

Rep No.	Respondent name / organisation	Policy number, where relevant	Support, support with modifications or object	Summary of key issues	Officer response	Officer recommendation, including proposed modifications.
7	Environment Agency	General	Comments	There is not enough detail in the policies that cover flood risk, contaminated land, biodiversity, ground and surface water quality.	<p>The DM policies DPD are an extension to the strategic policies in the Core Strategy, and should be read together. The policies should be concise and purposeful, and avoid repetition.</p> <p>Flood Risk The Core Strategy policy CS9: Flooding and water management sets out the Council's policy on Flooding. The policy is considered to be comprehensive. The Council is also preparing Sustainable Drainage Systems (SuDS) guidance.</p> <p>Ground and water quality The Core Strategy policy CS9: Flooding and water management sets out the Council's policy with regards to water quality. Paragraph 5.46 states that: <i>All proposals must conform to the Water Framework Directive 2000 and the Flood and Water Management Act 2010... The impact of development on water quality will be taken into account when determining planning applications.</i> CS17 Open space, green infrastructure, sport and recreation sets out that development that would have a detrimental impact upon water quality will not normally be permitted. DM6 Air and Water Quality and DM8 Land contamination and hazards expands on the Core Strategy policies.</p> <p>Contaminated land The Core Strategy policy CS9: Flooding and water management sets out the Council's policy with regards to contaminated land- where it sets out that</p>	<p>Flood Risk No further modification is required as a result of this representation.</p> <p>Ground and water quality No further modification is required as a result of this representation. See proposed modifications for DM6 and DM8.</p> <p>Contaminated land No further modification is required as a result of this representation. See proposed modifications for</p>

					<p>development should seek to remediate contaminated land to ensure that risk to water quality as a result of development is minimised. CS21 Design sets out that that new development proposals should seek to avoid significant harm to the environment.</p> <p>Policy DM8 Land Contamination and Hazards expands on the Core Strategy policies, setting out the requirements for development proposals that come forward on contaminated land.</p> <p>Biodiversity The Core Strategy policies CS7 Biodiversity and nature conservation and CS8 Thames Basin Heath Special Protection Area and to some extent CS17 Open Space, green infrastructure, sport and recreation and CS24 Woking's Landscape and townscape cover biodiversity.</p> <p>The draft Site Allocation DPD also identifies potential SANG sites- mitigation measure to reduce the impact of new residential development on the SPA.</p> <p>The policies in the Core Strategy and emerging Development Management Policies DPD are considered to be comprehensive.</p>	<p>DM8.</p> <p>Biodiversity No further modification is required as a result of this representation</p>
73	Environment Agency	General - Climate Change - Para 9.1, page 25	Support with modifications	<p>Add the following:</p> <ul style="list-style-type: none"> o A link to the green infrastructure policy and how green corridors along rivers contribute to climate change mitigation. For example, allowing uninterrupted green pathways for species to migrate along. Also the need for the renewal or adaptation of barriers that obstruct the migration of aquatic species, especially fish, e.g. weirs and culverts. o The benefits of reconnecting 	<p>The suggested addition to the key challenges for climate change are reasonable and acceptable.</p>	<p>The SA Report should be amended by adding the following to the list of challenges under climate change (page 25):</p> <ul style="list-style-type: none"> o A link to the green infrastructure policy and how green corridors along rivers contribute to climate change mitigation; o The need for the renewal or adaptation of barriers that obstruct the mitigation of aquatic species; o The benefits of reconnecting

				rivers with their floodplains and the creation of wetland habitats, that contribute to natural flood risk management.		rivers with their floodplains and the creation of wetland habitats, that contribute to natural flood risk management.
106	Environment Agency	General - Design. Para 6.1	Modification suggested	<p>"The Core Strategy sets out the key objective of achieving high quality design of buildings, neighbourhoods and the public realm across the Borough. The Council will always seek to secure high quality design which makes the best use of the land, whilst respecting the distinctive character of the local area." We recommend that this wording is amended to include that all developments are designed to ensure that they will not increase flood risk elsewhere and where possible reduce flood risk in the local area. This will then ensure that developers consider flood risk from an early stage.</p>	<p>This is unnecessary as all development is subject to Policy CS9 Flooding and Water Management, the detail of which does not need to be repeated.</p>	<p>No further modification is required as a result of this representation.</p>

54	Alice May (indigo Planning Limited)	General	Object	<p>There is presently an under supply of housing delivery against the Core Strategy requirement, which one of the key constraints is the Green Belt. In this regard, the key priority of the Council should be the preparation of the Site Allocations Development Plan Document instead of the Development Management Policies DPD, which adds little beyond the existing Core Strategy and national planning policies.</p> <p>The Development Management Policies DPD does not get to the crux of the issue in delivering the key Core Strategy objective of providing new homes. The Development Management Policies DPD will not pass the soundness tests because it will not deliver the objectives of the Core Strategy in relation to housing numbers.</p>	<p>The Council is committed to preparing both the Site Allocations DPD and the Development Management Policies DPD. The commitments are set out in the Core Strategy. The timetable for preparing the two DPDs is set out in the Council's Local Development Scheme (LDS), which is being followed. Both DPDs are being prepared in parallel and it is not expected that the preparation of the Development Management Policies DPD will undermine the focus on and/or the timetable for preparing the Site Allocations DPD.</p> <p>The introduction section of the DPD clearly sets out its overall purpose. The DPD does not allocate sites for housing. That is the responsibility of the Site Allocations DPD. Consequently, Officers are satisfied that there would not be issues of soundness because the DPD had failed to allocate land for housing. This would be a matter outside the scope of the DPD.</p>	No further modification is required as a result of this representation.
90	West Byfleet Neighbourhood Forum	General	Object	<p>Land at West Hall - any development on land at West Hall will take away valuable Green Belt that serves as buffer between West Byfleet and Byfleet. It will also have enormous impact upon the Wey Navigation and its important wildlife corridor for deer, swan and kingfishers. It is of upmost importance that the ambiance of the area is protected for future generations. The Dodd's Lane track is another area of natural beauty that should be protected. Development of the site would generate significant traffic, in particular, on Parvis Road.</p> <p>Broadoaks is a lovely site if developed with sensitivity. Its development should not be seen in isolation but also in the context of the</p>	<p>The DM Policies DPD does not allocate specific sites such as land at West Hall and Broadoaks for development. It is beyond its scope to do so. These are matters for the Site Allocations DPD. The West Byfleet Neighbourhood Forum has been briefed about the purpose of the DM Policies DPD and to seek their authority for the representations to be considered as part of the representations to Site Allocations DPD consultation. The Forum have written to confirm that the representations should be considered as a representation to the Site Allocations DPD.</p>	No further modification is required as a result of this representation.

				<p>West Hall proposal. Majority (95%) of residents recently survey agreed that some form of development should take place on the site. 63% would like to see a mixed use development to include residential, commercial, industrial, housing, education and sports. The development of the site will exacerbate traffic conditions and put additional pressure on existing infrastructure such as schools and health care.</p> <p>Land adjacent to Parvis Road - A small number of people who voted did not object in principle to development of land adjoining Parvis Bridge and Old Parvis Road. However, it was acknowledged that residents living close to the site may not consider the vote as truly representative of their views.</p>		
91	Alan Byrne, English Heritage	General	No detailed comments to make	N/A	None required	No further modification is required as a result of this representation.
92	Alan Byrne, English Heritage	General	Neutral	A draft local plan may be considered unsound if there has been no proper assessment of the significance of heritage assets in the area	The draft Development Management Policies DPD sets out in DM4: <i>Development in the Vicinity of Basingstoke Canal</i> that 'development proposals which would adversely affect the landscape, architectural or ecological character, setting or enjoyment of the Basingstoke Canal or which would result in the loss of important views in the vicinity of the Canal will not be permitted'. The draft policy states in the Reasoned Justification that 'The Council will take into account any relevant advice from the BCA in assessing proposals likely to have an impact on the Canal and its setting'. The text continues by stating that new development that directly adjoin or are in close proximity to the Canal will require a	No further modification is required as a result of this representation.

					<p>careful design which makes a positive contribution to enhancing the Canal. This is further supported in paragraphs 3.45 and 3.46 in the Reasoned Justification which sets out design and character information for specific sections of the Basingstoke Canal.</p> <p>As part of the preparation of the Core Strategy and Development Management Policies DPD, the Council has undertaken a number of heritage and conservation related assessments and studies in order to create a robust evidence base. The Heritage of Woking: An historic conservation Compendium (amended 2000) provides a foundation of heritage and conservation assets in the borough. This document was used to inform the Woking Character Study (2010) which identifies, analyses and describes the form and character of each main settlement in the borough and each distinct sub-area within it. The document pays specific regard to form, character, layout and land uses within each area.</p> <p>These two documents alongside the various Conservation Area Appraisals, were used to inform the adopted heritage and conservation policies of the Core Strategy. In addition to this, the Council adopted the Design Supplementary Planning Document (SPD) in February 2015 which sets good design criteria for developments within and adjacent to historic buildings and their setting.</p> <p>Within the Annual Monitoring Report, the Council also monitor and publish the number of heritage assets demolished or 'at risk'. Since the adoption of the Core Strategy in 2012, there is only one statutory heritage asset on the At Risk</p>	
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					Register. The significance of the heritage assets of the area is therefore comprehensively covered in the Local Development Documents of the Council.	
93	Alan Byrne, English Heritage	General	Neutral	A draft local plan may be considered unsound if the plan does not contain a positive strategy for the conservation, enhancement and enjoyment of the historic environment and policies that are clearly identified as strategic.	<p>Draft Policy DM20: Heritage Assets and their setting provides a positive frame work for the protection and enhancement of heritage assets. The draft policy builds on Core Strategy Policies CS20: Heritage and Conservation and CS21: Design and enables the delivery of new development within and adjacent to Conservation Areas. It also places significant weight on statutory and locally listed assets in the borough in order to protect them in accordance with relevant legislation and guidance in the NPPF. The policy is deemed to be strategic as it sets a broad policy framework in which proposed developments are required to comply with. There are opportunities for more detailed heritage and conservation policies to be prepared that are locally specific in the relevant Neighbourhood Plans.</p> <p>The draft Development Management Policies DPD also signposts towards other conservation and heritage policies and guidance documents that may be relevant to the public realm, advertising and signs and shopfronts.</p>	No further modification is required as a result of this representation.
94	Alan Byrne, English Heritage	General	Neutral	Sound local plan will be based on adequate up-to-date evidence about the historic environment.	As part of the preparation of the Core Strategy and Development Management Policies DPD, the Council has undertaken a number of heritage and conservation related assessments and studies in order to create a robust evidence base. The Heritage of Woking: An historic conservation Compendium (amended 2000) provides a foundation of heritage and conservation assets in the borough. This document was used to inform the Woking Character Study (2010) which	No further modification is required as a result of this representation.

					<p>identifies, analyses and describes the form and character of each main settlement in the borough and each distinct sub-area within it. The document pays specific regard to form, character, layout and land uses within each area.</p> <p>These two documents alongside the various Conservation Area Appraisals, were used to inform the adopted heritage and conservation policies of the Core Strategy. In addition to this, the Council adopted the Design Supplementary Planning Document (SPD) in February 2015 which sets good design criteria for developments within and adjacent to historic buildings and their setting.</p> <p>Within the Annual Monitoring Report, the Council also monitor and publish the number of heritage assets demolished or 'at risk'. Since the adoption of the Core Strategy in 2012, there is only one statutory heritage asset on the At Risk Register.</p>	
95	Alan Byrne, English Heritage	General	Neutral	A positive strategy for the conservation and the enjoyment of the Historic Environment	The Development Management Policies DPD sets a clear and positive strategy for the conservation and enjoyment of the Historic Environment. This is set out within DM20: Heritage Assets as well as specific information relating to the Basingstoke Canal Conservation Area in policy DM4: Development in the Vicinity of Basingstoke Canal. The policies state how enhancements within conservation areas can increase enjoyment for users as well as conserve the historic character.	No further modification is required as a result of this representation.
96	Alan Byrne, English Heritage	General	Neutral	Strategic policies for the conservation of the historic environment, including 'Building a strong, competitive economy', 'ensuring the vitality of town centres', 'supporting a prosperous rural economy',	The draft Development Management Policies DPD sets out detailed policies based on the strategic policies of the adopted Core Strategy (2012). The draft DMP DPD is in general conformity with the NPPF and therefore the policies	No further modification is required as a result of this representation.

				'promoting sustainable transport', 'supporting high quality communications infrastructure', 'delivering a wide choice of high quality homes', 'requiring good design', 'protecting Green Belt land', 'meeting the challenge of climate change, flooding and coastal change', 'conserving and enhancing the natural environment' and 'facilitating the sustainable use of minerals'.	relating to conservation and heritage in the draft DMP DPD are considered up to date and have been prepared to provide a positive framework for conserving and enhancing the historic environment of the borough.	
97	Alan Byrne, English Heritage	General	Neutral	Planning across boundaries - Local planning authorities are required to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in Local Plans, particularly those that relate to strategic priorities.	Woking Borough Council has actively engaged with neighbouring boroughs and cross boundary organisations in order to work in collaboration on strategic priorities that cross local boundaries. Further detailed information will be included in the Duty of Cooperate Statement which will accompany the Development Management Policies DPD when it is submitted to the Secretary of State.	No further modification is required as a result of this representation.
98	Alan Byrne, English Heritage	General	Neutral	Supplementary Planning Documents can be useful in providing more detail on how the local authority expects the strategic policies will apply in practice to common proposals.	In addition to the evidence documents used to inform the relevant heritage and conservation policies, the Council adopted the Design SPD (2015) which sets out urban design principles for new development across the borough. The guidance document notes the importance of the historic environment and design considerations that should be taken into account when preparing, analysing and determining a proposed development scheme in or adjacent to a heritage asset or conservation area. The Climate Change SPD (2013) is also relevant guidance for development in the historic built environment.	No further modification is required as a result of this representation.

99	Alan Byrne, English Heritage	General	Neutral	Neighbourhood Plans, including heritage in a neighbourhood plan will help make sure that potential new development is properly integrated with existing development, and does not result in the loss of local distinctiveness.	There are a number of Neighbourhood Plans that are in the process of being prepared and adopted within the borough. Policies relating to heritage and conservation within specific local areas could provide detailed design requirements or guidance that would enhance local distinctiveness. Planning Policy will consult with English Heritage when the specific draft Neighbourhood Plans are published for consultation in order to ensure they comply with legislation and best practice guidance.	No further modification is required as a result of this representation.
100	Cllr John Bond	General	Object	This DPD includes an assumption that the recommendations in last year's Green Belt Boundary Review require no consultation before adoption and can be taken as "evidence base" (see 1 below - Introduction 1.7) without any involvement with the affected local communities.	<p>The draft Development Management Policies DPD expands on the policy criteria set by the National Planning Policy Framework (NPPF) and Woking Core Strategy (2012). Without repeating the policies set out in the NPPF and Core Strategy, the draft DMP DPD provides further policy and clarification on appropriate development within and adjacent to the Green Belt within draft Policy DM13: Buildings in and adjacent to the Green Belt. The representation refers to the Green Belt Boundary Review (2014) which was commissioned by Woking Borough Council to inform its Site Allocations Development Plan Document. The draft Development Management Policies DPD does not allocate sites for development and therefore the Green Belt Boundary Review (2014) is not relevant in this instance. The Council encourages the representor to submit their comments on the Green Belt Boundary Review when the draft Site Allocations DPD is published for Regulation 19 Consultation, if that has not already been done at the Regulation 18 Consultation stage.</p> <p>The existing brownfield sites identified for housing are set out in the Council's Strategic Housing Land Availability</p>	No further modification is required as a result of this representation.

					Assessment (SHLAA) (2011). The document can be found on the Council's website.	
101	Cllr John Bond	General	Object	<p>The second serious problem is that the notification of the consultation period for this DPD document was only provided as an easily missed addition to an email advising on the official Adoption of a previous DPD - on the need for Community Involvement (see 4).</p> <p>It was on the third page of that email and after the formal "Statutory Notice" which appeared to be the final page of the email. In discussion with others it is clear that many residents and councillors will have missed the notification and still believe this current consultation has been delayed until later this year.</p>	<p>The draft Development Management Policies DPD Regulation 18 Consultation notification letter and email was sent out to those listed on the Council's LDF Consultee Database on 17 February 2015. The letter, as will be shown in the Consultation Statement, includes information relating to the then recent adoption of the Design SPD and updated Statement of Community Involvement as well as notification of the draft Development Management Policies DPD Regulation 18 Consultation. The email version of the notification was identical in terms of content and wording. Due to the formatting of the email notification, the subject of the email was titled 'Adoption of planning documents and consultation on Development Management DPD'.</p> <p>In addition to the letter and email notification, the Council also highlighted the consultation period within the local press and on the Council's main (www.woking.gov.uk) and planning (www.woking2027.info) websites. The draft Development Management Policies DPD and supporting documents were also sent to the four libraries in the borough on 17 February 2015. Officers believe this complies with the requirements set out within the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>As per the process for publishing Council documents for public consultation, officers must obtain prior approval from Members of the Executive Council. The papers for the Executive Meeting are published on the Council's website 7 days before the</p>	No further modification is required as a result of this representation. Nevertheless, the Council will continue to review its consultation methods to ensure the process is clear for local residents whilst also being in compliance with the statutory requirements.

					<p>meeting and made available for all Councillors. Therefore, it is considered that all Councillors were given the opportunity to review and comment on the draft document prior to the Regulation 18 Consultation Period. In addition to this, all Councillors were emailed on 17 February 2015 to notify them of the consultation period.</p> <p>After considering the process that was carried out in notifying people of the consultation period, the Council believe that it has been carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community Involvement.</p>	
102	Cllr John Bond	General	Object	It is also of concern that senior Woking Council officials specifically stated that the consultation was delayed and then failed to respond to emails requesting clarification of the timing.	The draft Development Management Policies DPD was approved by Executive of the Council to be published for public consultation in February 2015. The draft Development Management Policies DPD was originally due to be published alongside the draft Site Allocations DPD. However the Site Allocations DPD was delayed in its publication as further technical work needed to be carried out. The email that the representation refers to from Ray Morgan relates to the Site Allocations DPD and not the Development Management Policies DPD.	No further modification is required as a result of this representation.
103	Cllr John Bond	General	Object	Finally, it must be made very clear that there is considerable local community opposition to the release of Green Belt land in Woking	The draft Development Management DPD does not allocate or promote development within the Green Belt. Draft Policy DM13: Buildings in and adjacent to the Green Belt, provides locally specific policy requirements for proposals for the extension, alteration, replacement, infilling, redevelopment, conversion or re-use of buildings in the Green Belt. New development within the Green Belt will be required to clearly demonstrate that it will meet the 'Very Special Circumstances'	No further modification is required as a result of this representation.

					criteria set within the NPPF. This is further supported by Core Strategy Policy CS6: Green Belt.	
104	Cllr John Bond	General	Object	The local community are opposed and Woking Council need to include it in their deliberations.	<p>This Consultation Statement has been prepared to demonstrate how the Council has taken the representations received into consideration in preparing the Published version of the Development Management Policies DPD and highlight any proposed modifications in light of the comments received.</p> <p>As set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, the Development Management Policies DPD will be debated at public examination in front of an independent inspector appointed by the Secretary of State. The timetable for this process is set out within the Local Development Scheme.</p>	No further modification is required as a result of this representation.

105	Cllr John Bond	General	Netural	<p>Please note that I have now checked with Byfleet Library and they were unable to find the DPD despite this being promised in the email notifying everyone of this consultation. I'd be grateful if you would add this comment to my previous notes.</p>	<p>As per the requirements set out in Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council made the draft Development Plan Document available for inspection through a number of methods. Hard copies of the consultation documents were made available at the four libraries in the Borough. This includes Woking Town Centre, Byfleet, West Byfleet and Knaphill. In addition to this, the document was also available at Civic Offices, Gloucester Square. The draft documents could also be found online at www.woking2027.info. The draft Development Management Policies DPD and supporting documents were sent to the four libraries in the borough on 17 February 2015. The Council kindly ask that these documents are made available to the public for inspection until the consultation period concludes and if the library managers have any questions or concerns, that they contact the Planning Policy Team at Woking Borough Council using the contact details provided on the covering letter. Unfortunately Woking Borough Council has no control over whether the consultation documents are made available to the public at the libraries once they have been sent out. As part of the feedback received, officers will continue to monitor the way consultation documents are published and will liaise with the libraries in the borough to try and ensure the documents are made accessible to local communities.</p>	<p>No further modification is required as a result of this representation. Nevertheless, future consultation material to be hand delivered to the libraries or a follow up telephone call to confirm safe receipt and to further explain the consultation process.</p>
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20	The Theatres Trust	General (links to CS19)	Objects	Concerned that the DPD does not include policies to protect and enhance cultural facilities eg theatres, music and performance venues. Also states the adopted Policy CS19 is ambiguous as to what it applies to, as it lacks definition of such facilities.	Policy CS19 together with Core Strategy town and local centre policies provide the guidance sought by the Theatres Trust. The changes sought are not considered to add detail that would aid the implementation of these policies.	No further modification required as a result of this representation.
1	Natural England: David Hammond	DM1	Support	Support GI opportunities and the benefits of multi-functional green spaces including the increase of biodiversity and ecology. Policy is NPPF compliant.	Noted.	No further modification is required as a result of this representation.
5	Indigo Planning (MG Homes)	DM1	Comments	Considers the definition of GI needs to be consistent with the Core Strategy, where reference should be made to the list of GI elements set out in the introductory text of CS17.	The definition of GI is consistent with the NPPF and Core Strategy (Core Strategy policy CS17 para 5.146). However it may be helpful for further clarification. The policy will be amended to further clarify the definition.	<p>The policy text should be amended to:</p> <p>3.1 Green Infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. The Borough already consists of a wealth of GI assets, these are the individual elements that form part of the green infrastructure network, including waterways such as Basingstoke Canal, green spaces such as Woking Park, and individual trees and vegetation.</p> <p>....</p> <p>3.4 The majority of the Green Infrastructure will be delivered by the Woking Borough Council using CIL, s106 agreements or other public sector funding. However, the Council will require on-site provision of GI for large development schemes and where appropriate on other development. There are various ways in which GI could be incorporated into proposals, for example, through the incorporation of connected:</p>

						<ul style="list-style-type: none"> • trees and other vegetation such as hedgerows; • green walls and greenroofs; • sustainable drainage systems (SuDS); and • open space and recreation areas.
8	Environment Agency	DM1	Support	Support the recognition that GI assets can help alleviate surface water flooding. Suggest 'flood risk' to be included in the list of benefit of green infrastructure.	The policy will be amended with the insertion of 'flood risk' to the list of benefits of green infrastructure.	Paragraph 3.1 should be modified to read as follows:These existing GI assests, and new assets that come forward through development, can be harnessed in an integrated manner to maximise the economic, social and environmental benefits they provide, including accessibility to green space, reduction of flood risk, and mitigation and adaptation to climate change
9	Environment Agency	DM1	Support	Suggest reference is made to undeveloped buffer zones along watercourses (as set out in policy CS17)	The requirement for undeveloped buffer zones along watercourse is already set out clearly in policy CS17 Open space, green infrastructure, sport and recreation(p90) of the Core Strategy, it is not considered necessary to repeat this in the DM Policies DPD.	No further modification is required as a result of this representation.
2	Natural England: David Hammond	DM2	Support	Support GI opportunities and the benefits of multi-functional green spaces including the increase of biodiversity and ecology. Policy is NPPF compliant	Noted.	No further modification is required as a result of this representation.

6	Indigo Planning (MG Homes)	DM2	Comments	<p>There must not be a blanket protection of all trees regardless of their quality.</p>	<p>The Council recognises that trees have multiple benefits and it will seek to retain valuable trees and the mitigation against the loss of trees in the form of replacement trees. This is set out in Core Strategy Policies (CS17, CS21 and CS24).</p> <p>It is appreciated that not all trees can be retained when developing a site but the Council seeks to protect the most valuable trees and encourage the retention of trees generally where it is practicable.</p> <p>The policy should be re-ordered and reworded to emphasise a hierarchy (protected trees and then all other trees) in which the Council will seek to protect the trees within the borough.</p>	<p>The policy text should be re-ordered to emphasise a hierarchy in which the Council will seek to protect the trees within the borough- i.e. trees with Tree Preservation Orders and within a Conservation Area; and then all other trees</p> <p>Proposed modification:the Council will:</p> <ul style="list-style-type: none"> • only support or consent to the removal of protected trees (TPO trees and trees within a Conservation Area) and/or proposals that would have detrimental impact on the health of protected trees only in exceptional circumstances and where there are over-riding planning benefits. In such cases full compensation will be required, in the form of suitable replacements and/or additional planting, compensatory measure will have to be to the satisfaction of the Council; • make sure that where trees, hedgerows or other landscape feature are to be removed it is justified to the satisfaction of the Council and appropriate replacement planting will be required if it is safe and practical to do so and will enhance the quality of the development. Where the removal of trees is necessary in order to manage and maintain priority habitats, this should be demonstrated by the applicant. The view of the Council's Arboricultural Officer should be sought if needed.
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10	Environment Agency	DM2	Support but with modifications	EA have highlighted that the planting of new trees does not necessarily benefit biodiversity. For example In certain priority habitats such as lowland meadows and heathland and SSSI, removal of trees is part of their management..	<p>Noted.</p> <p>It would be helpful for the policy to highlight the circumstances where the planting of additional trees may not always be beneficial to biodiversity and in some circumstances removal is necessary as part of the management of the priority habitats. It is recommended that an additional text be inserted into the policy text to clarify this.</p>	<p>Policy DM2 should be modified to include:</p> <p>(additional text within policy text) <i>The Council will:</i></p> <ul style="list-style-type: none"> • <i>make sure that where trees, hedgerows or other landscape feature are to be removed it is justified to the satisfaction of the Council and appropriate replacement planting will be required if it is safe and practical to do so and will enhance the quality of the development. <u>Where the removal of trees is necessary in order to manage and maintain priority habitats, this should be demonstrated by the applicant.</u> The view of the Council's Arboricultural Officer should be sought if needed;</i>
3	Natural England: David Hammond	DM3	Support	Particularly support reference to best and most versatile agricultural land and not causing harm to sites of nature conservation interest.	Noted.	No further modification is required as a result of this representation.
12	Sport England	DM3	Comments	The policy is unduly prescriptive and could result in essential new sports facilities being refused at planning permission. Example is provided of a new pavillion.	<p>The policy offers a useful framework for development in both the urban area and within the Green Belt.</p> <p>In the Green Belt, where it is likely most proposals will be, it is clear in the Core Strategy and the NPPF what the acceptable uses within the Green Belt are, including the provision of appropriate outdoor sports and recreation facilities. In all cases the overriding purpose is to protect the openness of the Green Belt and the policy will help to achieve this goal.</p> <p>The policy is not considered to be unduly prescriptive and has been drafted to ensure that proposals that come forward for outdoor sports and recreation have regard to their surroundings, in particular where proposals are within or in the vicinity of the Green Belt.</p>	No further modification is required as a result of this representation

13	Sport England	DM3	Comments	The policy is prioritising the need for open space to remain open (even those with no designation)	<p>The policy offers a useful framework for development in both the urban area and within the Green Belt.</p> <p>In the Green Belt, where it is likely most proposals will be, it is clear in the Core Strategy and the NPPF what the acceptable uses within the Green Belt are, including the provision of appropriate outdoor sports and recreation facilities. In all cases the overriding purpose is to protect the openness of the Green Belt and the policy will help to achieve this goal.</p> <p>CS17 Open space, green infrastructure, sport and recreation sets out a general presumption against the loss of open space. This is consistent with national policy (NPPF, paragraph 74) .</p> <p>The policy has been drafted to ensure that proposals that come forward for outdoor sports and recreation have regard to their surroundings.</p>	No further modification is required as a result of this representation
14	Sport England	DM3	Comments	The policy and the supporting text should positively encourage outdoor sport and recreation.	The policy and supporting text has been drafted to be positive whilst recognising there needs to be a measured approach. There is a general presumption that proposals for outdoor sports and recreation will be permitted subject to the proposals meeting the criteria outlined.	No further modification is required as a result of this representation
15	Sport England	DM3	Comments	Make reference to Sport England design guidance on outdoor sport and recreation- including Artificial Surfaces for Outdoor Sports and Pavillions and Clubhouses	Noted. The policy will be amended to include reference to Sport England's various design guidance.	<p>Policy DM3 should be modified to include reference to Sport England guidance on outdoor sport and recreation.</p> <p>Proposed modification: (<i>Policy Links</i> box, under <i>Other supporting guidance</i>) Sport England design guidance available at: http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p>

16	Sport England	DM3	Comments	Make reference to para 74 in the NPPF	The policy sets out a general presumption against the loss of open space, sport and recreation by reference to CS17. It is not considered necessary to repeat what is contained in the NPPF in local policy as the NPPF is a material consideration in its own right.	No further modification is required as a result of this representation.
17	Sport England	DM3	Comments	The policy could inhibit development of golf facilities and make them unviable.	The policy requires that proposals to meet the criteria outlined, where the criteria largely relates to landscape character. It is not considered that the criteria is unreasonable or will affect viability of schemes. It is important to ensure that proposals are sympathetic to the landscape character of the area in accordance with the NPPF and policy CS6 Green Belt and CS24 Woking's landscape and townscape.	No further modification is required as a result of this representation.
4	Natural England: David Hammond	DM4	Support	Broadly support policy. Clear references to the canal being SSSI and parent policies in the Core Strategy. Policy is NPPF compliant.	Noted.	No further modification is required as a result of this representation.
11	Environment Agency	DM4	Support	Support that the policy should help to minimise any adverse impacts on the canal and risk of flooding	Noted.	No further modification is required as a result of this representation.
23	Natural England	DM5	Supports	Natural England welcomes the recognition of noise, dust, vibration and light pollution as having potential impacts on biodiversity. This policy is broadly supported.	Support welcomed.	No further modification required as a result of this representation.
38	Environment Agency	DM5	Supports with amendments	There is no mention of CS9 in the policy links section, which sets out how development should seek to remediate contaminated land and minimise risk to water quality.	Comment noted and supported to ensure relevant link to Core Strategy policy.	Policy DM5 should be modified to include reference to Policy CS9 in Policy links box.
39	Environment Agency	DM5	Supports with amendments	The policy should include reference to surface water and ground water quality.	The policy refers to both surface water and ground water quality (General Principles, second bullet point).	No further modification required as a result of this representation.

40	Environment Agency	DM5	Supports with amendments	The policy states that if there is economic/ social need for potentially polluting development and sufficient mitigation, it will be allowed. It needs to be specified how this will be quantified.	The policy requires appropriate mitigation to overcome unacceptable impacts. A balance of issues will be considered and determined on a case by case basis, as a matter of planning judgement, depending on the merits and benefits of the proposal.	No further modification required as a result of this representation.
71	Environment Agency	DM5, page 231	Support with modifications	It is suggested that the link between environmental pollution and previously developed land should result in positive effect rather than neutral.	The suggested new scores are reasonable and should change to positive and positive respectively.	The score for environmental pollution and previously development should be amended to positive.
24	Natural England	DM6	Supports	This policy is also broadly supported, especially in relation to the Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC. Reference could also be made to the Basingstoke Canal SSSI.	Support welcomed.	No further modification required as a result of this representation.
41	Environment Agency	DM6	Supports	Policy CS9 states that risk from development to water quality must be minimised, and all proposals must conform to Water Framework Directive 2000 and the Flood and Management Act 2010. EA is encouraged that this policy reinforces these requirements, setting detailed criteria to maintain and, if possible, improve water quality.	Support welcomed.	No further modification required as a result of this representation.
42	Environment Agency	DM6	Supports with amendments	Requests inclusion of undeveloped buffer zones to watercourses (as detailed in CS17), with reference to their contribution to intercepting run-off and thereby contributing to pollution prevention of water.	As stated by the respondent, this guidance is included in Policy CS17 and does not need to be repeated here.	No further modification required as a result of this representation.

43	Environment Agency	DM6	Supports with amendments	Development adjacent to or likely to affect underground or surface water bodies covered by the WFD and Thames RBMP must not cause any deterioration to the ecological status of those water bodies and should contribute towards those water bodies maintaining or achieving Good Ecological Status. It is important that the prevention of deterioration is adhered to across all WFD water bodies, not just at nationally and internationally designated wildlife sites. Page 31 Paragraph 4.12 – We suggest this should note the prevention of deterioration in the ecological status of water bodies. Currently the word 'jeopardise' is used to cover this and this could be more explicit.	Comment noted and modification recommended, to help clarify the reasoned justification.	Paragraph 4.12 should be amended as follows: ... and should not cause deterioration to the ecological status of water bodies covered by the WFD and Thames RBMP. Where possible development adjacent to or likely to affect these water bodies should contribute towards them maintaining or achieving a Good Ecological Status. (Note that WFD - Water Framework Directive- and RBMP- River Basin Management Plan - are defined earlier in the paragraph).
44	Environment Agency	DM6	Supports with amendments	Page 32, paragraph 4.14 - there is no mention of how an application should set out mitigation measures against adverse impacts on water quality from a development such as the use of SuDS.	Comment noted and modification recommended.	Policy DM6's Application Information should be amended in the last sentence of paragraph 4.14 to state '... adverse effect on the quality of the air or water. The Council requires all major development to incorporate appropriate Sustainable Urban Drainage Systems (SuDS), and encourages all development to consider inclusion of SuDS where feasible.
45	Environment Agency	DM6	Supports with amendments	Page 30 - suggests amending the wording within this section from 'Development adjacent to, or likely to affect, underground or surface water bodies under WFD' to 'groundwater or surface water bodies'.	Comment noted and modification recommended.	Policy DM6 should be modified as follows 'Development adjacent to, or likely to affect groundwater and surface water bodies'.

46	Environment Agency	DM6	Supports with amendments	Page 31 para 4.12 -this text is confusing as it mentions WFD but also source protection zones (SPZs). Under WFD we assess the quality of groundwater bodies and have designated safeguard zones where there is a problem with contamination at an abstraction. SPZs are protection zones that have been set up around groundwater abstractions used for drinking water to protect groundwater quality from contamination by limiting activities to only those that are acceptable in these areas.	Comment noted. The current phrasing of the latter half of this paragraph is potentially confusing and should be clarified to separate mention of Source Protection Zones and ensuring Good Ecological Status of water bodies covered by the WFD and Thames RBMP.	Policy DM6's reasoned justification should be amended to separate detail on these two areas of pollution management. Text seeking to avoid damage to Groundwater Source Protection Zones should be included as the second sentence of the paragraph, after reference to the Environmental Permitting Regulations (England and Wales) 2010, to read 'Development should avoid damage to Groundwater Source Protection Zones. In line with...'. The amendment suggested in response to EA's earlier representation (Rep No. 43) is the basis of the modification required on ensuring Good Ecological Status, with a further modification suggested here to account for the change above: 'This includes seeking to ensure that development does not cause deterioration to the ecological status of water bodies covered by the WFD and Thames RBMP. Where possible development adjacent to or likely to affect these water bodies should contribute towards them maintaining or achieving a Good Ecological Status.'
72	Environment Agency	DM6	Support with modifications	Suggest the link between air and water quality and land contamination should be positive effect as protecting water quality will have a positive impact on reducing land contamination.	The suggested new scores are reasonable and should change to positive and positive respectively.	The score for water quality and contamination should be amended to positive.

25	Natural England	DM7	Supports	Natural England welcomes the reference to areas of nature conservation importance, which is reinforced by paragraph 4.23 referring to SPA's, SAC's, SSSI's, National Nature Reserves, Sites of Nature Conservation Interest and Local Nature Reserves also. This reference to various types of designation provides clarity.	Support welcomed	No further modification required as a result of this representation.
32	Sport England	DM7	Objects	Policy needs to be clearer on what is defined as noise generating development, and whether this includes sports facilities.	Comment noted. Add detail to define noise-generating development.	At the start of Reasoned Justification on Noise Pollution, add as a new paragraph 4.18 (and amend all subsequent paragraph numbers accordingly): Noise generating development can include industrial and commercial uses, food and drink establishments and more intensive leisure and sports uses, particularly those that take place outdoors. It should be noted that this list is not exhaustive and that not all development falling within the uses stated are noise-generating, as it will be dependent on the specific operation or activity proposed.
33	Sport England	DM7	Objects	Need to consider proximity of noise sensitive development in close proximity to sports facilities.	Guidance on noise sensitive development is included in the policy, with regard to commercial/ industrial noise sources. This should be broadened to include other noise generating development.	Policy DM7 should be modified as follows: After the paragraph beginning 'For proposals involving residential and other noise-sensitive development...' add the following text: 'A similar approach will be taken for noise sensitive development sited close to any other form of noise-generating use.'

34	Sport England	DM7	Objects	The reference to proposals respecting the landscape character of the area needs to be defined. If it means that otherwise appropriate development could be refused, it should be removed. Alternative text should explain that each application should be judged on a detailed review of the lighting assessment relevant to the site.	The reference to landscape character in the context of this policy is too broad, and is covered by Core Strategy Policy CS24, which should be included in the Policy Links box.	Policy DM7 (last paragraph in the Nosie sub-section) should be modified to remove reference to respecting the landscape character of the area and be worded as follows: Add link to Policy CS24: Woking's landscape and townscape in the Policy Links box.
47	Environment Agency	DM7	Supports with amendments	Requests that undeveloped buffer zones and watercourses in Policy CS17 are referred to, to avoid light spill, and prevent impacts on nocturnal animals such as bats and water based species such as fish.	Comment noted.	Policy DM7 should be amended to include new text in the section on Lighting and Illumination, as follows: 'Particular attention will be paid to schemes in or close to open countryside or intrinsically dark landscapes, close to residential property and areas important for nature conservation. This includes the undeveloped buffer zones alongside watercourses identified in Core Strategy Policy CS17: Open Space, Green Infrastructure, sport and recreation.' In addition, add CS21: Open Space, Green Infrastructure, sport and recreation to the Policy Links box.
35	Sport England	DM7 Policy links		Sport England has design guidance on floodlighting 'Artificial Sports Lighting' which the Council may find useful to include in the policy.	Comment noted.	Policy DM7 should be modified to include a link to Sport England design guide on artificial sport lighting in the Policy links box - https://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/artificial-sports-facilities
48	Environment Agency	DM8	Supports with amendments	This policy needs to include reference to land, surface water and groundwater. In both parts i and ii, we suggest this should say: any existing contamination of the land or groundwater.	Comment noted, but it is only relevant to part i. which covers existing contamination. Part ii. Is about the effect of proposed development, so the amendment needs to be worded to account for that.	Policy DM8 should be modified to: amend as suggested by the EA for part I; and for part ii. amend to 'the proposed development will not cause the land or groundwater to become contaminated.

49	Environment Agency	DM8	Supports with amendments	Para 4.38 - suggests amending the wording in this paragraph to again, include water: 'could cause contamination of land or controlled waters...'	Comment noted and modification recommended.	Policy DM8's reasoned justification should be modified as follows, in para 4.39 (as modified) '...could cause land or controlled waters to become contaminated...'
50	Environment Agency	DM8	Supports with amendments	Para 4.41 - first bullet point, in addition to existing text, there should be inclusion of a preliminary Risk Assessment to demonstrate likely risk to controlled waters.	Comment noted and modification recommended.	In the application information section (para 4.42 as modified) of Policy DM8 add text as follows: 'Where development is proposed on or adjacent to land, or adjacent to controlled water, that is known or suspected to be contaminated...'
51	Environment Agency	DM8	Supports with amendments	Para 4.41 - second bullet point, the wording needs to include land and water.	Comment noted and modification recommended.	In the application information section (para 4.42 as modified) of Policy DM8, add to the second bullet point as follows 'Where proposed development may cause land or water to become contaminated...'
26	Natural England	DM9	Neutral, supports like to Policy CS8.	Natural England has no substantive comments to make in respect of this Policy, however, it welcomes the links to Core Strategy Policy CS8: Thames Basin Heaths Special Protection Areas Avoidance Strategy – this is welcomed and supported.	Support welcomed	No further modification required as a result of this representation.
27	Natural England	DM9	Supports with amendments	Policy Box between paragraphs 5.5 and 5.6 could refer to or include reference to Core Strategy CS 8 – helping to strengthen the document further.	Comment noted and supported to ensure relevant link to Core Strategy policy	Policy DM9 should be modified to include reference to Policy CS8: Thames Basin Heaths Special Protection Areas in the Policy Links text box between para 5.5 and 5.6.
52	Environment Agency	DM9	Supports with amendments	With reference to change of use to residential of floorspace above shops, access and egress should be considered as part of a planning application, as many commercial properties are at flood risk in the Borough. Recommends that this policy is amended to state these developments will only be permitted if flood risk is not increased as a result of development.	Comment noted. All development is subject to Policy CS9 Flooding and Water Management, the detail of which does not need to be repeated, however a link to these considerations may be useful.	To prompt reference to the coverage of these considerations, a minor modification is proposed to add Policy CS9 Flooding and water management to the Policy Links box.

56	Environment Agency	DM10	Support with modifications	<p>Policy should mention that the protection of green spaces is important to help minimise flood risk;</p> <p>Policy should be reworded to state that 'these developments will only be permitted if flood risk is not increased as a result of development.</p>	<p>The purpose of Policy DM10 is to provide an appropriate framework for managing housing development on garden land. There is no in-principle local or national policy objection to such development. Complementary Local Development Documents such as the Design Guide will make sure that such development does not undermine the character and valuable environmental assets of the area. Policy CS9 of the Core Strategy - Flooding and Water Management comprehensively deals with flood risk and water management as a result of development proposals and no purpose will be served by repeating that in Policy DM10. Policy CS9 is clear about what needs to be done regarding flood risk assessment before development can be acceptable.</p> <p>Paragraph 5.7 of the DM Policies DPD highlights some of the contribution that garden land makes to Green Infrastructure and to the character of residential areas. The paragraph should be amended by adding 'Green spaces is also important to help minimise flood risk'</p>	<p>Paragraph 5.7 should be modified by adding the following 'Green spaces are also important to help minimise flood risk'.</p>
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88	Knaphill Residents Association	DM10	Object	The adoption of Policy DM10 on <i>residential development on garden land</i> will end the current protection accorded development on garden land by the Core Strategy and other Supplementary Planning Documents. The policy is a complete U-turn to the Council's current position that was defended during the preparation of the Core Strategy and would also be contrary to national policy. The policy would mean that the lifestyle of some residents will be compromised in order for the Council to meet its housing requirement. The Design Guide does not provide any protection to the character of areas such as Knaphill because of the generality in the way some areas are classified. The SPG on Plot sub division – infilling and backland development should be given much weight.	The Core Strategy does not have an objection in principle to the development of garden land. The objective of Policy DM10 is to protect the character of the area from the development impacts of garden land by setting a clear policy framework for determining planning application. The Policy is also very clear to emphasise that the application of the policy will be informed by other supporting guidance where relevant. The adoption of the policy will not undermine the significance and/or the weight given to the supporting guidance listed in the Policy. In applying the policy, the Council will always make sure that the amenity of nearby local residents is protected, and there are robust policies to make sure that this is the case.	No further modification is required as a result of this representation.
28	Natural England	DM11	Supports with amendments	In respect of additional or increased housing provision the Council should include reference to Core Strategy CS 8: Thames Basin Heaths Special Protection Areas Avoidance Strategy. This would link in and compliment Policy DM 9 above, strengthening the document. Paragraph 5.20 refers to the Thames Basin Heaths Special Protection Area Avoidance Strategy which is welcomed and supported, a further reference could be made in the policy links box.	Comment noted and supported to ensure inclusion of relevant link to Core Strategy policy	Policy DM11 should be modified to include reference to Policy CS8 Thames Basin Heaths Special Protection Areas both in the Policy (final bullet point of the General Criteria) and in the Policy Links box following para 5.27.
53	Environment Agency	DM11	Supports with amendments	A further criteria needs to be added to the policy to ensure these developments are only permitted if flood risk is not increased.	Comment noted. All development is subject to Policy CS9 Flooding and Water Management, the detail of which does not need to be repeated, however a link to these considerations may be useful.	To prompt reference to the coverage of these considerations, a minor modification is proposed to add Policy CS9 Flooding and Water Management to the Policy Links box.

21	PegasusLife (Barton Willmore)	DM11	Objects	DPD lacks detailed policy to support the need identified for a greater level of housing for older people. Lack of clarity about how the council seeks to meet this need.	Support for specialist accommodation for elderly people can be found in Policy CS13, which allows scope for each planning application to be determined on their own merit. CS13 also protects existing housing provision for older people and supports remodelling of older, poorer quality accommodation that is no longer fit for purpose. It states that the Council will allocate specific sites through the Site Allocations DPD to assist in meeting need. It also states that the specific level of need will be reflected in the latest SHMA, which the Council expects to be complete by this autumn (2015). Its findings will be taken into account in the next iteration (Reg 19) of the Site Allocations DPD. The DM Policies DPD Policy DM11 is intended to provide detail and criteria on specialist housing.	No further modification required as a result of this representation. The Site Allocations DPD covers this, and will be further developed, as appropriate, to reflect the latest evidence contained in the forthcoming SHMA.
22	David Seear	DM11	Objects	Outlines lack of availability of bungalows, preferably in groups, for older people to downsize to. Opposes conversion of bungalows to larger dwellings. Seeks policy to allow development of small bungalows, preferably in groups, with restrictions against enlargement.	Support for a mix of housing and specialist housing for older people in CS11 and CS13 respectively. CS13 also protects specialist accommodation unless it can be demonstrated that there is insufficient need/demand for that type of accommodation. The Site Allocations DPD will allocate sites for a mix of dwellings, including specialist accommodation. It would be difficult to justify a policy to support restrictions on enlargement of bungalows. However, factors relating to negative impacts on residential amenity, local character, or design (CS20 and CS21) would apply to development.	No further modification required as a result of this representation.

55	Alice May (indigo Planning Limited)	DM13	Object	Policy does not add anything which is not already set out within both local and national policy. In this regard, the Council should focus on preparing its Green Belt boundary review and progress the Site Allocations DPD to make sure that there is sufficient supply of housing land. There should be recognition of the Green Belt boundary review within the policy and policy should be reworded to reflect that.	Officers do not accept that the DM Policies DPD does not add anything which is not already covered by national planning policy or Local Development Documents for the area. The purpose of the DPD is clearly stated in the introduction. The DPD contains detailed development management policies that will be essential for determining day to day planning applications. When adopted, it will fill any policy gaps that will be created when the Local Plan (1999) is superseded. Some of the Local Plan policies that will be superseded by this DPD have been agreed by the Secretary of State as part of the Core Strategy Examination. A list of the policies to be superseded is at Appendix 6 of the Core Strategy. This demonstrates further the need for the DPD.	No further modification is required as a result of this representation.
57	Environment Agency	DM13	Support with modifications	The policy states that unless very special circumstances can be clearly demonstrated, the Council will regard the construction of new buildings as inappropriate in the Green Belt. The policy should also highlight that the protection of the Green Belt would have flood risk benefits.	Paragraphs 5.39 – 5.40 of the policy only reiterates the national and local policies on the protections of the Green Belt. It is accepted that the open nature of the Green Belt would have flood risk benefits but this could best be highlighted in the introduction to the policy rather than within the policy box. Paragraph 5.39 should be amended by adding 'except to emphasise that the continuing protection of the Green Belt would have flood risk benefits'.	Paragraph 5.39 be amended by adding the following sentence 'except to emphasise that the continuing protection of the Green Belt would have flood risk benefits'
87	Sport England	DM13	Object	Object to policy because it does not take into account the need to provide opportunities for outdoor sports and recreation in the Green Belt. Also, the additional text 'development adjacent to the Green Belt' is not in the NPPF and should therefore be deleted.	The recreational and outdoor use of the Green Belt is acceptable in principle, and policy DM13 emphasises that. The NPPF and Policy CS6: <i>Green Belt</i> of the Core Strategy defines acceptable uses in the Green Belt to include outdoor sports and recreation. No purpose will be served by repeating the uses in the policy. The policy already accepts that recreational uses could be accepted in the Green Belt.	No further modification is required as a result of this representation.

					Development that is conspicuous to and from the Green Belt to a material consideration to its protection, and as such the wording 'development adjacent the Green Belt' is appropriate.	
58	Environment Agency	DM13 - Paragraph 5.48	Support with modifications	An increase in the footprint of a building (20% - 40% increase) within the floodplain can lead to a displacement of floodwaters elsewhere leading to an increase in flood risk to the surrounding area. The wording should therefore include that 'where increases in built footprint occur within the floodplain developers should include mitigation measures within the design that ensures that flood risk is not increased'.	The objective to make sure that development is located away from areas at risk of flooding and/or to make sure that development does not exacerbate the risk of flooding elsewhere is emphasised in the Core Strategy, in particular, by Policy CS9 – <i>Flooding and water Management</i> . The suggestion by the Environment Agency to make sure that the impacts of an increased footprint of development on flood risk are addressed will be in accordance with this objective and as such reasonable. In this regard, paragraph 5.48 should be amended by adding 'where increases in built footprint occur within the floodplain developers should include mitigation measures within the design of the development to make sure that flood risk is not increased'.	Paragraph 5.48 should be amended by adding: where increases in built footprint occur within the floodplain developers should include mitigation measures within the design of the development to make sure that flood risk is not increased'.
89	Carter Jonas	DM13 - Paragraph 5.52	Object	It will be wrong for paragraph 5.52 of Policy DM13 to assume that all domestic paraphernalia and ancillary buildings causes harm to the open character of the Green Belt. It will be helpful to insert the word 'may' in front of 'harm'.	The point made by the representation is reasonable. It is proposed that the word 'some' should be inserted before 'associated' to enable each case to be considered on its merits. This is preferred to the use of the word 'may' in this context, which could be subject to different interpretation.	The word 'some' should be inserted before 'associated' to enable each case to be considered on its merits.

59	Environment Agency	DM13 - Paragraph 6.1	Support with modifications	Paragraph 6.1 states 'The Core Strategy sets out the key objective of achieving high quality of design of buildings, neighbourhoods and the public realm across the Borough. The Council will always seek to secure high quality design which makes the best use of the land, whilst respecting the distinctive character of the local area'. This wording should be amended to include that all development are designed to ensure that they do not increase flood risk elsewhere and where possible reduce flood risk in the area. This will make sure that developers consider flood risk from an early stage.	The suggested wording is in accordance with the objectives of the Core Strategy. The second sentence of paragraph 6.1 should be amended as follows: the Council will always seek to secure high quality design which makes the best use of land, <i>does not increase flood risk elsewhere and where possible reduce flood risk</i> , whilst respecting the distinctive character of the local area.	the second sentence of paragraph 6.1 should be amended to read: the Council will always seek to secure high quality design which makes the best use land, <i>does not increase flood risk elsewhere and where possible reduce flood risk</i> , whilst respecting the distinctive character of the local area.
18	Penny Hoskyn, West Byfleet Neighbourhood Forum	DM21	Comments	The policy should also seek to ensure that proposals for new and replacement schools allow for adequate provision of indoor sports facilities. The policy currently requires adequate provision/retention of outdoor recreational facilities and amenity space	Noted. The policy will be modified to require adequate provision for indoor recreation	Policy DM 3 should be modified to include: (additional bullet point within policy text) -where appropriate, adequate provision is made or retained for indoor recreational facilities.

19	Penny Hoskyn, West Byfleet Neighbourhood Forum	DM21	Comments	Policy to ensure the maintenance of the Wey Navigation. For example protection as an important historic route/asset	<p>The maintenance of the Wey Navigation is the responsibility of the National Trust. The Council continue to work with the Trust to ensure its maintenance. Core Strategy Policy CS16 Infrastructure delivery sets out that the Council will work in partnership with developers to ensure the timely delivery of infrastructure through the CIL.</p> <p>The Wey Navigation is designated Conservation Area, therefore it is a designated heritage asset and policy CS20 Heritage and Conservation applies. The policy requires that development proposals that come forward in the vicinity must respect and enhance the character and appearance of the area.</p>	No further modification is required as a result of this representation
36	Sport England	DM21	Objects	A bullet point should be added to state '-It will not result in a loss of playing field or sports facilities'. As currently drafted there is a risk the Policy may override the considerations of the NPPF and CS17 in terms of protection of sports facilities.	This intention is clear in the NPPF and CS17 and does not need to be repeated. However, as both new and retained provision of recreation space is important to new or replacement schools, the wording in the penultimate bullet point could be ambiguous, and should be clarified in the policy and reasoned justification, as recommended.	Policy DM21 should be modified to amend the penultimate bullet point as follows (blue text shows additions): '- where appropriate, adequate new provision is made and/or existing provision is retained for outdoor recreational and amenity space, to meet the needs of the school'. Add to the reasoned justification as a new para 7.7: With regard to provision of space for indoor and outdoor recreation and amenity, Surrey County Council, as the Education Authority for the area, together with Sport England will be consulted on the amount of space appropriate for each proposal. The retention (and loss) of sports facilities is covered in the Core Strategy and NPPF, and does not need to be repeated here.

37	Sport England	DM21	Objects	Policy CS19 includes indoor sports facilities and Sport England would like DM21 to include reference to promote provision of indoor sports facilities, or for a new policy to be added to cover this.	Indoor sports facilities are promoted in Policy CS19, including the Council's intention to encourage co-location, which may be appropriate at education facilities. This does not need to be repeated in this document.	No further modification required as a result of this representation.
29	Natural England	DM22	Supports	Paragraph 7.13 refers to avoidance of masts in sensitive areas, such as the Thames Basin Heaths SPA and SSSI's. This is welcomed and supported.	Support welcomed	No further modification required as a result of this representation.
31	Natural England	Sustainability Appraisal	Supports	The Sustainability Appraisal objectives are broadly supported, especially objectives 9 and 10. The approach and methodology used is acceptable and appropriate policies, plans and programmes identified. The SA is acceptable to Natural England.	Support and agreement welcomed	No further modification required as a result of this representation.
75	Environment Agency	Sustainability Appraisal Framework - Objective 11, paragraph 10	Support with modifications	Add potential detrimental impacts of climate change on biodiversity and the benefits of SuDS in reducing flood risk.	The Table is about the sustainability appraisal objectives against which policies will be measured. The representation is about some of the consequences of climate change or some of effective measures to deal with the consequences. There are other measures to deal with flooding other than SuDS and it could be misleading to single out just one to be part of this objective.	No further modification is required as a result of this representation.
77	Environment Agency	Sustainability Appraisal Framework - Objective 14, page 45	Support with modifications	Add the contribution of undeveloped buffer zones to reducing water pollution from run off from development.	Whilst the suggested addition to objective 14 is reasonable, it is relevant as an action to deliver the objective rather than an objective in its own right. It is recommended that paragraph 18.1 that deals with mitigation be amended by adding the contribution of undeveloped buffer zones to reducing water pollution from run off from development.	Paragraph 18.1 be amended by adding the following bullet point: o Development should where relevant incorporate buffer zones to reduce water pollution from run off from development.

76	Environment Agency	Sustainability Appraisal Framework - Objective 9, page 41	Support with modifications	Need to consider whether any of the SANGs have existing biodiversity interest that can adversely be affected.	All the established SANGs have been scrutinised by Natural England to make sure that their use for that purpose will not compromise the biodiversity of the area in general and the individual SANGs in particular. This approach will be applied to future SANGs.	No further modification is required as a result of this representation.
62	Environment Agency	Sustainability Appraisal Report	Support with modifications	SA Indicator 'number of properties alleviated from flood risk' should be deleted as it is no longer monitored.	It is reasonable to delete the indicator if it is not monitored.	Delete indicator on number of properties alleviated from flood risk.
61	Environment Agency	Sustainability Appraisal Report - Appendix 2	Support with modifications	Latest update if any on the number of completed dwellings should be given. The 2012/13 data could be out of date.	It is necessary that information in the SA Report is continuously monitored, reviewed and updated. The housing completion figures will be updated by adding 2013/14 and 2014/15 figures. These are 370 and 66 respectively.	Housing completion figures should be updated by adding the figures for 2013/14 and 2014.15. These are 370 and 66 respectively.
68	Environment Agency	Sustainability Appraisal Report - Objective 14 (b)	Support with modifications	Viola Water is now Affinity water and has published a new Water Resources Management Plan (WRMP), which should be used to inform any assumptions on water use.	The change of name from Viola Water to Affinity water is noted as a statement of fact and the SA Report should be amended to reflect that.	SA Report should be amended by changing Viola Water to Affinity water.
60	Environment Agency	Sustainability Appraisal Report - Objective 3 on flooding	Support with modifications	The SA Framework Objective on flood risk should be amended by adding 'Ensuring that further growth and climate change does not exacerbate the existing situation'.	The Core Strategy seeks to make sure that development does not exacerbate flood risk. It also has robust policies to minimise the impact of development on climate change. The Council has also published a Climate Change SPD to facilitate the delivery of this objective. Adding a statement to the SA Framework objective on flooding to highlight that further growth should not exacerbate existing flood situation will be in accordance with the requirements of the Core Strategy. Whilst the Council will continue to make sure that the impacts of development on climate change is minimised, there are other effects on climate change that the DPD will not have any control. It will therefore be unrealistic to make a commitment that climate change will not exacerbate existing	SA Framework objective 3 be modified by adding 'make sure that further growth does not exacerbate existing flooding situation.

					flooding situation in the area. Objective 11 of the SA Framework deals with climate change and this matter can best be addressed under this objective.	
70	Environment Agency	Sustainability Appraisal Report - Page 25	Support with modifications	Climate Change should highlight the benefits of SuDS.	This section of the SA Report is about the key challenges facing the Borough. It will not be the appropriate section to highlight the benefits of SuDS. The importance of SuDS has already been highlighted.	No further modification is required as a result of this representation.
69	Environment Agency	Sustainability Appraisal Report - Pages 17, 18, 19, 28, 46, 162	Support with modifications	Should also highlight groundwater quality.	These pages will be reviewed and where relevant groundwater quality will be highlighted.	Because of the nature of the representation, this will be done as minor editorial changes to the SA Report.
67	Environment Agency	Sustainability Appraisal Report - Table 3, page 26	Support with modifications	Water consumption is identified as an issue in Table 3 (page 26). However, there is no mention of water efficiency measures in the 'sustainable construction and climate change section of Table 3 (page 29). Changes to the Code for Sustainable Homes should be noted and the water element of the code, which is 105l/h/d should be used as a standalone target without reference to the Code.	Table 3 is a list of sustainability issues. It is not intended to list the targets that need to be met under each issue. In any case, minimising the consumption of water is also about water efficiency measures already highlighted in the Table. It is stressed that the Council has already changed its policy on sustainable construction to reflect current national policy on the Code for Sustainable Homes.	For completeness Table 3 should be amended to add water efficiency measures.
65	Environment Agency	Sustainability Appraisal Report - Table 5, Objective 14	Support with modifications	Table 5 objective 14 – the following targets should be used: o To prevent any deterioration in the ecological status of all Water Framework Directive (WFD) water bodies; o To get all water bodies not currently at good ecological status to Good by 2021 and no later than 2027. Update on current ecological status of the main rivers should be provided. o Up-to-date pollution figures should be used.	The recommended targets are reasonable and can be monitored and should be acceptable.	The targets for objective 14 in Table 5 should be replaced by: o To prevent any deterioration in the ecological status of all WFD water bodies. o To get all water bodies not currently at good ecological status to good by 2021 and no later than 2027. o The target will be reviewed to include up to date figures on the ecological status of the main rivers and up to date pollution figures as set out in Appendix 2.

63	Environment Agency	Sustainability Appraisal Report DM10 and DM13	Support with modifications	Policies DM10 and DM13 will have positive impacts on flood risk as areas of floodplain within the Green Belt will be protected when they are kept as open space. The appraisal matrix should be amended accordingly.	The overall objective of Policy DM10 is not about keeping garden land open. The principle of developing garden land is acceptable. The policy is about how well such development could be managed if an application is submitted for determination. It appears that the purpose of the policy has been misunderstood by the representation. Policy DM13 on the hand seeks to manage development in and adjacent to the Green Belt to make sure that its overall purpose, which is to protect its openness is not undermined. In this regard, and in accordance with the Environment Agency's suggestion, it could have a positive impact of flood risk. The appraisal matrix will be modified to positive.	The appraisal matrix for Policy DM13 relating to flooding should be modified to positive (instead of neutral).
64	Environment Agency	Sustainability Appraisal Report: Groundwater	Support with modifications	Groundwater quality needs to be referenced throughout the document.	Objective 14 of the SA Framework seeks to maintain and improve groundwater and manage water resources sustainably. All policies in the DPD have been appraised against this objective to make sure that the overall impacts of the DPD on groundwater is minimised and/or improved. Nevertheless, the SA Report will be reviewed to identify where further reference to groundwater could be highlighted. This will be done as minor editorial changes.	The DPD will be reviewed to identify where further reference to groundwater could be made. This will be done as a minor editorial changes as they are unlikely to change the substance of the DPD.
74	Environment Agency	Sustainable construction and climate change – page 29	Support with modifications	Add 'potential detrimental impacts of climate change on biodiversity.	The suggested additional sustainability issue is reasonable and acceptable	The SA Report should be amended by adding the following to the list of sustainability issues under sustainable construction and climate change: <ul style="list-style-type: none"> o Potential detrimental impacts of climate change on biodiversity.
66	Environment Agency	Appendix 2 - Page 162	Support with modifications	The correct terminology for water quality indicator should be good or high and not good or fair. A better indicator would be rivers reaching Good overall status or Good chemical and biological statuses. The	The suggested wording reflects the correct terminology to use and therefore acceptable. Consequently, instead of good and fair, the classification will be modified to good and high. This will not affect the substance of the assessment.	The SA Report should be amended according to the actions set out in the Officer Response.

				<p>number of incidents needs updating with new figures. The quantified data box suggests the Water Framework Directive (WFD) was responsible for the reduction in incidents in 2007 but the WFD was not introduced in the UK until 2009.</p> <p>Appendix 2 – page 162 – the good and fair should be good or high. The targets should be amended with the following:</p> <ul style="list-style-type: none"> o To prevent any deterioration in the ecological status of all WFD water bodies; o To get all water bodies not currently at good ecological status to Good by 2021 and no later than 2027. o The trends/issues/constraints should acknowledge the WFD has replaced the River Ecosystem Classification Scheme. 	<p>The suggested indicator of 'rivers reaching Good overall status or Good chemical and biological statuses are also reasonable and acceptable. Relevant information to inform monitoring can be provided by the Environment Agency. The number of incidents has not changed significantly. The latest update are:</p> <ul style="list-style-type: none"> o Hoe Stream – Ecological status is poor, chemical quality does not require assessment, and overall risk is 'At Risk'. o Basingstoke Canal – Ecological status is moderate potential, chemical quality does not require assessment and overall risk is 'Not Assessed'. o Wey – Ecological status is moderate, chemical quality does not require assessment and overall risk is 'At Risk'. <p>P162 - The suggested targets are reasonable to enable consistency with the proposed terminology. The SA Report should therefore be updated with these new targets:</p> <ul style="list-style-type: none"> - To prevent any deterioration in the ecological status of all WFD water bodies; - To get all water bodies not currently at good ecological status to Good by 2021 and no later than 2027; - The trends/issues already acknowledge that the Water Framework Directive has replaced the River Ecosystem Classification Scheme, and no further modification is needed. - The sentence about the introduction of the WFD in the data box is meant to be distinct from the sentence that follows. The Table should be amended by separating the sentence about the WFD from the sentence about the reduction of incidence in 2007 to avoid any confusion or inference that the reduction of incidents was due to the WFD. 	
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81	Environment Agency	Appendix 2 – SA indicator 14 - Water quality – (a) Rivers	Support with modifications	Under trends/issues/constraints add the need for undeveloped buffer zones to rivers, to help reduce polluted run-off into watercourses.	The suggested addition to highlight the need for undeveloped buffer zones to rivers to help reduce polluted run-off into watercourses is reasonable and should be accepted. It will help improve water quality.	The SA Report should be amended by adding the following to SA indicator 14 (a) page 162 under trends/issue/constraints 'the need for undeveloped buffer zones to rivers to help reduce polluted run-off into watercourses.
79	Environment Agency	Appendix 2 – Schedule of baseline information – SA indicator 10	Support with modifications	(f) Number and area of SANGs – under trends/issues/constraints – add that there will be a presumption against establishing SANGs on land (including SNCIs) with existing biodiversity interest that could be impacted by new or increased recreation;	Natural England has guidance on the designation of SANGs and is a consultee of SANG designation, SANG Proposals and SANG Management Plans. A comprehensive and a balanced consideration of all the necessary factors that informs SANG designation would be the appropriate approach to take than singling out biodiversity interest as the issue to emphasise. It is also important not to lose sight of the overall purpose of SANGs to attract visitors away from the SPA. The Council will not designate SANGs that would have unacceptable impacts on biodiversity.	Appendix 2 objective 9f should be modified by adding the Council will not designate SANGs that will have adverse impacts on Sites of Nature Conservation Interests that cannot be mitigated.
80	Environment Agency	Appendix 2 – Schedule of baseline information – SA indicator 11	Support with modifications	(h) Population of farmland birds – this lists only nightjar, woodlark and Dartford, which are heathlands, not farmland birds. The section needs to include true farm birds that are in decline such as lapwing and skylark.	The suggested additional farm birds are reasonable and should be added to the list.	The following birds should be added to the list - lapwing and skylark.
78	Environment Agency	Appendix 2 – Schedule of baseline information – SA indicator 9	Support with modifications	(a) BAP priority habitats and species – need to qualify that there are other protected species in addition to bats, badgers and great crested newts that are listed;	The suggested qualification to emphasise that there are other protected species in addition to bats, badgers and great crested newts is a statement of fact and therefore acceptable.	Appendix 2, SA Indicator 9, should be amended by adding the following to the first sentence under the Woking Quantified Data – 'it is stressed that there are other protected species and those listed are only examples'.

82	Environment Agency	Appendix 2, Policy DM1 SA objective 9 on biodiversity	Support with modifications	Accept that the predicted effects will be broadly positive, but should include a note of caution that there could be long term negative impacts on SANG sites that have existing biodiversity interest that is disturbed by new or increased access.	The score is broadly supported. The suggested caveat to emphasise that there could be long term negative impacts on SANG sites that have existing biodiversity interest that is disturbed by new or increased access is cautiously acceptable. Whilst this caveat is acceptable it is important to emphasise that SANGs are designed and managed to avoid such situations and its overall purpose to attract people away from the SPA should not be undermined. SANGs often have Management Plans to make sure that they are managed effectively, and this includes the conservation of any biodiversity interest on the land.	the SA Report should be amended by adding the following to Appendix 3 – DM1 – SA objective 9 under nature of effects ‘there could be long term negative impacts on SANGs that have existing biodiversity interest that is disturbed by new or increased access if they are not managed effectively.
85	Environment Agency	Appendix 3, Policy DM13 – Green Belt	Support with modifications	DM13 further ensures the protection of the Green Belt and it could be argued that this will have a positive effect on biodiversity. However, it could also be argued that as DM13 allows some development of the Green Belt this could have a negative effect, and this may have to be mitigated.	The representation argues that the impacts of the policy on biodiversity could be positive or negative depending on the assumptions used. The overall purpose of the policy is to make sure that the integrity and purpose of the Green Belt is not undermined. In this context, the impacts are identified as positive.	The SA Report should be amended by changing the impacts of Policy DM13 on biodiversity from the neutral score to a positive score.
83	Environment Agency	Appendix 3, Policy DM2 SA objective 9 on biodiversity	Support with modifications	Need to be aware that some SSSIs require removal of trees as part of their management. Also, planting trees is not always a benefit to biodiversity.	The information provided is noted as requested and the Council will always bear that in mind in planning decisions.	No further modification is required as a result of this representation.
84	Environment Agency	Appendix 3, Policy DM7 SA objective 9 – noise and light pollution	Support with modifications	The impacts will be neutral if the impacts of light pollution on wildlife are mitigated.	The SA Report identifies the impacts as neutral, and is therefore consistent with representation.	No further modification is required as a result of this representation.