



# Planning Advisory Service - Support Services Evidence Base Review for Woking Borough Council

Final Report  
September 2011



Prepared for Woking Borough Council on behalf of the Planning Advisory Service

## Limitations

URS Scott Wilson Ltd (“URS Scott Wilson”) has prepared this Report for the sole use of the Planning Advisory Service and Woking Borough Council (“Client”) in accordance with the Agreement under which our services were performed (47030219.WOK). No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by URS Scott Wilson. This Report is confidential and may not be disclosed by the Client nor relied upon by any other party without the prior and express written agreement of URS Scott Wilson.

The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by URS Scott Wilson has not been independently verified by URS Scott Wilson, unless otherwise stated in the Report.

The methodology adopted and the sources of information used by URS Scott Wilson in providing its services are outlined in this Report. The work described in this Report was undertaken between [insert date] and [insert date] and is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances.

Where assessments of works or costs identified in this Report are made, such assessments are based upon the information available at the time and where appropriate are subject to further investigations or information which may become available.

URS Scott Wilson disclaim any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to URS Scott Wilson’s attention after the date of the Report.

Certain statements made in the Report that are not historical facts may constitute estimates, projections or other forward-looking statements and even though they are based on reasonable assumptions as of the date of the Report, such forward-looking statements by their nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted. URS Scott Wilson specifically does not guarantee or warrant any estimate or projections contained in this Report.

## Copyright

© This Report is the copyright of URS Scott Wilson Ltd. Any unauthorised reproduction or usage by any person other than the addressee is strictly prohibited.

---

Table of Contents

<b>1</b>	<b>Executive Summary .....</b>	<b>1</b>
<b>2</b>	<b>Introduction .....</b>	<b>5</b>
<b>3</b>	<b>Review of the Evidence Base against the PPS12 Tests of Soundness .....</b>	<b>7</b>
<b>4</b>	<b>Conclusions and Recommendations .....</b>	<b>9</b>
<b>5</b>	<b>List of Abbreviations .....</b>	<b>12</b>
<b>6</b>	<b>Glossary .....</b>	<b>13</b>

# 1 Executive Summary

- 1.1.1 The Planning Advisory Service (PAS) provides consultancy and peer support, learning events and outline resources to improve local government planning. In July 2011 Woking Borough Council requested assistance with a review of their assembled evidence base. URS/Scott Wilson have been commissioned to undertake this review on behalf of the PAS.
- 1.1.2 The objectives of this review were to provide a critical friend review of the evidence base as it stands and to provide an opinion as to whether the evidence base is sufficiently robust to support submission of the Woking Core Strategy. This report summarises the findings of the review of the evidence base, and makes any subsequent recommendations for further actions that might be needed to ensure that the evidence base is sufficiently robust to support the Core Strategy through the submission and examination processes.
- 1.1.3 This review consists of two closely integrated elements. The first relates to a series of questions which aim to demonstrate compliance with the tests of soundness in PPS12. These questions are derived from the published PAS Guidance on use of the Evidence Base: <http://www.pas.gov.uk/pas/core/page.do?pagelid=46130>. The second element of this review relates to the emerging Draft National Planning Policy Framework (NPPF) and in particular, the requirement for a 'proportionate evidence base'. The compilation of the evidence base and how it is being interrogated has been reviewed against these key criteria.
- 1.1.4 The review found that Woking has compiled an extensive and comprehensive evidence base to support the Core Strategy to submission. There are very few recommendations arising out of the review as a result; and Woking should be commended on the depth and extent of preparatory work that has been undertaken. The summary of conclusions and recommendations arising from this review are set out in the following table.

**Table 1: Summary of Conclusions and Recommendations**

PPS12 Test of Soundness Question	Commentary	Recommendations
1. Does the evidence base underpin the generation and testing of options and therefore inform the draft Core Strategy content?	√√ The evidence base has underpinned the generation and testing of options and has been used appropriately to provide a platform for the development of options.	No recommendations
2. Does the evidence base include the views of the local community as well as research and fact finding?	√√ The evidence base includes both the views of the local community, business interests and physical and social infrastructure providers, alongside the extensive factual evidence.  Woking Council has been very diligent in capturing the views of the local community and stakeholders. Reports prepared which summarise community consultation responses and the officers response and recommendations arising from these	No recommendations

provide measured and thoughtful responses, drawing on the evidence base and are helpful in capturing evidence of public participation in the plan process.

Woking have also worked with delivery stakeholders, including social and community infrastructure providers and users and with other local authorities across the County to collate and prepare key evidence. Engagement has included local communities and businesses.

<p>3. Has the evidence base been synthesised on a spatial basis which is tailored to Woking?</p>	<p>√</p>	<p>Evidence has been collated on a spatial basis that is appropriate to Woking. Reflecting the lack of area based functionality within the borough this work has been conducted at the borough-wide level, although evidence does exist at the more local level where appropriate, for example to support designation of the 'Priority Places' neighbourhoods in the Core Strategy, social infrastructure needs (by neighbourhood) and urban character. This evidence could be collated to support neighbourhood planning if necessary.</p> <p>So far, there has not been any expression of interest from local neighbourhoods to prepare neighbourhood plans.</p>	<p>No recommendations</p>
<p>4. Does the breadth and depth of the evidence base reflect the nature and content of the DPDs being produced?</p>	<p>√√</p>	<p>The evidence base underpinning the Core Strategy is very comprehensive. The topic based evidence is considered as up to date as is reasonable to provide a platform for robust decisions. Those elements that are most likely to be subject to change have been regularly reviewed and kept up to date (e.g. housing, employment and infrastructure) to reflect uncertainty around forecasting arising from the recent recession and tightening public funding constraints.</p> <p>The housing evidence also includes recent assessment of viability in relation to affordable housing, which reflects the high level of need for affordable housing which exists in the borough.</p>	<p>No recommendations</p>
<p>5. Does the evidence base include those studies</p>	<p>√√</p>	<p>Woking's existing topic based evidence base is extensive and includes all the evidence base studies required or suggested by</p>	<p>At some point in the future, for example when further work is done to develop the Borough's CIL, viability work could be extended to include "cumulative impacts</p>

<p>that are required by Government?</p>	<p>existing government guidance. There is also a very good fit with emerging requirements under the Draft NPPF.</p>	<p><i>on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan” as envisaged by paragraph 41 of the Draft NPPF.</i></p>
<p>6. Does infrastructure planning form an integral part of the evidence base?</p>	<p>√√ There has been extensive work on infrastructure requirements, both at the borough and county level. Woking have a dedicated officer to undertake this work and have engaged with delivery stakeholders from an early stage in the plan preparation process. Detailed work has been undertaken on social and community infrastructure requirements.</p>	<p>No recommendations</p>
<p>7. Has joint working on the evidence base been considered and pursued where appropriate?</p>	<p>√√ Woking participates in a number of cross-Surrey joint working groups and these groups have been successful in preparing joint evidence base studies, adopting a common and strategic approach to dealing with key issues such as the Thames Basin Heaths SPA and sharing of information. Woking has also worked with its immediate neighbouring local authorities on a number of evidence base studies. This partnership approach is commended, and the relationships that have established through such joint-working will be an important platform for the new “duty to co-operate” under the Localism Bill.</p>	<p>No recommendations</p>
<p>8. Has the evolving evidence base been carefully documented?</p>	<p>√ Woking Council have a useful evidence base webpage which helpfully sets out the evolving nature of the evidence base documents and usefully retains older elements of the evidence base to show how this has evolved.</p>	<p>Consider updating the evidence base spreadsheet to document how the evidence base is evolving, as an aide memoire for preparation for the Examination in Public. Its usefulness could be further enhanced by organising the documents by evidence base topic headings and the inclusion of a short commentary explaining which evidence is considered superseded by more recent work. Community consultation reports could be included in the spreadsheet also. This spreadsheet could then be updated as/when new studies/consultation reports are added to the evidence base.</p>
<p>9. Does the evidence required by the SEA Directive form an integral part of the evidence base?</p>	<p>√ The evidence required by the SEA Directive should also be regarded as an integral element of the evidence base. Sustainability Appraisal is expected to play a key role in documenting the ‘story’ behind the plan’s preparation.</p>	<p>It would be useful to prepare an update to Scoping Report to assist in the appraisal of the Submission SA report – to reflect the volume of new evidence which has been prepared since the Scoping Report was written. Alternatively, an analysis of the updated baseline could be incorporated into</p>

the Submission SA report when this is prepared.

The Submission SA report should tell the story of the plan's development, including in particular why particular alternatives were chosen and why other reasonable alternatives were discarded.

## 2 Introduction

### 2.1 Purpose of this report

- 2.1.1 The Planning Advisory Service (PAS) provides consultancy and peer support, learning events and outline resources to improve local government planning. The range of practical support packages for local authorities includes a support package relating to the development and use of the evidence base to support the plan making process. In July 2011 Woking Borough Council requested assistance with a review of their assembled evidence base. URS/Scott Wilson have been commissioned to provide this support on behalf of the PAS.
- 2.1.2 This report summarises the findings of the review of the evidence base, and makes any subsequent recommendations for further actions that might be needed to ensure that the evidence base is sufficiently robust to support the Core Strategy through the submission and examination processes.
- 2.1.3 This review consists of two closely integrated elements. The first relates to an attempt to answer the following questions (which relate to satisfying the tests of soundness in PPS12). These questions are derived from the published PAS Guidance on use of the Evidence Base: <http://www.pas.gov.uk/pas/core/page.do?pagelid=46130>. To fulfill the requirements of PPS12, it is important that the Council is able to satisfy itself that the following questions can be answered in the affirmative:
1. Does the evidence base underpin the generation and testing of options and therefore inform the draft Core Strategy content?
  2. Does the evidence base include the views of the local community as well as research and fact finding?
  3. Has the evidence base been synthesised on a spatial basis which is tailored to Woking?
  4. Does the breadth and depth of the evidence base reflect the nature and content of the DPDs being produced?
  5. Does the evidence base include those studies that are required by Government?
  6. Does infrastructure planning form an integral part of the evidence base?
  7. Has joint working on the evidence base been considered and pursued where appropriate?
  8. Has the evolving evidence base been carefully documented?
  9. Does the evidence required by the SEA Directive form an integral part of the evidence base?
- 2.1.4 The evidence base compiled to-date has been reviewed against these questions and against the best practice guidance and advice set out in the PAS Evidence Base Guidance document. The understanding of this evidence base and how it is being used has been further informed by discussion with the Woking Planning Policy Team.
- 2.1.5 The second element of this review relates to the emerging Draft National Planning Policy Framework (NPPF). There are a number of requirements set out in the draft framework in relation to the evidence base and the compliance of the assembled evidence is considered with respect to these. Many of these requirements do not represent a significant change from



current guidance. Most, if not all of the questions raised by PPS12 and the PAS Evidence Base Guidance, remain valid and appropriate moving forward under the new system.

- 2.1.6 It is important to state that this advice has been provided on a professional and ‘critical friend’ basis only, and is not a substitute for legal advice. The national policy context is changing, and any advice represents our best available knowledge at the time of writing. It will be up to the Council to take forward the conclusions and recommendations of this report as they see fit, alongside legal advice sought from Counsel.

### 3 Review of the Evidence Base against the PPS12 Tests of Soundness

#### 3.1 Does the evidence base underpin the generation and testing of options and therefore inform the draft Core Strategy content?

- 3.1.1 The consideration of alternatives or options is central to achieving a sound (justifiable) plan; and PPS12 emphasises that DPDs must be the most appropriate strategy when considered against the reasonable alternatives. The evidence base provides the means to both generate and test options.

*“The generation of realistic alternatives needs evidence on what is possible and the evaluation of alternatives needs evidence to anticipate their likely implications”.*

Communities and Local Government (2008). *Spatial Plans in Practice: Supporting the reform of local planning*

- 3.1.2 In order to develop deliverable spatial options, the evidence base for key settlements and their hinterlands must be reasonably well developed at an early stage. The SHLAA is a key component of this evidence base, and should be undertaken early on in the plan making process so that the Local Planning Authority (LPA) has knowledge of its deliverable housing sites when developing spatial options.
- 3.1.3 Woking's first SHLAA was undertaken in July 2009 and updated in 2010, and a further update is taking place in 2011. The timing of this research suggests that this information would have been available to inform strategic housing options. A Draft Infrastructure Study has been published in July this year, which draws together extensive earlier work on infrastructure capacity, including a county wide study into infrastructure capacity, which reported in June 2009, and social and community facilities audits undertaken in 2005 and 2006. (The social and community facilities audit work was later drawn together and updated in a Draft Social and Community Facilities Audit for Woking, published April 2011). The Draft Social and Community Facilities Audit (2011) helpfully analyses information on community facilities by nine identified neighbourhoods.
- 3.1.4 In 2006 a multi-modal model of the transport network was developed for Guildford and Woking (The Guildford and Woking Integrated Transport Study (GWITS)) and this enabled the implications of development options (particularly housing) to be tested for their impact on the network. This work has since been updated for Woking, but was available at an early stage to inform development options.
- 3.1.5 Other useful studies that were prepared prior to the 2009 consultation on issues and options included a joint Strategic Housing Market Assessment (SHMA) with neighboring councils Guildford and Waverley (February 2009); a Town, District and Local Centres Study (October 2009), the Woking Borough Open Space, Sports & Recreation Facilities Audit (September 2008) and a Strategic Flood Risk Assessment, including a joint study with Surrey Heath which focused on the River Bourne catchment (March 2007) and a separate analysis of the River Wey catchment (March 2009).

- 3.1.6 These important elements of the evidence base were therefore prepared at an appropriate and timely stage to inform the thinking within the Issues and Options consultation document, which was published between 27 October and 7 December 2009<sup>1</sup>.
- 3.1.7 In order to determine whether the evidence base that was available to the Council has appropriately informed the consideration and development of options, the consultation material that has been published has been reviewed.
- 3.1.8 The Issues and Options consultation document published in 2009 includes an Appendix which provides a “signpost to further Information”, and which lists the evidence base studies available at the time. While this is useful, it might have been more helpful to provide appropriate references to the evidence base (and to the Appendix) throughout the main text of the consultation paper so as to alert readers to the extent of evidence that was available. In addition, it is felt that presenting the options for consideration in a separate questionnaire made this document disjointed and more difficult for readers to comprehend the key issues. Although it is appreciated that this approach was taken to make the consultation material “user friendly” and succinct, it is felt that this was a lost opportunity to draw on the extensive evidence base that was available at the time to support the discussion of options. (In contrast, the earlier Core Strategy issues and options consultation document (June 2005) - prepared in relation to the Core Strategy that was withdrawn, clearly sets out the issues which arise from the evidence base, as well as summarising the communities early responses to consultation).
- 3.1.9 The Draft Core Strategy for Consultation document (November 2010) is more helpful. It draws on various evidence base documents as the basis for draft policies, and these documents are referenced throughout the discussion document, as well as usefully summarised in a text box at the end of each policy section.
- 3.1.10 References to the evidence base are helpful, but they don't tell the full story. The consultation material does not describe how the Council came to its ‘preferred option’, i.e. why it chose this option and why the alternative options were discarded. However the alternative options SA report is helpful in providing this story, now that this is available on the website.

### What does the NPPF say?

- 3.1.11 The proposed tests of soundness are set out at paragraph 48 of the draft NPPF. The ‘Justified’ test remains essentially the same – *“the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”*. Paragraph 27 states that the Local Plan should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Again, this is already required under PPS12.

---

<sup>1</sup> It is noted that a Core Strategy for Woking was prepared and submitted in 2006. In July 2007 the Council received a formal direction to withdraw the Core Strategy from the examination process, so the document was never adopted. This review relates to the latest Core Strategy process, which commenced in 2009.

## 3.2 Does the evidence base include the views of the local community as well as research and fact finding?

- 3.2.1 PPS 12 emphasises that the evidence base should contain two elements, evidence of participation and evidence of research/fact finding. The participation element incorporates the views of the local community and others who have a stake in the future of the area. Paragraphs 4.19 to 4.29 set out the requirements for public participation, community engagement and engagement with delivery stakeholders. Community involvement should be *appropriate, from the outset, continuous, transparent and accessible and planned* (paragraph 4.20). Local authorities should undertake timely, effective and conclusive discussion with key stakeholders on what option(s) for a core strategy are deliverable (4.27).
- 3.2.2 Woking Council has worked hard to engage with local communities. Outreach activities have included meetings and presentations to the various Residents Associations in the area. The Council has met collectively and well as separately with respective Resident Associations to discuss their views. The Horsell, Hook Heath, and Pryford Resident Associations have been engaged in this way. The Council have also held seminars in various local areas such as Knaphill, Byfleet and West Byfleet to seek views of the various Associations in the area and the general public. In Woking there are no Parish Councils and subsequently Resident Associations play a significant role in their local areas.
- 3.2.3 Woking Council has been very diligent in capturing the views of the local community and stakeholders. Summaries of the consultation responses that were received in response to early work on the first Core Strategy were helpfully set out in the first Issues and Options consultation document (June 2005). While the more recent consultation documents, including the Issues and Options Consultation (2009) and the Draft Core Strategy for consultation (November 2010) have taken a different approach and not included such summaries, reports summarising the responses to these consultations have been prepared separately and published on the website. Market research consultants Halo summarised the responses to the Core Strategy issues and options consultation which ran from 26 October 2009 to 7 December 2009 and this report is available on the website.
- 3.2.4 Two reports have been prepared (aligned with the two key community consultations) which capture a summary of the key issues raised, officers responses and officers recommendations. The officer's responses are full and measured and also make a number of useful references to the evidence base in supporting their recommendations for the preferred option/policy approach). The reports document both the issues and options (January 2010) and the Draft Core Strategy consultation processes (June 2011). These reports are considered very helpful in capturing evidence of public participation in the plan process.
- 3.2.5 Moving now to consideration of the involvement of stakeholders, the Council is preparing an Infrastructure Delivery Plan (IDP) which has established reporting and consultation arrangements with infrastructure delivery providers; and preparation of this Plan has required on-going consultation with a wide range of delivery agencies. An infrastructure sub-group of the Woking Partnership (LSP) was established in July 2009 to oversee development of the IDP. To maintain this connection it is intended that the Infrastructure Delivery Plan will report to the Woking Partnership for sign-off at least bi-annually.
- 3.2.6 Consultation undertaken to support preparation of the IDP has included an Infrastructure Delivery Workshop, meetings with the Woking Partnership, individual contact with individual service providers and meetings. Work on the Woking Infrastructure Delivery Plan commenced in 2009, and has built on earlier work undertaken by officers in relation to social, community and voluntary services, which is captured in the Draft Social and Community Facilities Audit (April 2011 and based on earlier audits of this infrastructure undertaken in 2005 and 2006.

- 3.2.7 In addition the IDP was subject to consultation during the Pre-submission consultation on the Core Strategy during July – September 2011, so the wider public has had an opportunity to comment on this important document.
- 3.2.8 Woking Council have also been involved in discussions with stakeholders in relation to infrastructure planning work at the county level, undertaken as part of the county wide Surrey Infrastructure Study, and discussions with neighbouring authorities and the County Council are on-going through cross-boundary forums such as the Surrey Planning Officers Society, Planning Working Group and West Surrey Group. Further discussion of infrastructure planning and joint working with neighbouring authorities is considered under questions 3.6 and 3.7 of this review.

### What does the NPPF and Localism Bill say?

- 3.2.9 Paragraph 25 of the Draft NPPF states that Local Plans are the key to: *“delivering development that reflects the vision and aspiration of local communities. To do this, early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that the Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the development of the area, including adopted neighbourhood plans.”*
- 3.2.10 Again at paragraph 125 which relates to inclusive communities, local planning authorities are charged with creating *“a shared vision with communities of the residential environment and the facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of local and neighbourhood plans and in planning decisions”*.
- 3.2.11 The enabling powers of the Localism Bill shift responsibility to local neighbourhoods through provisions relating to Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders (if neighbourhoods wish to take up this challenge). Evidence of local views and perspectives will become even more important in the plan making process under the Localism Bill provisions than in the present system. As local authorities will be charged with resourcing/assisting with these processes, such evidence becomes very important.
- 3.2.12 The Draft NPPF does not specifically set out the evidence requirements for Neighbourhood Plans, although to pass independent examination the neighbourhood plan must *“have regard to the policies in this Framework”*. However one element of the evidence base which is heavily stressed in the Draft NPPF is that local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area (paragraph 29) and that they should *“work closely with the business community to understand their changing needs”*... A robust evidence base must be prepared and maintained to understand existing business needs and likely changes, and this should be complied with the assistance of the county and neighbouring authorities and with Local Enterprise Partnerships (LEP).
- 3.2.13 Woking Council have engaged with the business community through a number of both formal and informal mechanisms. The Council has held a series of direct and formal meetings with the Woking Chamber of Commerce, comprising representatives of various business interests in the area. In particular, a series of meetings to identify the issues and concerns that they wished to have addressed by the Core Strategy were held. The Council has also held a series of presentations to the group at each stage of the Core Strategy process and have met some of their members directly to address specific concerns. The Woking Chamber of Commerce has been formally consulted as a group and as individual local businesses at each stage of the process through the Core Strategy consultations and their comments taken into account. In December 2007 a business survey was undertaken to support the work on employment land

demand and supply and a number of local businesses were engaged in this process. Woking is also part of the Enterprise M3 Local Enterprise Partnership. Two planners from the Planning Policy Team sit within the Partnership. Although the group's work is in the initial stages this is expected to pick up momentum in the near future.

### 3.3 Has the evidence base been synthesised on a spatial basis which is tailored to Woking?

- 3.3.1 A topic-by-topic approach to the assembly of evidence can produce a somewhat fragmented evidence base, particularly if these studies are being prepared to different timetables. It is important to step back at some stage in the evidence gathering process and effectively synthesise the messages coming out of the various topic-based studies.
- 3.3.2 One way to do this is to adopt an area-by-area approach. This essentially involves disaggregating the plan area into spatial units of analysis and characterising each of these, drawing on available data and the findings from the topic-based studies. Neighbourhood areas may be an appropriate spatial unit of analysis in some local authority areas, reflecting the emphasis in the Localism Bill and Draft NPPF; while in others, groupings of settlements and/or their hinterlands may be more appropriate.
- 3.3.3 As part of the adopted Local Plan, Woking Council produced area summaries setting out the key characteristics of each area. The Council have also more recently undertaken a Character Study that profiles the physical characteristics of each area. Due to the homogeneity of the functions of the various areas, Woking have not done any area profiling about functionality. However, they have established a hierarchy of centres which identifies centres which perform similar functions. There is also useful spatial information in the Social and Community Facilities Audit and the draft Infrastructure study – including maps showing the distribution of services and a discussion of area-based requirements.
- 3.3.4 Woking Council have also engaged with Residents Associations in a number of the local areas, as described under section 3.2 of this review, in order to gain their particular area-based perspectives. To date that has not been any local interest in the preparation of neighbourhood plans and no formal work has been undertaken with local communities regarding neighbourhood planning. Internally, councillors have been briefed about what neighbourhood plans are and the implications for policy making. The Corporate Strategy Manager and the Planning Policy Manager have been tasked to start internal debate about the localism agenda, which will include neighbourhood plans.

#### Priority Places

- 3.3.5 In drawing up Local Plans the draft NPPF requires local planning authorities to identify “*priority areas for economic regeneration, infrastructure provision and environmental enhancement*” (paragraph 73). Synthesising the evidence base by spatial units should help to identify such areas and to provide the justification for their identification in the Local Plan. The Publication Draft of the Woking Core Strategy has identified the Ward of Maybury and Sheerwater and the Lakeview Estate of Goldsworth Park as ‘Priority Places’ where specific types of development will be targeted to address the underlying causes of deprivation in the areas.
- 3.3.6 The ward of Maybury and Sheerway has been identified because it is one of four priority places in Surrey, where multiple interventions by county-wide and local partners are to take

place in a coordinated manner to address the high level of deprivation which exists (parts of this area are within the 14% most deprived areas nationally and the most deprived in the county for health deprivation and disability, income and employment). At a more local level, the Lakeview Estate area of Goldsworth Park has also been identified as a Priority Place to which resources should be targeted, as this is the second most deprived area in Woking Borough and falls within the 28% most deprived areas nationally. Although levels of deprivation are not as acute as in Maybury and Sheerwater, the Lakeview Estate experiences some specific socio-economic issues, particularly relating to having one of the highest concentrations of socially rented family accommodation in the Borough, and a high number of single parent households.

- 3.3.7 Identifying these priority areas in the Core Strategy is consistent with the approach advocated by the draft NPPF. The underlying issues behind this deprivation are recognised as being complex, and varied across the area. A number of Council and Partnership papers set out these issues in detail. Further evidence to support the identification of these areas in the Core Strategy is contained in a report to the Woking Partnership received on 22 April 2009 which sets out the reason for Lakeview, Maybury and Sheerwater being classed as Priority Places, along with research into these areas (Needs Assessment) undertaken by the Borough and County Council. This research also supports a number of Local Community Action Plans.

### 3.4 Does the breadth and depth of the evidence base reflect the nature and content of the DPDs being produced?

- 3.4.1 The breadth and depth of the evidence base required will obviously depend on the nature and content of the DPD being prepared. Evidence gathered should be proportionate to the purpose of the DPD and relevant to the place in question. Core Strategies therefore require a significant amount of evidence and some of the evidence required is a de facto requirement. In the case of Woking, the evidence base underpinning the development of the Core Strategy is very comprehensive and includes all of the studies which are recommended by national planning policy guidance.
- 3.4.2 Keeping the evidence base up-to-date is a challenge (and a requirement of both PPS12 and the Draft NPPF). Some issues however, are less transient and liable to short-term change than others, and it is important to make a distinction to enable meaningful progress to be made. It is pleasing to note that the more transient evidence, such as that relating to housing and employment has been periodically revisited (for example the Woking SHLAA has been reviewed annually since it was first prepared in 2009, and that earlier work on employment land – an Employment Needs Assessment prepared in 2005, was revised and updated by and Employment Land Review Market Appraisal in 2010. This evidence is considered as up to date as practically possible, especially in light of the uncertainty around forecasting arising from the recent recession and tightening public funding constraints.
- 3.4.3 The housing evidence also includes recent assessment of non-strategic housing sites (published July 2010) – to examine the suitability of various potential affordable housing policy positions in terms of the likely impact on residential development viability. This work is considered very appropriate given the high level of need for affordable housing which exists in the borough. All other evidence documents are considered as up to date as is reasonable to provide a platform for robust decisions.

## What does the NPPF say?

- 3.4.4 Paragraph 20 of the Draft NPPF states that each local planning authority is required to produce a Local Plan for its area and that any additional DPDs should only be used where clearly justified. This suggests a return to the old-style UDPs and subsequently, that Local Plans will contain both strategic and more detailed policies, including site allocations. This is confirmed by paragraph 24 of the Draft NPPF which states that Local Plans should indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map, allocate sites for development, with detail provided “*on form, scale, access and quantum of development where appropriate*”; including identifying Article 4 areas and land which will be protected from development due to its environmental or historic value.
- 3.4.5 For those planning authorities who decide to reconfigure their Core Strategy as a Local Plan prior to submission, this is likely to have implications for the spatial level of detail required in the supporting evidence base.
- 3.4.6 It is understood that Woking are going to continue with the approach of preparing a Core Strategy and separate Site Allocations Development Plan Document so this requirement is unlikely to apply in this case. It is also understood that an Area Action Plan will be prepared for Woking Town Centre, to reflect both its importance for the borough in terms of economic development, as well as the significant level of change which is expected in this area. This approach is justified given the town centres significance as a primary economic centre in the South East. The Council have sought clarification from CLG regarding their proposed suite of DPDs in light of the change of approach in the Draft NPPF. It was CLG’s view is that it is up to Local Planning Authorities to determine how many Plans they wish to prepare.
- 3.4.7 Another requirement of the Draft NPPF is that reviews of land available for economic development should be undertaken at the same time as, or combined with, the SHLAA and should include a reappraisal of the suitability of previously allocated land (paragraph 30). It is considered that work on the SHLAA and employment land for Woking have been undertaken within similar timeframes and thus would broadly meet this requirement.

## Neighbourhood Planning

- 3.4.8 The Localism Bill will devolve planning powers to communities to enable them to shape the place they live in, especially through the introduction of Neighbourhood Plans. Neighbourhood plans provide an opportunity to “shape and direct development in their area, subject to the presumption in favour of sustainable development” (paragraph 51, Draft NPPF). The onus will be on communities to research, consult on and produce their own plans, whilst local authorities will have a ‘duty to support’, providing technical advice at various stages of the process.
- 3.4.9 Neighbourhood plans must be in “general conformity” with the strategic policies of the Local Plan and should “plan positively to support them” (paragraph 50, Draft NPPF). A neighbourhood plan must also “have regard to the policies in this Framework” (paragraph 52, Draft NPPF). However neighbourhoods will have the power to promote more development than is set out in the strategic policies of the Local Plan (paragraph 50, Draft NPPF).
- 3.4.10 Although it is expected that neighbourhood plan policies will need to be backed by solid evidence, the evidence requirements are not set out in the Draft NPPF. It is envisaged that this evidence will need to be “proportionate”, reflecting the requirements for local plans and no more than is necessary to address the issues covered by the plan. Evidence collated for the Core Strategy should assist with the neighbourhood planning process and should be supplemented by evidence from within the community. It is likely that employment and business development will be of principal importance in many communities and subsequently that local business organisations should be closely engaged in building the evidence base for neighbourhood plans.



- 3.4.11 As stated previously, to date there has not been any expression of interest from the local communities in Woking to prepare neighbourhood plans.

### 3.5 Does the evidence base include those studies that are required by Government?

- 3.5.1 Woking's existing topic based evidence base is very comprehensive and includes all the evidence base studies required or suggested by existing government guidance as contained in current Planning Policy Statements. There is also a very good fit with emerging requirements under the Draft NPPF. At some point in the future, for example when further work is done to develop the Borough's CIL, viability work could be extended to include *"cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan"* as envisaged by paragraph 41 of the Draft NPPF.
- 3.5.2 In undertaking topic based studies it is important to ensure that the scope and level of detail reflects the significance of the issue in question (i.e. its proportionality relevant to the area in question). Studies should also be integrated as much as possible, rather than being produced without reference to other evidence base work taking place. Having not being involved in the production of these studies it is difficult to comment on the level of integration. However, as there is cross referencing within the studies to other studies which are being undertaken, and the Council ensure that any briefs to consultants include reference to other work that is taking place, it is considered that appropriate integration has been achieved.

#### What does the NPPF say?

- 3.5.3 The Draft NPPF specifically requires integration of the assessment of and strategies for housing, employment and other uses (para 27) and...that reviews of land available for economic development should be undertaken at the same time as, or combined with, the SHLAA and include a *"reappraisal of the suitability of previously allocated land"* (paragraph 30). The NPPF also requires that they *"take full account of relevant market and economic signals such as land prices to inform judgments about levels of demand"*.
- 3.5.4 Woking's recent research into housing requirements and potential sites (SHLAA and SHMA) and work on employment land requirements, including a market appraisal; has all been undertaken during a similar time period (2010-2011). Work on economic viability in relation to affordable housing has also been recently undertaken (July 2010). It is therefore considered that as far as is practical, this research has been closely integrated and reflects the latest position.
- 3.5.5 To give an indication of the depth of evidence that has been prepared, the following table sets out both the topic based evidence base requirements, originating from current planning policy statements and the emerging NPPF; and how Woking has responded to these.

**Table 2: Evidence base studies required or suggested by Government guidance and the Woking Evidence Base**

Existing Government guidance	Associated evidence base study	Draft National Planning Policy Framework	Associated evidence base study	Woking Evidence Base
<p><b>Design</b> <b>PPS 1: Delivering Sustainable Development</b> <i>Planning authorities should prepare robust policies on design and access. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its present defining characteristics (para. 36).</i></p>		<p><i>Local Plans, including any neighbourhood plans, should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its present defining characteristics (para. 116).</i></p>	Town and landscape assessment?	<p><b>Woking Character Study (October 2010)</b>  A borough wide character study to identify, analyse and describe in a systematic and objective way the form and character of each main settlement as a whole, and each distinct sub-area within it.  <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/charcstu/wwwoking.govukldfcharacterstudy">http://www.woking.gov.uk/planning/policy/ldfresearch/charcstu/wwwoking.govukldfcharacterstudy</a></p>
<p><b>Planning Policy Statement: Planning and Climate Change - Supplement to Planning Policy Statement 1</b>  Planning authorities should “consider identifying suitable areas for renewable and low-carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources”  “Planning authorities should have an evidence-based understanding of the local feasibility and potential for renewable and low-carbon technologies, including microgeneration, to supply new development in their area” and “set out a target percentage of the</p>	Planning for Climate Change (Renewable Energy) study	<p><i>...Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change (para. 149).</i>  Local planning authorities should:  “consider identifying suitable areas for renewable and low-carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources”  <i>identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers (para. 152).</i></p>	Renewable Energy Study	<p><b>Climate Change and Decentralised, Renewable and Low Carbon Evidence Base (November 2010)</b>  <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/ccdr1ceeb">http://www.woking.gov.uk/planning/policy/ldfresearch/ccdr1ceeb</a></p>

Existing Government guidance	Associated evidence base study	Draft National Planning Policy Framework	Associated evidence base study	Woking Evidence Base
<p><i>energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is viable"</i></p>				
<p><b>Planning Policy Statement 3: Housing</b>  <i>"Local Development Documents and Regional Spatial Strategies policies should be informed by a robust, shared evidence base, in particular, of housing need and demand, through a Strategic Housing Market Assessment and land availability, through a Strategic Housing Land Availability Assessment"</i></p>	<p>Strategic Housing Market Assessment (SHMA)            Strategic Housing Land Availability Assessment (SHLAA)</p>	<p>Local planning authorities should:  <i>...prepare a Strategic Housing Market Assessment to assess their full housing requirements, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to require over the plan period which:</i></p> <ul style="list-style-type: none"> <li>- <i>meets household and population projections...;</i></li> <li>- <i>addresses the need for all types of housing...; and</i></li> <li>- <i>caters for housing demand and the scale of housing supply necessary to meet this demand...;</i></li> </ul> <p><i>....prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified requirement for housing over the plan period (para. 28).</i></p>	<p>Strategic Housing Market Assessment (SHMA)            Strategic Housing Land Availability Assessment (SHLAA)</p>	<p><b>Housing Topic Paper (November 2010)</b>  <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/housingtopic">http://www.woking.gov.uk/planning/policy/ldfresearch/housingtopic</a></p> <p><b>Strategic Housing Market Assessment (SHMA)</b>            Woking has undertaken a joint Strategic Housing Market Assessment (SHMA) with neighboring councils of Guildford and Waverley (February 2009)  <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/shma">http://www.woking.gov.uk/planning/policy/ldfresearch/shma</a></p> <p><b>Strategic Housing Land Availability Assessment (SHLAA)</b>            A SHLAA was first prepared in 2009, updated in 2010 and is currently being updated for 2011.  <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/shlaa">http://www.woking.gov.uk/planning/policy/ldfresearch/shlaa</a></p> <p><b>North Surrey Gypsy and Traveller Accommodation Assessment 2006-2016</b>            (April 2007)  <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/shlaa">http://www.woking.gov.uk/planning/policy/ldfresearch/shlaa</a></p>

Existing Government guidance	Associated evidence base study	Draft National Planning Policy Framework	Associated evidence base study	Woking Evidence Base
				<a href="http://www.woking.gov.uk/planning/policy/ldfresearch/gtaa/gtaappdf.pdf">licy/ldfresearch/gtaa/gtaappdf.pdf</a>  Population Paper (February 2011) <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/Poptp.pdf">http://www.woking.gov.uk/planning/policy/ldfresearch/Poptp.pdf</a>
<p><b>Consultation Paper on a new Planning Policy Statement 4: Planning for Sustainable Economic Development</b></p> <p>Local planning authorities should “Thoroughly assess the existing supply of land available for economic development through an employment land review”</p>	Employment Land Review	<p>Local planning authorities should:</p> <ul style="list-style-type: none"> <li>• <i>work together with county and neighbouring authorities and with local enterprise partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and</i></li> <li>• <i>work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability (para.29)</i></li> </ul> <p><i>Local planning authorities should use this evidence-base to assess:</i></p> <ul style="list-style-type: none"> <li>• <i>the requirements for land or floorspace for economic development, including both the quantitative (how much) and qualitative (what type) requirements for all foreseeable types of economic activity over the plan period, including for retail and leisure development;</i></li> <li>• <i>the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified requirements. Reviews ...should be undertaken at the same time as, or combined with, strategic housing land availability assessments and should include a reappraisal of the suitability of previously</i></li> </ul>	<p>Employment Land Review</p> <p>Retail (Town Centre Use) Assessment – should also incorporate leisure use (see below)</p>	<p><b>Employment Land Review</b></p> <p>Includes an Employment Position Paper (January 2010) and a Market Appraisal (April 2010)</p> <p><a href="http://www.woking.gov.uk/planning/policy/ldfresearch/emprese">http://www.woking.gov.uk/planning/policy/ldfresearch/emprese</a></p> <p><b>Surrey Hotel Futures (September 2004)</b></p> <p><a href="http://www.woking.gov.uk/planning/policy/ldfresearch/shf.pdf">http://www.woking.gov.uk/planning/policy/ldfresearch/shf.pdf</a></p>

Existing Government guidance	Associated evidence base study	Draft National Planning Policy Framework	Associated evidence base study	Woking Evidence Base
		<p><i>allocated land</i></p> <ul style="list-style-type: none"> <li>• <i>the role and function of town centres and the relationship between them, including any trends in the performance of centres</i></li> <li>• <i>the capacity of existing centres to accommodate new town centre development</i></li> <li>• <i>locations of deprivation which may benefit from planned remedial action; and</i></li> <li>• <i>the needs of the food production industry and any barriers to investment that planning can resolve (para.30)</i></li> </ul>		
		<p><b>Viability</b></p> <p><i>Local planning authorities, parishes and neighbourhood forums should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the development plan at serious risk, and should facilitate development throughout the economic cycle (para. 41).</i></p>	Viability Assessment	<p><b>Economic Viability Assessment (July 2010)</b></p> <p>Affordable housing viability assessment  <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/eva.pdf">http://www.woking.gov.uk/planning/policy/ldfresearch/eva.pdf</a></p>
<p><b>Planning Policy Statement 5: Planning for the Historic Environment</b> <i>Regional and local planning</i></p>	Historic Environment Record	<p><i>Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets</i></p>	Historic Environment Record	<p><b>The Heritage of Woking (2000)</b>  <a href="http://www.woking.gov.uk/planning/lis">http://www.woking.gov.uk/planning/lis</a></p>

Existing Government guidance	Associated evidence base study	Draft National Planning Policy Framework	Associated evidence base study	Woking Evidence Base
<p><i>authorities should ensure that they have evidence about the historic environment and heritage assets in their area and that this is publicly documented. The level of detail of the evidence should be proportionate and sufficient to inform adequately the plan-making process.</i></p> <p><i>Local planning authorities should either maintain or have access to a historic environment record.</i></p> <p><i>Local planning authorities should use the evidence to assess the type, numbers, distribution, significance and condition of heritage assets and the contribution that they may make to their environment now and in the future. It should also be used to help predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.</i></p>		<p><i>and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Local planning authorities should either maintain or have access to a historic environment record (para. 37)</i></p> <p><i>Local planning authorities should set out a strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (para.178).</i></p> <p><i>Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible (para. 191).</i></p>		<p><a href="http://www.woking.gov.uk/planning/heritage/pd/f">tedbuildings/whichbuildingsarelisted/wwwokinggovukplanningheritage.pdf</a></p>
<p><b>Planning Policy Statement 6: Planning for Town Centres</b></p> <p><i>“Need assessments for the development plan document period should be carried out as part of the plan preparation and review process, and updated regularly”</i></p> <p><i>“An assessment of the need for new office floorspace over the development plan document period</i></p>	Retail (Town Centre Use) Assessment	<p>Local planning authorities should have a <i>clear understanding of business needs within the economic markets operating in and across their area</i> and should use this evidence-base to assess:</p> <ul style="list-style-type: none"> <li><i>the role and function of town centres and the relationship between them, including any trends in the performance of centres</i></li> <li><i>the capacity of existing centres to accommodate new town centre</i></li> </ul>	Retail (Town Centre Use) Assessment – should also incorporate leisure use	<p><b>Town, District and Local Centres Study (October 2009).</b></p> <p>An assessment of the vitality and viability of Woking Town Centre. Includes quantitative retail capacity forecasts for the Town Centre and West Byfleet</p> <p><a href="http://www.woking.gov.uk/planning/policy/ldfresearch/tdlcstudy">http://www.woking.gov.uk/planning/policy/ldfresearch/tdlcstudy</a></p>

Existing Government guidance	Associated evidence base study	Draft National Planning Policy Framework	Associated evidence base study	Woking Evidence Base
<p><i>should be carried out as part of the plan preparation and review process, and updated regularly”</i></p> <p><i>“In preparing their development plan documents local planning authorities should also consider the needs for other main town centre uses”</i></p>		<p>development (para 29-30)</p>		
<p><b>Planning Policy Statement 7: Sustainable Development in Rural Areas</b></p> <p><i>“The Government recognises and accepts that there are areas of landscape outside nationally designated areas that are particularly highly valued locally. ...carefully drafted, criteria-based policies in LDDs, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, ...</i></p>	<p>Landscape Character Assessment</p>	<p><i>Local planning authorities should:...</i></p> <p><i>Plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (para. 167)</i></p> <p><i>Planning policies should:</i></p> <p><i>...take account of the need to plan for biodiversity at a landscape-scale across local authority boundaries (para. 168)</i></p> <p><i>aim to:</i></p> <p><i>identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason (para. 173)</i></p>		<p><b>Woking Character Study (October 2010)</b></p> <p>A borough wide character study to identify, analyse and describe in a systematic and objective way the form and character of each main settlement as a whole, and each distinct sub-area within it.</p> <p><a href="http://www.woking.gov.uk/planning/policy/ldfresearch/charcstu/wwwokinggovukldfcharacterstudy">http://www.woking.gov.uk/planning/policy/ldfresearch/charcstu/wwwokinggovukldfcharacterstudy</a></p>
<p><b>Planning Policy Statement 9: Biodiversity and Geological Conservation</b></p> <p><i>“Development plan policies...should be based upon up-to-date information about the environmental characteristics of their areas. These characteristics should include the relevant biodiversity and geological resources of the area. In reviewing environmental characteristics local</i></p>	<p>E.g. Biodiversity Audit, Biodiversity and Geodiversity Action Plan</p>	<p><i>Planning policies should:</i></p> <ul style="list-style-type: none"> <li>- take account of the need to plan for biodiversity at a landscape-scale across local authority boundaries</li> <li>- identify and map components of the local ecological networks, including: international, national and local sites of importance for biodiversity, and areas identified by local partnerships for habitat restoration or</li> </ul>		<p><b>Surrey Biodiversity Action Plan (November 2010)</b></p> <p><a href="http://www.surreywildlifetrust.org/conservation/surrey_biodiversity_action_plan">http://www.surreywildlifetrust.org/conservation/surrey_biodiversity_action_plan</a></p> <p><b>Thames Basin Heaths Special Protection Area Avoidance Strategy (2010)</b></p>

Existing Government guidance	Associated evidence base study	Draft National Planning Policy Framework	Associated evidence base study	Woking Evidence Base
<i>authorities should assess the potential to sustain and enhance those resources”</i>		<i>creation (para. 168).</i>		<a href="http://www.woking.gov.uk/planning/policy/ldf/tbhspa/spastrategy2010.pdf">http://www.woking.gov.uk/planning/policy/ldf/tbhspa/spastrategy2010.pdf</a>
<p><b>PPS12 Local Spatial Planning Infrastructure Planning</b></p> <p><i>4.8 The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. This evidence should cover who will provide the infrastructure and when it will be provided. The core strategy should draw on and in parallel influence any strategies and investment plans of the local authority and other organisations.</i></p>	Infrastructure Capacity and Delivery Study	<p><i>Local planning authorities should work with other authorities and providers to:</i></p> <ul style="list-style-type: none"> <li><i>• assess the quality and capacity of transport, water, energy, telecommunications, utilities, health and social care, waste and flood defence infrastructure and its ability to meet forecast demands; and</i></li> <li><i>• take account of the need for nationally significant infrastructure within their areas (para. 31).</i></li> </ul> <p><b>Health and wellbeing</b></p> <p><i>Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population, including expected future changes, and any information about relevant barriers to improving health and well-being (para.38).</i></p> <p><b>Defence and national security</b></p> <p><i>Local planning authorities should work with the Ministry of Defence’s Strategic Planning Team to ensure that they have and take into account the most up-to-date information about defence and security needs in their</i></p>	<p>Infrastructure Capacity and Delivery Study</p> <p>Health status and needs of local population can be captured in Infrastructure Capacity and Delivery Study</p> <p>Infrastructure Study?</p>	<p><b>Woking Infrastructure Capacity Study and Delivery Plan (First Draft July 2011)</b></p> <p><a href="http://www.woking.gov.uk/planning/policy/ldfresearch/infrastructure/idp.pdf">http://www.woking.gov.uk/planning/policy/ldfresearch/infrastructure/idp.pdf</a></p> <p><b>Surrey Infrastructure Capacity Study (June 2009)</b></p> <p><a href="http://www.surreyimprovement.info/sicp/reports3.pdf">http://www.surreyimprovement.info/sicp/reports3.pdf</a></p> <p><a href="#">Social and Community Infrastructure Requirements Study 2005</a></p> <p><a href="#">Social and Community Infrastructure Requirements Study 2006</a></p> <p><a href="#">Draft Social and Community Facilities Audit</a></p> <p>Joint Strategic Needs Assessment</p> <p>Priority Communities Group Action Plan – 2009/2014</p> <p>Priority Communities Group – Update Report to Woking Partnership (22 April 2009)</p> <p>Maybury Draft Local Community Action Plan April 2008</p>



Existing Government guidance	Associated evidence base study	Draft National Planning Policy Framework	Associated evidence base study	Woking Evidence Base
		area (para. 33).		Report on the Sheerwater Community Needs Assessment  Sheerwater Local Community Action Plan (January 2008)
<p><b>PPG13: Transport</b> 20. Local authorities should seek to ensure that strategies in the development plan and the local transport plan are complementary: consideration of development plan allocations and local transport priorities and investment should be closely linked.</p>		<p><i>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable economic growth...(Para.85)</i></p> <p><i>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice (para. 94).</i></p>		<p>Transport and Accessibility Topic Paper (February 2011) <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/Transpacctp">http://www.woking.gov.uk/planning/policy/ldfresearch/Transpacctp</a></p> <p><b>Woking 2026 Transport Assessment (December 2010)</b> <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/Woktranspassess">http://www.woking.gov.uk/planning/policy/ldfresearch/Woktranspassess</a></p> <p><b>Surrey Local Transport Plan 3 (2011)</b> <a href="http://www.surreycc.gov.uk/sccwebsites/sccwspages.nsf/LookupWebPagesByTITLE_RTF/Surrey+Transport+Plan+-+LTP3?opendocument">http://www.surreycc.gov.uk/sccwebsites/sccwspages.nsf/LookupWebPagesByTITLE_RTF/Surrey+Transport+Plan+-+LTP3?opendocument</a></p> <p><b>Guildford and Woking Integrated Transport Study Option Testing (2006)</b> <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/gwits">http://www.woking.gov.uk/planning/policy/ldfresearch/gwits</a></p>
<p><b>Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation</b> "Local authorities should undertake robust assessments of the existing</p>	Open Space, Sport and Recreation Audit / Assessment	<i>Planning policies should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. The information gained from this assessment of</i>	Open Space, Sport and Recreation Audit / Assessment	<p><b>Woking Borough Open Space, Sports &amp; Recreation Facilities Audit (September 2008)</b> <a href="http://www.woking.gov.uk/planning/policy/ldfresearch/gwits">http://www.woking.gov.uk/planning/policy/ldfresearch/gwits</a></p>

Existing Government guidance	Associated evidence base study	Draft National Planning Policy Framework	Associated evidence base study	Woking Evidence Base
<p><i>and future needs of their communities for open space, sports and recreational facilities”</i></p> <p><i>“Local authorities should also undertake audits of existing open space, sports and recreational facilities, the use made of existing facilities, access in terms of location and costs (such as charges) and opportunities for new open space and facilities”</i></p>		<p><i>needs and opportunities should be used to set locally derived standards for the provision of open space, sports and recreational facilities (para. 128).</i></p>		<p><a href="http://www.woking.gov.uk/planning/policy/ldfresearch/ppg17.pdf">licy/ldfresearch/ppg17.pdf</a></p> <p><b>Playing Pitch Study (2006)</b></p> <p><a href="http://www.woking.gov.uk/planning/policy/ldfresearch/ppsmay2006">http://www.woking.gov.uk/planning/policy/ldfresearch/ppsmay2006</a></p>
<p><b>Planning Policy Statement 25: Development and Flood Risk</b></p> <p><i>“A SFRA [Strategic Flood Risk Assessment] should be carried out by the local planning authority to inform the preparation of its LDDs, having regard to catchment-wide flooding issues which affect the area”</i></p>	Strategic Flood Risk Assessment	<p><i>Local Plans must be supported by strategic flood risk assessment and develop policies to manage flood risk, taking account of advice from the Environment Agency (para. 155)</i></p>	Strategic Flood Risk Assessment	<p><b>Strategic Flood Risk Assessment</b></p> <p>The SFRA has been undertaken in two phases: a joint study with Surrey Heath which focuses on the River Bourne catchment (March 2007) and a study that focuses on the River Wey catchment (March 2009).</p> <p><a href="http://www.woking.gov.uk/planning/policy/ldfresearch/sfra">http://www.woking.gov.uk/planning/policy/ldfresearch/sfra</a></p> <p>Woking Surface Water Management Plan (in progress)</p>
<p><b>Minerals Policy Statement 1: Planning and Minerals</b></p> <p>12. <i>“use the best available information on mineral resources within their areas ...; - undertake regular assessments of the reserves for which planning permission has been granted for all mineral workings in their areas, ...</i></p>	Responsibility of MPA – Surrey County Council	<p><i>Local planning authorities should use the best available information to develop and maintain an understanding of the extent and location of mineral reserves in their areas and assess the projected demand for their use (para. 32).</i></p>	Responsibility of MPA - Surrey County Council	

Existing Government guidance	Associated evidence base study	Draft National Planning Policy Framework	Associated evidence base study	Woking Evidence Base
<p><i>- assess the range, volumes and availability of waste material which may exist within reasonable proximity and which could provide suitable alternatives to primary minerals”.</i></p>				

### 3.6 Does infrastructure planning form an integral part of the evidence base?

- 3.6.1 Infrastructure planning should form an integral part of the evidence base. PPS12 emphasises that the core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking into account its type and distribution (paragraph 4.8) and consistent with other relevant plans and strategies relating to adjoining areas. This evidence must be strong enough to stand up to independent scrutiny (paragraph 4.45).
- 3.6.2 A first draft of the Infrastructure Capacity Study and Delivery Plan was published in July 2011. The Infrastructure Delivery Plan has been prepared by officers of the Council in conjunction with the Woking Partnership (LSP), various delivery agencies and specialist input from consultants. The draft IDP is informed by a raft of earlier studies and joint working with stakeholders which relates to a wide range of physical, social and environmental infrastructure. Significant work on infrastructure planning has been taking place both in the borough and across the county (work at the county level commenced mid 2008 and at the borough level in early 2009 and training and preparation for this work commenced even earlier). A Woking Partnership (LSP) sub-group on infrastructure was established in 2009 and there is a dedicated officer tasked to undertake this work. Engagement with social and community infrastructure providers and users took place as early as 2004 – 2006 and resulted in the preparation of a Social and Community Facilities Infrastructure Audit (published April 2011). These earlier studies and discussions with stakeholders have informed the preparation of both the IDP and the core strategy.
- 3.6.3 The Draft IDP is considered a useful document. In the future it might be helpful (if necessary to support neighbourhood planning tasks) to build on this early work by reorganising this information so that it provides a spatial understanding of infrastructure capacity and limitations – i.e. by providing summary schedules which highlight any particular constraints in certain areas of the borough, or at certain periods of the plan period.
- 3.6.4 In 2008 local authorities across Surrey began work on a three-year programme assessing infrastructure capacity in the county. The programme was designed to engage all eleven district and borough councils, along with other infrastructure providers. The outputs of this study have included a live GIS database showing locations, conditions and levels of capacity for individual components of infrastructure and/or facilities; an infrastructure schedule detailing future capital commitments, the phasing of the various schemes, capital costs, estimated revenue expenditure and lead agencies responsible for delivery. A series of ‘Service Guides’ were also written for County and District planners detailing the sequential steps, key information sources and thresholds which can be used to undertake a baseline analysis of current provision and project forward future needs for the various infrastructure domains. The Surrey Infrastructure Study paid particular attention to governance arrangements and established a number of forums for engagement and dissemination of information.

#### What does the NPPF say?

- 3.6.5 The Draft NPPF highlights the importance of infrastructure deliverability in relation to the Local Plan. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up (paragraph 43). Infrastructure and development policies should also be planned at the same time, and any affordable housing or local standards requirements that might be applied to development assessed at the plan-making stage and kept under review. These requirements all correspond to a concern that the likely cumulative impacts of development will not put implementation of the plan at risk

(paragraph 41). Paragraph 31 of the draft NPPF sets out evidence base requirements in relation to infrastructure; and includes taking account of the need for nationally significant infrastructure within local authority areas.

- 3.6.6 The Localism Bill retains the Community Infrastructure Levy (CIL), although there are a number of changes proposed to the Planning Act 2008. A charging authority must use “appropriate evidence” to inform the preparation of the charging schedule. Detailed regulations are likely to be made about the application of this subsection, including determination of what evidence is or is not deemed to be “appropriate” or “available”, what evidence may or may not be used, and how. Infrastructure studies will be an important component of such evidence.
- 3.6.7 Woking’s IDP will provide the justification for the collection of any s106 monies and/ or Community Infrastructure Levy following the adoption of the Core Strategy. To facilitate this, the Council has committed to annually review the Infrastructure Schedule which forms part of the IDP, reporting this to the Woking Partnership. The Woking Partnership has established an Infrastructure Sub Group (ISG); which is tasked to oversee the infrastructure planning process, and specifically for preparing and monitoring the progress of the Infrastructure Delivery Plan (IDP). The Council have stated their intention to introduce a CIL in order to secure contributions from new development to pay for essential infrastructure in the Publication Core Strategy.

### 3.7 Has joint working on the evidence base been considered and pursued where appropriate?

- 3.7.1 Paragraph 4.28 of PPS 12 highlights that it is essential that stakeholders key to the plan’s delivery are engaged early in the production of the core strategy, to enable potential impediments to the plan to be identified and overcome, including late and unexpected representations emerging at the end of the process which might render the plan unsound and lead to lengthy delays in the delivery of a robust planning framework for the area. Listed delivery agents include regulatory agencies, physical infrastructure delivery agencies, social infrastructure delivery agencies, major landowners, homebuilders and developers and the minerals and waste industry. To be able to demonstrate deliverability, the evidence base that supports a core strategy should be “*coherent with the core strategies prepared by neighbouring authorities, where cross boundary issues are relevant*” (paragraph 4.45).
- 3.7.2 PAS guidance recommends that joint working on the evidence base should be pursued where this is helpful to comprehensively address cross boundary issues; and where a joint approach might make the best use of skills and capacity in different authorities. In particular, certain evidence base studies may require or lend themselves to a more sub-regional approach, for example Strategic Housing Market Assessments (SHMAs) or Strategic Flood Risk Assessments (SFRA’s).
- 3.7.3 Woking Borough Council has worked in partnership with neighbouring local authorities on a number of evidence base studies, including appropriately, those which address issues which typically transcend local authority boundaries – i.e. housing markets, flooding and water management and infrastructure delivery. Joint evidence base studies that have been prepared to date include:
- Joint Strategic Flood Risk Assessment – with Surrey Heath which focuses on the River Bourne catchment;

- Surrey's SWMP – currently being prepared by Surrey County Council, with assistance from the eleven districts and borough, including Woking;
  - Strategic Housing Market Assessment – with neighbouring boroughs Guildford and Waverley;
  - Gypsy and Traveller Accommodation Needs Assessment – with the three other North Surrey districts, Elmbridge, Runnymede and Spelthorne;
  - Surrey Infrastructure Capacity Study – this work was undertaken on behalf of all eleven district and borough councils within Surrey, and the County Council;
  - Guildford and Woking Integrated Transport Study – this options testing work was coordinated by Surrey County Council (November 2006);
  - Thames Basin Heaths Special Protection Area (SPA) Avoidance Strategy - The Thames Basin Heath SPA together with the nearby Wealden Heaths SPA and the Ashdown Forest SPA, forms part of a complex of heathlands in Southern England that support important breeding bird populations. The need for the strategic protection of the SPA to conserve its integrity has required cross-boundary working with other Surrey local authorities and Natural England to strategically monitor and mitigate any adverse impacts on the SPA. A Joint Strategic Partnership Board has been set up (of which Woking Borough Council is a member) to coordinate actions to deal with SPA matters.
- 3.7.4 The Publication Core Strategy recognises that the strategic protection of the Thames Basin Heaths SPA is a key cross boundary issue.

### The 'duty to co-operate'

- 3.7.5 If the Localism Bill is successful in removing Regional Spatial Strategies it is the governments intention that local authorities and other public bodies will work together on planning issues in ways that reflect genuine shared interests and opportunities through the 'duty to cooperate'.
- 3.7.6 The "duty to co-operate in relation to planning of sustainable development" (S33A) set out in the Localism Bill relates to the preparation of development plan documents, other local development documents, other activities that support the planning of development, including sustainable development and the use of land for or in connection with strategic infrastructure. The duty imposed "*requires the person to engage actively, constructively and on an ongoing basis*" so joint working on the evidence base is clearly envisaged to be an important activity under the new Bill. The joint working relationships established through these existing studies will therefore be particularly valuable.

### What does the NPPF say?

- 3.7.7 Paragraphs 44 to 47 of the Draft NPPF deal with "*planning strategically across local boundaries*". The framework reiterates the duty to cooperate, particularly in relation to the "strategic priorities" set out at paragraph 23 of the framework. This section of the draft is very strongly worded, with joint working to be: "*diligently undertaken for the mutual benefit of neighbouring authorities*".
- 3.7.8 Collaborative working should ensure that "*strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans*" taking account of different

geographic areas, including travel-to-work areas; and collaboration with Local Enterprise Partnership should “*enable delivery of sustainable economic growth*”. Cooperation is expected in two tier areas between county and district authorities.

3.7.9 In addition, local planning authorities will be expected to “*demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination*”, either through joint plans or policies, memorandum of understanding or joint strategies. This cooperation is expected to be continuous and from initial thinking through to implementation. It is expected that joint working will enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas and that as part of this process they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.

3.7.10 In relation to joint working on the evidence base, housing and employment are unsurprisingly, the focus for joint working in the Draft NPPF. With respect to housing requirements, authorities should work with neighbours where housing market areas cross administrative boundaries (paragraph 28). In relation to business requirements, local authorities are required to work with county and neighbouring authorities and with local enterprise partnerships to “*prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market*” (paragraph 29).

3.7.11 In examining local plans an independent inspector will assess whether the plan has been prepared in accordance with the ‘Duty to Cooperate’. In addition, to be found sound, the plan must be positively prepared – i.e. it must seek to meet objectively assessed requirements, including requirements from neighbouring authorities where it is practical to do so. The effectiveness test of soundness now includes a test as to whether the plan is “*deliverable and based on effective joint working on cross-boundary strategic priorities*” (paragraph 48).

3.7.12 The Draft NPPF therefore clearly envisages very close working between authorities. Woking is already involved in a number of cross boundary and joint working relationships. These are briefly described below:

- Surrey Planning Officer’s Society – comprises all the Surrey Heads of Planning (Borough and District Planning Officers). This group meets monthly to agree joint working arrangements, consider matters of cross-boundary significance and to discuss all other issues of PAN Surrey interest. They often delegate matters for detailed resolution to the Planning Working Group and the Development Management Group.
- Planning Working Group – a group of Planning Policy Managers in Surrey. The group meets bi-monthly to discuss and resolve cross boundary policy issues. For example, the Group is presently developing a common methodology for assessing the needs of Gypsies and Travellers.
- West Surrey Group – A group of Planning Policy Managers in West Surrey. The group meets bimonthly to deal with sub-regional issues and report back to the wider Planning Working Group.
- Transport for Woking – A group of all transport providers with interest in transport in Woking (public, private and voluntary sectors). The group seeks to coordinate limited resources for effective use, identify mitigation measures for transport issues, feed into policy formulation etc. Overall it works to integrate solutions by sharing necessary information. The group comprises Officers and Councillors of Woking Borough Council and Surrey County Council, Bus providers, South West Trains, Network Rail and Highways Agency. The group meets quarterly.

- Transport for Surrey – A similar group to Transport for Woking but with membership at the Surrey-wide level. The group looks at strategic transport issues across Surrey and the composition is similar to that of Transport for Woking.
- Woking Partnership – This is the Local Strategic Partnership for the area. The Partnership brings together the private, public and voluntary bodies in the local area to think strategically about the area and deliver services effectively and efficiently. The partnership coordinates resources and sets the overall aspirations for the local area. Woking Borough Council is the lead authority. The Planning Policy Manager is one of the key Council officers that serve the Partnership and there is a standing item on the Partnership agenda for each meeting on the Local Development Framework. The Partnership has set up an Infrastructure Sub-Group to coordinate the preparation of the Infrastructure Delivery Plan.
- Thames Basin Heaths Joint Strategic Partnership Board – This is a Joint Partnership Board comprising key Councillors of Local Authorities in Surrey with 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. It is served by relevant planning officers in each of the authorities.
- Thames Basin Heaths Joint Officer's Group – The group coordinates the strategic policy approach to mitigating and managing the impacts of development on the SPA. It provides information to the TBH Joint Strategic Partnership Board and comprises relevant officers from the various authorities and officers from Natural England.
- Local Enterprise Partnership (LEP) – Woking is part of the Enterprise M3 LEP. The LEP is a relatively new approach to the strategic management of resources and economic growth being promoted by the Government. Two planners from the Planning Policy Team are part of the LEP.

3.7.13 Given the level of joint working that already exists, it is considered that Woking is well placed to respond to the duty to cooperate requirements envisaged by the draft NPPF. Woking officers consider these joint partnerships have been helpful and effective to date, particularly with sharing information. For example, through the joint partnerships, the authorities have established a common and strategic approach to dealing with the Thames Basin Heaths SPA. Established working relationships have enabled joint preparation of the SHMA and work is currently taking place to develop a Surrey-wide methodology for assessing the needs of Gypsies and Travellers. Bilateral relationships between authorities are also considered important – Woking is presently working with Surrey Heath Borough Council to secure a joint Sustainable Alternative Natural Greenspace (SANG).

## 3.8 Has the evolving evidence base been carefully documented?

3.8.1 It is important that the evolving evidence base is carefully documented throughout the plan preparation process in order to maintain an effective audit trail. A clear audit trail is essential to ensure that stakeholders are aware of the extent of evidence that was (or is) available at different stages in the plan preparation process. It is also helpful for the Inspector and those who will attend the Examination in Public to know what evidence was available to the local planning authority at different stages in the process leading up to submission.

3.8.2 One means to capture the evidence base is to prepare topic papers on each of the key thematic areas and periodically update these as the plan progresses, publishing them in their



current form alongside different iterations of the plan. This can be time consuming, but may be a useful aide when it comes to the preparation of hearing statements at the examination stage.

- 3.8.3 Woking has recently prepared a number of topic papers, including key papers on population, housing and employment which inform the publication and submission stages of the Core Strategy.
- 3.8.4 In addition, a number of Woking's evidence base studies have been revised/ updated over the plan preparation period, as a result of changes in policy, financial and political circumstances. For example:
- The SHLAA has been reviewed annually since its initial preparation in 2009, with a review prepared in 2010 and a further review taking place in 2011;
  - An employment needs assessment was undertaken in 2005 and this work recently updated and revised through an employment land position paper and Market Appraisal in 2010;
  - The 2009 Town Centre Study replaces the earlier Retail and Commercial Leisure Study undertaken by consultants in 2004;
  - Initial work on social and community infrastructure requirements was undertaken in 2005, updated in 2006 and revisited again in 2010;
  - Work on infrastructure planning is on-going, and there is a commitment in the Publication Draft of the Core Strategy to revise the infrastructure delivery schedule on an annual basis;
  - Early work on transport modelling (the GWITS) undertaken in 2006 was updated in 2010 for Woking.
- 3.8.5 The evidence base webpages on the Woking Council website are very user friendly. Simple but straight forward explanations are given as to what the evidence base is, and where more recent evidence has replaced earlier work. The Council should be commended for this. It is also helpful to see that earlier evidence base documents are retained on the website for reference.
- 3.8.6 In addition, the evidence base excel spreadsheet provided for the purposes of this review is a useful document. Its usefulness could be further enhanced by organising the documents by evidence base topic headings and the inclusion of a short commentary explaining which evidence is considered superseded by more recent work. Evidence of community consultation could also be included within the spreadsheet. This spreadsheet could then be updated as/when new studies/consultation reports are added to the evidence base. This spreadsheet would be a useful aide memoire when preparing for the Examination in Public and could be published on the website for this purpose.
- 3.8.7 The implications of the Forest Health High Court ruling in relation to the SA evidence base are covered at section 3.9 of this report.

### 3.9 Does the evidence required by the SEA Directive form an integral part of the evidence base?

- 3.9.1 The evidence required by the SEA Directive<sup>2</sup> should be regarded as a key element of the evidence base. The Sustainability Appraisal (SA) which incorporates SEA; is expected to play a key role in documenting the 'story' behind the plan's preparation and performs a key role in providing a sound evidence base (PPS 12, paragraph 4.43). The SA is where the consideration and assessment of the main alternatives should be found and should therefore "*form an integrated part of the plan preparation process*" (ibid).
- 3.9.2 The SEA Directive specifically requires the assemblage of an evidence base to inform plan assessment and these requirements reflect a common sense approach to plan-making. For example, there is a requirement to establish the plan's "*relationship with other relevant plans and programmes*" – identifying the policy context is an expected and necessary activity in achieving sound planning.
- 3.9.3 Woking Council have prepared a SA Scoping Report (July 2009) which sets out the SA Framework and baseline evidence. The baseline has been presented on an indicator by indicator basis. Unfortunately this means that there is little spatial or graphical analysis of the baseline, which would have been helpful when analysing spatial policies or to assist the assessor to gain an understanding of the interaction between elements of the baseline. A further concern related to the baseline is that this is now likely to be slightly out of date, given the number of evidence studies which have been prepared since this document was published. Although a number of the more recent evidence base studies are listed at paragraph 6.2 of the Draft Core Strategy SA report for example, it is not evident whether the findings of these studies have been incorporated into the baseline and informed the subsequent appraisals. It would be useful to prepare an updated Scoping Report to assist in the appraisal of the Submission SA report, or alternatively, to incorporate an analysis of the updated baseline into the Submission SA report when this is prepared. It is acknowledged that this aspect of the SA process will always continue to evolve, due to the pace at which new evidence comes forward.
- 3.9.4 The discussion of 'key challenges' in the Submission Draft SA Report (as set out at section 10 of the Draft Core Strategy SA report and the Publication Draft SA Report) could then draw on this recent evidence more extensively.

#### Implications of the Forest Heath decision

- 3.9.5 The recent Forest Heath Core Strategy High Court judgement<sup>3</sup> demonstrates that SA is a key part of the plan making process and compliance with the SEA Directive is essential if challenges are to be avoided. The primary ground of the challenge in this case was that the Core Strategy had been adopted in breach of the requirements of the SEA Directive<sup>4</sup>, in particular the duty for the 'environmental report' accompanying the draft plan or programme to explain what reasonable alternatives to the proposed policies had been considered and why they had been rejected. It is noted that this case was one of the first in the English courts to consider the requirements of the SEA Directive.

<sup>2</sup> Strategic Environmental Assessment (SEA) Directive on the Assessment of Certain Plans and Programmes on the Environment (2001/42/EU)

<sup>3</sup> Save Historic Newmarket Ltd v. Forest Heath District Council [2011] J.P.L. 1233

<sup>4</sup> Directive 2001/42/EC on the assessments of the effects of certain plans and programmes on the environment

- 3.9.6 The judgement focused on the consideration of reasonable alternatives (options) and the need for the environmental report accompanying the final draft plan to provide a clear, identifiable and easily understood audit trail in terms of the alternatives considered; their effects and why they were rejected at the time they were ruled out, and that those reasons must still be valid. The Judge ruled that assessments must tell the story (“refer to, summarise or repeat the reasons”) and it is not sufficient to rely on the plan itself – “the environmental report and the draft plan must operate together, so that consultees can consider each in the light of the other”<sup>5</sup>.
- 3.9.7 In terms of reporting of assessments, an initial SA report has been prepared for the Issues and Options consultation (published October 2009). This report appraises the proposed Core Strategy objectives (alongside those of the Sustainable Community Strategy which was being consulted on concurrently) but did not appraise the various options which were put forward in the consultation document and questionnaire. While it is not compulsory to prepare interim SA reports, it would have been useful to undertake an appraisal of these options and to put this information in the public domain for consideration alongside the questionnaire and consultation document. This information could have usefully informed the consultation.
- 3.9.8 However the SA report published to accompany the Draft Core Strategy consultation (the next published iteration of the Core Strategy) states that details of the appraisal of options are contained within a separate background document. This document is entitled “Sustainability Appraisal of Alternative Options December 2009” and provides an appraisal of the refined options which arose out of consideration of the comments received on the October 2009 consultation on issue and options. This report is an integral element of the SA process and provides an excellent commentary on the appraisal of the options and process of selection of preferred options. The SA of Alternative Options is now available as a separate report on the website. It is important that the findings of this report are drawn out and summarised in the Submission SA report when this is prepared.
- 3.9.9 A separate appraisal was also undertaken in relation to the three strategic housing options in order to inform the preferred housing target (this appraisal was published as Appendix 5 of the Draft Core Strategy SA report) in light of the intent of the government to abolish the RSS. It would be useful to explain (in the Submission SA Report) that this appraisal was undertaken after the initial appraisal of the refined options, so it is clear why this is a stand-alone appraisal.
- 3.9.10 In light of the recent Forest Heath decision, it is now considered especially important to provide public documentation of how the preferred options were arrived at, why they were chosen, and why reasonable alternatives were discarded. This story of the development of the plan should be contained within the submission SA report, drawing on the earlier reports (in particular the Alternative Options and Housing Options Appraisal) that have been prepared. As a general and minor point, the SA reports could be made more user friendly by providing a numbered contents page.

### What does the NPPF say?

- 3.9.11 There is little detail in the Draft NPPF about the role of SA, and it does not refer specifically to SEA. There is a brief reference to the SA being an integrated part of the plan process, and that it should consider all the likely significant effects on the environment, economic and social factors (paragraph 34). There is a more general statement on environmental assessments (which are taken to include SA/SEA) which requires these to be proportionate to the plan, not repeat assessment of higher level policy, and be started early in the plan making process. Key stakeholders should be consulted in identifying the issues that the assessment must cover (paragraph 36).

---

<sup>5</sup> Save Historic Newmarket Ltd v. Forest Heath District Council [2011] J.P.L. 1233

## 4 Conclusions and Recommendations

- 4.1.1 In summary, the review has found that Woking has compiled an extensive and comprehensive evidence base to support the Core Strategy to submission. There are very few recommendations arising out of the review as a result; and Woking should be commended on the depth and extent of preparatory work that has been undertaken.
- 4.1.2 On the basis of a consideration of the available evidence base documents, and reflecting on the series of soundness questions set out in the PAS Evidence Base guidance; alongside emerging guidance as contained in the Draft NPPF, the following conclusions and recommendations have been made:

**Table 3: Summary of Conclusions and Recommendations**

PPS12 Test of Soundness Question	Commentary	Recommendations
1. Does the evidence base underpin the generation and testing of options and therefore inform the draft Core Strategy content?	√√ The evidence base has underpinned the generation and testing of options and has been used appropriately to provide a platform for the development of options.	No recommendations
2. Does the evidence base include the views of the local community as well as research and fact finding?	√√ The evidence base includes both the views of the local community, business interests and physical and social infrastructure providers, alongside the extensive factual evidence.  Woking Council has been very diligent in capturing the views of the local community and stakeholders. Reports prepared which summarise community consultation responses and the officers response and recommendations arising from these provide measured and thoughtful responses, drawing on the evidence base and are helpful in capturing evidence of public participation in the plan process.  Woking have also worked with delivery stakeholders, including social and community infrastructure providers and users and with other local authorities across the County to collate and prepare key evidence. Engagement has included local communities and businesses.	No recommendations
3. Has the evidence base been synthesised on a	√ Evidence has been collated on a spatial basis that is appropriate to Woking. Reflecting the lack of area based functionality within the	No recommendations

<p>spatial basis which is tailored to Woking?</p>	<p>borough this work has been conducted at the borough-wide level, although evidence does exist at the more local level where appropriate, for example to support designation of the 'Priority Places' neighbourhoods in the Core Strategy, social infrastructure needs (by neighbourhood) and urban character. This evidence could be collated to support neighbourhood planning if necessary.</p> <p>So far, there has not been any expression of interest from local neighbourhoods to prepare neighbourhood plans.</p>	
<p>4. Does the breadth and depth of the evidence base reflect the nature and content of the DPDs being produced?</p>	<p>√√ The evidence base underpinning the Core Strategy is very comprehensive. The topic based evidence is considered as up to date as is reasonable to provide a platform for robust decisions. Those elements that are most likely to be subject to change have been regularly reviewed and kept up to date (e.g. housing, employment and infrastructure) to reflect uncertainty around forecasting arising from the recent recession and tightening public funding constraints.</p> <p>The housing evidence also includes recent assessment of viability in relation to affordable housing, which reflects the high level of need for affordable housing which exists in the borough.</p>	<p>No recommendations</p>
<p>5. Does the evidence base include those studies that are required by Government?</p>	<p>√√ Woking's existing topic based evidence base is extensive and includes all the evidence base studies required or suggested by existing government guidance. There is also a very good fit with emerging requirements under the Draft NPPF.</p>	<p>At some point in the future, for example when further work is done to develop the Borough's CIL, viability work could be extended to include "<i>cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan</i>" as envisaged by paragraph 41 of the Draft NPPF.</p>
<p>6. Does infrastructure planning form an integral part of the evidence base?</p>	<p>√√ There has been extensive work on infrastructure requirements, both at the borough and county level. Woking have a dedicated officer to undertake this work and have engaged with delivery stakeholders from an early stage in the plan preparation process. Detailed work has been undertaken on social and community infrastructure requirements.</p>	<p>No recommendations</p>

<p>7. Has joint working on the evidence base been considered and pursued where appropriate?</p>	<p>√√ Woking participates in a number of cross-Surrey joint working groups and these groups have been successful in preparing joint evidence base studies, adopting a common and strategic approach to dealing with key issues such as the Thames Basin Heaths SPA and sharing of information. Woking has also worked with its immediate neighbouring local authorities on a number of evidence base studies. This partnership approach is commended, and the relationships that have established through such joint-working will be an important platform for the new “duty to co-operate” under the Localism Bill.</p>	<p>No recommendations</p>
<p>8. Has the evolving evidence base been carefully documented?</p>	<p>√ Woking Council have a useful evidence base webpage which helpfully sets out the evolving nature of the evidence base documents and usefully retains older elements of the evidence base to show how this has evolved.</p>	<p>Consider updating the evidence base spreadsheet to document how the evidence base is evolving, as an aide memoire for preparation for the Examination in Public. Its usefulness could be further enhanced by organising the documents by evidence base topic headings and the inclusion of a short commentary explaining which evidence is considered superseded by more recent work. Community consultation reports could be included in the spreadsheet also. This spreadsheet could then be updated as/when new studies/consultation reports are added to the evidence base.</p>
<p>9. Does the evidence required by the SEA Directive form an integral part of the evidence base?</p>	<p>√ The evidence required by the SEA Directive should also be regarded as an integral element of the evidence base. Sustainability Appraisal is expected to play a key role in documenting the ‘story’ behind the plan’s preparation.</p>	<p>It would be useful to prepare an update to Scoping Report to assist in the appraisal of the Submission SA report – to reflect the volume of new evidence which has been prepared since the Scoping Report was written. Alternatively, an analysis of the updated baseline could be incorporated into the Submission SA report when this is prepared.</p> <p>The Submission SA report should tell the story of the plan’s development, including in particular why particular alternatives were chosen and why other reasonable alternatives were discarded.</p>

## 5 List of Abbreviations

- CIL** – Community Infrastructure Levy
- DPD** – Development Plan Document
- EIP** – Examination in Public
- LDF** – Local Development Framework
- LEP** – Local Enterprise Partnership
- LPA** – Local Planning Authority
- NPPF** – National Planning Policy Framework
- PAS** – Planning Advisory Service
- PPS** – Planning Policy Statement
- SA** – Sustainability Appraisal
- SEA** – Strategic Environmental Assessment
- SFRA** – Strategic Flood Risk Assessment
- SHMA** – Strategic Housing Market Assessment
- SHLAA** – Strategic Housing Land Availability Assessment
- SPA** – Special Protection Area
- SWMP** – Surface Water Management Plan

## 6 Glossary

### **Annual Monitoring Report (AMR)**

One of a number of documents currently required to be included in the Local Development Framework Development Plan Documents. It is submitted to Government via the Regional Government office by a local planning authority at the end of December each year to assess the progress and the effectiveness of a Local Development Framework. The Localism Bill removes the statutory requirement for LPAs to submit AMRs to the Secretary of State. LPAs will have the discretion to include whatever information they feel necessary and there will be more flexibility on the timescales for publication.

### **Core Strategy**

Core Strategy Document is the key compulsory Local Development Document specified in United Kingdom planning law. Every other Local Development Document is built on the principles it sets out, regarding the development and use of land in a Local Planning Authority's area. The principles should be in accordance with the Community strategy.

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

A Local Development Document which forms part of the statutory development plan, including the Core Strategy and Allocations and Proposals Map DPD.

### **Green Infrastructure**

Green Infrastructure is a concept originating in the United States in the mid-1990s that highlights the importance of the natural environment in decisions about land use planning. In particular there is an emphasis on the "life support" functions provided by a network of natural ecosystems, with an emphasis on interconnectivity to support long term sustainability.

### **Local Enterprise Partnership (LEP)**

Local Enterprise Partnerships are locally-owned partnerships between local authorities and businesses which aim to determine local economic priorities and undertake activities to drive economic growth and the creation of local jobs.

### **Local Development Document (LDD)**

The individual documents that set out planning policies and guidance for the Borough for specific topics or for the geographical areas.

### **Local Development Framework (LDF)**

The Local Development Framework is the portfolio or folder of Local Development Documents, which set out the planning policy framework for the Borough.

### **Local Planning Authority (LPA)**

A Local Planning Authority is the local authority or council that is empowered by law to exercise planning functions for a particular area of the United Kingdom.

### **Planning Policy Guidance (PPG)**

Guidance documents which set out national planning policy.



---

### **Planning Policy Statement (PPS)**

Planning Policy Statement Guidance document which sets out national planning policy. These replace older PPGs.

### **Special Protection Area (SPA)**

SPAs are areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the 'Birds Directive 1979' which provides enhanced protection given by the Site of Special Scientific Interest (SSSI) status all SPAs also hold.

### **Strategic Environmental Assessment (SEA)**

Strategic Environmental Assessment (SEA) is a system of incorporating environmental considerations into policies, plans and programmes. It is sometimes referred to as Strategic Environmental Impact Assessment.

### **Strategic Flood Risk Assessment (SFRA)**

In England and Wales, Strategic Flood Risk Assessments (SFRAs) are a required part of the local planning process, as set out in Planning Policy Statement 25, produced by the Department for Communities and Local Government.

### **Strategic Housing Land Availability Assessment (SHLAA)**

A document that's primary objective is to identify sites with potential for housing, assess their housing potential and when they are likely to be developed.

### **Strategic Housing Market Assessment (SHMA)**

An assessment which considers the characteristics of the housing market, how key factors work together, existing housing need and demand and the probable scale of change in future housing need and demand.

### **Surface Water Management Plan (SWMP)**

A Surface Water Management Plan (SWMP) is a plan which outlines the preferred surface water management strategy in a given location. In this context surface water flooding describes flooding from sewers, drains, groundwater, and runoff from land, small water courses and ditches that occurs as a result of heavy rainfall.

### **Sustainable**

When making decisions in relation to land uses, local authorities have a duty to ensure that a development is sustainable. This means that a development or activity must meet the needs of people today without compromising the ability of future generations to meet their own needs.

### **Sustainability Appraisal (SA)**

In United Kingdom planning law a Sustainability Appraisal is an appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development. Since 2001, Sustainability Appraisals have had to be in conformity with the Strategic Environmental Assessment EU directive.

### **Supplementary Planning Document (SPD)**

These are Local Development Documents that have not been subject to independent testing by an Inspector and do not have the statutory weight of development plan. These documents replace older Supplementary Planning Guidance.

### **Unitary Development Plan (UDP)**

In United Kingdom planning law a Unitary Development Plan is an old-style development plan prepared by a Metropolitan district and some Unitary Local Authorities, which contains policies equivalent to those in both a structure plan and local plan.