

Date: 20 November 2025  
Our Ref: 0265  
Project Name: Byfleet Neighbourhood Plan

## **BYFLEET NEIGHBOURHOOD FORUM: RESPONSE TO PROCEDURAL MATTERS AND QUESTIONS**

Following the letter from Derek Stebbing BA (Hons) DipEP MRTPI dated 6<sup>th</sup> November 2025, this note sets out a response on behalf of the Byfleet Neighbourhood Forum to each of the questions raised in the Annex of the letter ahead of the examination of the Byfleet Neighbourhood Plan.

To confirm, all page numbers will be corrected in the Neighbourhood Plan.

We take each question in turn below.

### **Question 1: RE. Policy 2 – Renewable Energy and Sustainability (Page 32)**

“Energy generating infrastructure” includes renewable or low carbon energy sources such as solar panels, air or ground source heat pumps, small wind turbines, biomass boilers etc. Whilst it is noted that some renewable energy measures can be constructed under permitted development, there are still situations where planning permission is required where the relevant requirements of the Town and Country Planning (General Permitted Development) (England) Order 2015 are not met. It is considered necessary to control development which exceeds these requirements to maintain the character of the area it would be situated in, protect any heritage assets, community facilities and open space from inappropriate design, and to protect residential amenity.

We suggest a new paragraph is added to the supporting text which states '*Energy generating infrastructure includes renewable or low carbon energy sources such as solar panels, air or ground source heat pumps, small wind turbines, biomass boilers etc*'.

We suggest that another new paragraph is added which states '*It is noted that some forms of energy generating infrastructure can be installed under permitted development under Part 14, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015, however development which does not constitute permitted development, will require planning permission*'.

We suggest that the policy is amended to read:

#### **Policy 2 – Renewable Energy and Sustainability**

1. The installation of energy generating infrastructure at residential properties, that do not fall under permitted development, will be supported where:
  - a. The energy generating infrastructure is located as close as practicable to existing buildings and is in proportion to the scale of the existing buildings or proposed development it is intended to serve and;
  - b. The impact on heritage assets, community facilities and open spaces through the siting, scale and design of the development of the energy generating infrastructure is minimised and does not compromise public safety and;

- c. Adjoining uses are not adversely impacted in terms of noise, vibration and other amenity impacts and;
- d. Where appropriate, the energy generating infrastructure and its installation complies with the Micro-generation Certification Scheme or equivalent standard.

## Question 2: Re. Policy 6 – Flood Management and Figure 49 – Byfleet areas at risk of flooding (Pages 35 and 36, but should be Pages 43 and 44)

Woking Borough Council will confirm which Strategic Flood Risk Assessment is the latest document in a separate response. Any reference to the Strategic Flood Risk Assessment (such as in Policy 6) will be amended to ensure that it refers to the latest version of the report. Should any new Strategic Flood Risk Assessments be published by Woking Borough Council, this would be reflected in any future updates to the Neighbourhood Plan.

An updated Figure 49 can be found in Appendix A of this letter.

In response to representations made by Surrey County Council (Lead Local Flood Authority), the Environment Agency and Thames Water, we make the following amendments to the Flood Management section of the Neighbourhood Plan:

- Policy 6.1 has been amended to read '*Where it is appropriate new development will be supported where it can demonstrate that the development will not increase the risk of flooding from any source on or off site. There should be consideration of opportunities presented by development to reduce local flood risk to other land, arising from the development*'.
- Policy 6.2 has been amended to read '*All development which could affect drainage on or around the site, in compliance with CS9, should provide full details of the proposed surface water drainage (including details of its route, design and specification, how consideration has been given to the use of Sustainable Drainage Systems (SuDS), and details of its management and maintenance) and have been approved in writing by the Local Planning Authority*'.
- Paragraph 3 of the supporting text has been amended to read '*The Byfleet Flood Forum was founded in January 2014 with the objective of achieving a coordinated multi agency response and action plan in order to prevent future flood damage and to protect properties. This has resulted in the Sanway-Byfleet Flood Alleviation Scheme, due to commence in 2026. Work is ongoing to formulate protection schemes for other vulnerable areas within Byfleet and this plan supports this activity*'.
- Paragraph 4 of the supporting text has been amended to read '*Many of the surface water drainage systems and sewers are outdated and were designed for a lower water capacity than that required for modern day living, additionally, the effects of climate change have increased the frequency of river flooding events and the pressure on surface water drainage systems*'.
- Paragraph 5 of the supporting text has been amended to read '*Surface water and flood management is therefore a priority to protect residents and businesses from harm by limiting the impact from potential future flood events. It is the responsibility of the development to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding*'.
- A new paragraph 7 has been added which reads '*Land alongside watercourses is particularly valuable for wildlife and it is essential it is protected. Development that encroaches on watercourses has a potentially severe impact on their ecological value and can increase flood risk. Development proposals likely to affect a watercourse and its associated corridor should seek to conserve and enhance its*

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*ecological, landscape and recreational value. This should include providing adequate natural buffer zones to the watercourse, to ensure there is no increase in flood risk’.*

- A new paragraph 8 has been added which reads ‘*Riparian owner is the person, or people, with watercourses on, next to or under their property. Riparian owners have the responsibility for maintenance of these watercourses. Riparian responsibilities usually lie with the person who owns the land or property but may be the tenant depending upon the agreement in place*’.

### **Question 3: Re. Policy 7 – Infrastructure (Page 37, but should be [Page 45](#))**

In response to the representation made by Thames Water, we make the following amendments to the Infrastructure section of the Neighbourhood Plan.

- A new paragraph 4 has been added which reads ‘*Wastewater, sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure networks are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses*’.
- A new paragraph 5 has been added which reads ‘*Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure updates*’.
- A new paragraph 6 has been added which reads ‘*The Local Planning Authority will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying and potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of occupation of the relevant phase of development*’.

### **Question 4: Re. Policy 8 – Local Green Spaces (Page 38, but should be [Page 46](#))**

We note the comments from Surrey County Council. As set out in the Local Green Space Report, spaces have been assessed and designated in accordance with paragraph 107 of the NPPF. The NPPF does not specify that school fields, or any other spaces in a specific use, cannot be designated as Local Green Space, nor does it give any consideration to the ownership of land. So long as the three criteria of paragraph 107 are complied with, a space can be designated as a Local Green Space. In this case, S19 met all three criteria and so is suitable for designation as a Local Green Space.

We will therefore leave it to the Inspector to decide whether or not S19 should be designated as a Local Green Space.

### **Question 5: Re. Woking Local Plan 2027-2044**

Woking Borough Council will confirm the status of the emerging Local Plan as part of a separate response to this note.

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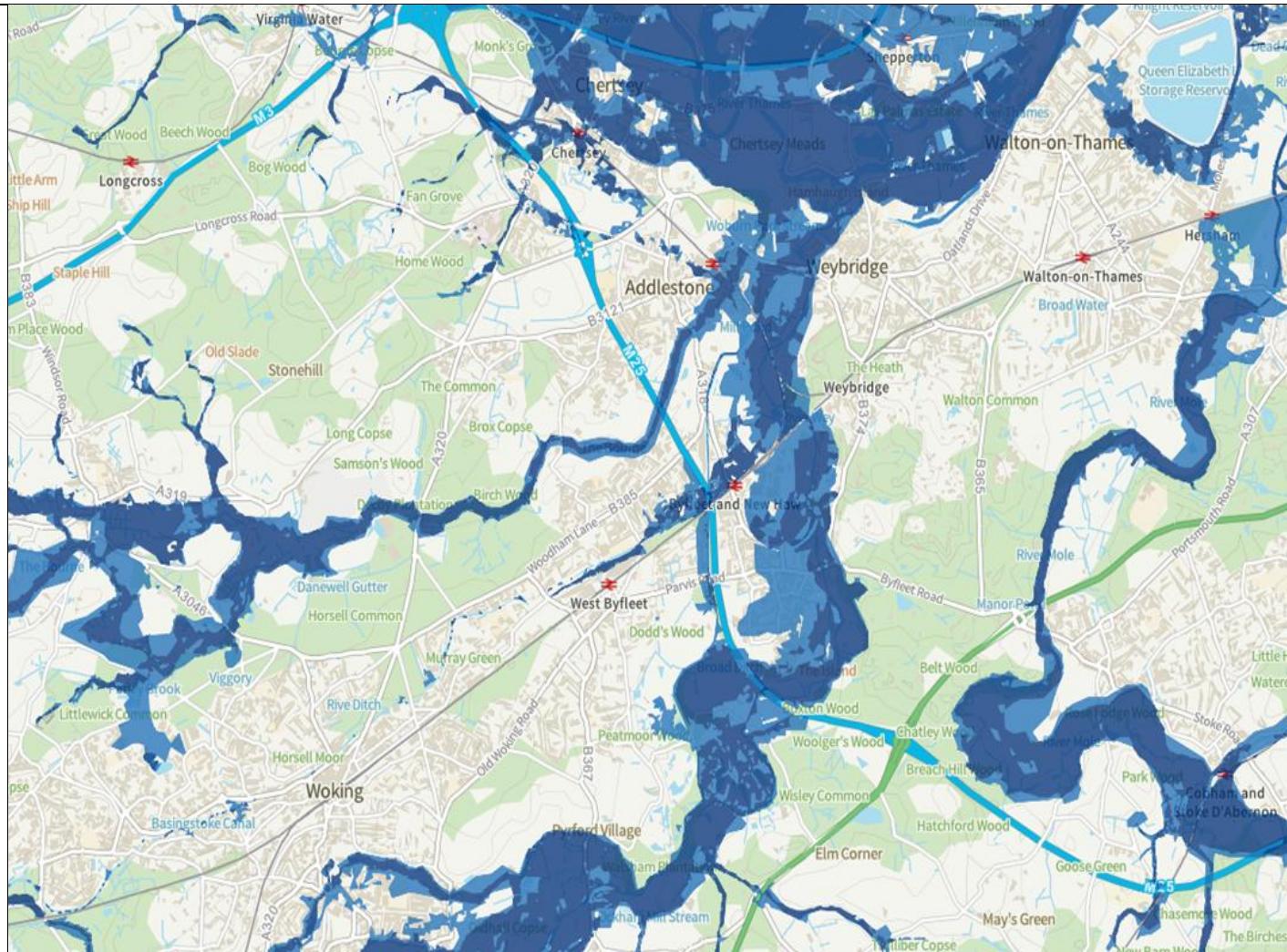
## Appendix 1 – Updated copy of Figure 49

## Byfleet risk of flooding

### Legend

Risk of flooding from Rivers and Sea

- High (>=3.3%)
- Medium (3.3% - 1%)
- Low (1% - 0.1%)
- Very Low (<0.1%)



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