Concerns have been submitted which question whether the approach to the town centre has considered adequately matters relating to development viability. However and whilst discussed in greater detail below, the Council has undertaken a professionally robust assessment of this issue, particularly as seen in the Economic Viability Assessment (EVA) which, on the balance of the available evidence and when taken as a whole, supports the thrust and intentions of the policy.

Other Centres

23. Policies CS3, CS4 and CS5 refer to other parts of the Borough. The settlement hierarchy is supported robustly by the Study which provides adequate evidence in support of the development intentions and identified boundaries of West Byfleet and other Local Centres. In light of the criteria contained within the Study and the nature of the settlement itself, there is no persuasive evidence that Knaphill should be a District Centre. The evidence provided by the Council, summarised in its responses to my Matters and Issues⁷, supports robustly the centre boundaries for Knaphill and Horsell taking into account the character, nature and mix of uses for each area.
24. Based upon the undisputed evidence of the Surrey Strategic Partnership, Policy CS5 identifies the ward of Maybury and Sheerwater as one of four 'Priority Places' within Surrey. In addition, the Woking Partnership has identified the Lakeview Estate Area and Goldsworth Park as being areas subject to notable deprivation. Such an evidence base supports the proactive approach of Policy CS5 to target resources and improvements to these locations, including a sufficiently precise reference to additional retail provision

⁷ WBC/12

in Sheerwater. There is insufficient evidence to indicate that parts of Westfield or Kingfield would warrant similar identification as priority places in the terms of CS5 at this time albeit I note the intention to ensure the Woking Partnership will consider the needs of these additional two areas in due course.

25. Overall, the evidence in relation to the settlement hierarchy and the intended levels of development is robust and supports adequately the likely effectiveness of the CS in such regards.

Matter 2: Does the CS take a justified and effective approach to issues relating to the Metropolitan Green Belt (GB) and the natural environment which is consistent with national planning policy?

26. Policy CS6 relates specifically to the GB. The existing GB, which forms a significant part of the Borough, is shown to be effectively carried forward within the CS from the existing development plan. The thrust of the policy, designed to ensure the GB serves its five main purposes by controlling inappropriate and harmful development, is consistent with the NPPF. I recommend the changes suggested by the Council in WBC/43 as main modifications to ensure consistency between the CS and the NPPF (MM2) and the effectiveness of the plan.
27. Unlike its predecessor, PPG2⁸, the NPPF makes no reference to the concept of Major Developed Sites (MDS) in the Green Belt. The Council has determined that the identification of such sites, which may enable limited infilling or redevelopment in principle, is helpful to the overall aims of the CS and thereby intends to maintain such designations at the local level. Consequently and with regard to the definition of MDS to be contained in the glossary of the CS, the available evidence indicates that the Carters Lane Sewage Treatment Works and Broadoaks are warranted as MDS and the CS will be suitably precise as worded. On the same basis, the McLaren Group Headquarters, which is not of an unduly substantial size and does not satisfy the definition of MDS, does not justify designation as such. The CS provides a clear indication of what limited forms of development may consequently be acceptable and does not provide an unwarranted and unrestricted opportunity for new development in such locations.
28. Mayford is a settlement within the GB and is identified as being capable of limited infill development. With due regard to the character of the village and the content of the Woking Character Study this arrangement is warranted and sound.
29. The body of evidence in support of the housing policies of the Council indicate that an amount of new development will be required upon land within the GB. Whilst the Council is seeking to maximise the proportion of housing to be provided within Woking and other settlements, the SHLAA indicates a shortfall in capacity within such areas to meet the housing aspirations of the plan. Consequently additional land will be required which, due to the extent and position of its boundaries, will invariably fall within the GB. This is acknowledged suitably by Policy CS6.

⁸ Planning Policy Guidance Note 2 'Green Belts'

30. Accordingly, the Council has identified the GB as a potential area for the future direction of growth which, in accordance with the NPPF, is shown in broad diagrammatic form in association with Policy CS1 within the LP. I have noted the submissions made in relation to the terminology used within the CS but am satisfied that the intentions of the Council are sufficiently clear and that the term 'broad locations of growth' is reasonable. The principle of GB land being used in such a manner is consistent with the thrust of the SEP which identifies the potential need for an urban extension to Woking and a selective review of the GB boundaries. The SEP indicates that, in the event of a more than minor GB review, focus should be had on the area to the south of the town; nonetheless the SEP also notes that the scale of any review should be tested through the Local Development Document process⁹.
31. Whilst the CS indicates the need for a GB review, the details for such an exercise are not contained within the document. The SHLAA indicates that areas of land appear to potentially exist to the south of the town centre but similarly evidence suggests that there are also opportunities for land elsewhere to be reasonably considered. The NPPF indicates that if alterations to Green Belt boundaries are to be undertaken, then due consideration should be given to their enduring permanence beyond the plan period. A broader geographic review of the GB will therefore provide a suitable opportunity to assess the most appropriate land provision to meet housing needs whilst also ensuring enduring permanence thereafter. Thus the broad location for growth identified by the Council, which includes land beyond the south of the town is, on balance, warranted and will enable full consideration to be given to areas of land that may be suitable for future development without premature limitation.
32. The CS indicates an intention to undertake the review of the GB in 2016/2017 in order that necessary sites for housing development can be identified for release in the last 5 years of the plan period. This would appear to necessitate a further review of the intended Sites Allocation DPD currently to be adopted in 2014. The Council considers that no purpose will be served by an earlier review of the GB.
33. Having evidenced the need for a GB review and mindful of the need to ensure a sufficient housing land supply, I can identify no overriding planning merit in delaying the intended review. Indeed, an argument of some weight can be made that a review of the GB should have informed the CS itself. Nonetheless, the NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their areas with adequate flexibility to adapt to rapid change. Amongst other evidence, the available SHMA is indicative of a housing need that cannot be met within the Borough over the plan period. The evidence provided to the SEP and underpinning the CS itself indicates that a balanced approach to housing delivery, including the consideration of environmental constraints and urban capacity, could reasonably secure an average of 292 dwellings per year until 2027 only with the release of land within the GB.
34. Whilst, it may be sequentially preferable, particularly in relation to the sustainability aims of the CS and with the NPPF in mind, to focus upon the

⁹ SEP Policy LF5

capacity of urban areas to provide housing over the earlier years of the plan, the decision to delay any review of the GB increases considerably the risk of an insufficient land supply being available to meet housing needs over the entire plan period. This would indicate an ineffective plan. Invariably there can be delays in site acquisition, land assembly and the promotion of site specific proposals both in relation to urban sites and those which may be greenfield. Given the extent of overall housing needs within the Borough and the need to ensure precision and flexibility within the CS to ensure effective delivery of residential development, such a risk would be reduced and efficiencies in the plan making process increased by simultaneously reviewing the GB in conjunction with the production of the Sites Allocation DPD. Such an outcome, which would need to include due consideration of the adequate provision of suitable green infrastructure and SANG¹⁰, would provide greater certainty for the plan period, be reasonable and ensure effectiveness for housing delivery. Therefore the GB review should be brought forward in the plan period (MM3) to the earliest practical opportunity albeit there is no substantive reason as to why the methodology and details of the review should be contained within the CS itself.

35. CS Policy 7 recognises the biodiversity and nature conservation assets within the Borough at an international, national and more local level, for example European SAC, SSSI and SNCIs¹¹. It is underpinned by an adequate and proportionate evidence base, which includes the Surrey Biodiversity Action Plan, the SEP, the SA and the Habitats Regulations Assessment. In such regards, the CS sets out a positive and strategic approach to biodiversity and green infrastructure that is consistent with the NPPF.
36. The CS necessarily addresses the existence of the Thames Basin Heaths SPA via Policy CS8. The evidence indicates that the Council has developed its approach in conjunction with key partners¹². With due regard to the submissions of Natural England and others, the Council's modified wording of CS8 clarifies that the CS secures an adequate and consistent approach to the SPA and development proposals which is consistent with the SEP. Whilst useful, the CS is not unsound without these minor modifications. Whilst submissions to the Examination have suggested changes to Policy CS8 to identify the need for SANG provision in relation to potential residential sites within the GB and Policy CS6, I am not persuaded that such modifications are essential to ensure the soundness of the CS overall.
37. With regard to matters of flooding, the Council has undertaken a Strategic Flood Risk Assessment for the Borough which, in line with the content of the NPPF and government guidance, will influence the siting of new development and minimise flood risk via Policy CS9. The Council proposes a suitable reference to the Water Framework Directive and, in agreement with the Environment Agency, modifications to the submitted CS that address in greater clarity the issue of Sustainable Urban Drainage and River Basin Management Plans. These changes add useful clarity but, on balance, do not represent a significant alteration to the content of the CS that affects its

¹⁰ Suitable Alternative Natural Greenspace

¹¹ Special Areas of Conservation, Sites of Special Scientific Interest, Sites of Nature Conservation Importance

¹² Thames Basin Heaths Special Protection Area Avoidance Strategy 2010-2015

soundness. In conjunction with the ongoing work upon the Surface Water Management Plan for Woking and Byfleet, there is no evidence to suggest matters relating to surface water will not be addressed adequately. I conclude this aspect of the LP to be sound.

38. Subject to the recommended modifications, the CS takes a justified and effective approach to issues relating to the GB and the natural environment which is consistent with national planning policy.

Matter 3: Is the approach of the CS to design justified by the evidence base, consistent with national planning policy and the most appropriate strategy when considered against alternatives within the context of Woking? Has sufficient regard been had to the historic environment?

39. Policy CS21 addresses specifically the matter of design, including the fundamental importance of good design to the delivery of the plan objectives. Whilst a Development Management DPD (DMDPD) and a Design SPD are intended, Policy CS21 sets out key criteria against which the acceptability of development proposals will be assessed. The policy acknowledges the cross cutting nature of considerations relating to biodiversity, amenity/green space, crime and energy consumption. In such regards the policy provides a robust and comprehensive strategic lead in relation to design for the Borough that has been informed by an awareness of the diversity of the area as evidenced by the Borough wide Character Study.
40. The intended DMDPD and Design SPD will be supplemented by the Town Centre AAP and collectively will provide suitable opportunities to reference detailed considerations in relation to the potential locations for tall or taller buildings. Indeed, the DMDPD will, as recognised by the Council, provide a suitable opportunity to provide detailed design advice in relation to matters such as room sizes with due consideration, subject to examination, of necessary evidence pertaining to any density and viability implications.
41. The policy has been subject to sufficiently robust SA, which includes a consideration of alternative approaches, and acknowledges adequately the thrust of the SEP; overall it is consistent with the content of the NPPF.
42. Policy CS20 is focussed upon heritage matters. The evidence base in support of the policy, which includes the recent Character Study and the somewhat older CD/19¹³, is proportionate to the circumstances of the Borough and supports adequately the content and direction of the policy itself. The minor modifications proposed by the Council, with due regard to the content of WBC/10¹⁴, will increase the consistency between the CS and the NPPF but are not essential to secure the soundness of the plan. There is insufficient evidence to suggest that Urban Areas of Special Residential Character should be maintained from the Woking Local Plan (LP) within the CS, particularly given the thrust of the NPPF and the objectives of the development plan to ensure considerations of an area's character are made fully in the event of all development proposals. When considered as a strategic policy which will

¹³ The Heritage of Woking – An Historic Conservation Compendium

¹⁴ Statement of Common Ground with English Heritage

operate in conjunction with government guidance such as contained in the NPPF, Policy CS20 is indicative that sufficient regard has been had to the historic environment of the borough.

43. In the context of the built environment, Policy CS22 relates to matters of sustainable construction whilst CS23 focuses upon renewable and low carbon energy generation. Policy CS22 seeks explicitly to ensure that the plan contributes positively to the reduction of energy use, the reduction of emissions and the promotion of renewable energy technology. In so doing, the CS draws on the content of the NPPF and its preceding documents whilst acknowledging the Council's existing initiatives, the Climate Change Strategy and CD/10¹⁵. Overall, mindful that the NPPF has replaced PPS1 and its Climate Change Supplement¹⁶, the aims of Policy CS22 are consistent with national planning policy and its principles are sound.
44. The policy, whilst lengthy, aims to improve the performance of new homes and non-domestic buildings, particularly with regard to their energy, CO2 and water impacts. To do so, the policy refers to the BREEAM¹⁷ standards and the Code for Sustainable Homes (the Code); the latter being linked to the national intention to progressively improve the performance of homes in relation to energy (Part L of the Building Regulations).
45. Whilst the Code is currently not mandatory, it nonetheless provides a useful and credible means of gauging, in part, the sustainability performance of new housing. Consequently, the strategic lead of the CS in requiring new homes to perform to increasingly stringent aspects of Code levels provides precision to the document in line with its objectives. The policy is prescriptive only in relation to the water, CO2 and energy components of the Code and, whilst encouraging opportunities to be taken to ensure full compliance with each Code level, crucially recognises the potential impacts of such actions upon development viability.
46. An adequate degree of viability testing has been undertaken¹⁸ which broadly supports the Council's ambition as iterated within Policy CS22, both in relation to greenfield and previously developed sites. Such evidence addresses both Code Levels 4 and 5 and, whilst it indicates the challenges to be realised in securing viable developments at higher code levels, for example EVA Tables 10 and 11, it does not, as a general assessment, indicate the submitted policy to be unsound. There is no other substantive evidence which would lead me to such a conclusion. The EVA provides some support for the slightly different timescales to be adopted in relation to specific site types and the achievement of Code Level 5, whilst I note the supplementary evidence provided by the Council which illustrates the scale of the cost implications of the policy provisions¹⁹. In any event, the Policy is clear that individual site considerations and viability evidence will be considered in the event of detailed

¹⁵ Climate Change, Decentralised, Renewable and Low Carbon Energy Evidence Base

¹⁶ Planning Policy Statement 1 'Delivering Sustainable Development' and Planning Policy Statement: 'Planning and Climate Change Supplement to Planning Policy Statement 1'

¹⁷ Building Research Establishment Environmental Assessment Method

¹⁸ See EVA

¹⁹ Officer responses within Appendix 7 of the Consultation Statement and oral evidence at Hearing 3.

proposals which cannot meet Code Level 5. Such an approach will ensure adequate flexibility and thereby effectiveness for the policy. There is no substantive evidence to demonstrate that the policy will hinder the effective delivery of intended development.

47. Policy CS22 provides a clear steer in relation to the issue of sustainable construction. With due regard to the available evidence, there is not an undue bias towards any single form of renewable energy source nor is the plan unduly prescriptive in its approach to the potential use of district heating systems. A reference to the potential of 'Allowable Solutions' as described within the reasoned justification of Policy CS22 is reasonable, especially in light of the available evidence which suggests such an approach to achieving effective zero carbon homes is being advanced at a national level.
48. Policy CS23 sets out a positive approach to renewable and low carbon energy generation with an emphasis towards community based/owned projects. The Council's approach draws upon the evidence considered in the production of the SEP which includes the DECC Study²⁰ in addition to the Climate Study²¹, and is consistent with the aims of the regional plan. The policy sets a clear strategic intention for the Borough and makes due reference to the future production of an SPD to assist in delivering the policy objectives. The principles of such an approach are sound and consistent with national policy, particularly paragraph 97 of the NPPF.
49. Overall, the CS is based on robust and proportionate evidence which includes suitable consideration of viability issues and which represent an effective approach to the matter within the Borough over the plan period.
50. Whilst the absence of detailed landscape assessment is not helpful, Policy CS24 takes a positive approach to the issue of the Borough's landscape and townscape. When considered as a whole, the policy is capable of securing its aims through the development management process particularly where schemes affecting sensitive parts of the borough may be required to produce bespoke landscape evidence in support.
51. In conclusion, the approach of the CS to design is justified by the evidence base, consistent with national planning policy and the most appropriate strategy when considered against alternatives within the context of Woking. Sufficient regard has been had to the historic environment whilst issues pertaining to sustainable construction, energy generation and landscape/ townscape are addressed adequately.

Matter 4: Does the CS provide the most appropriate and sufficiently comprehensive strategy towards the economy with due regard to cross border issues? Is the approach evidenced adequately with due regard to national policy? Will the approach be effective, particularly with regard to flexibility?

52. In line with the overarching vision of the CS, Policy CS15 seeks to provide a strategic basis for creating sustainable growth in the Borough economy. It is

²⁰ Review of Renewable and Decentralised Energy Potential in SE England CD/124

²¹ CD/10 Climate Change and Decentralised, Renewable and Low Carbon Evidence Base

informed by a comparatively up to date, proportionate and robust evidence base which extends beyond the Borough boundaries and which includes the Employment Land Review (ELR), the Market Appraisal, the Employment Position Paper and the Town, District and Local Centres Study (the Study). There are no substantive reasons to consider the methodology of the ELR to be flawed. Through an analysis of the existing economic land uses within the Borough and with due regard to reasonable anticipated growth levels, the ELR has suitably informed the Council's approach to floorspace requirements within the Borough, both in relation to retail and 'B' Class uses²².

53. The evidence base has assessed robustly the location and roles of employment areas throughout the Borough. The Council has taken the evidence and, with due regard to known local circumstances at Robin Hood Works, identified key employment areas. These, with justified exceptions, will be safeguarded for employment generating B class uses in a manner that recognises the changing demands for certain types of employment land, for example warehousing.
54. Policy CS15 provides explicit and adequate support for small and medium sized enterprises which, as the Council identify, make a significant contribution to the local economy.
55. Broadoaks is a MDS within the Green Belt located just outside of West Byfleet. Policy CS15 identifies that that the site should be a high quality business park to accommodate B class uses, focussed upon offices and research. A planning application was approved in 2000 for the redevelopment of the site to provide three new office buildings and the restoration of the listed manor house. The site is effectively disused despite clear investment into Phase 1 of the approved scheme and a resolution to grant a further planning permission (2010) which appears designed to increase the flexibility of the uses within the partially constructed offices.
56. Submissions have been made that the approach of Policy CS15 is inflexible and ineffective due to the nature of the Broadoaks site and negative changes in the market for the originally intended uses.
57. The NPPF advocates the need for plans to contain sufficient flexibility to adapt to rapid change, with due regard to potential impacts, and identifies the need to support economic growth appropriately. Indeed, paragraph 22 indicates that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose, that land allocations should be regularly reviewed and that where there is no reasonable prospect of a site being used for the allocated employment use alternative schemes should, amongst other matters, be treated on their merits.
58. The ELR offers only broad support for the Council's aspiration for the Broadoaks site and there is little substantive evidence relating to the need or deliverability of a high quality business park in this location. I note that the Council intends to review its ELR every five years and I am also mindful of the intended production of the Sites Allocation DPD. Both offer an opportunity to assess further the use of, and the planning policy position relating to, the

²² Class B of the Town and Country Planning (Use Classes) Order 1987 as amended

Broadoaks site. Nonetheless, in light of the available evidence, the current policy is unduly inflexible. Additional flexibility, maintaining a warranted focus upon the employment objectives of the Borough, can be secured to aid the effectiveness of the CS by a modification to the reasoned justification of the policy which I detail in Appendix 1 (MM4).

59. Whilst an important employer and business within the Borough, the CS makes due reference to the role of McLaren Industries and potential technological spin-off businesses within the CS and no modification is warranted to secure the soundness of the plan. As a separate matter, there is insufficient evidence to warrant further references to the role of tourism within the Borough within Policy CS15.
60. The CS does provide the most appropriate and sufficiently comprehensive strategy towards the economy with due regard to cross border issues. The approach is evidenced adequately with due regard to national policy and, as recommended, the approach will be effective.

Matter 5: Does the CS take a robust approach towards infrastructure provision in support of the CS objectives?

61. The CS provides a comprehensive definition of what is meant by the term 'infrastructure'. Policy CS16 seeks, by working with partners and developers as necessary, to ensure that infrastructure required to support development is either protected or provided in a timely manner. To do so, the Council makes clear reference to the intended introduction of a Community Infrastructure Levy (CIL), for which the Council has an approved Project Plan, and to the use of legal obligations as required. In general terms, such an approach is sound.
62. The Council has developed its Infrastructure Capacity Study and Delivery Plan (IDP) and its Schedule of Infrastructure Delivery Requirements to provide a non exhaustive indication of what infrastructure is anticipated to be required, where, when and ultimately who will most likely take the lead in securing its implementation and how it will be funded. This information covers a range of potential infrastructure that includes transport, education, health and key services. This is a sensible and, as far as the evidence indicates, a robust approach which the Council intends to review bi-annually.
63. The CS is based upon, as far as private sector interests allow, a best available and up to date evidence base. The evidence indicates that water supplies and sewerage infrastructure are not undue constraints to the delivery of the plan objectives. The annual review process, in conjunction with the intended production of documents such as the AAP and Sites Allocation DPD, will provide an effective mechanism and suitable opportunities for updating the IDP and ensuring robust links between development intentions and infrastructure needs.
64. Policy CS19 addresses adequately social and community infrastructure and is underpinned, primarily, by the Council's Social and Community Facilities Study²³. This demonstrates existing and planned joint working requirements, for example with the County Council, to ensure the effective delivery of

²³ CD/27

necessary infrastructure, including that relating to health and education. There is adequate strategic reference to matters of electronic communications.

65. The evidence pertaining to 'open space, green infrastructure, sport and recreation' within the Borough can be found from a number of sources which are summarised in part in WBC/08²⁴. These include the Council's Open Space, Sport and Recreational Facilities Audit and its own Green Spaces Development Plan which informs the proposed Appendix 4 of the CS that the Council intends will provide the Council's open space standards. The former document was updated in 2008 and, despite its age, provides a reasonable assessment of the Borough's facilities and needs. In combination with the IDP and the Schedule of Infrastructure Delivery Requirements, the overall evidence provides an adequate justification for the approach of the Council on these matters.
66. The important role of suitable green infrastructure is positively acknowledged within Policy CS17 which seeks justified quantitative and qualitative improvements in provision. This policy also identifies a robust approach to mitigating the potential impacts of new residential units within five km of an SPA based upon clear cross border partnership work with neighbouring authorities and Natural England.
67. The CS protects existing allotments whose numbers, it is recognised, do not meet the underlying need for such facilities within the Borough. The submitted provisions of Policy CS17, even in conjunction with the minor modifications proposed by the Council, do not specifically seek to address the shortfall. Consequently I recommend a change to the policy to more positively plan for development to meet the identified standards and need (MM5).
68. Overall, Policy CS17 is justified upon robust evidence and is sound and the CS takes a robust approach towards infrastructure provision in support of its objectives.

Matter 6: Is the advocated approach to sustainable transport the most appropriate strategy within the context of the Borough? Does the evidence support sufficiently the premise that the approach will be effective?

69. Policy CS18 addresses matters of transport and accessibility. It is underpinned by a robust range of evidence sources which include The Surrey Transport Plan and the Surrey Transport Assessment. The policy is consistent with the aims of the NPPF and seeks, through joint working with the County Council and others, to deliver a sustainable transport system that connects people to their destinations in an effective manner. By so doing, the policy recognises that existing urban areas will be the focus for new development, thus minimising the potential need to travel and the distances to be travelled. Transport Assessments and Plans will be suitable tools employed to aid the effective delivery of the policy aims.
70. The policy acknowledges adequately the range of transport modes, in addition to the private car, which need to be addressed within development proposals, with a suitable focus upon those which may be deemed more sustainable, for

²⁴ Topic Paper on PPG17

example cycling and walking. Submissions have been made that the policy and the CS overall could be more ambitious or indeed prescriptive in how such modes could be developed. However, I remain mindful that the CS needs to take a balanced approach to its strategic aims and ensure its deliverability and effectiveness. As such, Policy CS18 sets out a rational approach to matters of transport and accessibility. The policy addresses issues of car parking standards in a manner designed to encourage the use of sustainable transport and to control congestion which is a reasonable approach. The policy is consequently cogent, evidenced and consistent with both the NPPF and the overall thrust of the SEP.

71. A key component in the Borough's strategy is the presence of Woking Railway Station. Concerns have been raised as to the capacity of the station and its rail services to meet the increased demands placed upon them by the level of growth and development intended for the town and Borough over the plan period. However, whilst this matter should remain a focus for review, the available evidence which includes the London and South East Route Utilisation Strategy, does not indicate that Woking and its station have fundamental capacity issues which cannot be addressed by a range of initiatives which may, for example, include longer trains and ticket pricing strategies.
72. The Proposals Map seeks to carry forward land safeguarded for future transport infrastructure from the LP which, as part of a County Council review, will be updated as necessary as part of the intended Sites Allocation DPD. The principle of such an approach is sound but the Proposals Map should only reflect those schemes which are, based on current evidence, clearly intended. Where LP Policies are to be deleted or where uncertainty exists, for example the broad details of specific schemes unknown in advance of the Sites Allocation DPD, then they should not be included upon the Proposals Map. The IDP and schedule is an effective means by which necessary transport infrastructure can be identified, reviewed and updated over the plan period which will ensure that an adequate linkage can be made between development, growth and transport infrastructure requirements. The Proposals Map should therefore reflect the development plan as incorporating the matters flowing specifically from the Core Strategy; there is no robust justification for including alterations intended to reflect potential changes which may only be finalised when subsequent planning documents are prepared and adopted.
73. Overall, the advocated approach to sustainable transport is the most appropriate strategy within the context of the Borough. The policy provides an adequate strategic framework to be further developed with stakeholders and partners to ensure that the Borough is served by an effective sustainable transport system. There is no substantive evidence to indicate the policy is not robust or capable of effective implementation.

Matter 7: Is the Core Strategy's approach to housing provision sufficiently justified and consistent with national planning policy? With particular regard to deliverability and the 'duty to cooperate', will the Core Strategy be effective in meeting the varied housing needs of the Borough over the plan period?

74. The Council has drawn upon a variety of evidence sources in developing its approach to housing which is iterated within the CS. Chief amongst them are:

the SEP, the SHLAA, the SHMA, the EVA, the GTAA²⁵ and the Council's own Housing Strategy. When considered as a whole, the evidence base can be considered comprehensive and sufficiently up to date. Policies CS10-14 refer to the provision of housing throughout the Borough.

Housing Provision and Distribution

75. At a regional level, the SEP recognises the need to balance a high demand for housing with environmental constraints and that, historically, the supply of housing has not matched demand, particularly with regard to affordable homes. Against this background, the SEP indicates²⁶ the need for net dwelling completions to be at an annual average of 2,394 within the London Fringe which includes an annual average housing figure of 292 dwellings for Woking Borough, although this is not expressed as a specific target. The SEP was adopted in 2009 and is based upon a robust evidence base. The principles that it enshrines, including an emphasis upon partnership working, remain sound and are transferable, along with some of its supporting evidence, to the submitted Woking CS.
76. In this context and based on current evidence²⁷, it would appear that the local planning authorities within the London Fringe are cumulatively planning to maintain the annualised average provision of housing as indicated by the SEP. In general terms, this can be considered indicative of joint working towards an effective outcome in the spirit intended by the 'duty to cooperate'. The evidence indicates that the housing provision anticipated by the SEP for the London Fringe is, when taken in the round, being planned for adequately at this time.
77. The CS has been prepared partially alongside the SEP and adopts the housing delivery figures of the latter. Whilst relying in part upon the evidence supporting the SEP, the CS has maintained, updated and tailored its evidence sources to a proportionate degree. The SHMA has been prepared to cover the west of Surrey including the local authority areas of Woking, Guildford and Waverley which comprise, upon the basis of the available evidence and allowing for the proximity of London, a reasonable housing market area.
78. The West Surrey SHMA is supported by housing needs and market survey data which appear to assess adequately the needs and requirements for the Borough. By any measure, for example the average affordable housing requirement for 499 dwellings per annum over the plan period, the housing needs of the Borough exceed the annual average figure of new dwelling completions anticipated by the SEP and indicated by the intended housing delivery of the CS. With regard to the NPPF, the CS intention to deliver 4,964 dwellings over the plan period will not meet the full objectively assessed needs for either market or affordable housing in the Woking element of the housing market area.
79. Guildford Borough has not yet set an intended level of housing provision as part of its preparatory work upon its Local Plan (Core Strategy) although has

²⁵ North Surrey Gypsy and Travellers Accommodation Assessment

²⁶ SEP Policy H1

²⁷ WBC/44

indicated no requirement for Woking Borough to meet any part of its housing need. Waverley Borough has published a Draft Core Strategy that indicates an annualised housing provision of 230 units. This is below the SEP figure of 250. The shortfall of provision at Waverley, amongst other justifications, is anticipated to be met, at least in part, by major planned developments in neighbouring authorities excluding Woking Borough, such as Rushmoor Borough where the adopted CS will contribute a greater level of housing than indicated by the SEP.

80. The available evidence indicates that Woking Borough will not meet its own housing needs and that the intended local plans of its two West Surrey neighbours are not currently intending to address the shortfall. The picture is evolving but it therefore appears that the need for housing as identified by the West Surrey SHMA is yet to be clearly reconciled in plan making terms across the three Boroughs. Nonetheless, it is also evident that these Councils and those of the London Fringe are aware of, and are seeking to address, the Duty to Cooperate to plan strategically for the area in the future.
81. Whilst the submitted CS does not plan to meet the objectively assessed housing needs of the Borough, I am mindful that the NPPF indicates that the aspiration to meet housing need is dependent upon consistency with other parts of the Framework. With this in mind and as evidenced by the SA, the Council has considered alternative levels of housing provision, for example, its Option 3²⁸ which considered the provision of 594 new dwellings per year. The SA illustrates the increased negative effects of such an option, for example as affecting the environmental constraints of designated conservation assets within and near to the Borough, including the SPA and areas at risk of flooding. Indeed, the Council is mindful that a significant proportion of the Borough is Metropolitan Green Belt and that past completion rates, even in times of more economic buoyancy, have not consistently exceeded 300 dwellings per annum. Such an option is also shown to have adverse impacts upon air quality, sustainability and climate change.
82. The SA represents weighty evidence which supports the Council's chosen approach. It carries an assumption that incursions into the GB should be minimised and in the context of the NPPF and its predecessor PPG2, such an assumption is not unreasonable. A review of the GB would have usefully informed the CS and the reasonable capacity of the Borough to provide appropriate levels of housing over the plan period but it is a matter of fact that such a review was not undertaken, is planned and is now recommended by me that it is expedited. Taking a pragmatic view of the evidence which includes the extant SEP and the SA, the CS is not unsound in the absence of a GB review provided the overall level of housing planned for the Borough and its annualised housing provision average are deemed to be minimums. To ensure clarity upon this point and the effectiveness of the plan, I recommend a main modification accordingly (MM6). It will be incumbent upon the Borough and its neighbours to ensure that the processes and outcomes related to the Duty to Cooperate are honed further to maximise the sustainable delivery of suitable housing.
83. The available evidence when taken as a whole, including that which is

²⁸ SA Appendix 5

available from nearby Boroughs who indicate a general intention to maintain their housing provision in line with the SEP and to work jointly on strategic issues such as housing, is sufficient to enable a conclusion to be reached that an average housing completion figure of 292 dwellings per annum is reasonable provided it is seen as an average minimum and not an absolute target. This approach is consistent with the broad aims of the NPPF such as, for example, protecting the purposes of the Green Belt, taking a risk based approach to the location of new development with regards to flooding and by making a contribution to, and enhancing, the natural environment. Nonetheless, the evident need for housing within the Borough is such that any additional housing provision that meets the sustainable aims of both the CS and the NPPF should not be resisted solely on the grounds of over provision beyond the annual average figure. Within this context and in discharging the duty to cooperate, the Council will need to maintain a review of its housing delivery intentions.

84. Policy CS10 provides details as to the distribution of housing and its intended density which is consistent with the objectives of the CS to focus growth and new development within Woking itself. In this aim, the approach of the CS is supported by, amongst other evidence, the SHLAA.
85. The SHLAA was updated in the autumn of 2011. It adopts a comprehensive methodology to assessing potential housing sites within the Borough. There is no substantive evidence to indicate that its density and housing yield assumptions, with due regard to exemplar schemes and the housing mix requirements proposed by the CS, is flawed. With regard to the NPPF, it represents an adequate, proportionate and robust evidence source. The general threshold of assessing sites that can accommodate 6 or more dwellings is reasonable in light of the Council's experience that nearly 90% of such sites comprise previous completions over the preceding 5 years.
86. The SHLAA summarises the housing land supply for three 5 year periods until 2027. It concludes that there would be an overall deficit in the identified land supply against the cumulative identified housing requirement. The Council intends to resolve the deficit through a review of the Green Belt and a release of additional land for housing which I have recommended should be brought forward to coincide with the production of the Sites Allocation DPD.
87. For the first five years of the CS, the Council has identified a range of specific sites upon which housing will be delivered²⁹. The majority of new dwellings in this period are expected to be delivered through five key sites: Brookwood Farm, Moor Lane, and the completion of development at Hoe Valley, New Central and Martin's Press. Whilst the latter three sites appear deliverable, preparatory work continues on the former (see WBC/21) neither of which has yet received detailed planning permission and appear to be some distance from commencement. The inclusion of these previously safeguarded sites is justified on the basis of the extant development plan and the SHLAA yet the assumptions contained in the Council's revised housing trajectory appear optimistic in terms of the amount of housing either site will deliver in the first five years of the plan period.

²⁹ See Housing Supply Position Statement et al

88. Indeed, the trajectory indicates an approximate average provision of net new housing below 292 dwellings per annum over the previous five years and it anticipates a considerable upturn of housing provision compared to the two previous reporting years. Implementation rates appear to have declined³⁰ and the anticipated upturn appears based upon little substantive evidence that the current challenging economic circumstances which are affecting both the supply and take up of housing will significantly alter and improve. Logic and experience suggest any upturn in provision is likely to be more gradual.
89. The sites identified for the first five years of the plan period would appear capable of delivering the indicated densities and theoretically capable of delivering the minimum amount of housing required by the annualised average. The timing of the delivery is more uncertain. Given the preparatory work necessary before construction can begin, the probability that both Brookwood Farm and Moor Lane will be complete by 2016/2017 cannot be suggested with certainty and evidence from historic completion rates indicates caution should be exercised in assuming high yields in the early years of the plan period. It would certainly appear feasible that the housing to be delivered from each site will extend beyond the initial five years of the plan.
90. Nevertheless, there would appear to be some leeway for other sites to make up any potential shortfall so as to ensure the annualised average minimum is achieved across the first five years of the plan. The NPPF indicates³¹ that authorities should include sites, moved forward from later in the plan period, to provide a buffer to ensure choice and competition in the market for land. Given the Council's previous experience in delivering housing in the region of the annualised average of the SEP over the previous five years, a buffer of 5% appears reasonable. In any event however, the Council has indicated a five year housing land supply which exceeds the annualised figure of 292 dwellings by over 20% which provides a not insignificant margin for error.
91. More recently the Council has identified a consistent stream of small sites³² that have resulted in an average of more than 40 additional dwellings per year. Such sites and windfalls should be seen as supplementing the Council's housing provision rather than necessarily replacing particular identified sites, thereby providing the potential to exceed the minimum annualised housing figure of 292 dwellings and to thus make a more meaningful contribution to meeting the overall housing needs of the Borough. The leeway that such small sites provide would nonetheless appear capable of compensating for any delay in the housing which is anticipated to be delivered from, for example, Moor Lane or Brookwood Farm. Overall, the balance of the combined evidence indicates a deliverable five year land supply for the Borough.
92. The CS makes no provision for any non-implementation of housing sites as a result of unforeseen circumstance, which increases the reliance upon the key sites in the first five years of the plan period and increases the potential risk to achieving adequate housing delivery. However, given the potential level of provision as described above, a requirement for a specific non-implementation allowance is not substantiated by the evidence. The process of 'plan, monitor

³⁰ WBC/34

³¹ Para 47

³² See SHLAA, WBC/33, WBC/37 et al

and manage' will enable, over the entire plan period, the Council to identify the need for subsequent action should the anticipated levels of housing delivery not materialise.

93. On balance, I am satisfied that the Council's approach will enable adequate choice and competition in the housing market and thereby it satisfies the thrust of the NPPF in these regards.
94. The SHLAA also indicates a reasonable prospect that sites for the second five year period of the CS can be secured. This will need to be kept under review, as part of the 'plan, monitor, manage' approach intended by the Council, and will need to be addressed in detail by the Sites Allocation DPD process. There is no substantive evidence to indicate that this cannot be achieved.
95. The Council acknowledges the need to identify further housing land for the final five years of the plan period to accommodate the necessary requirement of new homes. In doing so, the Council indicate that the two broad locations of growth will be the town centre and the Green Belt. Whilst I heard concerns that the identification of the town centre as a broad location for future development may be unwarranted and impractical given the intensity of planned development, the review process of the Council during the life of the plan, supplemented by the production and maintenance of the Sites Allocation DPD will be sufficient to ensure that either suitable sites are found or that alternative locations are identified. There is no substantive evidence to find the Council's approach flawed in this regard.
96. The proximity of GB land to Woking creates an inevitability that land within the GB will be required to meet the housing aspirations of the plan and, as discussed above [31], its designation as a broad location for future growth is consequently reasonable. The CS will be more precise and effective on the basis that the GB review is undertaken at an early date enabling suitable site identification and phasing, subject to need, for the end of the plan period. Given the availability of fresh data³³ which will indicate the accuracy or otherwise of the anticipated housing trajectory and the need to ensure the permanence of green belt boundaries beyond the plan period, the Council may consider it prudent to undertake its GB review in a manner that identifies sites capable of delivering more than the identified minimum requirement of new dwellings.
97. Policy CS10 provides indicative density ranges for new residential development depending on its location. Notwithstanding an aim to use land efficiently, the policy is clear that final scheme density will depend on the nature of the site and such flexibility will ensure the effectiveness of the plan in operation.

Housing Mix

98. The CS, through the provisions of Policy CS11, seeks to secure an appropriate mix of housing that meets the needs of the Borough as identified by the latest SHMA information. This reasonable objective is clearly stated within the policy and supported by the reasoned justification; this includes a justified focus upon family homes. The policy acknowledges the importance of ensuring

³³ For example AMR 2011/2012 and beyond

schemes address the established character and density of an area in conjunction with considerations of development viability. Thus, higher density town centre based developments may justify lower proportions of family accommodation whilst lower residential densities may warrant a reduced proportion of single bed homes. Such flexibility will contribute positively to the effective delivery of new housing.

99. There is a risk that the CS focus upon higher density town centre development will not realise a suitably balanced housing mix that addresses the needs of the Borough. However, Policy CS11 refers reasonably to the intended Site Allocations DPD which, in conjunction with the Council's Development Management DPD, will provide further opportunities to clarify how a balanced and mixed housing supply will be secured. This will militate against an unsuitable housing mix across the Borough over the plan period. Such documents, coupled to effective annual monitoring which will allow suitable management processes to be enacted as necessary, will enable the Council to take an effective and sound approach towards the housing mix of the Borough. On balance, the available evidence supports adequately the Council's approach.

Affordable Housing

100. Policy CS12 has been informed particularly by the SHMA and the EVA with regard to the SEP. Amongst other provisions, Policy CS12 sets an overall target for affordable housing of 35% of all new homes and, in setting thresholds for new development, distinguishes between previously developed and greenfield land. This 'target' is below the affordable housing requirement for the Borough but is one that the Council considers to be deliverable and there is no persuasive evidence to the contrary.
101. The overall target is supported adequately by the Council's EVA which, notwithstanding the need for this document to make a multitude of informed assumptions, provides a proportionately thorough assessment of matters affecting housing delivery, particularly the requirements for affordable homes and the design standards which may apply.
102. Undoubtedly the current housing market is operating in challenging economic circumstances that are not as buoyant as those experienced, for example, in 2007. The EVA recognises that fact in both its content and conclusions. I am also mindful that the CS is a strategic document that covers a 15 year period during which the economic cycle will invariably progress and change further. The evidence in support of the Council's strategy is proportionate and robust.
103. Whilst concerns have been raised at the implications of the CS approach to affordable housing upon development viability and site delivery, there is no substantive evidence which leads me to find the rationale and content of the CS to be unsound. There is also no substantive evidence which supports setting the overall target higher than 35%, albeit in specific circumstances affordable housing requirements will exceed this level (eg 40% on sites larger than 0.5ha). Furthermore, Policy CS12 makes specific provision for the consideration of viability issues in relation to development schemes and the proportion of affordable housing they may provide. Such flexibility will ensure the likely effectiveness of the policy as a whole.

104. The Council have suggested a number of modifications to Policy CS12 which would cumulatively have the effect of clarifying the Council's intentions. These ensure the Council's consistent approach to greenfield sites and those in public ownership as requiring 50% of dwellings to be affordable. Whilst the modifications, which include the suitable definition of affordable housing, do not appear to alter fundamentally the policy objectives or means of policy operation, they are necessary to ensure the effectiveness of the plan and therefore I recommend them as main modifications accordingly (MM7).
105. The CS makes specific allowance for exceptional circumstances to be considered in delivering affordable housing which, given the acknowledged shortfall of proposed homes when measured against need, is sensible, flexible and thus likely to increase the effectiveness of the plan. The CS seeks to ensure that the potential provision of affordable homes off-site is linked to the creation of suitably balanced communities and I have no reason to find this approach unsound, ever mindful that an Affordable Housing SPD is intended to aid delivery of the policy aims.

Older People and Vulnerable Groups

106. The SHMA indicates a need to make provision for the housing needs of older people and vulnerable groups. Accordingly, Policy CS13 outlines the approach that the Council will take including a justified requirement to incorporate adequately sized accommodation and a commitment to utilise the Site Allocations DPD to bring specific development sites forward during the plan period. On such a basis and contrary to submissions made to the examination, there is no necessity to identify suitable sites within the CS. The submitted and advocated approach is supported by the evidence base and is sound.

Gypsies, Travellers and Showpeople

107. The CS and Policy CS14 were prepared whilst Circular 1/06 'Planning for Gypsy and Traveller Caravan Sites' was extant. This has now been replaced by the government's 'Planning Policy for Travellers Sites'. Document WBC/42 represents the Council's position in relation to the CS and national policy.
108. The preparatory evidence base for Policy CS14 revolves around The North Surrey Gypsy and Traveller Accommodation Assessment (GTAA) which indicated a need for 10 additional pitches to be provided in the Borough between 2006 and 2016. Permission has been granted for this number whilst the need for one pitch to meet the needs of Travelling Showpeople remains unmet.
109. The GTAA is not up to date and does not cover the plan period. As a consequence, the submitted Policy CS14 cannot be considered to be based on adequately robust evidence. However, the Council proposes modifications to its policy to reflect the fact that a fresh assessment of needs will be undertaken during 2012 and that new pitch provision will be made accordingly. In the interests of plan making efficiency, rather than delaying the examination process to enable the evidence base to be updated and pitch provision to be made for the entire plan period, I consider that the Sites Allocation DPD provides a reasonable mechanism by which locations for additional pitch provision may be found. Thus I recommend a main

modification which will alter Policy CS14 to reflect the ongoing work in relation to the new assessment and to reflect the need to allocate an appropriate total of new pitches through the Sites Allocation DPD process (MM8).

Summary

110. Overall and subject to the modifications indicated, the Core Strategy's approach to housing is sufficiently justified and will be consistent with national planning policy. With due regard to the duty to cooperate, there is no persuasive evidence to indicate the intentions of the CS are either fundamentally flawed or undeliverable. As far as constraints allow, the CS will be effective in meeting the varied housing needs of the Borough over the plan period.

Matter 8: Does the CS address adequately the provision of necessary infrastructure to support the delivery of the strategic objectives? Are the Core Strategy's monitoring targets justified adequately and of a level of detail that is appropriate to a Core Strategy? How will the effectiveness of the CS be managed?

111. Amongst other matters, a plan needs to be effective. To gauge and ensure effectiveness, such a plan should be capable of accurate monitoring to assess the success or otherwise of its policies in securing the plan's objectives. The CS contains details of how each policy is intended to be monitored and I am mindful of the content of the Council's topic paper, WBC/09³⁴ and WBC/11³⁵, which clarifies further the intended approach to be taken. The Council has also suggested modifications to the submitted CS with regard to the level of detail it contains in relation to monitoring³⁶. Such modifications increase the range of monitoring indicators within the plan and ensure they are linked suitably and fully, with milestones, to the policies themselves. To ensure effectiveness I recommend the inclusion of Appendix 5 into the CS as a main modification (MM9).

112. Such an approach, linked to the process of annual monitoring will enable the Council to assess the effectiveness of the CS and, as necessary, undertake suitable management actions, both in plan making and development management, to remedy any problems arising. The CS makes some contingency provisions and, overall, there is sufficient flexibility within the CS, for example linking development viability with infrastructure provision in Policy CS16, to enable the delivery of planned outcomes.

113. Whilst not exhaustive nor a direct part of the CS, the IDP sets out clearly the infrastructure requirements and intentions for the foreseeable future and, subject to the intended process of regular review, provides a sound basis for the planning of the Borough. The Council has a commitment to produce a CIL which will be a key component in its partnership working arrangements to ensure the timely delivery of key infrastructure. The principle of such an approach is sound and interim arrangements, linked to the use of S106

³⁴ Woking Borough Council's approach to Delivery and Monitoring

³⁵ How the policies of the CS link to the key objectives

³⁶ WBC/40 New CS Appendix 5

obligations, are adequate.

114. The Council has produced a list of saved and superseded policies³⁷ which is adequate. To ensure compliance with the Regulations³⁸ this should form part of the Core Strategy and therefore I recommend a main modification to include the relevant information within CS Appendix 6 (MM10).
115. The Submissions Proposals Map is based on that produced in support of the Local Plan. The Proposals Map is not a direct part of the CS submitted for examination although a number of changes flow from the plan's contents. The Council has decided not to include details of the Flood Zones upon the map and, for reasons relating to ease of future updates and clarity, I do not dissent. Flood zone information will be available separately.
116. The boundary of Woking Town Centre has been informed by the Study and the Council's working knowledge of the area with its attendant development pressures. Submissions have been made which raise concerns at the inclusion of land to the south east of the railway line along Oriental Road although I note that this area has been part of the defined Town Centre since adoption of the Woking Local Plan in 1999. The Study provides two potential options for defining the Town Centre in this location, one of which maintains the 1999 definition and one of which excludes Oriental Road to the south east of the railway station with a more tightly defined boundary. The Council considers the former boundary to be warranted for the reasons cited in the Study.
117. Having visited the area, it appears that the character of Oriental Road running west from its junction with Heathside Crescent is increasingly residential and suburban. Nonetheless, its close proximity to the station and the remainder of the town centre to the north and west provides a clear spatial link between the two. The Council has chosen to maintain the town centre boundary in accord with option 2 of the Study and, whilst I can appreciate the concern of local residents, such an option has support from a suitably robust evidence base which seeks to focus development within the town centre but with due regard to achieving the flexibility necessary to secure the delivery of suitable development. On balance, therefore, it is consequently sound. Invariably, the policies of the CS must be considered as a whole when considering new development proposals and these must include due consideration of local character and design. The inclusion of some more suburban residential elements within the town centre does not provide a charter for ill considered development proposals.
118. There is no reason to consider that the Proposals Map will not be updated suitably following the intended review of highway related schemes. Notwithstanding the historic content of the LP, it would appear that the inclusion of a potential car park site within Horsell is yet to be determined with any certainty and I note that the existing policy within the LP, MV11, is to be deleted. Thus, on the basis of the available evidence, there is no justification for the inclusion of such a facility on the PM in relation to Horsell at this time. The PM should be updated accordingly in relation to these matters. However

³⁷ WBC/04 List of Saved (and Superseded) Development Plan Policies

³⁸ The Town and Country Planning (Local Planning) (England) Regulations 2012 – Reg 8(5)

and with due regard to submissions made, I am not persuaded that these considerations impinge upon the fundamental soundness of the CS itself and no recommended main modification is warranted in such regards.

119. The CS addresses adequately the provision of necessary infrastructure to support the delivery of the strategic objectives. The monitoring targets of the CS are justified adequately and of a level of detail that is appropriate to a Core Strategy. The Council's intended process of 'plan, monitor and manage' will ensure the effectiveness of the CS during the plan period.

Assessment of Legal Compliance

120. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. Subject to MM10 [114], I conclude that the Plan meets them all. The Council considers that the main modifications do not alter the substance of the submitted CS or its policy principles and therefore do not require further public consultation or additional sustainability appraisal. I have no reason to disagree.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS October 2011 which sets out an expected adoption date of September 2012. The Core Strategy's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2011 and consultation has been compliant with the requirements therein, including the consultation on the post-submission matters where necessary.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report December 2011 sets out why AA is not necessary.
National Policy	The Core Strategy complies with national policy except where indicated and modifications are recommended.
Regional Strategy (SEP)	The Core Strategy is in general conformity with the SEP.
Sustainable Community Strategy	Satisfactory regard has been paid to the Sustainable Community Strategy.
2004 Act (as amended) and 2012 Regulations.	The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

121. The Plan has a number of deficiencies in relation to soundness and legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

122. The Council has requested that I recommend main modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Woking Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Andrew J Seaman

Inspector

This report is accompanied by the Appendix containing the Main Modifications

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics* or with reference to Core Documents.

The page numbers and paragraph numbering below refer to the submission CS, and do not take account of the deletion or addition of text. The following table cross references Woking Borough Council's documents WBC43³⁹ and WBC38⁴⁰ which contain proposed modifications to the submitted Core Strategy.

Ref	Page	Policy/ Paragraph	Main Modification
MM1		Policy CS25	Modify the CS in accordance with WBC 43 reference 48.
MM2		Policy CS6	Amend the CS in accordance with WBC 43 references 11 and 14
MM3	51 53	Policy CS 6 5.10	Last paragraph of the policy, second sentence: A Green Belt boundary review will be carried out in 2016/17 with the specific objective.... A review of the Green Belt boundary will be carried out in 2016/17 <u>to inform the Site Allocations DPD and in any event before 2016/17,</u> to evaluate where it is appropriate ...
MM4	83	5.128	The Broadoaks site in West Byfleet is identified as a Major Developed Site in the Green Belt. The site has planning permission as a high quality office and research park set within landscaped grounds. <u>The Council considers the retention of this site for quality office and/or research premises is important as no other similar sites are available within the Borough. The Council will keep the site under review when updating its ELR and preparing the Site Allocations DPD. The Council will consider justified alternative proposals that contribute quantitatively and qualitatively to the employment objectives of the Borough.</u>
MM5	90	Policy CS17	The number of allotments in the Borough Allotment numbers should be protected, and There will be 'in-principle' support for new allotments <u>and opportunities sought to contribute to meeting the Council's standards set in Appendix 4.</u>
MM6	63	CS10 Para 5.53	The Council will make provision for <u>at least 4,964</u> dwellings ... The Council will make provision for the delivery of <u>at least 4,964</u> dwellings in the Borough between 2010 and 2027

³⁹ Further proposed additional modifications to the Core Strategy Publication Document July 2011 (May 2012)

⁴⁰ Table of All Modifications from Prior to and During the Core Strategy Examination (25 April 2012)

