



Woking Local Development Document

**Development Management Policies DPD
Consultation Statement**
(Regulation 22)

February 2016



Produced by the Planning Policy Team

For further information please contact:
Planning Policy, Woking Borough Council, Civic Offices, Gloucester
Square,
Woking, Surrey, GU21 6YL
Tel: 01483 743871. Email: planning.policy@woking.gov.uk

CONSULTATION STATEMENT

1 Introduction

- 1.1 The purpose of this document is to provide details about the consultation which has taken place prior to the publication of Woking Borough Council's Development Management Policies Development Plan Document (DPD).
- 1.2 The Council has an adopted [Core Strategy \(2012\)](#). This contains strategic planning policies for the borough. The Development Management Policies DPD will sit alongside the Core Strategy when it is adopted. It contains detailed policies that will help determine day to day planning applications.
- 1.3 This Consultation Statement sets out how Woking Borough Council has consulted and engaged with stakeholders and the community in the preparation of the DPD.
- 1.4 The Town and Country Planning (Local Planning) Regulations 2012 (hereafter referred to as 'the Regulations') sets out the procedure that Local Planning Authorities must comply with when producing documents.
- 1.5 Regulation 22 (1)(c) of the Regulations requires local planning authorities to produce a Statement which sets out the following information in respect of all the consultations carried out under Regulation 18 (preparation of a local plan) and Regulation 19 (publication of a local plan):
 - who was consulted
 - how were stakeholders invited to make representations
 - a summary of the main issues raised by the consultees at Regulation 18 stage and how the representations have been taken into account
 - the number of representations made and a summary of the main issues raised by the consultees in accordance with Regulation 20 stage
 - if no representations were made in accordance with Regulation 20, that no such representations were made.
- 1.6 The National Planning Policy Framework (NPPF) (2012) states:

"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made." (paragraph 155).
- 1.7 The NPPF also outlines the role of independent inspectors in examining local plans to "assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound." To be considered 'sound', a plan must be positively prepared, justified, effective and consistent with national policy.

- 1.8 The Town and Country Planning Regulations set out in more detail how local planning authorities in England are required to prepare Local Development Documents, including the arrangements that must be made for public participation and the receipt of representations.
- 1.9 This statement addresses the set of requirements, providing details of how the Borough Council has conducted its consultation in compliance with these regulations.
- 1.10 The preparation of this DPD began in May 2012, where the Core Strategy was adopted in October of the same year. The procedures set out in the Town and Country Planning (Local Development) (England) Regulations 2012 were followed.
- 1.11 The Council has an approved [Statement of Community Involvement \(SCI\) 2015](#) which sets out how it will involve the community in its plan and policy-making process. The SCI 2015 has been prepared in accordance with relevant planning requirements.

1.12 Statement of Community Involvement

- 1.13 The Borough Council adopted a Statement of Community Involvement (SCI) 2015. The various consultation on the DPD has been carried out in compliance with the SCI. Statement has been prepared in compliance with the SCI. The SCI is on the Council's website:
<http://www.woking2027.info/community>
- 1.14 The Council has a consultation database, listing names and contact details of representatives of stakeholder organisations and of members of the public who had expressed an interest in Local Development Document previously. There are currently over 2000 consultees contained in the database. The database has been continuously maintained and updated, and has been used to involve members of the public and other stakeholders in the consultation activities described in this document. It is important to emphasise that apart from the formal consultation events, there has also been extensive informal consultation with key stakeholders and the Statutory Consultees prior to the publication of the DPD for the Regulation 18 and Regulation 19 consultations. Individual arrangements of the Consultation database receive direct mail on each of the formal consultation events. The list of people on the database is attached to Appendix 1.

2 Consultation on the Development Management Policies DPD

Key stages in preparing the Development Management DPD including the numerous consultation stages



- 2.1 Significant and ongoing consultation has been carried out in the preparation of the Development Management Policies DPD. This has involved continuous consultation throughout with key stakeholders and formal consultation periods between 19 February -3 April 2015 (Regulation 18) and 26 October – 7 December 2015 (Regulation 19). On each occasion, comments received have informed policy formation and subsequent changes have been made to the policies/document where appropriate.

2.2 Duty to Cooperate

- 2.3 The Duty to Cooperate was introduced by the Localism Act 2011. It is a legal duty placed on Local Planning Authorities and public bodies to engage constructively and actively on strategic cross boundary matters. The duty is not a duty to 'agree' but for Local Planning Authorities to demonstrate that every effort has been made to 'cooperate' on strategic cross boundary matters.
- 2.4 The Council has complied with this duty and has actively engaged with other public bodies regarding strategic cross boundary issues. A separate Duty to Cooperate statement has been prepared, please see [*hyperlink to the document*](#). Overall, the DPD does not raise any significant cross boundary issues.

3 Consultation (Regulation 18)

Early engagement

- 3.1 The Core Strategy was adopted in October 2012 and some policies in its Local Plan 1999 were saved (until such time that the Development Management Policies DPD replaces them). The Council began the process of DPD preparation by reviewing its existing policies and considering the potential gaps that may be left through the loss of its detailed policies in the 1999 Local Plan. The review was undertaken by all the relevant sections of the Council, in particular, by the Development Management Team. The initial stages of plan preparation is usually known as the scoping phase. The process of planning policy formation is guided by legislation and there is strict criteria that the Council must follow. Policies are supported by significant research, evidence, technical appraisals and consultation with key stakeholders and the public. This statement will focus on the role that community involvement and consultation have played in policy formation.
- 3.2 Significant consultation has been carried out in preparing the Development Management Policies DPD. The main stages of consultation on DPDs are set out in the [SCI](#) (page 13 of the SCI).
- 3.3 Various stakeholders were consulted at the very initial stages of DPD preparation, this included statutory consultation bodies and professionals in specialist areas. Development Management colleagues have been consulted on the policies throughout, as they are one of the primary users of the Development Management Policies DPD. The purpose of the initial engagement was to establish what policies were required and what could be realistically delivered.
- 3.4 In May 2012, a letter was sent to statutory consultees to notify them of the Council's intention to begin the process of preparing a number of DPDs and SPDs Appendix 2. This included a Development Management Policies DPD. The Council sought initial views on what broad issues and topic areas the Council should cover in its forthcoming documents.
- 3.5 The Council received a number of comments from most of the statutory consultees including Environment Agency, Highways Agency, Natural England, Surrey County Council, Thames Water and English Heritage. The responses are contained in Appendix 2. The responses highlighted numerous topic areas that the respondents felt needed to be covered in the Council's DPDS, including flooding, biodiversity, infrastructure provision, pollution, education provision, and policies for the positive enhancement of the historic environment.
- 3.6 The Council considered the suggestions and cross referenced it with a list of topics that it considered might need further detailed policies in particular, those set out in Appendix 6 of the Core Strategy (the responses also highlighted issues more relevant for the Site Allocations DPD e.g. the need to identify sites to meet future growth in the borough). Many of the topics were already covered in the adopted Core Strategy and the Council had to consider what benefit further detailed policy would have. This initial consultation was helpful and provided useful suggestions on what topic areas to pursue.

3.7 The Council also consulted with neighbouring authorities at an early stage to seek views on cross boundary issues. This was in line with duty to cooperate. Further information on how the Council has complied with this is set out in a separate statement, however for completeness, reference is made to these in this consultation statement.

3.8 A letter was sent to neighbouring authorities in February 2013 seeking views on cross boundary issues. The various authorities replied highlighting what they considered to be cross boundary issues or where further ongoing discussions would be required on the following:

- § Site allocations and the impact on the strategic road network
- § Housing requirements
- § The impact of major allocations on adjoining boroughs
- § SPA mitigation
- § Traveller need
- § Infrastructure provision
- § Basingstoke Canal
- § The impact of development on the town centres

The points were considered and where reasonable, the points fed into formulating the policies and proposals in the Development Management DPD and Site Allocation DPD. It is clear from the above that most of the points raised are matters either for the Core Strategy DPD or the Site Allocation DPD rather than for the Development Management Policies DPD to cover.

- 3.9 The Council followed up with an email to specific consultation bodies in August 2013 Appendix 3. The email contained a list of policies the Council intended to pursue to assist in the management of development in the borough. The email set out the policy topics and an explanation of what each policy would cover. The Council was seeking general views on the scope of the proposed policies and whether there were any significant gaps in relation to cross boundary issues.
- 3.10 Only a few responses were received at this stage, summaries are contained in Appendix 4. No significant issues were raised, however an opportunity to prepare a Green Infrastructure Strategy was suggested. The comments received were used to further refine the policy formation process.
- 3.11 In the meantime various policies were being drafted which were informed by evidence base and the comments received. Continuous, focused consultation was carried out on the draft policies. Officers sought the views and expertise from colleagues and key stakeholders on relevant policies/topics. For example advice was sought from the Environmental Health team with regards to detailed policies on contamination and pollution; and views were sought from Arboricultural Officers with regards to the Tree policy etc.
- 3.12 The policy drafting stage was an iterative process of drafting and re-drafting after further comments. A draft Sustainability Appraisal (SA) on the Development Management Policies DPD was carried out as an integral part of the DPD process to ensure that sustainability objectives are demonstrated in the policies. A Habitats Regulation Assessment (HRA) was undertaken to assess whether any aspects of the emerging DPD would have the potential to cause a likely significant effect on Natura 2000 or European Sites and to identify mitigation measures if such effects were identified.
- 3.13 There has also been significant Councillor Involvement throughout the DPD process. A draft Development Management Policies DPD was taken to the LDF Working Group in 8 January 2015 and scrutinised. It was then taken forward to the Executive Meeting 5 February 2015 with the recommendation that the draft DPD be approved for public consultation. Approval was granted and the draft DPD went out for Regulation 18 public consultation between 19 February-3 April 2015. The same Member's involvement was undertaken during the Regulation 19 stage of the process. In addition, the Portfolio Holder is regularly briefed on the progress of the DPD process.

Public consultation 19 February -3 April 2015 (Regulation 18 Consultation)

3.14 The draft Development Management Policies DPD was published in 19 February 2015 for a period of six weeks ending on 3 April 2015. The Council invited representations /comments on the draft. News of the consultation period was advertised through:

- Local newspaper: A Public Notice was placed in Woking News and Mail on February 19 2015 (page 28) Appendix 9
- Mail out: notification was sent to individuals and organisations on the Woking Local Development Framework database, including specific consultation bodies and general consultation bodies, councillors and internal officers. This was undertaken via letter or email. Appendix 1 lists the individuals and organisations invited to make representations, Appendix 8 is a copy of the letter and email text.
- Website: the DPD was published on the Council's website at <http://www.woking2027.info/management> Appendix 5,6,7
- Hard copies: the DPD and its supporting documents were made available in hard copy format at the ground floor reception of the Council's Civic Offices and provided to all public libraries in the Borough, including Byfleet, Knaphill, West Byfleet and Woking. An electronic version of the document was made available on the website Appendix 7.
- The Chamber of Commerce, Developers Forum and Independent Associations were regularly briefed on key stages of the DPD process.

Responses to consultation 19 February -3 April 2015

3.15 The Council received representations from a total of twelve individuals or groups, including statutory bodies and local groups. Representations covered a range of issues. The summary of the representations with the Council's response and recommendations is in Appendix 10.

Preparation of Publication Draft

3.16 The DPD was updated with the proposed modifications and non-material amendments were also made to the text in order to make the policies more accessible and clear. This was scrutinised by the LDF Working Group on 1 October 2015. The Working Group was satisfied that the updated draft DPD should go forward for consideration by the Executive Committee and requested the Executive to approve it for public consultation (Regulation 19). The Development Management Policies DPD was approved for public consultation on 15 October 2015.

4 Consultation (Regulation 19)

4.1 The Development Management Policies DPD Publication Draft was published on 26 October 2015 for a period of six weeks (up to 7 December, 5pm). The Council invited representations to be submitted on the Publication Draft. The Statement of representation procedure was advertised through:

- Local newspaper: A Public Notice was placed in Woking News & Mail on 22 October 2015 Appendix 16
- Mail out: notification was sent to individuals and organisations on the Woking Local Development Framework database, including specific consultation bodies and general consultation bodies, councillors and internal officers. This was undertaken via letter or email. A copy of the letter and email text, are included in Appendix 15.
- Website: news of the DPD was published on the Council's main website [Woking Borough Council](#) and on its micro site [Woking 2027](#) Appendix 11,12,13 and 14
- Hard copies: The Development Management Policies DPD Publication Draft and its accompanying SA and HRA were made available in hard copy at the ground floor reception of the Council's Civic Offices and provided for inspection at all public libraries in the Borough, including Byfleet, Knaphill, West Byfleet and Woking.
- An electronic version of the document was made available on the [website](#) Appendix 13.
- News of the consultation was aired on the local radio via an interview via the Portfolio Holder for Planning.

4.2 The Council advised that comments should be focused on whether representors considered the plan met the tests of soundness i.e. whether it has been positively prepared, justified, effective and consistent with national policy, and whether it satisfied the legal requirements and the Duty to Cooperate. A representation form and accompanying guidance note was designed to guide respondents to do this (see Appendix 14). A total of 29 responses were received during the period. The summary of representation, together with the Council's response and recommendations is attached as Appendix 17. A schedule of proposed modification as a result of the representations is attached as Appendix 18.

5. Conclusion

- 5.1 The preparation of the Development Management Policies DPD and its supportive evolved through a number of stages. The Council have made sure as demonstrated by this Consultation Statement that Community Involvement has been at the heart of each stage and has valued and taken into account representations received at all the key stages. The consultations have been carried out in accordance with the Statement of Community Involvement and all statutory requirements. There has also been significant Councillor involvement at all key stages, by scrutinising the contents and procedures in preparing the DPD. The Council is satisfied that overall, the outcome of the consultations has enhanced the quality of the DPD and its accompanying documents.

APPENDIX 1

List of people in the consultation database

Specific consultee bodies

AMEC
Bisley Parish Council
Bracknell Forest Council
Chobham Parish Council
DEFRA
Department for Transport
Elmbridge Borough Council
HeritageEngland – South East Region
Environment Agency
Epsom and Ewell Borough Council
Guildford Borough Council
Hart District Council
Highways England
Mobile Operators Association
Mole Valley District Council
National Grid
Natural England
Network Rail
Ockham Parish Council
Pirbright Parish Council
POS (SE)
Reigate and Banstead Borough Council
Ripley Parish Council
Royal Borough of Windsor and Maidenhead
Runnymede Borough Council
Rushmoor Borough Council
Send Parish Council
Southern Gas Networks
Spelthorne Borough Council
Sport England South
Surrey County Council
Surrey Heath Borough Council
Tandridge District Council
ThamesWater
The Planning Bureau Limited
The Planning Inspectorate
Veolia Water
Waverley Borough Council
West End Parish Council
Wisley Parish Council
Woking Partnership
Wokingham Borough Council
Worplesdon Parish Council

Agents and Developers

A H K Associates
A.N.D. Consulting
AAP Architecture Ltd
Adams Planning+ Development Ltd

ADM Architecture
Alexson Homes
Allchurch Bailey
Alliance Environment and Planning Ltd
AMG Planning and Development
Anderson Planning and Development
Antler Homes
Apcar Smith Planning
Architype
Ashill Developments
B R I C Developments Ltd
Balmoral Homes
Banner Homes (Wessex) Ltd
Barratt Homes
Barton Willmore
Batcheller Thacker
BBF Fielding
Beaumonde Homes
Beckbridge Ltd
Beechcroft Developments
Bell Cornwell Partnership
Bellway Homes
Berkley Homes (Southern) Ltd
Bewley Homes
Birchwood Homes
Bishopgate Homes Ltd
Bloor Homes
Blue Architects
Blue Cedar Homes
Blue Sky Planning Ltd
BNP Paribas Real Estate
Bonham Homes Ltd
Bouygues Development
Bovis Homes Ltd
Boyer Planning Ltd
Brimble, Lea and Partners
Broadway Malyan
Bruton Knowles
Bryan Jezeph Consultancy
Burhill Golf and Leisure Ltd
Cadenza Estates Ltd
CALA Homes
Cameron Jones Planning
Capita Norman and Dawbarn
Carter Jonas LLP
Carter Planning Ltd
Castle Wildish Chartered Surveyors
CGMS
Charles Church Developments Ltd
Charles Richards
Churchods
Clarence Country Homes Ltd

Clarke Gammon Wellers	Hammerson UK
ClarkeWillmott	Hayward Partnership
Conceptual Design Associates Ltd	Henry Adams Planning Ltd
Cooper Environmental Planning	Henry Smith
Courtley Consultants Ltd	Heritage Architecture
Coverly Developments Ltd	Heritage Property Consultant
Crane and Associates	Heronbrook
Crest Strategic Projects	Holder Mathias Architects
Croudace	House Builders Federation
D & M Planning	Housing Expectations
Dalton Warner Davis LLP	HTA Design LLP
Danks Badnell	Humberts
David L.Walker Chartered Surveyors	Hyder Consulting (UK) Ltd
Day Tanner Partnership Ltd	Iceni Projects Ltd
Development Planning Partnership	Iconic Design
DHA Architecture	Indigo Planning Ltd
DHS Engineering	James Smith Associates
Donnajane Whitcombe	John Ebdon Homes
DPDS Consulting Group	JSA Architects
Drivers Jonas Deloitte	Kempton Carr Croft
DSP	Kiely Planning
DTZ	King Sturge
Edgington Spink and Hyne Architects	Knight Normal Partnership
Edwards and Associates	Knowles
Exedra Architects	Lacey Simmons Ltd
Fairview New Homes Plc	Lambert Smith Hampton on behalf of
Fibonacci Architects	NOMS/HM Prison Service
Firefly	Landmark Information Group Ltd
Firstplan	Leach and Co
Flowitt Architects	Leith Planning Ltd
Floyd Matcham (Hampshire) Ltd	Lewel Ltd
Form Architecture and Planning	Linden Homes South East Ltd
FrankWinter Associates	Lizard Estates
Fullerthorne	Local Dialogue
Fuller Long Planning	M.C.S. Design Planning Consultants
Fusion Online Ltd	MAA Architects
Fusion Online Planning	Maddox & Associates
George Wimpey South West Thames Ltd	Martin Critchell Architects
George WimpeyWest London Ltd	Martin Gardner
Gerald Eve	Martin Grant Homes
Gerry Lytle Associates Ltd	Mary Hackett and Associates
Gillenden Development Company Ltd	Mayer Brown
GL Hearn	MBH Partnership
Gleeson Strategic Land	McCarthy and Stone (Developments) Ltd
Glen House Estates Ltd	MCS Design
Goadsby and Harding Commercial	Mercury Planning
Goldcrest Homes	MGA Town Planning
Gordon Ellerington Development Consultants	Michael Shanley Group
GRB-Ventures	Millgate Homes
Gregory Gray Associates	Mitchell Evans Partnership
Gurney Consulting Engineers	Morgan Smithyes
GVA Grimley	Mott MacDonald
Hallam Land Management Ltd	Mouchel Parkman
	Nathaniel Lichfield and Partners

National Farmers Union (SE Region)
 National Landlords Association
 Nigel Rose Architects
 Norman Knight Partnership
 Nye Saunders Architects
 Octagon Developments Ltd
 Omega Partnership
 Open Planning
 OSP Architects
 Parnell Design Partnership LLP
 Parsons Brinckerhoff
 Peacock and Smith
 Persimmon Homes (South East)
 Peter Allan
 Phoenix Planning
 Pitmans
 Planning Issues Ltd
 Planning Issues/Churchill Retirement
 Planware Ltd
 Pleydell Smithyman Ltd
 PRC Fewster Planning
 Proteus
 PRP Architects
 Pyrford Homes Ltd
 Quinton Scott Chartered Surveyors
 and
 Estate Agents
 Quod Ingeni Building
 R Perrin Town Planning Consultants
 Rapleys LLP
 Raspin Propoerties Ltd
 RDJW Architects Ltd
 Reef Estates Ltd
 Rippon Development Services
 Rolfe Judd
 Romans Land and Planning
 RPS Planning
 Runnymede Homes Ltd
 Rushmon New Homes
 Ruston Planning Ltd
 Rutland Group
 Rydon Homes
 Savills
 SCD Architects (Hampton Court)
 Scott Brownrigg – Planning
 Shanly Homes
 St James South Thames Ltd
 Stanhope Plc
 Stephanie Webster Architect
 Sterling Portfolio Management on
 behalf of Leylano Ltd
 Stewart Ross Associates
 Strategic Land Partnerships
 S106 Management
 Tanner and Tilley Town Planning

Consultants
 Terence O'Rourke
 Tetlow King Planning
 The John Philips Planning
 Consultancy
 The Landmark Trust
 The Planning Bureau Ltd
 Thomas Eggar LLP
 Thomas Roberts Estate Ltd
 Turley Associates
 VailWilliams
 Vincent Homes Ltd
 Vincent James Homes Ltd
 WADP Architects
 Waterfall, Durrant and Barclays
 Wates Developments
 Wentworth Homes
 West Estates Limited
 WestWaddy: ADP
 Weston Architects Ltd
 Winsor Chartered Surveyors
 Woking 20 Developments Ltd
 Woolf Bond Planning
 Work Space Group
 WYG Management Services
 WYG Planning and Design

Community support groups

Byfleet United Charities
 Home-StartWoking
 Just Advocacy
 Lakers Youth Centre
 Lakeview Youth Club
 Liaise
 Sheerwater Youth Centre
 Surrey Community Action
 The Barnsbury Project
 The Sheerwater/Maybury Partnership
 West ByfleetWomen's Institute
 Woking Community Transport Ltd
 Woking Youth Arts Centre
 Woking Youth Centre
 York Road Project

Disability Groups

Carers Support Woking
 Just Advocacy
 North West Surrey Association Of
 Disabled People
 Surrey Disabled People's Partnership
 The Squirrels
 Woking MIND

Elderly Groups

Age Concern
Friends of The Elderly

Health Groups

Health & Safety Executive
NHS Property Services - Planning and
Development Assistant
NHS Surrey
North West Surrey CCG
South East Coast Strategic Health
Authority
Surrey County Council – Public Health
Team
Virgin Care Limited

Housing Associations

A2 Dominion
Ability Housing Association
Accent Peerless Ltd
Affinity Sutton
Bracknell Forest Homes
Catalyst Housing
Downland Housing Association
Greenoak Housing Association
Housing 21
Hyde Housing Association (Hyde
Martlet)
Hydemartlet
London & Quadrant Housing Trust
Mount Green Housing Association
New Vision Homes
Paragon Housing Association
Pinecrofe Housing Association
Places for People Ltd
Rosemary Simmons Memorial
Housing
Association
Rosetower Ltd
Servite Houses
South Neighbourhood: L&Q Housing
Trust
Stonham Housing Association
Surrey Heath Housing
Thames Valley Housing Association
The Guinness Trust
Tower Homes Ltd
Transform
Welmede Housing Association

Local businesses

ASDA
Cap Gemini
Carisbrooke Investments
Chris Thomas Ltd

Christchurch Bookshop
Clerical Medical Managed Funds Ltd
Country Land and Business
Association
Enterprise First
Federation of Small Businesses
(Surrey and West Sussex Regional
Office)
GMK
Horsell Businesses' and Traders'
Association
Jones Day
Knaphill Traders Association
M3Enterprise LEP
McLaren Group Limited
Moyallen
MRC Pension Trust Ltd
National Housing Federation South
East
Repropoint
Surrey Chamber of Commerce
Surrey Connects
The Garibaldi
The Lightbox
The Peacocks Centre
Tourism South East
Toys R US
West Byfleet Business Association
William Nash PLC
Wm Morrison Supermarkets Plc
Woking and District Trades Council
Woking Asian Business Forum
Woking Borough Council Town Centre
Manager
Woking Chamber
Woking Shopmobility
Wolsey Place Shopping Centre

Local residents (1392)**Minority Groups**

Chinese Association of Woking (CAW)
Deafplus
Friends Families and Travellers
Planning
Friends, Families and Travellers
Gypsy and Traveller Forum
Indian Association of Surrey
Irish Community Association
Irish Travellers Movement in Britain
(ITMB)
Lakeview Community Action Group
London Gypsy and Traveller Unit
Muslim Community Centre
National Association of Gypsy And

Traveller Officers
Outline Surrey
Surrey Access Forum
Surrey Lifelong Learning Partnership (SLLP)
Surrey Travellers Community Relations Forum
The Gypsy Council (GCECWR)
The Shah Jehan Mosque
Transform Housing
Woking Association of Voluntary Service (WAVS)
Woking Chinese School
Woking Pakistan Muslim Welfare Association

Nature, environmental and conservation organisations

Ancient Monuments Society
Basingstoke Canal Authority
Byfleet, West Byfleet & Pyrford Residents Association
Campaign to Protect Rural England - Surrey Office
Commission for Architecture and the Built Environment
Council for British Archaeology
CPRE Woking and Surrey
Energy Saving Trust
English Heritage South East Region
Forestry Commission
Friends of the Earth
Georgian Group
Horsell Common Preservation Society
Inland Waterways Association
Local Agenda 21
Maybury Sheerwater Partnership
Garden Project
National Trust
National Trust - RiverWey & Godalming Navigations
NFU Office
Open Spaces Society
Surrey & Farming Wildlife Advisory Group
Surrey & Hampshire Canal Society
Surrey Archaeological Society
Surrey Countryside Access Forum (SCAF)
Surrey Heathland Project
Surrey Nature Partnership
Surrey Wildlife Trust
The British Wind Energy Association
The Garden History Society

The RSPB
The Society for The Protection Of Ancient Buildings
The Twentieth Century Society
Urban Parks Forum
Victorian Society
Wildlife Trusts South East
Woking Cycle Users Group
Woking Local Action 21
Woodland Trust

Other organisations

CNS Systems - Navigation, Spectrum & Surveillance
Entec UK Ltd
Guildford Police Station
National Grid Control Centre
Probation Service
Scotia Gas Networks
Surrey Police
Thamesway Sustainable Communities Ltd
The Coal Authority
Walden Telecom Ltd
Local Councillors (Borough and County)
MP for Woking
Woking Conservatives
Woking Liberal Democrats
Residents associations
Alpha Road Tenant & Leaseholders Association
Anthony's Residents Association
Brambledown Residents Association
Brookwood Village Association
Byfleet Village Association
Byfleet, West Byfleet & Pyrford

Residents Association

Cheapside Residents Association
Claydon Road Residents Association
Friars Rise Residents Association
Gloster Road and Priors Croft Residents Association
Goldsworth Park Community Association
Hillside Residents Association
Hockering Residents Association
Hook Heath Residents Association
Horsell Park Neighbourhood Watch / Woking Association Neighbourhood Watches (WAN)
Horsell Park Residents Association
Horsell Residents Association
Knaphill Residents' Association

Maybourne Rise & WoodpeckerWay
Residents Association
Maybury Community Association
Mayford Village Society
Moor Lane Area Residents
Association
Old Woking Community Association
Old Woking Village Association
Pyrford Action Group
RydensWay Action Group
SandyWay Residents Association
Sheerwater Neighbourhood Watch
Sheets Heath Residents Association
St Johns Village Society
Sutton Green Association
Sutton Green Village Hall and
Association
Tenants RepresentativesWoking
The East Hill Residents Association
The Grove Area Ltd
The Ridge and Lytton Road Residents
Association
Westfield (Hoe Valley) Residents
Association
Westfield Common Residents
Association
Westfield Community Association
Westfield Community Residents
Association
Woodlands Community Group
Wych Hill Way Residents Association

Religious organisations

All Saint's Church
Christian Clinic for Environmental
Medicine
First Church of Christ Scientist
Guildford Diocese
Jehovah'sWitnesses
New Life Church
Religious Society of Friends
St Edward Brotherhood
St Marks Church Westfield
St Mary's Church
St. Peter's Convent
The Church of England Guildford
Diocesan Board Of Finance
The Salvation Army
Woking People of Faith

Schools, Colleges and educational organisations

Barnsbury Infant School
Barnsbury Junior School
Beaufort Community Primary School

Broadmere Community Primary
School
Brookwood Primary School
Byfleet Primary School
Education Funding Agency
Goldsworth Primary School
Hoefield County Middle School
Kingfield School
Knaphill Lower School
Knaphill School
Local Education Officer
Maybury Infant School
New Monument School
Pyrford C of E (Aided) School
St Dunstan's Catholic Primary School
St Hugh of Lincoln Catholic Primary
School
St John's Primary School
St Mary's C of E Primary School
St. John the Baptist R.C Secondary
School
The Bishop David Brown School
The Hermitage School
The Horsell Village School
The Marist Catholic Primary School
The Oaktree School
The Park School
The Winston Churchill School
West Byfleet Infant School
Westfield Primary School
Wishmore Cross School
Woking College
Woking High School
Woking Schools Confederation
Woking Youth Council

Sports and leisure organisations

Ambassadors Theatre Group
Arts Council forWoking
Link Leisure
SCPFA
Sport England South
Surrey County Playing Fields
Association
The Lawn Tennis Association
The Theatres Trust
Tourism South East
West Byfleet Golf Club
Woking Community Play Association
Woking Football Club
Woking Ramblers
Woking Sports Council

**Transport providers and
organisations**

Arriva Southern Counties

Carlone Buses

Countryliner

Fairoaks Airport Ltd

Freight Transport Association

Highways Agency

Network Rail

Network Rail Plc

Reptons Coaches

South West Trains Ltd

Stagecoach South

Working for Pedestrian

APPENDIX 2

Consultation letter May 2012

Letter/email sent to all 'specific consultation bodies in Core Strategy Consultation Statement' as follows:

Dear All,

Woking Borough Council - Local Development Documents

I would like to notify you that Woking Borough Council is about to begin the process of preparing the following Local Development Documents:

- **Site Allocations DPD** – this document will allocate specific sites for the delivery of all forms of development, including residential, commercial and retail development. Where relevant, it will also safeguard land for the delivery of infrastructure. The programme for the preparation of this DPD is set in the Council's adopted Local Development Scheme (LDS). The LDS is on the Council's website (www.woking.gov.uk/planning/policy/ldf/LDS2).
- **Development Management Policies DPD** – it will set specific detailed policies for the management of development and the use of land. The programme for the preparation of this DPD is set out in the LDS. It should be emphasised that the Core Strategy will provide the policy framework for determining the suitability of a significant number of development proposals that will come forward. Consequently, this DPD will concentrate on policies where detailed guidance is necessary to guide the management of development.
- **Supplementary Planning Document for design:** it will provide detailed design guide to ensure that development enhances the distinctive character of the area without constraining creativity and innovation. It will include guidance to manage the development of hot food takeaways and other such uses.
- **Supplementary Planning Document for affordable housing:** It will provide detailed clarification of the requirements of the affordable housing policy of the Core Strategy (Policy CS12: Affordable Housing) and how it will apply. For example, how affordable housing could be secured on the back of commercial development.
- **Supplementary Planning Document for sustainable construction and renewable energy:** it will set out detailed guidance for the application of the sustainable construction and renewable energy policies of the Core Strategy (Policies CS22: Sustainable construction and CS23: Renewable and low carbon energy generation). Examples of what the SPD might include are the zones within which new development will be required to connect to a CHP station or district heating network and details of the allowable solutions framework and the Council's carbon offset fund.
- **Supplementary Planning Document for Thames Basin Heaths Special Protection Areas Avoidance Strategy:** it will provide detailed guidance for the protection and enhancement of the Thames Basin Heaths Special Protection Area.
- **Community Infrastructure Levy:** it will set out a Charging Schedule, a funding gap and differential rates to be levied on development to secure contributions toward the delivery of local infrastructure to support development.
- **Review of the car and cycle parking standards:** the review will seek to bring the existing standards up to date to reflect current residential and business needs as well as national planning policy on parking.

Before the Council begin the preparation of the documents, I would like to seek your views about the broad issues/topics that you would like the documents to cover. This will enable the Council to take that into account from the beginning of the process.

The Council has a project plan with specific timescales for the preparation of these documents. In this regard, I will appreciate it if you can respond to this request by 29 June 2012. I will ensure that you are involved in all the key stages during the preparation of the documents.

You might be aware that Woking's Core Strategy is going through an independent examination. The Hearing part of the Examination took place between 20 March 2012 and 4 April 2012. In the light of the publication of the National Planning Policy Framework, the Council has resolved to give the policies of the Core Strategy significant weight for the purposes of development management and other planning decisions (except Policies CS6, CS10 and CS12). It is therefore important that any suggestions that you make are consistent with the relevant policies of the Core Strategy. This is also necessary to ensure that the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 are met.

Yours sincerely

Ernest Amoako

Planning Policy Manager
Woking Borough Council

Responses to the letter sent May 2012

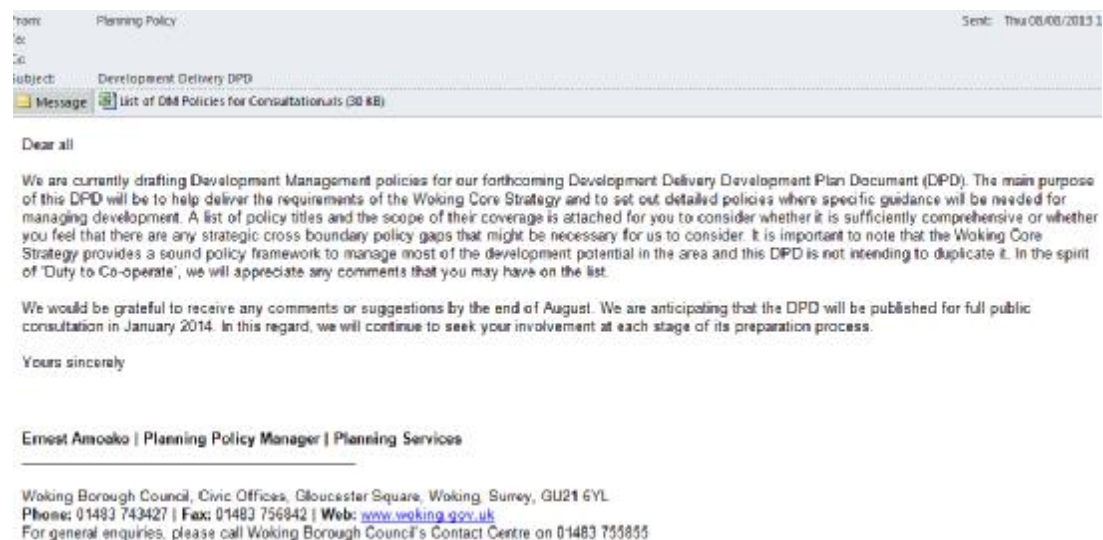
Name/organisation	Development Management Policies DPD
Neil Landricombe, Environment Agency	<p>We would expect the following broad topic areas to be covered by policies in this document:</p> <ul style="list-style-type: none"> • Flood risk and climate change • Biodiversity and habitat enhancement • Water quality • Water resources (including matters such as water efficiency, and groundwater protection) • Ensuring sufficient infrastructure in place to support new development <p>Please see our comments on the core strategy consultations for more detail on these points, or alternatively please contact me to discuss any of these points in more detail.</p>
Patrick Blake, Highways Agency	<p>Thank you for your letter dated 31 May 2012 inviting the Highways Agency (HA) to provide views about broad issues/topics that should be covered as you begin the process of preparing a number of Local Development Documents (LDD).</p> <p>As you will be aware, the HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. In the case of Woking Borough this relates to the A3 and the M25 junctions 10 and 11. In broad terms we would be concerned if there was a material increase in traffic on these sections of SRN as a result of proposed development in Woking without careful consideration of mitigation measures. It is important that the LDDs provide a planning policy framework to ensure development cannot progress without appropriate measures in place. When considering development proposals, any impacts on the SRN need to be identified and mitigated as far as reasonable possible. The HA, in general will support a local authority proposal that considers sustainable measures which will manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort.</p>
John Lister, Natural England	<p>I assume that this DPD may use the criteria used for considering site allocations (see above), in order to test any windfalls that may come forward over the plan period. In addition it would be helpful if the policies and text provided a clear basis for assessing the impact of proposals on the natural environment and for seeking enhancement. I also assume that the document will refer to the Thames Basin Heaths SPD and related documents. It would also be helpful if the DPD could include a policy and text to deal with surveys to check sites likely to accommodate European and protected species and to ensure that they are not harmed through the development process and beyond.</p>
Katharine Harrison, Surrey County Council	<p>Thank you for consulting Surrey County Council on the above. We have only minor and general comments to make at this scoping stage, although we do envisage that we will have a significant input at a later stage, particularly with regard to the Site Allocations DPD, Development Management DPD, CIL charging schedule, and review of parking standards.</p> <p>.....</p> <p>It is envisaged that Development management issues will include issues such as the sustainable location of development, transportation provision, schools and other infrastructure, necessary to support development and identified in the Infrastructure Development Plan. You will be aware that the situation with regard to forecasts for education need has changed since the current IDP was prepared and we would urge you to engage with our education planning service before moving forward with the Development Management DPD. We should be pleased to facilitate a meeting to discuss this further. I hope these comments are useful and look forward to future engagement between our authorities on your developing Local Plan documents.</p>
Mark Mathews, Thames Water Property Services	<p>As you will be aware from our representations to the Core Strategy, Thames Water are the statutory sewerage undertaker for the Borough. Thames Water are not the water supply undertaker for the Woking Borough. With regard to water supply, this comes within the area covered by the Veolia Water Company. We have the following comments on a number of the proposed Local development Documents:</p>

Mark Mathews, Thames Water Property Services	<p>If for any reason our proposed changes to Policy CS16 of the Core Strategy are not accepted and incorporated then a specific water and sewerage policy should be included in the Development Management Policies DPD. A key sustainability objective for the preparation of the Local Development Framework/Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the new National Planning Policy Framework (NPPF), March 2012, states:</p> <p>“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....” Paragraph 162 of the NPPF relates to infrastructure and states: “Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</p>
Mark Mathews, Thames Water Property Services	We consider that the Development Management DPD must specifically cover the key issue of the provision of water and sewerage infrastructure to service development as this is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.
Mark Mathews, Thames Water Property Services	Notwithstanding the preparation of a separate Infrastructure Delivery Plan, a separate policy on waste water and water supply infrastructure is necessary because it will not be possible to identify all of the water supply and wastewater/sewerage infrastructure required over the plan period due to the way we are regulated and plan in 5 year periods.
Mark Mathews, Thames Water Property Services	The water companies' investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP5 period which runs from 1 st April 2010 to 31 st March 2015 and does not therefore cover the whole Local Plan period. AMP6 will cover the period from 1 st April 2015 to 31 st March 2020, but we have not yet submitted our business plan for this period. Our draft Business Plan for AMP6 will be submitted to Ofwat in August 2013.
Mark Mathews, Thames Water Property Services	Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements can not be required to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.
Mark Mathews, Thames Water Property Services	It is important that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.

Mark Mathews, Thames Water Property Services	It is therefore important that Policy DMD 69 is amended to specifically refer to water and sewerage/wastewater infrastructure or there should be a new Policy along the lines of: Proposed Addition to Infrastructure Policy DMD69 or Text for new Water/Wastewater Infrastructure Policy. Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where: 1. sufficient capacity already exists or 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development." Text along the following lines should be added to the Core Strategy to support the above proposed Policy : "The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development."
Mark Mathews, Thames Water Property Services	Such a policy is important as sewerage and water undertakers have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.
Martin Small, English Heritage	Thank you for advising English Heritage of the impending commencement of the process of preparing a number of Local Development Documents and seeking the views of English Heritage on the broad issues/topics that we would like to see covered in the documents. I have the following suggestions:
Martin Small, English Heritage	Development Management Policies DPD: The NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. Local plans should be consistent with the principles and policies set out in the NPPF, including those relating to the historic environment and should include strategic policies to deliver conservation and enhancement of the historic environment, including landscape.
Martin Small, English Heritage	I note that your Council's Core Strategy contains a relatively detailed strategic policy on the historic environment. However, there is scope for more detailed guidance within the development management policies on how development proposals will be expected to conserve and enhance the historic environment (including both designated and undesignated local assets, known or potential archaeological remains, and the setting of these assets). Paragraphs 128-141 of the NPPF give guidance on how local planning authorities should determine planning applications which have, or may have, implications for heritage assets, and this guidance should be reflected in development management policies.
Martin Small, English Heritage	I would emphasise the need for these policies to be positive rather than simply reactive: they might, for example, set out the Council's commitment to the preparation and review of Conservation Area Appraisals and Management Plans and designating additional Areas where appropriate.
Martin Small, English Heritage	In addition to specific heritage asset-related policies, there may well be scope for references to the historic environment or heritage assets in other development management policies, e.g. on design or green infrastructure or locality-specific policies. Together these policies would form the positive strategy for the conservation and enjoyment of the historic environment required by the NPPF.

APPENDIX 3

Email sent to specific consultation bodies on August 2013. The email contained an attached spreadsheet containing policies the Council would cover and the topics and the scope of what they would cover



APPENDIX 4

Responses to email sent August 2013

LDD consultee name, organisation	Responses
Beata Ginn, Assistant Asset Manager, Highways Agency	We have reviewed your list and have nothing to add/comment on at this time.
Stuart Watson, Guildford Borough Council	Thank you for your email received 08/08/2013, regarding your Consultation on the Woking borough council - Development Management policies, which we read with interest!!.. Guildford Borough Council has no response to make on the consultation document, but we would be interested to be kept informed as this work goes forward.
John Lister Natural England	<p>Thank you for consulting Natural England on your Development Delivery DPD. We welcomed the Core Strategy (CS) and recognized that it provides a good framework for development management. My brief comments on the DPD are therefore as follows:</p> <ul style="list-style-type: none"> The DPD should develop policies relating to trees and landscape (listed in your spreadsheet of potential policies) in the context of the principles established in para 5.13 of the CS There is a wealth of information on your website to Thames Basin Heaths including: <ul style="list-style-type: none"> Avoidance Strategy 2010 - 2015 Avoidance Strategy tariff (April 2013 update) Joint Strategic Partnership Board <p>It may be helpful to include key elements of that material in the new DPD, with links to sections which may be subject to imminent or ongoing change.</p> <ul style="list-style-type: none"> Policy CS7 provides a good framework for considering biodiversity and nature conservation issues, and it makes reference to the need for HRA for European sites where necessary. There is less guidance on how development likely to impact on SSSIs will be tested, and some summary of (or reference to) NPPF para 118 may be helpful. Policy CS17 makes reference to the Green Infrastructure (GI) network, however I cannot immediately find a relevant strategy which identifies the nature and distribution of GI and the gaps in the network. This may be helpful to the forthcoming Trees and Landscape Policy and may reveal opportunities for sustainable transport. The National Planning Policy Framework indicates that "Local planning authorities should ... set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure" (NPPF, Para 114). Natural England publishes guidance which will be helpful in planning positively for networks of biodiversity and green infrastructure. (DCLG Web Guidance – September 2013) The forthcoming Trees and Landscape Policy will no doubt consider a range of issues relevant to site planning, such as responding to the landscape and habitat network context, seeking the protection and enhancement of on-site assets, and providing access through sites into the broader sustainable transport network. Whilst there may be limited areas of the best and most versatile agricultural land, and more widespread irreplaceable habitat (eg ancient woodland), the plan should seek to protect these assets from development (see NPPF paras 112 and 118) <p>Due to the current pressure of consultations on land-use plans, I</p>

	<p>have not been able to spend the time I would have wished reviewing and commenting on your Development Delivery DPD.</p> <p>Nevertheless, I hope you find these comments helpful.</p> <p>If there are issues I have not covered please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.</p>
Jonathan Fleming, Environment Agency	<p>Thank you for consulting us regarding the above preliminary document. We acknowledge that the development management policies DPD will not duplicate the adopted Core Strategy but will rather provide more specific policies and guidance.</p> <p>With regards to our remit we are pleased that the protections of existing vegetation of amenity/environmental value and provision of new planting as part of green infrastructure provision will be considered as this will expand upon the general green infrastructure and biodiversity policies in the Core Strategy.</p> <p>Furthermore, we welcome the addition of a more detailed policy that will seek to minimise land contamination, hazardous installations, pollution, and to protect air and water quality. Once again, thank you for contacting us and we welcome the opportunity to contribute to and review the forthcoming development management policies. If you have any queries or if we can be of any assistance please do not hesitate to contact me</p>

APPENDIX 5

News of the Regulation 18 Public Consultation held between 19 Feb-3 April was published on the front page of the Council's website.

The screenshot shows the Woking Borough Council website homepage. The header features the council's logo, a search bar, and a navigation menu. The main content area displays several news items, including 'Council budget approved for 2015/16', 'New Hospice for the people of Woking and North West Surrey wins planning permission', 'Tell us your views on Development Management Policy', and 'Join the fight against child sexual exploitation'. A sidebar on the right contains links to various services, including 'Pay for it', 'Services gateway', 'Apply for it', 'Report it', and 'Comment on it'. The bottom section of the page shows a detailed view of the 'Tell us your views on Development Management Policy' article, dated 19 February 2015, which includes information about the council's draft Development Management Policies Development Plan Document (DPD) and the public consultation period.

Woking Borough Council

Search this site: [SEARCH](#) [Advanced search](#) [Site map](#)

A to Z of services: [A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#) [Q](#) [R](#) [S](#) [T](#) [U](#) [V](#) [W](#) [X](#) [Y](#) [Z](#)

About Woking

- Advice and benefits
- Business in Woking
- Community and living
- Council and democracy
- Environment
- Housing
- Jobs and careers
- Leisure and culture
- Planning and regulation

Council budget approved for 2015/16

New Hospice for the people of Woking and North West Surrey wins planning permission

Tell us your views on Development Management Policy

Join the fight against child sexual exploitation

Free event: Wednesday 18 March, H.G. Wells Conference and Events Centre

Pay for it
Including parking tickets and Council Tax

Services gateway
Including Hometrak

Apply for it
Including planning applications and voter registration

Report it
Including abandoned cars and graffiti

Comment on it
Including planning

Woking Borough Council

Search this site: [SEARCH](#) [Advanced search](#) [Site map](#)

A to Z of services: [A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#) [Q](#) [R](#) [S](#) [T](#) [U](#) [V](#) [W](#) [X](#) [Y](#) [Z](#)

Home > Latest news

Tell us your views on Development Management Policy

19 February 2015

Woking Borough Council is seeking the views of local residents and businesses on its draft **Development Management Policies Development Plan Document (DPD)**.

The purpose of the Development Management Policies DPD is to provide detailed policies for determining day-to-day planning applications that will assist in delivering Woking's Core Strategy.

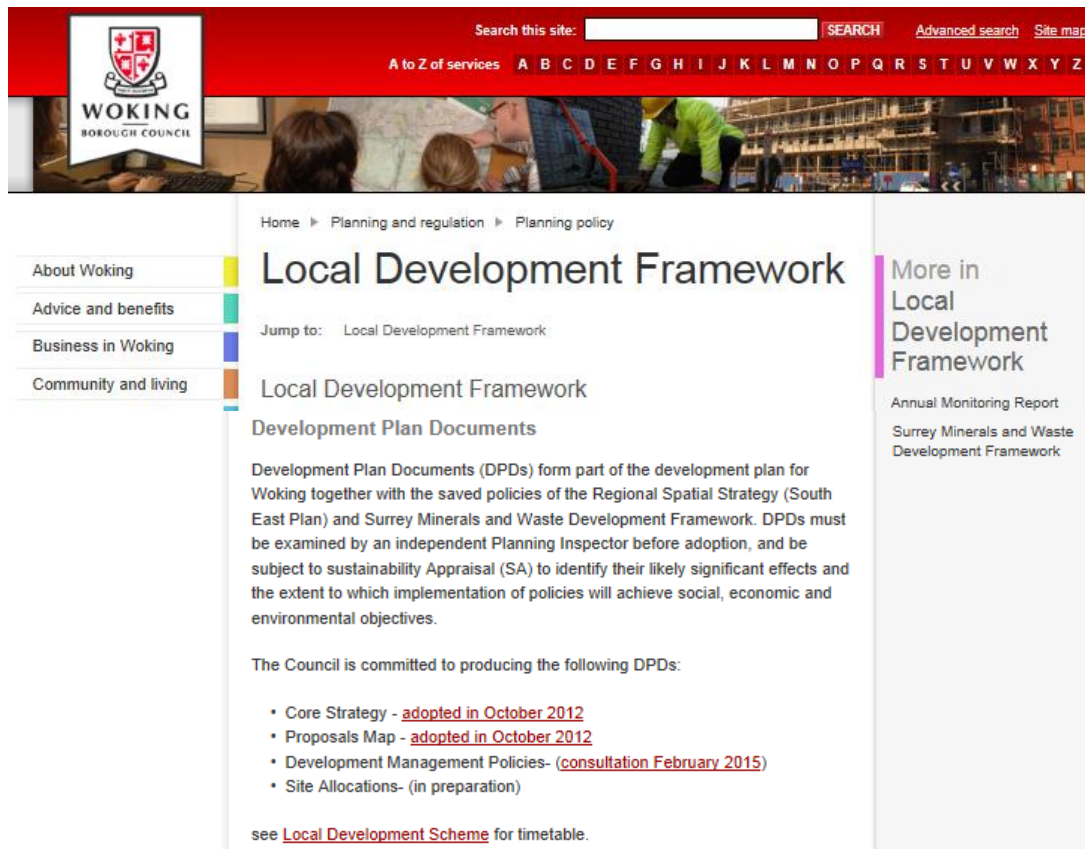
The consultation begins today (**Thursday 19 February 2015**) and will run until **5pm, Friday 3 April 2015**.

The document, along with its supporting Sustainable Appraisal Report and Habitats Regulations Assessment, can be viewed at the following locations:

- Woking Borough Council, Civic Offices, Gloucester Square, Woking, GU21 6YL. Monday to Friday, 9am to 5pm.

APPENDIX 6

Further information on the Regulation 18 Public Consultation held between 19 Feb-3 April was published on the the Council's Planning Policy webpages on the Council's website



The screenshot shows the Woking Borough Council website. The header features the council's logo and a search bar. Below the header is a navigation menu with links to 'Home', 'Planning and regulation', and 'Planning policy'. The main content area is titled 'Local Development Framework' and includes a 'Jump to:' section with a link to 'Local Development Framework'. The page also features a sidebar with links to 'About Woking', 'Advice and benefits', 'Business in Woking', and 'Community and living'. The main text describes the Development Plan Documents (DPDs) and lists the following documents: Core Strategy - adopted in October 2012, Proposals Map - adopted in October 2012, Development Management Policies- (consultation February 2015), and Site Allocations- (in preparation). The page also mentions the Local Development Scheme for timetable.

Search this site: [SEARCH](#) [Advanced search](#) [Site map](#)

A to Z of services [A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#) [Q](#) [R](#) [S](#) [T](#) [U](#) [V](#) [W](#) [X](#) [Y](#) [Z](#)

Home ► Planning and regulation ► Planning policy

About Woking

Advice and benefits

Business in Woking

Community and living

Local Development Framework

Jump to: [Local Development Framework](#)

Local Development Framework

Development Plan Documents

Development Plan Documents (DPDs) form part of the development plan for Woking together with the saved policies of the Regional Spatial Strategy (South East Plan) and Surrey Minerals and Waste Development Framework. DPDs must be examined by an independent Planning Inspector before adoption, and be subject to sustainability Appraisal (SA) to identify their likely significant effects and the extent to which implementation of policies will achieve social, economic and environmental objectives.

The Council is committed to producing the following DPDs:

- Core Strategy - [adopted in October 2012](#)
- Proposals Map - [adopted in October 2012](#)
- Development Management Policies- ([consultation February 2015](#))
- Site Allocations- (in preparation)

see [Local Development Scheme](#) for timetable.

More in Local Development Framework

[Annual Monitoring Report](#)

[Surrey Minerals and Waste Development Framework](#)

APPENDIX 7

The Draft Development Management DPD and associated documents (Regulation 18) were made available on the Woking2027 website between 19 Feb-3 April 2015

ASK A QUESTION COMMENT ON IT GLOSSARY PROPOSALS MAP USEFUL LINKS

DEVELOPMENT MANAGEMENT POLICIES DPD

Core Strategy

Statement of Community Involvement

Development Management Policies DPD

Site Allocations DPD

Supplementary Planning Documents

Local Development Scheme

Community Infrastructure Levy

Neighbourhood Planning

Development Management Policies DPD

The Council has drafted a Development Management DPD, which contains detailed development management policies on various issues such as design and access, noise advertisements and shop fronts, specific leisure developments, residential extensions and tree protection. The main purpose of the DPD is to prepare detailed policies to help determine day to day planning applications. This will facilitate the delivery of the Woking Core Strategy (2012). The policies of the DPD are areas of policy where further detail is needed beyond that contained in the Core Strategy. The DPD does not cover policy areas where principles for development are fully addressed by national or Core Strategy policies.

The Council values your involvement to ensure that the policies of the DPD are sufficiently robust to manage development across the Borough. Your views are being sought on the [draft Development Management Policies DPD](#). We also welcome your views on the supporting [Sustainability Appraisal](#) and [Habitats Regulations Assessment](#).

The consultation period for the DPD is between 19 February 2015 and 3 April 2015 (by 5.00pm). You are encouraged to send any representations that you may have.

Representations can be emailed to planning.policy@woking.gov.uk

THIS SECTION

More in Development Management Policies DPD

[Draft Development Management Policies DPD](#)

[Draft Development Management Policies DPD, Sustainability Appraisal SA](#)

[Draft Development Management Policies DPD, Habitats Regulations Assessment HRA](#)

[Sustainability Appraisal Scoping Report](#)

ASK A QUESTION COMMENT ON IT GLOSSARY PROPOSALS MAP USEFUL LINKS

DEVELOPMENT MANAGEMENT POLICIES DPD

Core Strategy

Statement of Community Involvement

Development Management Policies DPD

Site Allocations DPD

Supplementary Planning Documents

Local Development Scheme

Community Infrastructure Levy

Neighbourhood Planning

Draft Development Management Policies DPD

The Council has drafted a Development Management DPD, which contains detailed development management policies on various issues such as design and access, noise advertisements and shop fronts, specific leisure developments, residential extensions and tree protection. The main purpose of the DPD is to prepare detailed policies to help determine day to day planning applications. This will facilitate the delivery of the Woking Core Strategy (2012). The policies of the DPD are areas of policy where further detail is needed beyond that contained in the Core Strategy. The DPD does not cover policy areas where principles for development are fully addressed by national or Core Strategy policies.

The Council values your involvement to ensure that the policies of the DPD are sufficiently robust to manage development across the Borough. Your views are being sought on the [draft Development Management Policies DPD](#). We also welcome your views on the supporting [Sustainability Appraisal](#) and [Habitats Regulations Assessment](#).

The consultation period for the DPD is between 19 February 2015 and 3 April 2015 (by 5.00pm). You are encouraged to send any representations that you may have.

Representations can be emailed to planning.policy@woking.gov.uk

THIS SECTION

More in Development Management Policies DPD

[Draft Development Management Policies DPD](#)

[Draft Development Management Policies DPD, Sustainability Appraisal SA](#)

[Draft Development Management Policies DPD, Habitats Regulations Assessment HRA](#)

[Sustainability Appraisal Scoping Report](#)

APPENDIX 8

Letter sent to interested parties informing them of the six week consultation on the Draft Development Management Policies DPD (Regulation 18). Sent 17 February 2015

Dear Sir/Madam

Development Management Policies Development Plan Document (DPD) - Regulation 18 Consultation

Woking Borough Council has published its Development Management Policies DPD to give you the opportunity to submit any representations, which will be taken into account before the Submission version of the document is published. The main purpose of the DPD is to prepare detailed policies to help determine day to day planning applications. This will facilitate the delivery of the Woking Core Strategy (2012). The policies of the DPD are areas of policy where further detail is needed beyond that contained in the Core Strategy. The DPD does not cover policy areas where principles for development are fully addressed by national or Core Strategy policies.

The Council values your involvement to ensure that the policies of the DPD are sufficiently robust to manage development across the Borough.

The consultation period for the DPD is between **19 February 2015 and 3 April 2015 (by 5.00pm)**. You are encouraged to send any representations that you may have.

The Development Management Policies DPD and its supporting Sustainability Appraisal Report and Habitats Regulations Assessment are available for inspection at the following venues:

- Woking Borough Council, Civic Offices, Gloucester Square, Woking, GU21 6YL.
Monday to Friday 9am – 4.45pm
- Woking, Byfleet, West Byfleet and Knaphill libraries. Please see www.surreycc.gov.uk for address and opening times of the libraries.
- On the Council's website www.woking.gov.uk

Representations can be e-mailed to planning.policy@woking.gov.uk or posted to:

The Planning Policy Team
Woking Borough Council
Civic Offices
Gloucester Square, Woking
Surrey GU21 6YL

Representations must be received no later than 5pm on 3 April 2015

Please be aware that all comments will be made publically available and identifiable by name and organisation. Any other personal information provided will be processed by Woking Borough Council in line with the Data Protection Act 1998.


Next stages of the process

After the consultation period, all duly made representations received will be taken into account before a Submission version of the document is published. You will have another opportunity to comment of the Submission version of the DPD and for your comments to be taken into account before the DPD is submitted to the Secretary of State for Independent Examination. You will be notified when the Submission version is published.

If you have any questions on the draft DPD, please do not hesitate to contact the Planning Policy Team on 01483 743871 or e-mail: planning.policy@woking.gov.uk.

APPENDIX 9

Public Notice placed in the Woking News & Mail on 19 February 2015 (page 28) publicising the six week consultation between 19 February- 3 April 2015 on the the Draft Development Management Policies DPD (Regulation 18 consultation).



WOKING BOROUGH COUNCIL
The Town and Country Planning (Local Planning) (England) Regulations 2012
Development Management Policies Development Plan Document (DPD) -
Regulation 18 consultation

Woking Borough Council has published its Development Management Policies DPD to give you the opportunity to submit any representations, which will be taken into account before the Submission version of the document is published. The main purpose of the DPD is to prepare detailed policies to help determine day to day planning applications. This will facilitate the delivery of the Woking Core Strategy (2012). The policies of the DPD are areas of policy where further detail is needed beyond that contained in the Core Strategy. The DPD does not cover policy areas where principles for development are fully addressed by national or Core Strategy policies.

The Council values your involvement to ensure that the policies of the DPD are sufficiently robust to manage development across the Borough.

The consultation period for the DPD is between **19 February 2015 and 3 April 2015 (by 5.00pm)**. You are encouraged to send any representations that you may have.

The Development Management Policies DPD and its supporting Sustainability Appraisal Report and Habitats Regulations Assessment are available for inspection at the following venues:

- Woking Borough Council, Civic Offices, Gloucester Square, Woking, GU21 6YL.
Monday to Friday 9am – 4.45pm
- Woking, Byfleet, West Byfleet and Knaphill libraries. Please www.surreycc.gov.uk for address and opening times of the libraries.
- On the Council's website www.woking.gov.uk

Representations can be e-mailed to planning.policy@woking.gov.uk or posted to:
The Planning Policy Team
Woking Borough Council
Civic Offices
Gloucester Square, Woking
Surrey GU21 6YL

Representations must be received no later than 5pm on 3 April 2015

Please be aware that all comments will be made publically available and identifiable by name and organisation. Any other personal information provided will be processed by Woking Borough Council in line with the Data Protection Act 1998.

Next stages of the process

After the consultation period, all duly made representations received will be taken into account before a Submission version of the document is published. You will have another opportunity to comment of the Submission version of the DPD and for your comments to be taken into account before the DPD is submitted to the Secretary of State for Independent Examination. You will be notified when the Submission version is published.

If you have any questions on the draft DPD, please do not hesitate to contact the Planning Policy Team on 01483 743871 or email planning.policy@woking.gov.uk.

APPENDIX 10

Summary of responses received at Regulation 18 public consultation. Including Officer responses, and proposed modifications

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 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. Policy DM8 Land Contamination and Hazards expands on the Core Strategy policies, setting out</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 DM8.</p>

					<p>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. 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>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 rivers with their floodplains and the creation of wetland habitats, that contribute to natural flood risk management. 	<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.

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>	<p>No further modification is required as a result of this representation.</p>

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 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>	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.	No further modification is required as a result of this representation.
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	No further modification is required as a result of this representation.

					<p>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 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 Register. The</p>	
--	--	--	--	--	---	--

					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.	<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</p>	No further modification is required as a result of this representation.

					<p>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	<p>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.</p>	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', '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'.	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 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.	No further modification is required as a result of this representation.
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.	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	No further modification is required as a result of this representation.

					<p>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 Assessment (SHLAA) (2011). The document can be found on the Council's website.</p>	
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 Councils 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 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</p>	<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>

					consultation period. 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.	
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' criteria set within the NPPF. This is further supported by Core Strategy Policy CS6: Green Belt.	No further modification is required as a result of this representation.

104	Cllr Bond	John	General	Object	<p>The local community are opposed and Woking Council need to include it in their deliberations.</p> <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	Natural	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.	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.	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.
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	<p>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.</p>	<p>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>	<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>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 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>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.
---	----------------------------	-----	----------	---	--

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)</p> <p><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 para 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 Noise 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>
88	Knaphill Residents Association	DM10	Object	<p>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.</p>	<p>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.</p>	<p>No further modification is required as a result of this representation.</p>

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	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	No further modification is required as a result of this representation.

				and should therefore be deleted.	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. 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 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.	SA Framework objective 3 be modified by adding 'make sure that further growth does not exacerbate existing flooding situation.
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	<p>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 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 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 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 requirement 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 	The SA Report should be amended according to the actions set out in the Officer Response.

					<p>ecological status to Good by 2021 and no later than 2027;</p> <ul style="list-style-type: none"> - 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. 	
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.

APPENDIX 11

News of the Regulation 19 Public Consultation held between 26 October- 7 December 2015 was published on the front page of the Council's website.

The screenshot shows the Woking Borough Council website homepage. The top banner features the council's logo, a search bar, and navigation links for 'Online services' (Pay, Apply, Report, Services gateway). A large banner for 'happy diwali' and 'Lantern Parade & Celebration Event' is displayed. The main content area is divided into three columns. The left column contains a sidebar with links to various council services. The middle column features 'Your local services' and several news articles, including 'Let's Talk - free event about private tenants rights', 'Woking residents invited to third annual Crime Summit', 'Opportunity to comment on Planning Policy document', and 'Commercial Way prepares to welcome Cote Brasserie'. The right column contains links for 'Pay', 'Apply', and 'Report' services. The bottom section shows a detailed view of the 'Opportunity to comment on Planning Policy document' news article, dated 26 October 2015, which discusses the council's draft Development Management Policies Development Plan Document (DMPD) and invites public consultation.

Woking Borough Council

Search this site: [SEARCH](#) [Advanced search](#) [Site map](#)

Online services: [Pay](#) [Apply](#) [Report](#) [Services gateway](#)

happy diwali

Lantern Parade & Celebration Event
Thursday 12 November 2015, 6pm
Woking Town Centre

[Click here](#)

Your local services
Information about where you live, including waste and recycling collection dates and more.

House name or number: Your postcode: [SEARCH](#)

Let's Talk - free event about private tenants rights

Woking residents invited to third annual Crime Summit

Opportunity to comment on Planning Policy document

Commercial Way prepares to welcome Cote Brasserie
Due to open in Spring 2016, Cote Brasserie is the latest high-end restaurant chain to be associated with Woking Town Centre's developing food offer.

Pay
Council Tax
Housing
Parking
[More ...](#)

Apply
Planning
Parking
Garden waste
Council Tax
Benefits
Homecare
[More ...](#)

Report
Abandoned car
Missed bin
Graffiti
Pest control

Opportunity to comment on Planning Policy document
26 October 2015

Woking Borough Council is seeking the views of local residents and businesses on its draft Development Management Policies Development Plan Document (DMPD) before it is finalised for adoption.

The purpose of the Development Management Policies DMPD is to provide detailed policies for determining day-to-day planning applications that will assist in delivering Woking's Core Strategy.

Cllr Graham Cundy, Woking Borough Council Portfolio Holder for Planning, said: "The Development Management Policies Development Plan Document along with its supporting Sustainable Appraisal Report and Habitats Regulations Assessment, form an important part of the Council's Planning Policy. The Council greatly values the public's involvement and I would encourage local people and businesses to have their say during the consultation period before it is submitted to the Secretary of State for Independent Examination. All comments received will be taken into account before the documents are submitted to Government."

The consultation begins today (Monday 26 October 2015) and will run until 6pm, Monday 7 December 2015.

The document, along with its supporting Sustainable Appraisal Report and Habitats Regulations Assessment, can be viewed at the following locations:

- Woking Borough Council, Civic Offices, Gloucester Square, Woking, GU21 6YL, Monday to Friday, 9am to 4.45pm
- Byfleet, West Byfleet, Knaphill and Woking libraries. Please visit www.surrey.gov.uk for address and opening times of the libraries
- On the Council's www.woking2027.info website

Representations can be emailed to planning.policy@woking.gov.uk or posted to:
The Planning Policy Team
Woking Borough Council
Civic Offices
Gloucester Square
Woking, Surrey
GU21 6YL

APPENDIX 12

Further information on the Regulation 19 Public Consultation held between 26 October- 7 December 2015 was published on the the Council's Planning Policy webpages on the Council's website

The screenshot displays the Woking Borough Council website. At the top, there is a red header bar containing the council's logo on the left, a search bar with the text "Search this site:" and a "SEARCH" button, and links for "Advanced search" and "Site map". Below the header, a banner image shows people looking at a map. A navigation bar below the banner includes "Online services:" with buttons for "Pay", "Apply", "Report", and "Services gateway". The main content area has a breadcrumb trail "Home > Planning and regulation" and a large heading "Planning policy". Under this heading, there are two main sections: "The Development Management DPD Regulation 19 consultation" and "Hook Heath Neighbourhood Plan". The first section includes text about the council's Development Management Policies DPD for Regulation 19 consultation, stating it gives the final opportunity to submit representations before the Publication version of the DPD is submitted to the Secretary of State for Examination. It also mentions the consultation period from 26 October 2015 to 7 December 2015 (by 5.00pm) and encourages users to visit [Woking2027](#) to make comments. The second section, "Hook Heath Neighbourhood Plan", states that the council has made this plan part of the Development Plan for managing development in the Hook Heath Neighbourhood Area, effective from 22 October 2015, and provides a link [here](#) to view the plan. On the left side of the page, there is a vertical menu with links to various council services: About Woking, Advice and benefits, Business in Woking, Community and living, Council and democracy, Environment, Housing, Working for us, Leisure and culture, Planning and regulation (highlighted), Transport and streets, and Contact us. On the right side, there are two sidebars. The first, "More in Planning policy", lists links to Local Development Documents, Local Plan 1999, National planning policy, Regional planning policy, Research and evidence base, and Surrey Minerals and Waste Development Framework. The second, "Also in Planning and regulation", lists links to View or comment on a planning application, Make a planning application - forms and submission requirements, Planning service, and Major developments.

Search this site: [SEARCH](#) [Advanced search](#) [Site map](#)

Online services: [Pay](#) [Apply](#) [Report](#) [Services gateway](#)

Home > Planning and regulation

Planning policy

The Development Management DPD Regulation 19 consultation

Woking Borough Council has published its Development Management Policies DPD for Regulation 19 consultation to give you the final opportunity to submit any representations, which will be taken into account before the Publication version of the DPD is submitted to the Secretary of State for Examination.

The consultation period for the DPD is between 26 October 2015 and 7 December 2015 (by 5.00pm). You are encouraged to send any representations that you may have. Please visit [Woking2027](#) to make your comments

Hook Heath Neighbourhood Plan

The Council has made the Hook Heath Neighbourhood Plan part of the Development Plan for the purposes of managing development in the Hook Heath Neighbourhood Area. This decision takes effect from 22 October 2015.

The Hook Heath Neighbourhood Plan is available [here](#)

More in Planning policy

- [Local Development Documents](#)
- [Local Plan 1999](#)
- [National planning policy](#)
- [Regional planning policy](#)
- [Research and evidence base](#)
- [Surrey Minerals and Waste Development Framework](#)

Also in Planning and regulation

- [View or comment on a planning application](#)
- [Make a planning application - forms and submission requirements](#)
- [Planning service](#)
- [Major developments](#)

- [About Woking](#)
- [Advice and benefits](#)
- [Business in Woking](#)
- [Community and living](#)
- [Council and democracy](#)
- [Environment](#)
- [Housing](#)
- [Working for us](#)
- [Leisure and culture](#)
- [Planning and regulation](#)
- [Transport and streets](#)
- [Contact us](#)

APPENDIX 13

The Development Management Policies DPD Publication Draft(Regulation 19) and associated documents were made available on the Woking2027 website

Core Strategy

Statement of Community Involvement

Development Management Policies DPD

Site Allocations DPD

Supplementary Planning Documents

Local Development Scheme

Community Infrastructure Levy

Neighbourhood Planning

DEVELOPMENT MANAGEMENT POLICIES DPD

Development Management Policies DPD

The Council has drafted a Development Management DPD, which contains detailed development management policies on various issues such as design and access, noise advertisements and shop fronts, specific leisure developments, residential extensions and tree protection. The main purpose of the DPD is to prepare detailed policies to help determine day to day planning applications. This will facilitate the delivery of the Woking Core Strategy (2012). The policies of the DPD are areas of policy where further detail is needed beyond that contained in the Core Strategy. The DPD does not cover policy areas where principles for development are fully addressed by national or Core Strategy policies.

Current Consultation (Regulation 19)

The Council values your involvement to ensure that the policies of the DPD are sufficiently robust to manage development across the Borough. The Council has published its [Development Management Policies DPD](#) for Regulation 19 consultation to give you the final opportunity to submit any representations, which will be taken into account before the Publication version of the DPD is submitted to the Secretary of State for Examination.

The Council values your involvement to ensure that the policies of the DPD are sufficiently robust to manage development across the Borough. The consultation period for the DPD is between 26 October 2015 and 7 December 2015 (by 5.00pm). You are encouraged to send any representations that you may have using the Representation Form.

The **Representation Form** is available [here](#)

Guidance notes on how to complete the Representation Form is available [here](#)

THIS SECTION

More in Development Management Policies DPD

[Sustainability Appraisal: Development Management Policies DPD- Publication Draft \(Reg19\)](#)

[Habitats Regulations Assessment: Development Management Policies DPD- Publication Draft \(Reg19\)](#)

[Representation Form \(Reg19\)](#)

[Guidance Notes: Completing the Representation Form \(Reg19\)](#)

[Draft Development Management Policies DPD \(Reg18\)](#)

[Sustainability Appraisal: Draft Development Management Policies DPD \(Reg18\)](#)

[Sustainability Appraisal Report- Executive Summary, Draft Development Management Policies DPD \(Reg18\)](#)

[Habitats Regulations Assessment: Draft Development Management Policies DPD \(Reg18\)](#)

[Sustainability Appraisal Scoping Report](#)

[Development Management Policies Development Plan Document - Publication document \(Regulation 19\)](#)

APPENDIX 14

A representation form was published alongside the The Development Management Policies DPD Publication Draft(Regulation 19) to focus responses on the relevant matters. Guidance Notes were provided.

The screenshot displays the Woking Borough Council website interface. The header features the council's logo, the 'Woking 2027' logo with the tagline 'Planning the future of our Borough', and a search bar. Below the header is a navigation bar with icons for 'ASK A QUESTION', 'COMMENT ON IT', 'GLOSSARY', 'PROPOSALS MAP', and 'USEFUL LINKS'. The main content area is titled 'Representation Form (Reg19)' and includes a description: 'Representation Form for the Development Management Policies DPD Publication Document (for the Regulation 19 consultation)'. A download link for the 'Representation Form (Reg19) PDF file (47.5K)' is provided, along with a link to 'Get the latest version of Adobe Reader'. A sidebar on the left contains navigation links for various planning documents, with 'Development Management Policies DPD' highlighted. A 'THIS SECTION' sidebar on the right lists related documents, including 'Sustainability Appraisal: Development Management Policies DPD- Publication Draft (Reg19)', 'Habitats Regulations Assessment: Development Management Policies DPD- Publication Draft (Reg19)', 'Guidance Notes: Completing the Representation Form (Reg19)', 'Draft Development Management Policies DPD (Reg18)', 'Sustainability Appraisal: Draft Development Management Policies DPD (Reg18)', 'Sustainability Appraisal Report- Executive Summary, Draft Development Management Policies DPD (Reg18)', and 'Habitats Regulations Assessment: Draft Development Management Policies DPD (Reg18)'.

Representation Form (Reg19)

Representation Form for the Development Management Policies DPD Publication Document (for the Regulation 19 consultation)

[Download the *Representation Form \(Reg19\)* PDF file \(47.5K\)](#)
[Get the latest version of Adobe Reader](#)

THIS SECTION

- Also in Development Management Policies DPD
- [Sustainability Appraisal: Development Management Policies DPD- Publication Draft \(Reg19\)](#)
- [Habitats Regulations Assessment: Development Management Policies DPD- Publication Draft \(Reg19\)](#)
- [Guidance Notes: Completing the Representation Form \(Reg19\)](#)
- [Draft Development Management Policies DPD \(Reg18\)](#)
- [Sustainability Appraisal: Draft Development Management Policies DPD \(Reg18\)](#)
- [Sustainability Appraisal Report- Executive Summary, Draft Development Management Policies DPD \(Reg18\)](#)
- [Habitats Regulations Assessment: Draft Development Management Policies DPD \(Reg18\)](#)

Guidance Notes: Completing the Representation Form (Reg19)

Guidance notes for completing and submitting the Representation Form on the Development Management Policies DPD draft Publication (regulation 19 consultation).

[Download the *Guidance Notes: Completing the Representation Form \(Reg19\)* PDF file \(141.5K\)](#)
[Get the latest version of Adobe Reader](#)

THIS SECTION

- Also in Development Management Policies DPD
- [Sustainability Appraisal: Development Management Policies DPD- Publication Draft \(Reg19\)](#)
- [Habitats Regulations Assessment: Development Management Policies DPD- Publication Draft \(Reg19\)](#)
- [Representation Form \(Reg19\)](#)
- [Draft Development Management Policies DPD \(Reg18\)](#)
- [Sustainability Appraisal: Draft Development Management Policies DPD \(Reg18\)](#)
- [Sustainability Appraisal Report- Executive Summary, Draft Development Management Policies DPD \(Reg18\)](#)
- [Habitats Regulations Assessment: Draft Development Management Policies DPD \(Reg18\)](#)



Representation Form
for Supporting or Objecting to the
Woking Local Development Documents
Development Management Policies Development Plan Document Publication
Document, Sustainability Appraisal Report and
Habitats Regulation Assessment Report

Your details	Your agent (if applicable)
Name and address:	Name and address:
Telephone:	Telephone:
Email Address:	Email Address:

Please use a separate sheet for each representation

1. To which document and which section does this representation relate?
 Please indicate the document and the specific page, paragraph number, policy figure or table within it.

Document	Section
Development Management Policies Publication Document (DMP DPD)	Section
Sustainability Appraisal Report (SA)	Page number
Habitat Regulations Assessment (HRA)	Paragraph number
	Other (e.g. an omission or comment relating to procedure)

2. Do you consider that the Development Management Policies DPD is:

a) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
b) Sound*	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

If you answer no please go to question 3

*The considerations in relation to the Development Management Policies DPD being 'sound' are explained in paragraph 182 of the National Planning Policy Framework (NPPF) and the additional guidance for completing this representation form.

If you do not think the Development Management Policies DPD is sound:

3. Do you consider the Development Management Policies DPD is unsound because it is not:

a) Justified	<input type="checkbox"/>	d) Consistent with national policy	<input type="checkbox"/>
b) Effective	<input type="checkbox"/>	e) Positively prepared	<input type="checkbox"/>
c) Not in accordance with the Duty to Cooperate	<input type="checkbox"/>	f) Legally compliant	<input type="checkbox"/>

Please see guidance notes for an explanation of these terms

4. Please give details of why you consider the Development Management Policies DPD is not legally compliant or is unsound. Please be as precise as possible.
If you think that the documents satisfy the legal compliance and the tests of soundness, please also use this box to set out your comments.

Please continue on a separate sheet if necessary

5. Please set out what change(s) you consider necessary to make the Development Management Policies DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

Please note your representation should succinctly cover all the information, evidence and supporting information necessary to support/justify the representation and your proposed change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

6. If your representation is seeking a change, do you consider it necessary to participate at the Examination?

☐

No, I do not wish to participate at the Examination

☐

Yes, I wish to participate at the Examination

7. If you wish to participate at the Examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination.

8. Do you wish to be informed when the Development Management Policies DPD progresses to the next stages:

☐

Yes

☐

No

Signed:	Date:
----------------	--------------

Please return to:

Planning Policy, Woking Borough Council, Gloucester Square, Woking, GU21 6YL

All representations must be received by the Council by 5pm on Monday 7 December 2015. Unfortunately we cannot accept any responses received after 5pm on the closing date.

Additional copies of this form are available online at www.woking2027.info, from the Civic Offices, Woking, Byfleet, Knaphill and West Byfleet libraries, and on request from the Planning Policy Team at planning.policy@woking.gov.uk and 01483 743871.

Thank you for taking the time to respond to the consultation.



Woking Borough Council Development Management Policies Development Plan Document, Sustainability Appraisal Report and Habitats Regulations Assessment Guidance Notes

Woking Borough Council has prepared its **Development Management Policies Development Plan Document (DPD) Publication Document** for Regulation 19 consultation. The Development Management Policies DPD sets out detailed policies to help determine day to day planning applications. The DPD has been published in order for representations to be made prior to submission. The representations together with the DPD will be submitted to the Secretary of State and examined by an Independent Inspector. The Planning and Compulsory Purchase Act 2004 (as amended) (the 2004 Act) states that the purpose of the Examination is to consider whether the DPD complies with the legal requirements, the tests of soundness and is in accordance with the Duty to Cooperate.

A **Sustainability Appraisal Report** has been prepared to assess the social, economic and environmental implications of the DPD. Overall, the appraisal concluded that the DPD will contribute towards achieving sustainable development in the Borough.

A **Habitats Regulations Assessment** has been carried out to assess the implications of the DPD on European designated sites in the Borough. The policies were screened out as having no likelihood of leading to significant adverse effects on European sites either alone or in combination with other plans or projects.

The above documents can be read in full on the Council's website www.woking2027.info or can be inspected at the Civic Offices and libraries across the Borough.

You can find an **electronic form** on our website: www.woking2027.info. Completing an electronic form would help to save paper and staff resource.

Guidance for completing the form

The Council is consulting on its Development Management Policies DPD Publication Document from 26 October 2015 to 7 December 2015. This stage of the consultation is the final opportunity for stakeholders and the general public to comment on the DPD and the other publication documents before they are submitted for independent Examination. At this stage, representations should relate to the soundness of the document, compliance with the Duty to Cooperate and legal compliance. The representation form will ask you whether you consider that the DPD is sound and legally compliant and if not, which 'tests of soundness' or other requirements you feel it does not satisfy.

Even if you have made comments on the DPD in the past you must make representations during this consultation stage if you wish to have the right to speak to the Inspector and make your case at the Examination.

Legal Compliance

At the Examination the Independent Inspector will check that the DPD is legally compliant, has been prepared in accordance with the Duty to Cooperate and that it is sound. In order to check that it is legally compliant the Inspector will check that the DPD:

- **Has been prepared in accordance with the Council's current Local Development Scheme (LDS).**
The LDS sets out the Local Development Documents that the Council proposes to produce. It sets out the key stages for the production of the DPDs with timetables. The LDS is on the Council's website and available at the Civic Offices.
- **Has been prepared in accordance with the Council's Statement of Community Involvement (SCI).**

The Statement of Community Involvement (SCI) is a document which sets out how the Council wishes the community to be involved in the preparation and revision of Local Development Documents (including DPDs) and the consideration of planning applications.

- **Meets the Government's procedural regulations as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.**
The DPD should comply with the Regulations. These states amongst other things that on publication, the Council must publish the documents prescribed in the Regulations and a Statement of Representation Procedure, and make them available for inspection at specified places and times at which they can be inspected. The documents will be made available for inspection at the Civic Offices of the Council and Woking, Byfleet, West Byfleet and Knaphill libraries. The documents will also be put on the Council's website (www.woking.gov.uk).
- **Has been subject to Sustainability appraisal and Habitats Regulations Assessment.**
The Council is required to provide a Sustainability Appraisal Report when they publish the DPD. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure that they take account of social, environmental, and economic objectives. A Habitats Regulations Assessment has been prepared in accordance with EU Directives.
- **Is in general conformity with the Saved policy of the South East Plan, national planning policy and the Core Strategy**
The DPD should have regard to national policy and conform generally to the Saved policy of the South East Plan and the Core Strategy.

Soundness

The tests of soundness are explained fully in the National Planning Policy Framework (NPPF). The Inspector has to be satisfied that the DPD is positively prepared, justified, effective and consistent with national policy. To be sound the DPD should be:

- **Justified**
This means that the DPD should be founded on a robust, proportionate and credible evidence base.

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives.
- **Effective**
This means the DPD should be:
 - Deliverable over its period and based on effective joint working on cross boundary strategic priorities.
- **Consistent with national policy**
The DPD should enable the delivery of sustainable development in accordance with the policies of the NPPF.
- **Positively prepared**
The DPD should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including the unmet requirements from neighbouring authorities.

If you think the content of the DPD is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national planning policy or the saved policy of the South East Plan? If so, it does not need to be included.

- Is what you are concerned with covered by policies in the Core Strategy. There is no need for repetition between documents in the LDDs.
- If the policy is not covered elsewhere, in what way is the DPD unsound without the policy?
- If the DPD is unsound without the policy, what should the policy say?

General advice

Further guidance on considering soundness can be found on the Planning Portal at www.planningportal.gov.uk

If you wish to make a representation seeking a change to the DPD or part of the DPD you should make clear in what way the DPD or part of the DPD is not sound having regard to the legal compliance, the Duty to Cooperate and the tests of soundness set out above. You should try to support your representation by evidence showing why the DPD should be changed. It will be helpful if you also say precisely how you think the DPD should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at Publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Where there are groups who share a common view on how they wish to see the DPD changed, it would be very helpful for that group to send a single representation which represents their view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

Further detailed guidance on the preparation, publication and examination of DPDs is provided in the Town and Country Planning (Local Planning) (England) Regulation 2012.

- Please complete in full and use a separate form for each individual representation or comment that you wish to make.
- You can photocopy the form or obtain further copies from the Civic Offices at the address below, or from Byfleet, West Byfleet, Knaphill and Woking libraries. You can also find a printable version on our website: www.woking2027.info
- Forms should be returned to: Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square, Woking, GU21 6YL.
- The consultation runs from 26 October 2015 to 7 December 2015. Representations received after 5pm on 7 December 2015 will not be considered.

Notes

Why should I use the form?

- You are recommended to use the form because it gives basic information needed for speedy and effective handling of your representation or comments in support of, or objection to, the DPD and accompanying Sustainability Appraisal Report and Habitats Regulations Assessment.

How do I use the form?

- Please complete the form in full and use a separate form for each representation or comment that you wish to make in support of, or objection to, a paragraph, proposed policy or any other parts of the DPD.
- Please identify precisely which paragraph and policy number your comment relates to by completing the appropriate box.

- Please state clearly why you support or object to the proposed paragraph or policy of the DPD or the accompanying Sustainability Appraisal Report and Habitats Regulations Assessment.
- Please note that any written comments will be made available for public inspection and so we are unable to accept confidential or anonymous responses. Your full address will not be published as all personal data will be treated in accordance with the Data Protection Act.
- Forms should be returned to: Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square, Woking, Surrey GU21 6YL.
- Representations received after 5pm on 7 December 2015 will not be considered.

What happens next?

- The DPD will then be submitted to the Secretary of State along with copies of all representations received for independent examination.
- A date for the Examination of the DPD will be published in due course when it is known.

For more information or if you need any assistance completing this form please:

- see the website: www.woking2027.info
- email planning.policy@woking.gov.uk
- or telephone 01483 743871.



APPENDIX 15

Letter text to inform interested parties of a six week consultation on the DPD Publication Draft. Regulation 19. Sent 22 October 2015 (letter), Sent 26 October (Email)

Dear Sir/Madam

Development Management Policies Development Plan Document (DPD) - Regulation 19 consultation

Woking Borough Council has published its Development Management Policies DPD for Regulation 19 consultation to give you the final opportunity to submit any representations, which will be taken into account before the Publication version of the DPD is submitted to the Secretary of State for Examination. The main purpose of the DPD is to prepare detailed policies to help determine day to day planning applications. This will facilitate the delivery of the Woking Core Strategy (2012). The policies of the DPD are areas of policy where further detail is needed beyond that contained in the Core Strategy. The DPD does not cover policy areas where principles for development are fully addressed by national or Core Strategy policies.

Please note that the Development Management Policies DPD does not allocate any land for future development. That is a matter for the Site Allocations DPD, which will be published separately for Regulation 19 consultation in due course.

The Council values your involvement to ensure that the policies of the DPD are sufficiently robust to manage development across the Borough. The consultation period for the DPD is between **26 October 2015 and 7 December 2015 (by 5pm)**. You are encouraged to send any representations that you may have.

The Development Management Policies DPD and its supporting Sustainability Appraisal Report and Habitats Regulations Assessment are available for inspection at the following venues:

- Woking Borough Council, Civic Offices, Gloucester Square, Woking, GU21 6YL.
Monday to Friday 9am – 4.45pm
- Woking, Byfleet, West Byfleet and Knaphill libraries. Please go to www.surreycc.gov.uk for addresses and opening times of the libraries.
- On the Council's website www.woking2027.info

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- That the Development Management Policies DPD has been submitted to the Secretary of State for Independent Examination;
- The publication of the recommendations of any person appointed to carry out an Independent Examination of the DPD; and
- The adoption of the DPD.

If you require this notification, please remember to specify this on the representation form and provide your contact details.

Representation forms are available online at www.woking2027.info or at the above locations. Representations can be e-mailed to planning.policy@woking.gov.uk or posted to:

The Planning Policy Team
Woking Borough Council
Civic Offices
Gloucester Square, Woking
Surrey GU21 6YL

Representations made at this stage should relate to one of the tests of soundness. To be sound, the Development Management Policies DPD should be positively prepared, justified, effective and consistent with national policy. It must also satisfy the legal requirements and the duty to cooperate. The representation form has been designed to guide respondents to do this.

Representations must be received no later than 5pm on 7 December 2015

Please be aware that all comments will be made publically available and identifiable by name and organisation. Any other personal information provided will be processed by Woking Borough Council in line with the Data Protection Act 1998.

Next stages of the process

After the consultation period, all duly made representations received together with the DPD and its supporting documents will be submitted to the Secretary of State for Independent Examination. You will be notified of the details of the Examination.

If you have any questions on the publication DPD, please do not hesitate to contact the Planning Policy Team on 01483 743871 or e-mail: planning.policy@woking.gov.uk.

Yours sincerely,





Ernest Amoako
Planning Policy Manager

For further information please contact Ernest Amoako on 01483 743427 (Direct Line) or email Ernest.Amoako@woking.gov.uk

APPENDIX 16

Public Notice placed in the Woking News & Mail on 22 October (page 30) publicising the six week consultation between 26 October-7 December 2015 on the the Development Management Policies DPD Publication Draft (Regulation 19 consultation).



**The Town and Country Planning (Local Planning) (England) Regulations 2012
Development Management Policies Development Plan Document (DPD) -
Regulation 19 Consultation**

Woking Borough Council has published its Development Management Policies DPD to give you the final opportunity to submit any representations, which will be taken into account before the Publication version of the DPD is submitted to the Secretary of State for Independent Examination.

The main purpose of the DPD is to prepare detailed policies to help determine day to day planning applications. This will facilitate the delivery of the Woking Core Strategy (2012). The policies of the DPD are areas of policy where further detail is needed beyond that contained in the Core Strategy. The DPD does not cover policy areas where principles for development are fully addressed by national or Core Strategy policies. This DPD does not allocate land for development. That will be a matter for the Site Allocations DPD, which will be published separately for Regulation 19 consultation in due course.

The Council values your involvement to ensure that the policies of the DPD are sufficiently robust to manage development across the Borough.

The consultation period for the DPD is **between 26 October and 7 December 2015 (by 5pm)**. You are encouraged to send any representations that you may have.

The Development Management Policies DPD and its supporting Sustainability Appraisal Report and Habitats Regulations Assessment are available for inspection at the following venues:

- Woking Borough Council, Civic Offices, Gloucester Square, Woking, GU21 6YL, Monday to Friday, 9am – 4.45pm.
- Woking, Byfleet, West Byfleet and Knaphill libraries. Please visit www.surreycc.gov.uk for address and opening times.
- On the Council's website www.woking.gov.uk

Representation forms are available at these locations.

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- That the Development Management Policies DPD has been submitted to the Secretary of State for Independent Examination;
- The publication of the recommendations of any person appointed to carry out an Independent Examination of the DPD; and
- The adoption of the DPD.

If you require this notification, please remember to specify this on the representation form and provide your contact address. Representations can be emailed to planning.policy@woking.gov.uk or posted to:

The Planning Policy Team
Woking Borough Council
Civic Offices
Gloucester Square, Woking
Surrey GU21 6YL

Representations must be received no later than 5pm on 7 December 2015

Please be aware that all comments will be made publically available and identifiable by name and organisation. Any other personal information provided will be processed by Woking Borough Council in line with the Data Protection Act 1998.

Next stages of the process

After the consultation period, all duly made representations received together with the DPD and its accompanying documents will be submitted to the Secretary of State for Independent Examination. Details of the Examination will be published in due course.

If you have any questions on the draft DPD, please contact the Planning Policy Team on 01483 743871 or email planning.policy@woking.gov.uk

APPENDIX 17

Summary of representations received at Regulation 19 consultation, Officer response and any proposed modifications:

Mike Cooke – Chairman, Hook Heath Neighbourhood Forum
Summary of representations

- 1 There is nothing in the Development Management Policies Development Plan Document (DPD) to point out that policies in made Neighbourhood Plans has the same legal standing as the 25 Core strategy policies. This should be emphasised in the introduction section of the DPD. The following is suggested: Neighbourhood Planning Regulations were passed into law in 2012. The Regulations enable communities to establish Neighbourhood Forums, define Neighbourhood Areas and develop Neighbourhood Plans for the defined Neighbourhood Areas. Once a Neighbourhood Plan is made, the policies it contains become part of the legal planning framework, and have the same material weight and standing as policies in the Core Strategy. Where they exist, Neighbourhood Plans will therefore be used together with the Core Strategy, to determine development in areas to which the respective Plans relate.

Officer response

- 1 Adopted Neighbourhood Plans form part of the Development Plan for the area, and consequently, their provisions are a material consideration when determining planning applications in Neighbourhood Areas. It is therefore reasonable to emphasise the role of Neighbourhood Plans in the DPD. However, Neighbourhood Plans are one of a number of Development Plan Documents for this area and it is proposed that a new paragraph 1.22 on Development Plans be added to clarify the role of Development Plans as follows:

The Development Plan for the area comprise of:

- The Saved policy of the South East Plan;
- The Surrey Waste Plan;
- The Surrey Minerals Plan Core Strategy and Primary Aggregates Development Plan Documents;
- Woking Core Strategy;
- The saved policies of the Woking Borough Local Plan (1999); and
- Adopted Neighbourhood Plans

Section 38 of the Planning and Compulsory Purchase Act 2004 emphasises that if regard is to be had to the Development Plan for the purposes of any determination to be made under the Planning Act the determination must be made in accordance with the Development Plan unless material consideration indicate otherwise. If to any extent a policy contained in a Development Plan for an area conflicts with another policy in the Development Plan, the conflict must be resolved in favour of the policy which is contained in the latest document to be adopted, approved or published (as the case may be).

For the avoidance of doubt, the Development Plan is the Development Plan Document (taken as a whole) which has been adopted or approved in relation to that area. The Council is in the process of preparing the Development Management Policies DPD (this DPD) and the Site

Allocations DPD. When they are adopted they will also form part of the Development Plan for the area.

Proposed modification

A new paragraph 1.22 should be inserted as follows:

The Development Plan for the area comprise of:

- The Saved policy of the South East Plan;
- The Surrey Waste Plan;
- The Surrey Minerals Plan Core Strategy and Primary Aggregates Development Plan Documents;
- Woking Core Strategy;
- The saved policies of the Woking Borough Local Plan (1999); and
- Adopted Neighbourhood Plans

Section 38 of the Planning and Compulsory Purchase Act 2004 emphasises that if regard is to be had to the Development Plan for the purposes of any determination to be made under the Planning Act the determination must be made in accordance with the Development Plan unless material consideration indicate otherwise. If to any extent a policy contained in a Development Plan for an area conflicts with another policy in the Development Plan, the conflict must be resolved in favour of the policy which is contained in the latest document to be adopted, approved or published (as the case may be).

For the avoidance of doubt, the Development Plan is the Development Plan Document (taken as a whole) which has been adopted or approved in relation to that area. The Council is in the process of preparing the Development Management Policies DPD (this DPD) and the Site Allocations DPD. When they are adopted they will also form part of the Development Plan for the area.

Mrs Sandra Simkin
Summary of representations

- 1 The DPD Regulation 19 consultation is in effect endorsing the Regulation 18 consultation that allocated Green Belt sites for housing. Policy DM13 supports new buildings allocated in the Site Allocations DPD and yet no discussion has taken place in this regard.
- 2 Paragraph 1.14 says that the Regulation 19 consultation is informed by the Regulation 18 consultation. However, no public expression of the consultation or the core allocation proposals in the Site Allocations DPD that was published for Regulation 18 consultation has been discussed by the Council.
- 3 Section 1.14 does not take account of the 28,000 representations received on the Site Allocations Regulation 18 consultation.
- 4 Whilst paragraph 5.48 protects the visual amenity of the Green Belt, the Council is taking all Green Belt land in Mayford for dense housing and 50% affordable housing.
- 5 The voice of the people who will be affected by the DPD has not been given credence. Any recommendation should be in the open and not hidden in blanket coverage as Regulation 19 consultation.

Officer response

- 1 The Development Management Policies DPD is a separate Development Plan Document from the Site Allocations DPD, and it does not allocate sites for development. It sets out detailed policies to help determine day to day planning applications. It was published for Regulation 18 consultation between 19 February 2015 and 3 April 2015. The representations received were used to inform the Publication version that was published for consultation between 26 October and 7 December 2015. The Council published a schedule on how the representations had informed changes in the Publication version. This is on the Council's website (www.woking.gov.uk).

The reference in Policy DM13 of the Development Management Policies DPD to the Site Allocations DPD is to establish the principle that if any site is allocated in the Site Allocations DPD, the development of that site as a matter of principle will not be inappropriate development. This is a statement of fact, which the policy is reiterating.

The Council is also committed to preparing the Site Allocations DPD, which will allocate specific sites for development. This process is presently running in parallel with the Development Management Policies DPD but is of different nature and content. The Regulation 18 consultation on the Site Allocations DPD was between 18 June 2015 and 31 July 2015. The Council is in the process of analysing the representations that were received and will be taking that into account before publishing the Publication version of the DPD. The relevant committees of the Council will be considering a report in due course about how the representations should inform the Publication version of the DPD. The Publication version of the DPD will be published for a Regulation 19 consultation to give the

public the opportunity to make their representations before it is submitted to the Secretary of State for Examination.

The Council is considering a revised timetable for the preparation of the Site Allocations DPD and this will be published in the revised Local Development Scheme. The relevant committee papers relating to the Site Allocations DPD will be in the public domain when they are published. The above response also addresses points 2 to 5 above.

Proposed modification

No modification is being proposed as a result of the representation.

Savills (on behalf of Thames Water)
Summary of representations

- 1 In order for the Local Plan to be effective and compliant with the NPPF, there should be a policy dealing with water and sewerage infrastructure. The following draft policy is suggested: ‘

Planning permission will only be granted for development which increases the demand for off-site service infrastructure where:

- a. Sufficient capacity already exists or
- b. Extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.

When there is a capacity problem and improvements in off-site infrastructure are not programmed by the water company, planning permission will only be granted where the developer sets out how the appropriate infrastructure improvements will be delivered and completed prior to occupation of the development.

The development or expansion of water supply or waste water facilities will be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development, or in the interest of long term water and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impacts is minimised.

A separate text has been suggested for the reasoned justification.

Officer response

- 1 Policy CS16: *Infrastructure delivery* of the Core Strategy provides a definition of infrastructure to include transport, Affordable Housing, education, health, social and community infrastructure, public services, utilities (such as gas supply, electricity supply, water supply, waste water treatment, telecommunications infrastructure), flood alleviation measures and green infrastructure. It will be misleading to single out water and sewerage infrastructure for a separate standalone policy. Whilst Policy CS16 covers all types of infrastructure, it is sufficiently comprehensive to cover the objectives that the representation seeks to achieve for water supply and water treatment. The proposed modification will be unnecessary repetition of what is already covered in the Core Strategy.

Proposed modification

No modification is being proposed as a result of the representation.

Ian Motuel (on behalf of Waverley Borough Council)

- 1 The policies are local to Woking and therefore do not wish to submit any formal representations. However, Waverley Borough Council would repeat its comment on the Site Allocations DPD Regulation 18 consultation that Woking Borough Council should commence a review of its Core Strategy, giving that much has changed since it was adopted in 2012.

Officer response

- 1 The Core Strategy has an in-built mechanism for monitoring and review. This matter is therefore not for the Development Management Policies DPD to address. It is acknowledged that Waverley Borough Council has made representations to the Site Allocations DPD. This will be dealt with separately through the Site Allocations DPD process.

Proposed modification

No modification is being proposed as a result of the representation.

Raakhee Patel (on behalf of Sports England)

Summary of representations

- 1 Sports England generally supports the recognition of development for outdoor recreation and sports activities and ancillary development. However, Policy DM3 remains unduly prescriptive and could result in essential new facilities being refused planning permission. The policy should be redrafted to more positively encourage outdoor sports and recreational facilities. The policy should include reference to paragraph 74 of the NPPF to ensure that there are no adverse effects on existing sports and facilities. The policy should also include reference to paragraph 81 of the NPPF to ensure greater flexibility and a more positive approach to outdoor sport and recreation development in the Green Belt.
- 2 Policy DM13 does not take account of the need to provide opportunities for outdoor sport and recreation in the Green Belt. The policy should be amended to allow for buildings that support outdoor sport and recreation in the Green Belt to be granted planning permission.
- 3 Policy DM21 acknowledges provision of indoor and outdoor recreational and amenity space. However, there should also be explicit reference to sports in recognition to its benefits.

Officer response

- 1 Policy DM3 clearly emphasises the Council's support for outdoor recreation and sports activities in appropriate circumstances. The policy provides a useful framework for managing development in both the urban area and within the Green Belt. However, that needs to be balanced with the protection of the Green Belt, heritage assets, versatile agricultural land and the amenity of nearby residents. In this regard, the Council do not consider the policy to be unduly prescriptive. The policy is positively drafted to permit planning permission for proposals that meets the prescribed criteria. The suggestion to include reference to paragraphs 74 and 81 of the NPPF is noted. However, particular attention should rather be drawn to paragraph 89 of the NPPF, which provides guidance on acceptable development in the Green Belt where most proposals that will be relevant to the policy are likely to occur. It emphasises that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include the provision of appropriate facilities for outdoor sport and outdoor recreation as long as it preserves the openness of the Green Belt and does not conflict with the purpose of including land within it. The NPPF therefore does not give a blanket support for outdoor sport and outdoor recreation if it will undermine the openness of the Green Belt. The exception also refers to the provision of *appropriate* facilities for outdoor sports and outdoor recreation (this implies that not all facilities will be appropriate). Policy DM3 reflects these requirements. The Council should be able to refuse planning applications that does not meet the requirements of the policy and or the NPPF. Policy CS17: *Open space, green infrastructure, sport and recreation* of the Core Strategy is robust enough to protect the loss of

sport and recreational facilities. It also makes provision to enable the delivery of new facilities. In accordance with paragraph 1.3 of Development Management Policies DPD, no purpose will be served by repeating this policy.

- 2 The first paragraph of Policy DM13 makes reference to the exceptions under Section 9 of the NPPF and Policy CS6: *Green Belt* of the Core Strategy. The exceptions include outdoor sport and outdoor recreation that preserves the openness of the Green Belt and does not conflict with the purpose of including land within it. The objective of the representation has already been covered by the policy and no purpose will be served by repeating it.
- 3 The suggestion for an explicit reference to sports in the policy is reasonable. The last but one bullet point should be amended by inserting 'outdoor sport' after outdoor recreation.

Proposed modification

The last but one bullet point of Policy DM21 should be modified by inserting outdoor sports after outdoor recreation.

Philip Riley (on behalf of Basingstoke Canal Society)

Summary of representations

- 1 The word 'permitted' in paragraph 3.37 that states recreational, navigational and ancillary facilities will be 'permitted' should be replaced by 'encouraged'.
- 2 Policy DM4 mingles two issues – the concept of permanent residential moorings and the idea of creating off-line moorings, boat basins. The Basingstoke Canal Society have always argued against the provision of more permanent residential moorings but very much in favour of establishing new boat basins and other forms of off-line mooring in view of the clear need to provide additional mooring facilities on the canal.
- 3 There should be a restriction on the heights of new buildings within, say 50m of the canal. Within that area, buildings should not exceed 2 storeys and an adequate margin of undeveloped land between the canal and the nearest structure should be stipulated in any planning consent.
- 4 There is a word missing at the end of paragraph 3.47.
- 5 The canal requires regular dredging. The disposal of the dredged silt presents a problem in the urban area. There should be a policy to ensure that the Council cooperates with Basingstoke Canal Association and Surrey County Council to identify silt disposal sites either adjacent to the canal or elsewhere in the Borough.

Officer response

- 1 As a point of correction, the word 'permitted' in the context suggested by the representation appears in paragraph two of Policy DM4 instead of paragraph 3.37. The word permitted is appropriate in this context because it provides a clear and a positive intention of the Council to permit planning permission for the recreational, navigational and ancillary facilities along the canal if the criteria set out in the policy are met. It is a stronger positive intention than encouraged. The Council will continue to work with interested parties to encourage the recreational and navigational use of the canal through the implementation of the policy. This point can be highlighted by adding the following to paragraph 3.40: 'The Council will work in partnership with the Basingstoke Canal Authority, Surrey County Council and other interested parties to encourage the delivery of the aims of the policy. This will include partnership working in identifying suitable silt disposal sites after dredging. The appropriateness of any site for silt deposit will be considered on a case by case basis when a need is justified'.
- 2 The last paragraph of the Policy intentionally deals with both permanent residential moorings and the creation of off-line, moorings, boat basins. Whilst the Council is aware that the Basingstoke Canal Authority has always argued against the provision of more permanent residential moorings, it is important that the policy allows some flexibility in exceptional circumstances for the consideration of such proposals on a case by case basis depending on the merits of the proposal. In any case, Policy DM4 is clear that the Council will take into account any relevant

- advice from the Basingstoke Canal Authority in assessing proposals likely to have an impact on the canal and its setting.
- 3 Policy CS17 of the Core Strategy requires undeveloped buffer zones alongside watercourses including the Basingstoke Canal. The policy recommends 8 metres for main rivers and 5 metres for ordinary water courses. No purpose will be served by repeating this in the DPD. It will be unnecessarily prescriptive to specify the number of storeys for development along the canal. It is important that each application is determined on its own merits taken into account the particular locational circumstance of the development.
 - 4 It is noted that something is missing from the last sentence of paragraph 3.47. The sentence should have read: Where embankment toe drains exist they are to be preserved and incorporated into the drainage scheme of any development. The paragraph should be modified accordingly.
 - 5 This has been addressed in point one above.

Proposed modification

Paragraph 3.40 should be modified by adding the following: 'The Council will work in partnership with the Basingstoke Canal Authority, Surrey County Council and other interested parties to encourage the delivery of the aims of the policy. This will include partnership working in identifying suitable silt disposal sites after dredging. The appropriateness of any site for silt deposit will be considered on a case by case basis when a need is justified'.

The last sentence of Paragraph 3.47 should be modified by adding: 'preserved and incorporated into the drainage scheme of any development'.

Mike Waite – (on behalf of Surrey Wildlife Trust

Summary of representations

- 1 DM1 – Surrey Wildlife Trust should be replaced with Surrey Nature Partnership.

Officer response

- 1 The suggested change is a statement of fact, which is acceptable.

Proposed modification

Reference to Surrey Wildlife Trust in Policy DM1 should be replaced with Surrey Nature Partnership.

Hook Heath Neighbourhood Forum

Summary of representations

- 1 The introduction section of the DPD should make reference to Neighbourhood Plans and their place in the hierarchy of planning documents. A new paragraph 1.2 should be inserted as follows:
Neighbourhood planning Regulations were passed into law in 2012. The Regulations enable communities to establish Neighbourhood Forums, define Neighbourhood Areas and develop Neighbourhood Plans for the defined Neighbourhood Area. Once a Neighbourhood Plan is made, the policies it contains become part of the legal planning framework, and have the same material weight and standing as policies in the Core Strategy. Where they exist, Neighbourhood Plans will therefore be used with the Core Strategy, to determine development in the areas to which the respective Plans relate.
- 2 Reference to Green Belt boundary review report should be deleted and specific reference made to the fact that the evidence is under review. Evidence has been submitted to demonstrate that the Green Belt boundary review is not robust and should not be referred to.
- 3 There are two paragraphs numbered 1.18. A suggestion is made to insert a new heading and a paragraph after the second paragraph 1.18 as follows: Neighbourhood Plans set out a clear vision for the neighbourhood to which it applies. They include specific policies for their areas which have been examined to ensure they are consistent with the NPPF and the Core Strategy. They must therefore be taken together with the Core strategy and this DPD when determining planning applications.
- 4 Paragraph 3.1 – second sentence ‘consists’ should be replaced by contains as consists implies that there is nothing else.
- 5 Policy DM1 – additional bullet point should be added to read:
development proposals which would result in significant harm to the broader green infrastructure network will only be considered if ‘the benefit arising from the development is of sufficient value to outweigh any harm caused.
- 6 There are two paragraphs numbered 5.43.
- 7 The first sentence of Policy DM13 that reads ‘the Site Allocations DPD does not allocate buildings’ does not make sense. It should be reworded as ‘unless very special circumstances can be demonstrated, the Council will regard the construction of new buildings in the Green Belt as inappropriate.
- 8 The following should be added to the first bullet point of policy DM15 ‘ or it can be demonstrated that competition from nearby development has reduced the viability of the shop’.
- 9 Policy DM18: insert a new paragraph 3 as follows: advertisement proposals on other heritage assets will only be permitted in they do not spoil the character of the building or the street scene.
- 10 The last paragraph of Policy DM20 should be prefix by ‘in general’.
- 11 Implementation and monitoring – paragraph 8.2 should begin ‘when it is’ and not ‘is it’

- 12 Appendix 1 – evidence base documents – add as second bullet point ‘Neighbourhood Plans when made, and their supporting documents.

Officer response

- 1 This representation has been comprehensively covered in the Officer response to representations made by Mike Cooke (Chairman of the Hook Heath Neighbourhood Forum). No purpose will be served by repeating that.
- 2 Reference to the Green Belt boundary review report is appropriate in this context. The report continues to be published and a robust evidence base of the Council.
- 3 The numbering of 1.18 twice is an editorial error that has been noted and will be corrected. The first paragraph 1.18 should be replaced by 1.17 and the subsequent paragraph numbers modified as a consequence. The suggested new paragraph has already been covered in a previous response.
- 4 The proposed change of ‘consists’ to ‘contain’ is reasonable and the DPD will be modified accordingly.
- 5 The proposed additional bullet point is a reasonable addition. The DPD should therefore be modified by adding: ‘the benefit arising from the development is of sufficient value to objectives of the Development Plan to outweigh any harm caused’.
- 6 The numbering of 5.43 twice is an editorial error that has been noted and will be corrected. The first paragraph 5.43 should be replaced by paragraph number 5.39 and the subsequent paragraph numbers modified as a consequence.
- 7 The wording of the first sentence of Policy DM13 is mainly appropriate in the context of the objective that the policy seeks to achieve. To provide further clarification it is proposed that the first sentence of the policy be redrafted as follows: ‘Unless very special circumstances can be clearly demonstrated, the Council will regard the construction of new buildings and forms of development other than those specifically identified on allocated sites in the Site Allocations DPD as inappropriate in the Green Belt’.
- 8 It is not intended to use the policies of the DPD to influence or intervene in the competition amongst businesses. The proposed wording is therefore unacceptable.
- 9 The Glossary of the Core Strategy defines the heritage assets of the Borough. To be all encompassing in ensuring that the overall heritage assets of the area is not compromised by development, it will be reasonable to include a paragraph that covers all the other heritage assets. A new paragraph 4 should be inserted in Policy DM18 as follows: ‘Advertisement proposals on other heritage assets or areas will only be permitted if they will preserve or enhance particular features of architectural or historic interest’.
- 10 The last paragraph of Policy DM20 is appropriately worded in the context of the objectives that it seeks to achieve. However, the first sentence of

the paragraph can be reworded to provide further clarification as follows:
'The Council will not permit the demolition of heritage assets except in exceptional circumstances. Where partial or total demolition of a heritage asset is permitted in exceptional circumstances, a high standard of design will be required in any replacement building'.

- 11 The words 'is it' in the first line of paragraph 8.2 should be 'it is'. This is an editorial error that should be corrected.
- 12 It is reasonable to add 'adopted Neighbourhood Plans' to the list of evidence base in Appendix 1.

Proposed modifications

The first paragraph 1.18 on page 9 should be replaced by 1.17 and the subsequent paragraph numbers modified accordingly.

The word 'consists' in the second sentence of paragraph 3.1 should be replaced with 'contain'.

The fifth paragraph of Policy DM1 should be modified by adding the following bullet point: 'the benefit arising from the development is of sufficient value to the overall objectives of the Development Plan to outweigh any harm caused'.

The paragraph number 5.43 on page 55 should be replaced with paragraph number 5.39 and the subsequent paragraph numbers modified accordingly.

The first sentence of Policy DM13 should be replaced by: 'Unless very special circumstances can be clearly demonstrated, the Council will regard the construction of new buildings and forms of development other than those specifically identified on allocated sites in the Site Allocations DPD as inappropriate in the Green Belt'.

A new paragraph 4 should be inserted in Policy DM18 as follows: 'Advertisement proposals on other heritage assets or areas will only be permitted if they will preserve or enhance particular features of architectural or historic interest'.

The first sentence of the last paragraph of Policy DM20 should be replaced with: 'The Council will not permit the demolition of heritage assets except in exceptional circumstances. Where partial or total demolition of a heritage asset is permitted in exceptional circumstances, a high standard of design will be required in any replacement building'.

The words 'is it' in the first line of paragraph 8.2 should be replaced with 'it is'.

'Adopted Neighbourhood Plans' should be added to the list of evidence base in Appendix 1.

British sign and graphics association

Summary of representations

- 1 The following legal corrections are suggested to policy DM18: replace conserve with preserve, planning permission in the penultimate paragraph should be replaced with express consent or advertisement consent.
- 2 The final paragraph of Policy DM18 should make it clear that any condition requiring removal or discontinuance may only be imposed where there are specific reasons for the condition, and that these must be stated and explained on the grant of express consent.
- 3 Reference to need in paragraph 6.14 should be deleted because an application cannot be refused on grounds of being unnecessary.
- 4 Paragraph 6.12 makes reference to road traffic safety and highway safety. For simplicity one should be deleted.
- 5 The law does not allow considerations to be restricted to whether they would 'add to visual interest' as set out in paragraph 6.13 of the DPD. Provided the advertisement does not detract from amenity or public safety, it must be allowed. There is no reason small internally illuminated 'plastic boxes' should unlikely be suitable. Each must be considered on its individual merits. The whole paragraph should be deleted.
- 6 The first two sentences of paragraph 6.15 should be positively prepared as follows: Bulky, fully illuminated box signs, crudely attached to an existing fascia, are unlikely to be acceptable. Slimline box signs with individual illuminated letters and logos, or halo illuminated signs are often more appropriate. External illumination from discreetly located spotlights, or through trough lighting, is also often more appropriate.
- 7 The phrase 'in limited circumstances' in paragraph 6.16 should be replaced with 'sign posting in rural areas'.
- 8 Reference to NPPG Advertisements and to the free DCLG advisory booklet – Outdoor Advertisement and Signs – A Guide for Advertisers should be added to the Policy Links.

Officer response

- 1 The proposed change of 'conserve' to 'preserve' in Policy DM18 is reasonable. Consequently, 'conserve' in paragraph 2 and 3 of Policy DM18 should be replaced with 'preserve'. The suggested use of express consent instead of planning permission is legally preferable. The Planning Practice Guidance (PPG) clarifies the various types of advertisement consents and the use of express consent will be appropriate in this context. The words 'planning permission' in the penultimate paragraph of Policy DM18 should be replaced with 'express consent'.
- 2 The PPG sets out the standard conditions that would apply to any advertisement consent. If the Council wishes to impose additional conditions they must be supported by specific and relevant planning reasons. This point can be clarified in the Policy. It is also stressed that a condition has to be attached to any consent to require the removal of an advertisement at the end of the express consent period. Policy DM18 should be modified by an additional paragraph at the end of the policy as follows: 'The Planning Practice Guidance sets out the standard conditions

- for all types of advertisement consent. If the Council wishes to impose additional conditions it will specify the relevant planning reasons on the express consent why the conditions are imposed’.
- 3 References to the word ‘need’ in paragraph 6.14 are appropriate in their context and should be retained. They do not imply that decisions by the Council about the appropriateness of the advertisement will be judged on need.
 - 4 For consistency and simplicity ‘highway safety’ should be used instead of ‘road traffic safety’ in paragraph 6.12.
 - 5 To reflect the objectives of the PPG on advertisements, the first sentences of paragraph 6.13 should be modified as follows: ‘Projecting signs will only be permitted if it is considered that it is not harmful to public safety and amenity and are of appropriate materials and dimensions. The second sentence beginning with ‘Small plastic box signs ...’ should be deleted to allow each application to be determined on its merits.
 - 6 The wording of paragraph 6.15 is appropriate in this context. It communicates a clear message of what is appropriate to minimise any adverse effects caused by displays and shop signs, to help preserve and/or enhance the character of Conservation Areas. The wording does not absolutely rule out consideration of other forms of shop sign or displays on a case by case basis other than individually illuminated letters or indirect light from spot lights. The suggested wording implies that illuminated box signs should be bulky or crudely attached to be inappropriate. This is not always the case.
 - 7 The PPG provides some guidance on sign posting in rural areas. In this context, the suggested wording by the representation is reasonable. The words ‘in limited circumstance’ in paragraph 6.16 should be deleted and replaced with ‘if it is in relation to sign posting in rural areas’.
 - 8 The following contains useful information to merit adding to the list under the supporting guidance: Planning Practice Guidance – advertisements and DCLG advisory booklet – Outdoor Advertisement and Signs – A guide for Advertisers.

Proposed modification

The word ‘conserve’ in paragraphs 2 and 3 of Policy DM18 should be replaced with ‘preserve’.

The words ‘planning permission’ in the penultimate paragraph of Policy DM18 should be replaced with ‘express consent’.

Policy DM18 should be modified by an additional paragraph at the end of the policy as follows: ‘The Planning Practice Guidance sets out the standard conditions for all types of advertisement consent. If the Council wishes to impose additional conditions it will specify the relevant planning reasons on the express consent why the conditions are imposed’.

The words ‘highway safety’ should replace ‘road traffic safety’ in paragraph 6.12.

The first sentences of paragraph 6.13 should be modified as follows: ‘Projecting signs will only be permitted if it is considered that it is not harmful to public safety and amenity and are of appropriate materials and dimensions’.

The second sentence of paragraph 6.13 beginning with ‘Small plastic box signs ...’ should be deleted.

The words 'in limited circumstance' in paragraph 6.16 should be deleted and replaced with 'if it is in relation to sign posting in rural areas'.
The following should be added to the supporting guidance under Policy links:
Planning Practice Guidance – advertisements and DCLG advisory booklet – Outdoor Advertisement and Signs – A guide for Advertisers.

Tony Howe – County Archaeologist and Manager, Surrey County Council
Summary of representations

- 1 The following wording in Policy DM20: 'The Council will not permit the demolition of heritage assets, but where partial or total demolition of a heritage asset is permitted in exceptional circumstances, a high standard of design will be required in any replacement building' should be replaced with 'The Council will resist the demolition of heritage assets except in exceptional circumstances, but where partial or total demolition of a heritage asset is permitted, a high standard of design will be required in any replacement building' This is necessary because the demolition of heritage assets is not prohibited in national legislation, just discouraged.
- 2 The Council should consider if the provisions of Policy DM20 are fully deliverable and what new and further measures might be necessary to ensure this. The Council will have to scrutinise proposals to ensure that new designs are in keeping with existing heritage landscape, ensure that features such as street fittings are sympathetically designed, enforce the submission of acceptable professional heritage statements from applicants etc.

Officer response

- 1 The representation has already been comprehensively addressed by the Officer response to representations by Hook Heath Neighbourhood Forum.
- 2 The Council is committed to preserve the heritage assets of the area and work in partnership with all interest parties to ensure the delivery and enforcement of the requirements of the policy. The Council is also investing in urban design expertise to scrutinise proposals when they come forward. Organisations such as the County Council will be consulted on relevant applications when it is necessary to do so.

Proposed modification

No modifications are being proposed as result of this representation.

Stephen Saviker**Summary of representations**

- 1 DM1 - It seems quite vague and not clear about where and when new Green Infrastructure assets will be required. The wording is not strong enough to ensure the required results.
- 2 DM2 – Where retaining trees or hedgerows it would be useful to say that developers must comply with RHS.
- 3 DM7 – is an appropriate level of mitigation calculable?; would it be easy to argue against. A firm wording will be needed.

Officer response

- 1 Policies CS16: *Infrastructure delivery* and CS17: *Open space, green infrastructure, sport and recreation* and Appendix 5 of the Core Strategy sets out clear standards to achieve regarding green infrastructure. Policy DM1 is not intending to repeat that but to be read in conjunction with them. Taking as whole, the policy is not vague as suggested.
- 2 The British Standards (BS5837) is the most relevant set of standards, which are taking into account when considering development with implications for trees. This is already referred to in the other supporting guidance.
- 3 There are acceptable standards for noise and light pollution. In this regard, acceptable levels of mitigation can be agreed and enforced by condition. The policy sets out the factors that will have to be taken into account is assessing any scheme of mitigation.

Proposed modification

No modifications are being proposed as a result of this representation.

Alice May (on behalf of Martin Grant Homes)

Summary of representations

- 1 The overall approach to meeting housing need is unsound. The DPD is not positively prepared. To meet objectively assessed need for housing and be consistent with achieving sustainable development, the Site Allocations DPD should be brought forward in advance of the DM Policies DPD or at the very least at the same time. The Site Allocations DPD should be prioritised over the DM Policies DPD.
- 2 The DPD is not effective as it will not deliver housing to meet housing need, and will add an additional layer of policy, particularly in relation to Policy DM13.
- 3 The DPD is not consistent with national policy to boost significantly the supply of housing. Policy DM13 is not consistent to recent changes to Green Belt policy and should be deleted. It does not add anything that is not covered by local or national policy. The policy is not filling any policy gap as there are no saved local plan policies relating to buildings in the Green Belt which require replacing.

Officer response

- 1 Paragraph 1.10 of the Core Strategy commits the Council to prepare both the Site Allocations DPD and the Development Management Policies DPD. Both are necessary to ensure the delivery of the Core Strategy and are being prepared in parallel. They both perform different purposes in setting the necessary policy framework for managing development in the area and delivering the requirements of the Core Strategy. The Council has a Local Development Scheme and a work programme for the preparation of the two DPDs, and have allocated resources accordingly to ensure their preparation. It is not envisaged that the preparation of the Development Management Policies DPD will undermine the timetable for the preparation of the Site Allocations DPD.
- 2 The DPD has a clear purpose to set out detailed policies to help determine day to day planning applications. The Core Strategy sets out the strategic context for the Borough's housing requirement, its broad distribution and the standards that development should achieve. The Site Allocations DPD allocates specific sites for various types of development. All three DPDs have different purposes, and it is not intended that the Development Management Policies DPD will be allocating sites to deliver housing to meet the objectively assessed housing need. It is emphasised that the Council has identified about 6.4 years housing land supply over and above the required 5 year housing land supply. The suggestion that housing completions are lagging because of lack of supply of housing land is incorrect.
- 3 This representation has been addressed above. The Council considers Policy DM13 to be relevant in managing development in and adjacent to the Green Belt.

Proposed modification

No modification is proposed as a result of this representation.

Historic England

Summary of representations

- 1 Policy link on page 79 should also provide a link to the National Heritage List for England (<http://www.historicengland.org.uk/listing/the-list/>) and the Heritage Gateway.
- 2 The word 'compliment' in paragraph 6.31 should be 'complement'.
- 3 On monitoring, it may be helpful to include an additional measure of the effectiveness of the policy in preserving and enhancing heritage assets related to heritage at risk. This will provide a good indication of the trends in the condition of the historic environment and the effectiveness of the implementation of the policy.

Officer response

- 1 The National Heritage List and the Heritage Gateway contains useful information to signpost to. The links should therefore be added to the Policy Link on page 79.
- 2 The word compliment in paragraph 6.31 should be replaced with complement. It is an editorial error that should be corrected.
- 3 Appendix 3, the indicator under Policy DM20 in Table 3 should be modified by adding 'the number of heritage assets at risk'. The measure under Policy DM20 should be modified by adding "the effectiveness of the policy in preserving and enhancing heritage assets at risk'.

Proposed modification

The following should be added to the Policy Link under Policy DM20 on page 79: The National Heritage List for England at: <http://www.historicengland.org.uk/listing/the-list/>.

The following should be added to the Policy Link under Policy DM20 on page 79: Heritage Gateway.

Appendix 3, the indicator under Policy DM20 in Table 3 should be modified by adding 'the number of heritage assets at risk'. The measure under Policy DM20 should be modified by adding "the effectiveness of the policy in preserving and enhancing heritage assets at risk'.

Iain Warner – Tetlow King (on behalf of Retirement Villages Group Ltd)

Summary of representations

- 1 The Council is pursuing a suite of documents to form the Local Plan that is considered unsound in terms of providing a joined up thinking approach for the proper planning within the specialist field. For example, the draft Site Allocations DPD failed to allocate specific new sites to meet identified need for specialist housing. It is clear that the Core Strategy and the emerging Site Allocations DPD are currently failing to ensure that the demand for specialist housing is met. The Development Management Policies DPD does not allocate new sites either but only focus on the use of existing buildings through sub-divisions and conversions etc. Furthermore, the Site Allocations DPD was published before the latest version of the Strategic Housing Market Assessment. In the light of the importance of ensuring the provision of sufficient levels of specialist housing for the elderly, the DPD's approach of only considering additional provision through conversion and sub-division of existing properties is not an appropriate solution to the problem.
- 2 The DPD should set clear criteria for determining planning applications for specialist housing for the elderly. The DPD should include reference to the need for sites to be able to accommodate at least 50 Extra Care Housing units, the need to provide those services and facilities set out in the North West Surrey Extra Care Housing Strategy, the need to identify sites that are in sustainable locations and the potential for co-locating a nursing/residential care home on part of the site where there is an identified need.
- 3 There should be a mechanism for monitoring the specific delivery of specialist housing across the plan period.

Officer response

- 1 The Core Strategy and the Site Allocations DPD are separate documents from the Development Management Policies DPD and by way of the process for their preparation should be treated as such. They will collectively help achieve the sustainable development of the area. It is a considered decision of the Council to prepare the documents separately. The Council has an up to date sound Core Strategy that is in general conformity with the NPPF. The Core Strategy sets out the overall spatial strategy for the Borough, the quantity of development and their broad distribution. Paragraph 1.10 of the Core Strategy commits the Council to prepare the Site Allocations DPD and the Development Management Policies DPD. These DPDs are necessary to enable the comprehensive delivery of the Core Strategy. Policy CS13: *Older people and vulnerable groups* offer an in-principle support to elderly people's accommodation. The purpose of the Development Management Policies DPD is to prepare detailed policies for determining day to day planning applications. It is never intended for it to allocate specific sites for development. That is a matter for the Site Allocations DPD. The Council does not accept it is pursuing a local plan that is unsound and neither does it accept that its overall approach is not joined up. The Site Allocations DPD process is on-going and it will not be helpful to second guess its outcome at this stage. It is acknowledged that the Retirement Villages Group Ltd has made

representation to the Site Allocations DPD Regulation 18 consultation, which will appropriately be taken into account as part of that process. The housing need figures in the 2015 Strategic Housing Market Assessment are broadly similar to the 2009 SHMA. Whilst the Council had the opportunity to take into account the 2015 SHMA before the DPD was published for Regulation 19 consultation, there is no significant new evidence in the study that would change the policies of the DPD.

- 2 Policy CS13 of the Core Strategy and other policies of the Core Strategy are sufficiently comprehensive to enable consideration of any application that might come forward for the provision of elderly people accommodation. The rest of the representation has been addressed above.
- 3 Appendix 5 of the Core Strategy includes a clear monitoring framework for monitoring the delivery of specialist accommodation. No purpose will be served by repeating that in the Development Management Policies DPD.

Proposed modification

No modification is being proposed as result of this representation.

Katharine Harrison (on behalf of Surrey County Council)

Summary of representations

- 1 Reference should be made to the government's policy on SUDs and to the Council's own guidance contained in an advice note. A suggested new paragraph to be inserted after paragraph 2.3 has been provided as follows: Core Strategy Policy CS9 requires relevant development to incorporate appropriate sustainable drainage systems (SUDS) as part of any development proposals. This is in line with new Government Policy introduced in April 2015 which requires the provision of SUDS for all new major developments. The Borough Council has prepared an advice note on SUDS which is available to download from the Council's website. Similarly, there should be an additional reference to the advice note in paragraph 8.5 after the references to SUDS in paragraphs 3.4 and 4.14.
- 2 Support Policy DM4 but there is an omission from the last sentence of paragraph 3.47.

Officer response

- 1 This matter has been adequately and appropriately covered under paragraph 4.14 of the DPD, and no purpose will be served by repeating that as a separate paragraph in section 2. Paragraph 4.14 should be expanded by adding a sentence to acknowledge the existence of the Council's Advice Note on SUDS as follows: The Council has published an Advice Note on SUDS, which is available to download on the Council website. This is in line with the Government's policy on SUDS to require the provision of SUDS for all major developments. The Policy Link under Policy DM6 should be modified by adding the link to the Advice Note as follows: <http://www.woking.gov.uk/planning/service/suds/sudadvice>.
- 2 This matter has already been addressed.

Proposed modification

Paragraph 4.14 should be modified by adding the following sentence: The Council has published an Advice Note on SUDS, which is available to download on the Council website. This is in line with the Government policy on SUDS to require the provision of SUDS for all new major developments.

The Policy Link under Policy DM6 should be modified by adding the following link: <http://www.woking.gov.uk/planning/service/suds/sudadvice>.

Stephanie O'Callaghan (on behalf of Scotia Gas Network)

Summary of representations

- 1 The Core Strategy allows for the redevelopment of B Class uses for alternative uses that accord with other policies in the Core Strategy. However, the Council has not given due regard to the significant costs related to the decontamination of the former Gas Holder site on Boundary Road, which thus would require uses of sufficient value to ensure the redevelopment of the site is viable. It is essential that the site is allocated for uses of sufficient value to ensure that redevelopment is viable, taking into account the significant abnormal costs of the enabling works. The future uses of the site should be considered within the emerging plan.
- 2 The DPD should include the following policy to recognise the importance of viability of the site and the associated costs required to make the site suitable for alternative higher value uses such as residential: 'Hazardous installations will be identified in the adopted Proposals Map. The Council will take account of the need to incentivise and fund decommissioning as part of any redevelopment proposal through higher value land uses'.

Officer response

- 1 The site is in an employment area and is identified in the Site Allocations DPD to contribute towards the employment needs of the area. The Council is of the view that the site continue to be a suitable employment land and the proposed uses should enable the site to come forward. Having said that, this matter is outside the scope of this DPD because it does not allocate sites for development. This is a matter for the Site Allocations DPD which is a separate process.
- 2 See response to one above. The suggested additional policy is unacceptable. The Council has no intention to fund the decommissioning cost of the site.

Proposed modifications

No modification is proposed as a result of this representation.

Kieran Gregson (on behalf of Burhill Group Limited)

Summary of representations

- 1 Paragraph 5.46 (should be paragraph 5.52) implies that all associated features such as fences and walls, driveways, domestic paraphernalia and ancillary buildings harm the open character of the area. This might not be the case as each proposal should be judged on its merits. The word 'may' should be inserted between buildings and harm in that sentence.

Officer response

- 1 It is accepted that not all associated features will be harmful to the open character of the area. It is proposed to insert 'could' between 'buildings' and 'harm' in the last but one line of paragraph 5.46 to highlight this point.

Proposed modification

Paragraph 5.46 should be modified by inserting 'could' between 'buildings' and 'harm' in the last but one line of the paragraph.

Brookwood and Bridley Neighbourhood Forum

Summary of representations

- 1 Welcome the Council's assurance to work with local communities through Neighbourhood Plans to make sure that Green Infrastructure achieves maximum benefit to the Neighbourhood Area. It is suggested that Brookwood Cemetery should be one place that the Council could provide safe footpaths and cycle access to reduce the need to travel by the car.
- 2 Whilst trees are generally a great asset and benefit to the community and the environment, due consideration should also be given to the adverse effects mature trees can have on those living nearby. For example, mature trees can endanger lives and buildings and can restrict sunlight reaching neighbouring properties.
- 3 Support the approach taken by the Council on self build and custom housebuilding in the DM Policies DPD, but very surprised that in preparing the Site Allocations DPD the Council has refused to consider for allocation sites that would not yield at least 10 dwellings at an average density of 30dpd. There are a number of sites in Bridley which are suitable for low density housing and which can be developed without in any way infringing the Green Belt principles and without damage to the surrounding area. These sites will be highly suitable for self build homes.

Officer response

- 1 The point made about Brookwood Cemetery is noted. Brookwood cemetery is being considered as part of the Site Allocations DPD process, and this matter will appropriately be considered as part of that process.
- 2 Whilst the benefits of trees are clearly highlighted by the policy, it is also accepted that it might not always be beneficial to biodiversity and amenity in a limited number of cases and locations. For example, trees should not be planted on priority habitats such as lowland meadows or along water courses that are already very shaded. It is proposed that an additional sentence be added to paragraph 3.15 to highlight this as follows: 'Whilst the benefits of trees are acknowledged, the Council is also aware that trees might not always be beneficial to some forms of biodiversity, and they need to be maintained to avoid potential danger to safety, property and amenity. This will be taken into account in planning decisions'.
- 3 The DPD appropriately offers an in-principle support to self build and custom housebuilding. The allocation of sites is a matter for the Site Allocations DPD process.

Proposed modifications

Additional sentence be added to paragraph 3.15 as follows: Whilst the benefits of trees are acknowledged, the Council is also aware that trees might not always be beneficial to some forms of biodiversity, and they need to be maintained to avoid potential danger to safety, property and amenity. This will be taken into account in planning decisions

Gladman Developments

Summary of representations

- 1 Since the Core Strategy was adopted, there have been significant changes to local plan making. The adopted Core Strategy recognises the need to undertake a Green Belt boundary review to meet housing need between 2022 and 2027. Now that the Green Belt boundary review has been completed it is considered that this is an appropriate juncture for the Council to consider whether the production of a single new local plan, taking account of the latest evidence on housing need would be more appropriate way of managing the Borough's development needs over the next 15 – 20 years.
- 2 The Council should take the opportunity to review its Objectively Assessed Need (OAN) in the light of more up-to-date information and population projections. The process for carrying out OAN and the key points to note has been highlighted.
- 3 To boost significantly the supply of housing, the Council should ensure that its housing requirement is sufficient to support demographic needs, economic growth and address market signals of affordability and demand.
- 4 The Council should ensure that it plans to deliver the full assessed need for affordable housing.
- 5 The requirements of Policy DM13 that deal with development adjoining the Green Belt or outside the Green Belt but conspicuous when viewed from it is onerous because it is already covered by Policy CS24 of the Core Strategy. It is also onerous because all proposals for development will be required to submit a landscape assessment to ensure landscape character is not harmed. The policy as draft appears to treat Green Belt as requiring special landscape protection. However, land is not designated as Green Belt because it has a landscape quality that needs to be protected.
- 6 The part of Policy DM20 requiring that where a development proposal affects the character or setting of a heritage asset, the applicant must show that the works are in 'harmony with' the heritage asset lacks precision and is too open to interpretation. It should be drafted to meet the requirements of paragraph 154 of the NPPF.

Officer response

- 1 Paragraph 1.10 of the Core Strategy sets out the Development Plan Documents that the Council wishes to prepare. This includes a separate Site Allocations DPD and a Development Management Policies DPD. The latest guidance on plan preparation allows flexibility for Local Planning Authorities to prepare separate Development Plan Documents if they wish to do so. The Council has an adopted Core Strategy that is post NPPF and has considered but taken the decision to prepare the Site Allocations DPD and the Development Management Policies DPD as separate documents. Both documents are being prepared expeditiously. This approach is not at odds with Government guidance.
- 2 The Council already has an up-to-date Strategic Housing Market Assessment with an up to date objectively assessed housing need. This was only published in September 2015. The SHMA had been prepared following good practice guidance, and is in line with the requirements of

- the NPPF. There is nothing in the SHMA that should require the immediate review of the Core strategy.
- 3 The Core Strategy sets out the housing requirement for the area of 292 dwellings per year (average). The Core Strategy (Policy CS12) also includes a policy on Affordable Housing with a clear target for Affordable Housing provision. The DPD and the Site Allocations DPD will facilitate the delivery of the housing requirement.
- 4 See 3 above.
- 5 The Council does not accept that the requirements of Policy DM13 are onerous. It provides a policy framework for determining applications for new building with Major Developed Sites in the Green Belt (there are two designated Major developed sites in the Borough), extensions and alterations, replacement and reuse of buildings. The Council continue to receive these types of application and the policy will be helpful in determining the applications. The policy does not require all proposals to submit a landscape assessment as suggested by the representation.
- 6 The part of the policy referred to is appropriately pitched to allow planning decisions to be made on the merits of individual proposals on a case by case basis.

Proposed modification

No modification is proposed as a result of this representation.

Greg Dowden (on behalf of McKay Securities PLC)

Summary of representations

- 1 Policy DM3 is unclear as to whether it relates just to formal buildings and playing pitches or other facilities as well. The Policy will not prevent development coming forward as easily as it should. The policy should make it clear whether it relates to buildings or to formal playing pitches or recreational facilities so that there is no ambiguity as to how the policy applies.
- 2 The part of Policy DM4 that relates to important views is insufficient and is entirely subjective because the important local views are not identified and the setting of the canal has not been mapped. The policy should be amended as follows: 'Development proposals which would conserve and enhance the landscape, heritage, architectural or ecological character, setting or enjoyment of the Basingstoke Canal and would not result in the loss of important views as illustrated on the Proposals Map will be permitted if all other relevant Development plan policies are met'.
- 3 Policy DM5 is vague and should provide robust guidance as to what constitute unacceptable impacts in relation to the environmental factors listed. The most important parts of the evidence should be incorporated into the reasoned justification. The policy should deal with the upper pollutant limits for each factor. It is also not clear that health and safety is a legitimate land use planning concern. Reference to unacceptable impacts should be deleted and replaced with specific, measurable criteria against which proposals can be examined.
- 4 Policy DM7 is not effective because there is no appropriate definition accompanying the light pollution section of the policy. The use of the word unduly causes uncertainty.
- 5 DM16 treats servicing of development as onerous which ignores its vital contribution in enabling economic activity and allowing it to continue. The policy should be redrafted to positively promote the importance of good servicing facilities in new development and positive criteria should be set which encourages new schemes to come forward. Rewording has been suggested.
- 6 Policy DM17 ineffective and unsound because the policy objective is vague and seeks to identify and encourage appropriate levels of activity and social interaction, which is not a planning policy objective. It also repeats the Woking Design Supplementary Planning Document (SPD). The policy requires only improvements to be made to the public realm and does not recognise that the preservation of the current standard can be satisfactory.
- 7 Policy DM18 is negatively phrased. It should be redrafted to use positive language. The policy is also excessively detailed and contradicts paragraph 67 of the NPPF which states that advertisements should be subject to control only in the interests of amenity and public safety.
- 8 Policy DM19 repeats guidance in the Design SPD. The duplication adds to unnecessary complexity which will reduce the effectiveness of the policy. The following has been suggested as a rewording: Proposals for new and replacement shopfronts will be permitted where they pay regard to the guidance set out in Woking Design SPD on shopfronts in terms of character, proportion, materiality, lighting and security.

- 9 Policy DM20 is unsound because it does not accurately reflect the correct legal or policy test for heritage assets which are conservation areas. It presently excludes development which would not preserve the conservation area rather than just enhance it. The word 'preserve and' should be inserted before enhance in the first bullet point of the policy.

Officer response

- 1 Policy DM13 is clear that the policy relates to extension and alterations to buildings, replacement of buildings, re-use of buildings and new buildings and facilities relating Major Developed Sites. There are two designated Major Developed Sites in the Borough and any new buildings or facilities within them should relate to the designated uses on the sites.
- 2 It will be unreasonable to anticipate and define views to and from the canal or potential future development on the Proposals Map for every proposal that might come forward. The Proposals Map identifies areas of protection, identifies safeguarded sites and sets out the areas to which specific policies apply. The way in which views to and from any of the designations are assessed should be considered on a case by case basis taken into account the merits of each proposal and the appropriate vantage points from which the views are taken.
- 3 Policy DM5 is not vague. There are unacceptable levels of pollutions regarding air quality, surface and ground water quality, land quality and health and safety of the public. The policy is clear to emphasise that the relevant experts will be consulted on relevant applications and their advice will help determine what is acceptable or unacceptable. The other supporting information has a link to relevant pollution information. A condition to limit pollution of any kind and the potential effect that might have on health and safety as a result of development is a legitimate planning issue.
- 4 There are acceptable standards for noise and light pollutions. The relevant experts will be consulted when necessary. The other supporting guidance includes a lot of relevant information to enable informed decisions to be made. It is not accepted that the policy creates uncertainty.
- 5 Policy DM16 is in the DPD because of the recognition of the importance of servicing of development to the functioning of the local economy. Nevertheless, it is important that its impacts are fully addressed and as such a balance needs to be struck between the two objectives. The policy as drafted struck that balance.
- 6 Policy DM17 seeks to encourage the integration of public realm in development. Public realm has a clear social function that is a legitimate planning function. Paragraph 7 of the NPPF sets out the purpose of the planning system, which is to contribute towards the achievement of sustainable development. The three dimensions of sustainable development are given as economic, social and environmental.
- 7 The policy provides a positive framework for determining applications. There are proposed modifications in response to representations by the

British Sign and Graphics Association that might address some of the comments raised by this representation.

- 8 Policy DM19 as drafted is necessary to give it the appropriate weight to determine planning applications on shopfronts. Shopfronts are a source of a significant number of applications, and the policy will contribute towards informing what needs to be taken into account when the applications are determined. The Design SPD is already referenced in the policy.
- 9 The suggestion to insert 'preserve' in the first bullet point of Policy DM20 is reasonable.

Proposed modification

The first bullet point of Policy DM20 should be modified by inserting 'preserve and' before enhance.

Anthony Heslehurst (on behalf of Thakeham Homes Ltd)

Summary of representations

- 1 Policy DM13 applies a presumption against development on land adjacent to the Green Belt and employs a wording that is anti-development, contrary to the aims and objectives of the NPPF. The policy is unacceptably vague and shifts the onus onto the applicant to demonstrate that development would not cause perceived harm. Green Belt issues are dealt with in detail within the NPPF and it is not considered necessary to revisit that in the DPD. The part of the policy that refers to 'development adjacent to the Green Belt' should be removed.
- 2 Although supportive of policy DM9, concern is expressed that applications will only be permitted 'provided the appropriate car parking standards for such development can be met'. Such proposals should not adhere to the full relevant car parking standards.
- 3 Policy DM10 is excessively restrictive and would make infill development difficult. This is in particular regarding to the following part of the policy 'provided that it does not involve the inappropriate sub-division of existing curtilage to a size below that prevailing in the area, taking account of the need to retain and enhance mature landscapes'.

Officer response

- 1 Policy DM13 sets out the circumstances under which certain types of development in and adjacent to the Green Belt will be considered. Strict controls are necessary to avoiding any harm to the purpose and integrity of the Green Belt. In this regard, the policy is not considered anti-development. It seeks to ensure that the types of development set out in the policy could come forward if the required criteria are met. It is always the case that the applicant has to justify the merits of the proposal they are promoting and the requirements of this policy are no different.
- 2 The Council has an adopted car parking standards that should apply to proposed developments. In applying the standards, Policy CS18 emphasises that the Council will seek to ensure that this will not undermine the overall sustainability objectives of the Core Strategy, including the effects on highway safety. Decisions about parking are taken on a case by case basis depending on the nature of the proposal and its locational characteristics.
- 3 Policy DM10 is positively drafted to support development on garden land that does not compromise the overall character of the area. This is necessary to preserve the character of the area, and there are sufficient number of policies in the Core Strategy, the DPD and the various Supplementary Planning Guidance Notes to ensure that this is the case.

Proposed modification

No modification is proposed as result of this representation.

Donatella Cillo (on behalf of the Environment Agency)

Summary of representations

- 1 The Sustainability Appraisal (SA) report does not include up to date statuses of the main rivers within the Borough as well as water pollution incidents. As such it does not provide the appropriate evidence to support the DPD.
Objective 14: 'maintain and improve the water quality of the Borough's rivers and groundwater, and manage water resources sustainably' included in Appendix 2 need to be updated as part of the minor modifications. The up to date information in the Cycle 2 of the River Basin Management Plan 2014 data should be included at the current ecological status of the main rivers as follows:

Up to date Cycle 2 of the River Basin Management Plan 2014 data

Main River	Ecological Status	Chemical elements	Overall risk
Hoe Stream	Moderate	High: Ammonia and phosphate Moderate: Annex 8 chemicals Good: Annex 10 chemicals	Not assessed yet for cycle 2, at risk for cycle 1.
Basingstoke Canal	Moderate	Not assessed	Not assessed
The Wey	Moderate	High: Ammonia Poor: Phosphate Pollutants High and Good	Not assessed yet for cycle 2, at risk for cycle 1'.

- 2 In accordance with paragraph 103 of the NPPF, Policy DM9 should be amended by adding a further bullet point: 'there is safe access and egress route during flood events'. The supporting paragraph 'Application Information' should be amended to include the following: Change of use planning applications need to be supported by a site specific flood risk assessment (FRA), subject to the triggers set out in footnote 20, paragraph 103 of the NPPF. Within the FRA it should be demonstrated that a safe route access and egress can be provided and maintained during flood events up to and including 1% annual exceedance probability (AEP) (1 in 100 years) plus an allowance for climate change flood events'.
- 3 In accordance with paragraph 103 of the NPPF, Policy DM11 should be amended by adding a further bullet point: 'a safe access and egress route during flood events can be provided'. The supporting paragraph 5.16 should also be amended by including the following: 'The criteria in this policy are also intended to ensure that sub-division and conversions are appropriately flood resilient and resistant, including demonstrating that a safe route of access and egress can be provided and maintained during flood events up to and including the 1% annual exceedance probability (AEP) (1 in 100 year) plus an allowance for climate change flood event'.
- 4 Policy DM1 should make reference to undeveloped buffer zones to make the policy more consistent with Policy CS17 of the Core Strategy.

- 5 A further bullet point should be added to the part of Policy DM1 that begins with Development proposals which would result in significant harm ... as follows: 'the benefits of the development outweigh the harm to biodiversity'. In addition, reference to SANGs in the policy will be helpful with emphasis on them being not established on Sites of Nature Conservation Importance (SNCI)
- 6 Policy DM2 should include a wording to highlight that tree planting is not always of benefit to biodiversity.
- 7 Policy DM5 should refer to the aims of the Water Framework Directive.
- 8 Policy DM6 should include reference to undeveloped buffer zones. The policy should also seek to minimise the potential impacts of fly tipping over back fences for all developments facing the Borough's watercourses.
- 9 Policy DM7 should include the following additional wording 'Proposals for the external lighting as part of a new or existing development which require planning permission will be permitted where the applicant can demonstrate that the lighting scheme is the minimum necessary for security, safety, working or recreational purposes and that it minimises that pollution of glare or slippage to prevent impacts on nocturnal animals such as bats and water base species such as fish'.
- 10 Policy DM10 should also mention that the protection of green spaces is important to help minimise flood risk.

Officer response

- 1 It is important that the Sustainability Appraisal is informed by up to date information. Consequently, objective 14 in Appendix 2 regarding water quality should be amended with the following information:

Up to date Cycle 2 of the River Basin Management Plan 2014 data

Main River	Ecological Status	Chemical elements	Overall risk
Hoe Stream	Moderate	High: Ammonia and phosphate Moderate: Annex 8 chemicals Good: Annex 10 chemicals	Not assessed yet for cycle 2, at risk for cycle 1.
Basingstoke Canal	Moderate	Not assessed	Not assessed
The Wey	Moderate	High: Ammonia Poor: Phosphate Pollutants High and Good	Not assessed yet for cycle 2, at risk for cycle 1'.

- 2 The suggested new bullet point is in line with paragraph 103 of the NPPF and therefore acceptable. Policy DM9 should be modified by adding a new bullet point as follows: 'there is a safe access and egress route during flood events'. The following should also be added to the application information in paragraph 5.4 as follows: 'Change of use planning applications need to be supported by a site specific flood risk assessment (FRA), subject to the triggers set out in footnote 20 of paragraph 103 of

- the NPPF. Within the FRA it should be demonstrated that a safe route access and egress can be provided and maintained during flood events up to and including 1% annual exceedance probability (AEP) (1 in 100 years) plus an allowance for climate change flood events’.
- 3 Based on the same reason as point 2 above, Policy DM11 should be modified by adding an additional bullet as follows: ‘there is a safe access and egress route during flood events’. Paragraph 5.16 should also be modified by adding the following to clarify the suggested new bullet point: ‘The criteria in this policy are also intended to ensure that sub-division and conversions are appropriately flood resilient and resistant, including demonstrating that a safe route of access and egress can be provided and maintained during flood events up to and including the 1% annual exceedance probability (AEP) (1 in 100 year) plus an allowance for climate change flood event’
 - 4 Paragraph 1.3 of the DPD emphasises that ‘the Development Management policies do not cover all policy areas: where principles of development are fully addressed by national or Core Strategy policies, they are not repeated’. Policy CS17: *Open space, green infrastructure, sport and recreation* clearly states ‘The Council will seek to protect river corridors by creating undeveloped buffer zones, which will serve as green infrastructure as well as habitats of biodiversity value’. In the context of Policy DM1, no purpose will be served by repeating this.
 - 5 This point has already been addressed in response to Hook Heath Neighbourhood Forum’s representations. The second bullet point of the part of Policy DM1 beginning ‘where proposals include...should be modified by adding an additional bullet as follows: ‘that the provision of Suitable Alternative Natural Greenspace will not compromise the biodiversity value of Sites of Nature Conservation Interests’.
 - 6 The representation about tree planning has already been addressed with a proposed modification to Policy DM2 that covers this point.
 - 7 The aims of the Water Framework Directive have been taken into account in the preparation of the Sustainability Appraisal and the policies of the DPD. Reference to it in the policy is reasonable. Paragraph 2 of policy DM5 should be modified by adding: ‘the aim of the Water Framework Directive should be taken into account in planning decisions affecting water quality and management’.
 - 8 Reference to undeveloped buffer zones has already been addressed. There are other functions of the Council that appropriately deals with fly tipping. Fly tipping is not a matter that can effectively be addressed through planning policy.
 - 9 The Core Strategy seeks to protect the biodiversity of the area. Therefore, the suggested modification to minimise the impacts of light pollution on nocturnal animals is reasonable and consistent with the requirements of the Core Strategy. Policy DM7 should be modified by adding the following as a last sentence under the part of the policy on lighting and illumination: ‘Proposals for the external lighting as part of a new or existing development which require planning permission will be permitted where the applicant can demonstrate that the lighting scheme is the minimum

necessary for security, safety, working or recreational purposes and that it minimises the pollution of glare or slippage to prevent adverse impacts on nocturnal animals such as bats and water species’.

- 10 The policy is not about the protection of green spaces. It is about the factors to be taken into account when developing on garden land. The principle of back garden development that does not detract from the character of the area is acceptable. The suggested addition to the policy in this particular context will be counter productive to the objective that the policy seeks to achieve. There are other policies in the Core Strategy and in this DPD that promotes new green spaces and protect existing ones.

Proposed modification

Objective 14 in Appendix 2 regarding water quality should be amended with the following information:

Up to date Cycle 2 of the River Basin Management Plan 2014 data

Main River	Ecological Status	Chemical elements	Overall risk
Hoe Stream	Moderate	High: Ammonia and phosphate Moderate: Annex 8 chemicals Good: Annex 10 chemicals	Not assessed yet for cycle 2, at risk for cycle 1.
Basingstoke Canal	Moderate	Not assessed	Not assessed
The Wey	Moderate	High: Ammonia Poor: Phosphate Pollutants High and Good	Not assessed yet for cycle 2, at risk for cycle 1’.

Policy DM9 should be modified by adding a new bullet point as follows: ‘there is a safe access and egress route during flood events’. The following should also be added to the application information in paragraph 5.4 as follows: ‘Change of use planning applications need to be supported by a site specific flood risk assessment (FRA), subject to the triggers set out in footnote 20 of paragraph 103 of the NPPF. Within the FRA it should be demonstrated that a safe route access and egress can be provided and maintained during flood events up to and including 1% annual exceedance probability (AEP) (1 in 100 years) plus an allowance for climate change flood events’.

Policy DM11 should be modified by adding a bullet point as follows: ‘There is a safe access and egress route during flood events’. Paragraph 5.16 should be modified by adding the following to clarify the suggested bullet point: ‘The criteria in this policy are also intended to ensure that sub-division and conversions are appropriately flood resilient and resistant, including demonstrating that a safe route of access and egress can be provided and maintained during flood events up to and including the 1% annual exceedance probability (AEP) (1 in 100 year) plus an allowance for climate change flood event’

The second bullet point of the part of Policy DM1 beginning ‘where proposals include...should be modified by adding an additional bullet point as follows: ‘that the provision of Suitable Alternative Natural Greenspace will not compromise the biodiversity value of Sites of Nature Conservation Interests’.

Paragraph 2 of policy DM5 should be modified by adding: 'the aim of the Water Framework Directive should be taken into account in planning decisions affecting water quality and management'.

Policy DM7 should be modified by adding the following as a last sentence under the part of the policy on lighting and illumination: 'Proposals for the external lighting as part of a new or existing development which require planning permission will be permitted where the applicant can demonstrate that the lighting scheme is the minimum necessary for security, safety, working or recreational purposes and that it minimises the pollution of glare or slippage to prevent adverse impacts on nocturnal animals such as bats and water species'.

APPENDIX 18

Schedule of proposed modifications:



Woking Borough Council

**Development Management Policies Development Plan
Document (DPD) and accompanying Sustainability Appraisal
Report (SA)
Schedule of proposed modifications**

February 2016



Produced by the Planning Policy Team

**For further information please contact:
Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square,
Woking, Surrey, GU21 6YL.
Tel: 01483 743871. Email: planning.policy@woking.gov.uk**

Introduction

The preparation of the Development Management Policies Development Plan Document (DPD) has evolved through various stages. The Council has made sure that community involvement is at the heart of each stage and has valued and taken into account comments received at both the Regulations 18 and 19 consultation stages and the informal consultations with the key stakeholders. The Council has a Consultation Statement that sets out in detail how the public has been involved in the DPD process and how their comments have been taken into account. The Development Management Policies DPD, the Sustainability Appraisal and the Habitats Regulations Assessment were published for Regulation 19 consultation between 26 October 2015 and 7 December 2015. Overall 29 individuals and organisations made representations. The representations were considered by the Local Development Framework Working Group at its meeting on 13 January 2016, the Executive on 4 February 2016 and by the Council on 11 February 2016. The Council proposes to make the following modifications for the Inspector to consider as part of the Independent Examination of the DPD. They are modifications that the Council considers as minor modifications, which will not change the substance of any of the policies but collectively will significantly enhance the quality of the DPD. The proposed modifications are as follows, and do follow any particular order of priority:

- 1 A new paragraph 1.22 should be inserted as follows:
The Development Plan for the area comprise of:
 - The Saved policy of the South East Plan;
 - The Surrey Waste Plan;
 - The Surrey Minerals Plan Core Strategy and Primary Aggregates Development Plan Documents;
 - Woking Core Strategy;
 - The saved policies of the Woking Borough Local Plan (1999);
 - Adopted Neighbourhood Plans

Section 38 of the Planning and Compulsory Purchase Act 2004 emphasises that if regard is to be had to the Development Plan for the purposes of any determination to be made under the Planning Act the determination must be made in accordance with the Development Plan unless material consideration indicate otherwise. If to any extent a policy contained in a Development Plan for an area conflicts with another policy in the Development Plan, the conflict must be resolved in favour of the policy which is contained in the latest document to be adopted, approved or published (as the case may be).

For the avoidance of doubt, the Development Plan is the Development Plan Documents (taken as a whole) which has been adopted or approved in relation to that area. The Council is in the process of preparing the Development Management Policies DPD (this DPD) and the Site Allocations DPD. When they are adopted they will also form part of the Development Plan for the area.
- 2 The last but one bullet point of Policy DM21 should be modified by inserting 'outdoor sports' after outdoor recreation.
- 3 Paragraph 3.40 should be modified by adding the following: 'The Council will work in partnership with the Basingstoke Canal Authority, Surrey County Council and other interested parties to encourage and deliver the aims of the

policy. This will include partnership working in identifying suitable silt disposal sites after dredging. The appropriateness of any site for this purpose will be considered on a case by case basis when a need to do so is justified’.

- 4 The last sentence of Paragraph 3.47 should be modified by adding: ‘preserved and incorporated into the drainage scheme of any development’.
- 5 Reference to Surrey Wildlife Trust in Policy DM1 should be replaced with Surrey Nature Partnership.
- 6 The first paragraph number 1.18 on page 9 should be replaced with paragraph number 1.17 and the subsequent paragraph numbers modified accordingly.
- 7 The word ‘consists’ in the second sentence of paragraph 3.1 should be replaced by ‘contain’.
- 8 The fifth paragraph of Policy DM1 should be modified by adding the following bullet point: ‘the benefit arising from the development is of sufficient value to the overall objectives of the Development Plan to outweigh any harm caused’.
- 9 The first paragraph number 5.43 on page 55 should be replaced by paragraph number 5.39 and the subsequent paragraph numbers modified accordingly.
- 10 The first sentence of Policy DM13 should be replaced by: ‘Unless very special circumstances can be clearly demonstrated, the Council will regard the construction of new buildings and forms of development other than those specifically identified on allocated sites in the Site Allocations DPD as inappropriate in the Green Belt’.
- 11 A new paragraph 4 should be inserted in Policy DM18 as follows: ‘Advertisement proposals on other heritage assets or areas will only be permitted if they will conserve or enhance particular features of architectural or historic interest’.
- 12 The first sentence of the last paragraph of Policy DM20 should be replaced with: The Council will not permit the demolition of heritage assets except in exceptional circumstances. Where partial or total demolition of a heritage asset is permitted in exceptional circumstances, a high standard of design will be required in any replacement building’.
- 13 The words ‘is it’ in the first line of paragraph 8.2 should be replaced by ‘it is’.
- 14 ‘Adopted Neighbourhood Plans’ should be added to the list of evidence base in Appendix 1.
- 15 The word ‘conserve’ in paragraphs 2 and 3 of Policy DM18 should be replaced with ‘preserve’.
- 16 The words ‘planning permission’ in the penultimate paragraph of Policy DM18 should be replaced by ‘express consent’.
- 17 Policy DM18 should be modified by an additional paragraph at the end of the policy as follows: ‘The Planning Practice Guidance sets out the standard conditions for all types of advertisement consent. If the Council wishes to

impose additional conditions it will specify the relevant planning reasons on the express consent why the conditions are imposed’.

- 18 The words ‘highway safety’ should replace ‘road traffic safety’ in paragraph 6.12.
- 19 The first sentences of paragraph 6.13 should be modified as follows: ‘Projecting signs will only be permitted if it is considered that it is not harmful to public safety and amenity and are of appropriate materials and dimensions’.
- 20 The second sentence of paragraph 6.13 beginning with ‘Small plastic box signs ...’ should be deleted.
- 21 The words ‘in limited circumstance’ in paragraph 6.16 should be deleted and replaced with ‘if it is in relation to sign posting in rural areas’.
- 22 The following should be added to the supporting guidance under Policy links of Policy DM18: Planning Practice Guidance – advertisements and DCLG advisory booklet – Outdoor Advertisement and Signs – A guide for Advertisers.
- 23 The following should be added to the Policy Link under Policy DM20 on page 79: The National Heritage List for England at: <http://www.historicengland.org.uk/listing/the-list/>.
- 24 The following should be added to the Policy Link under Policy DM20 on page 79: Heritage Gateway.
- 25 Appendix 3, the indicator under Policy DM20 in Table 3 should be modified by adding ‘the number of heritage assets at risk’. The measure under Policy DM20 should be modified by adding “the effectiveness of the policy in preserving and enhancing heritage assets at risk’.
- 26 Paragraph 4.14 should be modified by adding the following sentence: The Government has published its policy on SUDS. In line with this, the Council has published an Advice Note on SUDS, which is available to download on the Council website.
- 27 The Policy Link under Policy DM6 should be modified by adding the following link: <http://www.woking.gov.uk/planning/service/suds/sudadvice>.
- 28 Paragraph 5.46 should be modified by inserting ‘could’ between ‘buildings’ and ‘harm’ in the last but one line of the paragraph.
- 29 Additional sentence be added to paragraph 3.15 as follows: Whilst the benefits of trees are acknowledged, the Council is also aware that trees might not always be beneficial to some forms of biodiversity, and they need to be maintained to avoid potential danger to safety, property and amenity. This will be taken into account in planning decisions.
- 30 The first bullet point of Policy DM20 should be modified by inserting ‘preserve and’ before enhance.
- 31 Objective 14 in Appendix 2 regarding water quality should be amended with the following information:

Up to date Cycle 2 of the River Basin Management Plan 2014 data

Main River	Ecological Status	Chemical elements	Overall risk
Hoe Stream	Moderate	High: Ammonia and phosphate Moderate: Annex 8 chemicals Good: Annex 10 chemicals	Not assessed yet for cycle 2, at risk for cycle 1.
Basingstoke Canal	Moderate	Not assessed	Not assessed
The Wey	Moderate	High: Ammonia Poor: Phosphate Pollutants High and Good	Not assessed yet for cycle 2, at risk for cycle 1'.

- 32 Policy DM9 should be modified by adding a new bullet point as follows: 'there is a safe access and egress route during flood events'. The following should also be added to the application information in paragraph 5.4 as follows: 'Change of use planning applications need to be supported by a site specific flood risk assessment (FRA), subject to the triggers set out in footnote 20, paragraph 103 of the NPPF. Within the FRA it should be demonstrated that a safe route access and egress can be provided and maintained during flood events up to and including 1% annual exceedance probability (AEP) (1 in 100 years) plus an allowance for climate change flood events'.
- 33 Policy DM11 should be modified by adding additional bullet point as follows: 'There is a safe access and egress route during flood events'. Paragraph 5.16 should also be modified by adding the following to clarify the suggested bullet point: 'The criteria in this policy are also intended to ensure that sub-division and conversions are appropriately flood resilient and resistant, including demonstrating that a safe route of access and egress can be provided and maintained during flood events up to and including the 1% annual exceedance probability (AEP) (1 in 100 year) plus an allowance for climate change flood event'
- 34 The second bullet point of the part of Policy DM1 beginning 'where proposals include...should be modified by adding an additional bullet as follows: 'that the provision of Suitable Alternative Natural Greenspace will not compromise the biodiversity value of Sites of Nature Conservation Interests'.
- 35 Paragraph 2 of policy DM5 should be modified by adding: 'the aim of the Water Framework Directive should be taken into account in planning decisions affecting water quality and management'.
- 36 Policy DM7 should be modified by adding the following as a last sentence under the part of the policy on lighting and illumination: 'Proposals for the external lighting as part of a new or existing development which require planning permission will be permitted where the applicant can demonstrate that the lighting scheme is the minimum necessary for security, safety, working or recreational purposes and that it minimises the pollution of glare or slippage to prevent adverse impacts on nocturnal animals such as bats and water species'.

