



# **Woking Borough Council**

## **Development Management Policies Development Plan Document**

### **Duty to Cooperate Statement**

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**Produced by the Planning Policy Team**

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## **Development Management Policies Development Plan Document (DPD)**

### **Duty to Cooperate Statement**

#### **1.0 Introduction**

- 1.1 The Duty to Cooperate Statement has been prepared by Woking Borough Council to demonstrate how it has met the requirements of the Duty to Cooperate as set out by the Planning Act 2004 (as amended) and by the National Planning Policy Framework. The Development Management Policies DPD is a development plan document, which the requirements of the Duty to Cooperate are relevant to its preparation. Paragraph 182 of the National Planning Policy Framework (NPPF) emphasises that the Local Plan, in this particular case, the Development Management Policies DPD will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Consequently, failure to meet the requirements of the Duty to Cooperate can put at risk the soundness of the DPD.
- 1.2 The Duty to Cooperate requires the Council to engage constructively, positively and actively with the relevant bodies in relation to the preparation of the DPD to address any matters of cross boundary significance. The Council is satisfied that it has met the requirements of Duty to Cooperate. As demonstrated by the Duty to Cooperate Statement, the Council has concluded that the Development Management Policies DPD does not raise any matters of cross boundary significance.

#### **2.0 Legislative context**

- 2.1 Section 110 of the Localism Act deals with the Duty to Cooperate in relation to planning of sustainable development. It inserts S333A (Duty to Cooperate in relation to planning of sustainable development) in Part 2 of the Planning and Compulsory Purchase Act 2004 (local development) (as amended). The Duty to Cooperate requires each person who is:

- (a) A local planning authority;
- (b) A county council in England that is not a local planning authority; or
- (c) A body, or other person, that is prescribed or of a prescribed description

to cooperate with every other person specified above in maximising the effectiveness with which the following relevant activities are undertaken:

- (a) The preparation of development plan documents;
- (b) The preparation of other local development documents

so far as relating to strategic matters. The Duty imposes on the persons listed above:

- (a) To engage constructively, actively and on an on-going basis in this case, the plan making process; and
- (b) To have regard to activities of the persons listed above so far as they are relevant to activities listed in subsection 3 of Section 110.

Subsection 4 of Section 110 of the Act defines a strategic matter as:

- (a) Sustainable development or use of land that has or would have significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas; and
- (b) Sustainable development or use of land in a two tier area if the development or use is a county matter, or has or would have a significant impact on a county matter.

2.2 The National Planning policy Framework sets out the Government's planning policies for England and how these are expected to be applied. Paragraph 156 defines strategic priorities to include:

- The homes and jobs needed in the area;
- The provision of retail, leisure and other commercial development;
- The provision of infrastructure for transport, telecommunications, waste management, water supply, waste water, flood risk and coastal change management, and the provision of minerals and energy (including heat)
- The provision of health, security, community and cultural infrastructure and other local facilities; and
- Climate change mitigation and adaptation, conservation and enhancement of the rural and historic environment, including landscape.

2.3 Paragraphs 178 to 181 deals with planning strategically across local boundaries. Local authorities have a duty to cooperate on planning issues that crosses administrative boundaries, particularly those which relate to the strategic priorities set out above. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. They should also work collaboratively with private sector bodies, utility and infrastructure providers.

2.4 Local Planning Authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for Examination. This Statement is a demonstration of the Council's evidence that the requirements of the Duty to Cooperate have been met.

2.5 The Town and Country Planning (Local Planning) (England) Regulations 2012 specifies the bodies and persons that needs to be notified of the subject of the local plan which the local planning authority proposes to prepare and to invite them to make representations about what the local plan with that subject ought to contain. Regulation 4 lists the prescribed bodies for the purposes of the Duty to Cooperate as:

- The Environment Agency;
- The Historic Buildings and Monuments Commission for England (English Heritage);
- Natural England;
- The Mayor of London;
- The Civil Aviation;
- The Homes and Communities Agency;

- Each Primary Care Trust established under Section 18 of the National Health services Act 2006(b) or continued in existence by virtue of that section;
- The Office of the Rail Regulator;
- Transport for London
- Each Integrated Transport Authority
- Each Highway Authority within the meaning of Section 1 of the Highways Act 1980(f) (including the Secretary of State, where the Secretary of State is the Highways Authority; and
- The Marine Management Organisation.

2.6 Local Planning Authorities should also work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with LEPs.

2.7 The above provides the legislative context within which this Statement has been prepared.

### **3.0 Woking Core Strategy**

3.1 The Woking Core Strategy was adopted in October 2012. Its provisions are in general conformity with the NPPF and considered up to date for the purposes of managing development in the Borough. The Core Strategy makes provision for the delivery of the following scale of development up to 2027:

- 4,964 net additional dwellings (35% of this to be Affordable Housing);
- 28,000 sq.m of additional office floorspace and 20,00 sq.m of warehouse floorspace;
- 93,900 sq.m of additional retail floorspace.

3.2 The Core Strategy contains 25 strategic policies, and the Council is committed to their comprehensive delivery against their objectives. The Development Management Policies DPD is one of two key Development Plan Documents that the Council is committed to prepare to facilitate the delivery of the Core Strategy, in particular, to make sure that individual proposals that come forward are developed to high quality and acceptable standards. The other document is the Site Allocations DPD.

### **4.0 The Development Management Policies Development Plan Document**

4.1 Paragraph 1.10 of the Core Strategy commits the Council to prepare the Development Management Policies DPD to help facilitate the comprehensive delivery of the Core Strategy. The DPD includes detailed policies to help determine day to day planning applications. The DPD offers detailed, often criteria-based policies in areas of policy where further detail is needed beyond that contained in the Core Strategy. The policies of the DPD build on and support rather than repeat the strategic policies of the Core Strategy and other Development Plans. It is intended that when it is adopted, its policies together with the policies of the Core Strategy will supersede the policies of the Woking Local Plan (1999) and help provide an up to date policy framework for managing development in the area. Appendix 6 of the Core Strategy includes an initial list of the Local Plan policies that will be superseded by the policies of the Development Management Policies DPD. A copy of the draft Development Management Policies DPD is on the Council's website ([www.woking.gov.uk](http://www.woking.gov.uk)).

## 5.0 Cross boundary and joint partnership relationships

- **Surrey planning Officer's Society** – It comprises all the Surrey Heads of Planning. The Group meets monthly to agree joint working opportunities and arrangements, consider matters of cross boundary significance and PAN Surrey interest. They often delegate policy matters of detailed resolution to the Planning Working Group.
- **Planning Working Group** – a group of Planning Policy Managers in Surrey and the County Council that meets bi-monthly to discuss and find explore solutions to cross boundary policy issues, share information and experience.
- **West Surrey Group** – a group of Planning Policy Managers in West Surrey. The Group meets bi-monthly to deal with the sub-regional issues, identify opportunities for joint working.
- **Surrey County Council** – is the County Council for the area, responsible for education and transport provision. It is also responsible for the Surrey Waste Plan, the Surrey Minerals Plan Core Strategy and Primary Aggregates Development Plan Document. The Council actively works bilaterally with the County Council to deliver transport and education objectives. The County Council is also a member of the Planning Working Group, Surrey Planning Officers Society and the west Surrey Group.
- **Thames Basin Heaths Joint Strategic Partnership Board** – This is a Joint Strategic Partnership Board comprising Councillors of local authorities with Thames Basin Heaths Special Protection Areas (SPA) within their boundaries and Natural England. The Board is set up to ensure a strategic approach to mitigate and manage the impacts of development on the SPA. The Joint Strategic Partnership Board is served by the Thames Basin Heaths Joint Officer's Group. It provides advice and information to the Board to inform strategic decision making.
- **Local Enterprise Partnership (LEP)** – Woking is part of the Enterprise M3 LEP. The Council actively works with the LEP to facilitate economic growth and infrastructure delivery.

## 6.0 Means and methods of cooperation

6.1 The following means have been used to involve the relevant bodies in the preparation of the DPD:

- Meetings;
- E-mails
- Direct mails;
- Telephone discussions;
- Formal and informal consultation.

## 7.0 Process for identifying cross boundary implications of the Development Management Policies DPD

7.1 An internal review of existing policies of the Development Plan, taking into account Appendix 6 of the Core Strategy was undertaken by the relevant sections of the Council including the Development Management Team and the Environmental Health Team. The main purpose of the exercise was to identify any policy areas where gaps exist, which will be needed to help determine day to day planning applications. All the

relevant bodies listed for the purposes of the Duty to Cooperate and other stakeholders were notified by letter of the Council's intention to prepare the Development Management Policies DPD and invited them to make representations on the broad policy areas and issues that they would like the DPD to cover. The letter was sent on June 2012, and a copy is attached as Appendix 1. Representations were received from:

- Environment Agency;
- Highway Agency (Highways England)
- Natural England
- Surrey County Council
- Thames Water Property Services
- English Heritage

- 7.2 The representations that were received are at Appendix 2. The policies covered in the DPD takes into account the representations that were received. The list of policies covered in the DPD is in Table 1. It is a clear demonstration of how the Council has taken on board the representations received from the key stakeholders.
- 7.3 **Cooperation with the statutory consultees** (Natural England, Environment Agency and English Heritage) has been continuous, positive and on-going through meetings, e-mails, direct mails and informal and formal consultations. The Environment Agency and Natural England have met with the Council on several occasions to be kept up to date on progress on the preparation of the DPD. They have commented on drafts of the DPD and their comments taken into account before the DPD had been formally published for consultation.
- 7.4 **Cooperation with the neighbouring authorities** has also been continuous and positive. Through the Surrey Planning Officers Association, the Planning Working Group and the West Surrey Group all the local authorities in Surrey are regularly kept up to date on progress with the preparation of the DPD and any potential issues they may wish for the Council to note. Bilateral meetings with Elmbridge, Runnymede, Surrey Heath Borough Councils and Surrey County Council have taken place to identify and agree any cross boundary issues that might need to be addressed and to find appropriate means to address them. The authorities have also been formally consulted on both the Regulations 18 and 19 consultations on the DPD. The Planning Working Group and West Surrey Group meet every other month. Surrey County Council is a member of the Planning Working Group, Surrey Planning Officers Association and the West Surrey Group, and is responsible for both transport and education infrastructure.
- 7.5 The Council has signed a Memorandum of Understanding with Waverley and Guildford Borough Councils to work jointly to address cross boundary planning issues in the Housing Market Area and the Functional Economic Market Area. The three authorities form a common Housing Market Area and a Functional Economic Market Area. The three authorities meet regularly every four to six weeks. The meetings provide opportunity to discuss any cross boundary implications of our respective plans and to find solutions to address them.

7.6 Whilst they are not part of the prescribed relevant bodies for the purposes of the Duty to Cooperate, the Council has a strong and continuous partnership working relationship with **the Developers Forum, Neighbourhood Forums and the Resident Associations**. There are bi-annual meetings with these groups to brief them on the preparation of the Council's Local Development Documents and to seek their informal views to inform subsequent stages of the documents. The Council also attends the monthly meetings of **the Chamber of Commerce** to keep them up to date on progress on the preparation of the DPD and to address any issues that they may have.

7.7 **The Highways Agency, the utility companies, the Homes and Communities Agency, the Surrey Wildlife Trust, the NHS Clinical Commissioning Group, Office of the Rail Regulator and the Mayor of London** have all been directly consulted at both the Regulations 18 and 19 consultation stages of the DPD. It is important to stress that the preparation of the Council's Local Development Documents have evolved. For example, the above groups were actively involved in the preparation of the Infrastructure Delivery Plan to support the development of the area as set out in the Core strategy.

7.8 Dates of the meetings, when e-mails and letters were sent can be provided on request. The Regulation 18 consultation took place between 19 February 2015 and 3 April 2015. The Regulation 19 consultation was between 26 October 2015 and 7 December 2015. A Consultation Statement has been prepared to demonstrate the general extent of community involvement in the preparation of the DPD and how representations received have been analysed and taken into account to inform the DPD. The Consultation Statement is on the Council's website.

## 8.0 Outcome of cooperation

8.1 An analysis of the representations received from the key stakeholders, the statutory consultees, the relevant bodies, the list of policy areas highlighted in Appendix 6 of the Core Strategy, the information gathered from the other sections of the Council and the details of the policies covered in the DPD has led the Council to conclude that the policies covered in the DPD does not raise any matters of cross boundary significance for the purposes of the Duty to Cooperate.

8.2 Table 1 below is a list of the policies covered in the DPD, their intended objectives and why the Council has concluded that they do not raise strategic matters of cross boundary significance:

Table 1

List of policies	Objectives of the policy	Cross boundary significance
DM1: Green infrastructure opportunities	To make sure that the green infrastructure assets of the Borough are harnessed in an integrated manner to maximise their economic, social and environmental benefits.	The policy harnesses the benefits of green infrastructure within Woking Borough, and it is not considered to give rise to strategic implications of cross boundary significance.
DM2: Trees and landscaping	To provide detailed criteria	Policy seeks to protect

	necessary to maintain existing trees and landscaping and related features and to secure new provision in development schemes.	existing trees and maintains the importance of landscaping as an integral part of new development. It is location specific. It raises no cross boundary issues of significance.
DM3: Outdoor recreation and sports facilities	The policy seeks to make sure that appropriately scaled outdoor sport and recreation facilities are provided to support development whilst respecting the purpose of the Green Belt. It also seeks to protect the loss of existing provision.	The policy is location specific and has no cross boundary significance.
DM4: Development in the vicinity of Basingstoke Canal	The policy sets detailed criteria to harness the beneficial use of the canal whilst making sure that development does not adversely affect the Basingstoke Canal, which is a heritage asset in the Borough.	It is acknowledged that the Basingstoke Canal extends beyond Woking Borough. However, the policy sets criteria for determining location specific proposals that could have adverse impacts on the Canal, which is a heritage asset. The policy is not likely to have significant cross boundary significance. The Council will continue to work with the County Council and the Basingstoke Canal Authority to make sure that the Canal and its benefits are protected.
DM5: Environmental Pollution	The policy seeks to manage the impacts of development on environmental pollution.	The policy is a location specific criteria based policy with no cross boundary implications.
DM6: Air and water quality	The policy seeks to manage the impacts of development on air and water quality.	The policy is a location specific criteria based policy with no cross boundary implications.
DM7: Noise and light pollution	The policy seeks to manage the impacts of development on noise and light pollution.	The policy is a location specific criteria based policy with no cross boundary implications.
DM8: Land contamination and hazards	The policy seeks to ensure that sites are suitable for development, taking into account ground conditions.	The policy is a location specific criteria based policy with no cross boundary implications.
DM9: Flats above shops and ancillary accommodation	The policy seeks to make sure that proposals for flats above shops and ancillary	The policy is about achieving acceptable standards of development in relation to



	accommodation are of acceptable standards and would not undermine economic vitality.	location specific proposals, and it is not likely to raise issues of cross boundary significance.
DM10: Development on garden land	The policy ensures that the development of garden land does not detract from the character of the area and/or undermine the biodiversity value of the site.	The policy is about achieving acceptable standards of development in relation to location specific proposals, and it is not likely to raise issues of cross boundary significance.
DM11: Sub-divisions, specialist housing, conversions and loss of housing	The policy seeks to make sure that the existing housing stock is appropriately managed without adversely affecting the character of the area.	The policy is about achieving acceptable standards of development in relation to location specific proposals, and it is not likely to raise issues of cross boundary significance.
DM12: self build and custom build houses	The policy offers in-principle support for self build and custom build houses.	The policy only offers an in-principle support for self build and custom build houses, and is not likely to have cross boundary significance.
DM13: Buildings in and adjacent to the Green Belt	Policy seeks to manage development in and adjacent to the Green Belt to protect its overall purpose and integrity.	The policy is location specific that is designed to protect and/or enhance the overall purpose and integrity of the Green Belt. It is not considered to have cross boundary significance.
DM14: Rural workers dwelling	Policy sets out detailed approach to managing new homes in the countryside for rural workers.	The policy seeks to address the accommodation needs of rural workers whose businesses can only operate in the countryside for which the day to day presence of a worker is necessary. Its contribution to the overall housing land supply is insignificant and is unlikely to have cross boundary significance.
DM15: Shops outside designated centres	Policy sets out a detailed approach to managing the change of use of isolated shops and the development of farm shops and retail nurseries.	The policy is location specific, and it is not likely to raise issues of cross boundary significance.
DM16: Servicing development	Policy ensures that commercial development is appropriately served by well designed servicing facilities that will not give rise to traffic congestion, conflict with	The policy is about achieving acceptable standards of development in relation to location specific proposals, and it is not likely to raise issues of cross boundary

	pedestrians or other road users or be detrimental to residential amenity.	significance.
DM17: Public realm	The policy seeks to make sure that public realm is appropriately integrated into development. It also highlights the positive contribution of public art to public realm.	The policy is about achieving acceptable standards of development in relation to location specific proposals, and it is not likely to raise issues of cross boundary significance.
DM18: Advertising and signs	The policy ensures that the benefits of advertising and signs to economic vitality is realised without compromising safety and amenity.	The policy is about achieving acceptable standards of development in relation to location specific proposals, and it is not likely to raise issues of cross boundary significance.
DM19: Shopfronts	The policy makes sure that proposals for new or replacement shopfronts pays regard to the character and amenity of the area.	The policy is about achieving acceptable standards of development in relation to location specific proposals, and it is not likely to raise issues of cross boundary significance.
DM20: Heritage assets and their setting	The policy seeks to protect the heritage assets of the area and their setting as a result of development.	The policy is about protecting the existing heritage assets of the Borough due to location specific development pressures. It is therefore unlikely to have cross boundary significance.
DM21: Education facilities	The policy sets out detailed criteria for managing proposals for new or replacement schools and other educational facilities.	Whilst it is accepted that a school could have a catchment area beyond the Borough, the policy is a criteria based requirements to judge the acceptability of proposals for education provision. It is therefore considered that it will not have cross boundary significance.
DM22: Communication infrastructure	The policy seeks to make sure that acceptable provision can continue to be made for communication infrastructure, including next generation broadband, whilst ensuring that the impacts on the environment and residential amenity is minimised.	The policy is location specific and it is unlikely to have cross boundary significance.

## **9.0 On-going cooperation**

9.1 Whilst the Council has concluded that the DPD does not raise matters of cross boundary significance, the Council will still continue to actively and constructively engage with the key stakeholders and the neighbouring authorities to ensure that the DPD:

- Takes into account any detailed comments they might have to enhance the quality of the Plan;
- Is based on up to date information;
- Is in general conformity with national and international requirements; and
- Does not create any unacceptable impacts that could potentially impact on another authority in the future.
- Is having regard to issues covered in other plans and strategies;

In this regard, the neighbouring authorities and the statutory consultees have been regularly updated on progress with the preparation of the DPD, consulted on draft versions of the DPD where relevant before they were formally consulted at the Regulations 18 and 19 consultations. Appendices 3 and 4 are a summary of the representations received on the Regulation 19 consultation of the DPD and the Schedule of Proposed Modifications that the Council wishes to submit to the Secretary of State for Examination. They demonstrate clearly how the Council have valued and taken into account representations received from the relevant bodies and the general public.

## **10.0 Conclusion**

10.1 The Council has a clear duty to provide evidence to demonstrate that it has met the requirements of the Duty to Cooperate. This Statement satisfies this requirement. Based on the representations received throughout the preparation of the DPD and the contents of the specific policies of the DPD, the Council is satisfied that the DPD does not raise any matters of cross boundary significance for the purposes of the Duty to Cooperate. The Council have engaged constructively and collaboratively with the relevant bodies throughout the preparation of the DPD. The engagement has been on-going and with some of the neighbouring authorities, a Memorandum of Understanding has been signed to ensure positive future partnership working. Across Surrey, there are existing joint partnership arrangements such as the Surrey Planning Officers Association, the Planning Working Group and the West Surrey Group to ensure that policy issues of strategic significance will continue to be explored, identified and addressed. Woking will continue to play an active role in all the above joint working arrangements.

## Appendix 1

### 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](http://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

## Appendix 2

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"> <li>• Flood risk and climate change</li> <li>• Biodiversity and habitat enhancement</li> <li>• Water quality</li> <li>• Water resources (including matters such as water efficiency, and groundwater protection)</li> <li>• Ensuring sufficient infrastructure in place to support new development</li> </ul> <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</p>

	<p>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>
<p>Katharine Harrison, Surrey County Council</p>	<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>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>
<p>Mark Mathews, Thames Water Property Services</p>	<p>As you will be aware from our representations to the Core Strategy, Thames Water is the statutory sewerage undertaker for the Borough. Thames Water is 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 an number of the proposed Local development Documents: ... ..</p>
<p>Mark Mathews, Thames Water Property Services</p>	<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</p>

	<p>wastewater....” Paragraph 162 of the NPPF relates to infrastructure and states:</p> <p>“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	<p>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.</p>
Mark Mathews, Thames Water Property Services	<p>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.</p>
Mark Mathews, Thames Water Property Services	<p>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<sup>st</sup> April 2010 to 31<sup>st</sup> March 2015 and does not therefore cover the whole Local Plan period. AMP6 will cover the period from 1<sup>st</sup> April 2015 to 31<sup>st</sup> 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.</p>
Mark Mathews, Thames Water Property Services	<p>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.</p>



<p>Mark Mathews, Thames Water Property Services</p>	<p>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 &amp; 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.</p>
<p>Mark Mathews, Thames Water Property Services</p>	<p>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.”</p>
<p>Mark Mathews, Thames Water Property Services</p>	<p>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</p>

	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

### Representations received to the Regulation 19 consultation with Council's response and recommendations

**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](http://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 a 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, and to help preserve and/or enhance the character of Conservation Areas. The wording does not absolutely rule out consideration of other forms of shop signs or displays on a case by case basis other than individually illuminated letters or indirect light from spotlights. The suggested wording by the representation 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 appropriate 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 Governments 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'.



## **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**

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## 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

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- 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'.