

Our ref:  
Your ref:

CIL Consultation  
Planning Policy Team  
Woking Borough Council  
Civic Offices  
Gloucester Square  
GU21 6YL

Beáta Ginn  
Highways Agency  
Federated House  
London Road  
Dorking RH4 1SZ

Direct Line: 

29<sup>th</sup> August 2013

Email: [planning.policy@woking.gov.uk](mailto:planning.policy@woking.gov.uk)

FAO: Planning Policy Team,

**Community Infrastructure Levy – CIL: Woking Borough Council – Draft Charging Schedule: Public Consultation & Climate Change SPD Consultation**

Thank you for your e-mail of 18<sup>th</sup> July 2013 engaging with the Highways Agency (HA) on the Community Infrastructure Levy (CIL) – Draft Charging Schedule (PDCS) for Woking Borough and on the Climate Change SPD. The Agency welcomes the introduction of the CIL to replace or complement developer contributions through Section 106 agreements. We are, however, keen to ensure that the levels of contributions are sufficient to enable adequate infrastructure to be delivered which satisfies the Secretary of State in respect of the strategic road network (SRN).

The HA, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN), i.e. the Trunk Road and Motorway Network in England. We will be concerned with proposals that have potential to impact the safe and efficient operation of the SRN. In the case of Woking Borough this relates to the A3 and M25 junctions 10 and 11.

We have reviewed the CIL consultation and associated documents and make the following comments:

Need for an up-to-date plan & Regulation 123 List

Paragraph 11 of the guidance states that the Government expects that charging authorities will implement the levy where their 'appropriate evidence' includes an up-to-date relevant Plan. Hence where practical levy charges should be worked up and tested alongside the Local Plan as set out in the National Planning Policy Framework (NPPF).

The HA commented on the draft Woking Core Strategy and associated Sustainability Appraisal Report in January 2011. Subsequently we commented on the Woking Borough Core Strategy Publication Document in September 2011 and were content that most of our concerns had been addressed. The HA therefore acknowledges the use of the Core Strategy as part of the evidence base for CIL.

However, we noted in our comments of September 2011 that while Woking's Transport Assessment (2010/2011) indicated that developments brought forward would have no significant impact on the SRN, M25 Junctions 10 and 11 and sections of the A3 plus relevant junctions were operating close to capacity. On that basis we requested that detailed Transport Assessment and junction modelling be conducted when a development came forward. We

noted that developers would need to identify and contribute to the funding of highway improvement measures needed to mitigate potential adverse impact on the SRN. It is important that developers are aware of these potential contributions. This is consistent with the fact that your Regulation 123 list included in Appendix C of the draft Charging Schedule does not include schemes or improvements to the SRN. This implies that potential improvements to the SRN are not budgeted for in the proposed CIL rates and therefore that funding for any schemes on the SRN would have to be raised through alternative means.

It remains the policy of the Secretary of State to direct conditions in respect of planning permissions, the effect of which will, most commonly, be to require the developer to deliver the mitigation measures on the SRN necessary to cater safely and efficiently for anticipated traffic levels and/or to phase the delivery of the development. This is commonly achieved through the use of negative or Grampian style planning conditions. As you will be aware these types of conditions must have a reasonable chance of being met within the timescale of the planning consent and this places further emphasis on the need for the Local Planning Authority to ensure sufficiency of CIL contribution.

#### Proposed CIL Rates

While the HA does not wish to contest the CIL level calculations proposing £75/m<sup>2</sup> for residential development in town centres (Sheerwater and Maybury), £125/m<sup>2</sup> for residential development elsewhere in the Borough, £75/m<sup>2</sup> for all types of retail, and no charges for all other commercial and non residential development, our comment would be that the infrastructure delivery body will need to satisfy itself that these contribution levels are adequate to ensure sufficient funding for essential infrastructure.

#### Request for Notification

As requested in your consultation brief, the HA would like to be notified of the following:

- That the Draft Charging Schedule has been submitted for Independent Examination;
- The publication of the recommendations of any person appointed to carry out an Independent Examination of the Draft Charging Schedule;
- The adoption of the Charging Schedule.

#### Climate Change SPD

Having reviewed the Climate Change SPD, we have no specific comments to make. However, the HA is supportive of all efforts that will help to reduce carbon emissions and build resilience to climate change impacts. As noted in your document, The Climate Change Act 2008 establishes a legally binding climate change target to reduce the UK's greenhouse gas emissions by at least 80% by 2050 (from the 1990 baseline), with an interim target of 34% by 2020. We would encourage the council in its efforts in contributing towards achieving these targets. We note in particular under Section 6 of the document the recognition of the role that good spatial planning can make towards fostering sustainable transport and hence reducing carbon emissions. Throughout the LDF consultation process, we have stressed the importance of sustainable travel options in reducing the potential impact on the surrounding SRN mainly the A3, located south east of Woking, and the M25 junctions 10 and 11. We therefore welcome the document's reminder to developers to bear in mind sustainable transport issues and plan to minimise the need for motorised transport when locating and designing their developments.

I hope the above comments have been useful, please do not hesitate to contact me if you have any queries.

Yours sincerely,

[Redacted signature]

Mrs Beáta Ginn  
Assistant Asset Manager

Email: [Redacted email address]

