

EXAMINATION OF THE GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES

EXAMINATION STATEMENT ON BEHALF OF THE GUILDFORD HOUSING FORUM

APPENDICES

Matter 3 – Unmet Need in the HMA

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Appendix 1 Copy of Woking Borough Council's Key Issues and Matters Raised during Regulation 18 Consultation – dated June 2016



Draft Site Allocations Development Plan Document Response to key issues and matters submitted during the Regulation 18 consultation

June 2016



Introduction

Woking Borough Council has committed to prepare a Site Allocations Development Plan Document (DPD) to enable the comprehensive delivery of the requirements of the Woking Core Strategy (2012). The Core Strategy makes provision for the delivery of the following scale of uses between 2010 and 2027:

- 4,964 net additional dwellings;
- 28,000 sq.m of additional office floorspace and 20,000 sq.m of warehouse floorspace;
- 93,900 sq.m of additional retail floorspace.

A draft Site Allocations DPD was published for a Regulation 18 consultation between 18 June and 31 July 2015. About 1,692 individuals and organisations submitted representations covering a range of issues. Most of the representations focused on a number of key issues, which Officer's have identified as follows:

- 1 There is no justification for the release of Green Belt land for future development in the Borough;
- 2 There is no justification for safeguarding Green Belt land to meet future development needs and/or the number of sites identified for safeguarding is more than needed and more than necessary;
- 3 There is no proper assessment of the infrastructure needed to support the Site Allocations DPD and/or no plans has been made to enable adequate infrastructure to be provided to enable the sustainable delivery of the Site Allocations DPD;
- 4 There is no need to release Green Belt land to meet the accommodation needs of Travellers and/or the Council has failed to consider alternative sites to meet the identified need instead of the proposed allocations in accordance with the sequential approach emphasised in the Core Strategy and other evidence base;
- 5 There is no proper assessment of the flood risk implications of the Site Allocations DPD;
- 6 There was insufficient consultation on the Site Allocations DPD;
- 7 There is lack of a full and proper landscape assessment and heritage and Conservation Area Appraisals to inform the Site Allocations DPD;
- 8 There is inadequate evidence base to support the Site Allocations DPD;
- 9 There is a lack of assessment of alternative sites to enable decisions about the preferred sites;
- 10 Criticism about how the Green Belt boundary review assessed sites;
- 11 No evidence has been produced to demonstrate that Woking Borough Council has exhausted assessment of brownfield sites for development;
- 12 Green Belt land in Mayford is fundamental to the physical separation of Woking, Mayford and Guildford and should be recognised;
- 13 The ownership status of land should have no bearing on whether it should be Green Belt or nor.
- 14 Prey Heath and Smarts Heath are SSSIs with the potential to be designated as Special Protection Areas (SPA) and should therefore have 400m buffer zone within which development is not allowed;
- 15 Development will lead to urban sprawl;

- 16 The Council should use empty offices, commercial buildings in industrial estates for development instead of Green Belt land;
- 17 The Council has deviated from the recommendations of the Green Belt boundary review report;
- 18 Proposed densities are excessive and incompatible with surroundings;
- 19 The proposals in the DPD will have adverse impacts on the heritage assets of the area;
- 20 The 2010 Transport Assessment is based on modelling that does not take account of the proposed development of Green belt land and in particular, around west Hall, and should not be used to justify the proposals in the DPD;
- 21 The proposed allocations will significantly reduce or take away Green Belt land in this particular area/ward to the detriment of the general wellbeing and amenity of residents;
- 22 There is over concentration of Travellers sites in the West of the Borough and the proposals of the DPD will exacerbate this trend;
- 23 The proposals will change the character of the respective local areas where sites are allocated for the worse;
- 24 There is lack of joined up work between Woking Borough Council and Surrey County Council on transport matters.

This document sets out the Council's general response to these key issues. It also sets out response to other issues that attracted significant number of representations but are mainly locally specific. These issues are also addressed and are numbered A – Z in the document. It is acknowledged that many of the representations also raise site specific concerns. These have been addressed as part of the schedule comprising a summary of the representations received with Officer's analysis and recommendations about how they should be taken forward to inform the Publication version of the DPD for Regulation 19 consultation. A copy of this document can be inspected on request.

1.0 Is there a justification for releasing Green Belt land for development to meet future development requirements of the Core Strategy?

- 1.1 Paragraph 47 of the National Planning Policy Framework (NPPF) requires local planning authorities to use their evidence to make sure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. This is necessary to meet a clearly stated national objective to boost significantly the supply of housing. The Government's commitment to housing delivery as a key driver to high productivity in the economy is further emphasised in '*fixing the foundations: creating a more prosperous nation*'; presented to parliament by the Chancellor of the Exchequer (2015).
- 1.2 The NPPF expects local planning authorities to have a clear understanding of housing needs in their area by preparing a Strategic Housing Market Assessment (SHMA) to assess their full housing needs. They should also prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.
- 1.3 The Council has an adopted Core Strategy (2012), which had been informed by both the SHMA and SHLAA, and has been examined against the requirements of the NPPF and found sound. The SHMA and the SHLAA are on the Council's website (www.woking.gov.uk). The Core strategy makes provision for the delivery of:
- 4,964 net additional dwellings, with an affordable housing provision target of 35%;
 - 28,000 sq.m of additional office floorspace;
 - 20,000 sq.m of warehouse floorspace; and
 - 93,900 sq.m of additional retail floorspace.
- 1.4 The Council is expected and committed to the comprehensive delivery of the requirements of the Core Strategy by allocating specific sites to bring forward their delivery. This is necessary to avoid speculative development in unsustainable locations including in the Green Belt and to meet national planning policy requirements.
- 1.5 The SHMA (2009) that informed the Core Strategy identified an objectively assessed housing need of 594 dwellings per annum (499 of this figure to be affordable housing). Taking into account the available evidence including an assessment of various options of housing provision and the requirements of the NPPF as whole the Inspector agreed that the Core Strategy should make provision for an annual average housing requirement of at least 292 dwellings. Over the plan period between 2010 and 2027 this equates to 4,964 dwellings. Under the Duty to Cooperate the Council will have to work with neighbouring authorities to explore whether the unmet need can be met in their areas. Based on lessons learnt so far regarding the Duty to Cooperate this will be difficult negotiation to achieve. Against this backdrop it will be indefensible if the Council failed to demonstrate that it has identified sufficient land in the Site Allocations DPD to enable the delivery of its housing requirement of 292 per

year over the plan period. The identification of specific sites to meet the development needs should be guided by the spatial strategy of the Core Strategy.

- 1.6 The Core Strategy directs most new development to previously developed land in the Town, District and Local Centres, which offers the best access to a range of services and facilities. For the avoidance of doubt, the NPPF defines previously developed land as *'land which is or was occupied by permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time'*. The Core Strategy also accepts that land will be required to be released from the Green Belt to meet housing delivery between 2022 and 2027 because sufficient sites could not be identified in the urban area to meet the requirement over the entire plan period. The overall spatial strategy was supported by the Core Strategy Examination Inspector. He particularly emphasised that *'the Core Strategy provides the most appropriate spatial strategy for sustainable development within the context of the Borough with clear objectives for the plan period in accord with the aims of national planning policy'*.
- 1.7 Within the broad context of the spatial strategy, the SHLAA (2011) was carried out to assess the capacity of the urban area to accommodate the housing requirement. The outcome of the SHLAA indicated a shortfall in the capacity of the urban area to meet the requirement over the plan period. Overall, about 13 years supply of land could be identified in the urban area to meet housing need. The Inspector agreed that the Green Belt should be identified as a potential direction for future growth to meet housing need between 2022 and 2027. He concluded that *'by this approach the Core Strategy takes a justified and effective approach to issues relating to the Green Belt and the natural environment which is consistent with national planning policy'*.
- 1.8 Apart from the number of dwellings that the Council is expected to identify land to deliver, the proposed housing development in the Green Belt will also help to provide the nature and type of family homes that the community also needs. Most of the housing that will be delivered in the urban area is likely to be high density flatted accommodation. The SHMA demonstrates a clear need for family homes, which the proposed Green Belt sites will help to meet.
- 1.9 The Council acknowledged at the preparation of the Core Strategy that exceptional circumstances case ought to be made to release Green Belt land for housing. The exceptional circumstances case to identify the Green Belt as the future direction of growth to release land for housing development between 2022 and 2027 has already been established through the in-principle policies in the Core Strategy to do so (see Policies CS6: Green Belt and CS10: Housing provision and distribution). It was considered that the significant unmet need for housing and the necessity to meet the housing requirement over the plan period provides sufficient justification. Recent

reviews of the SHLAA (2014) and the SHMA (2015) do not provide any significant new evidence that would lead the Council to change its policy approach. Whilst there has been further clarification of national policy on Green Belt, there has not been any change of national policy of material significance since the Core Strategy was adopted. In this regard, it will be very difficult for the Council to have a sound Site Allocations DPD without the release of Green Belt land to meet housing land supply over the entire plan period. Without the Site Allocations DPD, there is the likelihood of uncontrolled speculative development in the Green Belt. The Council can best protect the Green Belt if it can demonstrate that it has identified sufficient land to deliver its development requirements.

- 1.10 The Core Strategy Examination Inspector provided guidance on how Green Belt sites should be identified for development. He recommended that *‘A review of the Green Belt boundary will be carried out to inform the Site Allocations DPD and in any event before 2016/17, to evaluate where it is appropriate to release land in the Green Belt for housing purposes and the size and scale of the release’*. Taking as a whole, not only did the Inspector recommend the release of Green Belt land for housing development, he was also prescriptive about the process and its timing. The Core Strategy commits the Council to prepare the Site Allocations DPD to release Green Belt land for development, and in doing so make sure that it will not undermine its overall purpose and integrity.
- 1.11 Section 9 of the NPPF deals with the protection of Green Belt land. It accepts that Green Belt boundaries could be altered, only in exceptional circumstances and through the preparation or review of the local plan. Guidance is provided in paragraph 85 on the factors to consider when defining Green Belt boundaries. In particular, it emphasises that when defining boundaries *‘Local Planning Authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development, and where necessary, identify in their plans areas of safeguarded land between the urban area and the Green Belt in order to meet longer-term development needs stretching well beyond the plan period.’* The Council has followed the letter and spirit of national policy in preparing the Site Allocations DPD. The DPD will not meet the requirements of both paragraphs 47 and 85 of the NPPF if land is not allocated in the Green Belt to meet development needs over the entire plan period and beyond. Without the allocation of the Green Belt sites to meet the requirements of the Core Strategy, it is unlikely that the Site Allocations DPD would be found sound.
- 1.12 Based on the above, and in the opinion of the Council, the case for releasing Green Belt land, including safeguarding land to meet future development needs has already (or can be) been established and is consistent with national policy. The focus for consideration for the DPD should be about ensuring that the proposed allocations and or any other preferred alternatives are the most sustainable when compared against other reasonable alternatives.
- 1.13 The Council is satisfied that the proposals in the Site Allocations DPD achieve the above objective. The Site Allocations DPD is informed by robust evidence, including, the Green Belt boundary review, a Sustainability Appraisal Report, Habitats Regulations Assessment, Transport Assessment and other evidence base listed in

Appendix 1 of the draft DPD. In accordance with the Duty to Cooperate the input of key stakeholders such as the County Council, Natural England, and the Environment Agency have been taken into account before the DPD was published and the Council will continue to involve them at all the key stages of the process. The views of the general public has also been considered and taken into account. Alternative sites have been rigorously appraised in a consistent and transparent manner using a consistent Sustainability Appraisal Framework. Based on the outcome of this exercise and the other supporting evidence, the Council is satisfied that the proposals in the DPD are the most sustainable when compared against the reasonable alternatives.

- 1.14 All the proposed sites will make a significant and a meaningful contribution towards meeting the housing requirement and future development needs. Not allocating any or all of the sites (or not having new sites to replace any site that is rejected) could undermine the overall delivery of the Core Strategy. The key requirements set out as part of the proposed allocations will further make sure that any adverse impacts on the purpose and integrity of the Green Belt and the general environment of the area is minimised.

2.0 Should land be safeguarded to meet future development needs beyond 2027?

- 2.1 The National Planning Policy Framework (NPPF) provides useful policy and guidance about what to do when altering Green Belt boundaries. It emphasises that Green Belt boundaries should only be altered in exceptional circumstances through the preparation of the local plan. At the time, local authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Where necessary, local authorities should identify in their plans areas of ‘*safeguarded land*’ between the urban area and the Green Belt, in order to meet longer-term development needs *stretching well beyond the plan period. It should also make it clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposed the development. They should satisfy themselves that the Green Belt boundaries will not need to be altered at the end of the development plan period*’.
- 2.2 There is no doubt that there is a great degree of expectation by the NPPF that in altering the Green Belt boundary, sites should also be safeguarded to ensure its enduring permanence well beyond the plan period. In this particular case it will be necessary to safeguard land in the Site Allocations DPD to avoid altering the Green Belt boundary again after this plan period. The only situations where safeguarding might not be necessary will be if the Council can demonstrate that it has sufficient sites in the urban area to meet future development needs throughout the next plan period or because of existing constraints no suitable sites can be identified in the Green Belt to meet future development needs beyond this Core Strategy period. Safeguarded sites are also expected to be situated between the urban area and the Green Belt. In this regard, there is also clear guidance on where safeguarded land should be situated. The Council cannot ignore this national policy and guidance without substantive reasons to justify doing so if it wishes to have a sound Site Allocations DPD. Based on the available evidence it will be difficult to find any reasons why sites should not be safeguarded. The Council has rightly made a decision to look beyond the plan period and safeguard land to meet development needs between 2027 and 2040. This is reflected in the draft Site Allocations DPD. Without the safeguarded land, there is the likelihood that the Council will have to carry out another Green Belt boundary review to alter the Green Belt boundary to be able to meet development requirements beyond the present Core Strategy period. Practically, the review will have to be programmed to start a couple of years prior to 2027 when the Core Strategy expires because of the lead time needed to get an adopted plan in place. This will clearly be at odds with national policy. In particular, when it is very unlikely that another Green Belt boundary review will produce a different outcome to the Peter Brett Green Belt boundary review used to inform the Site Allocations DPD.
- 2.3 Approximately 40 hectares of land has been proposed to be safeguarded in the DPD to meet development needs between 2027 and 2040. The scale of the safeguarded land is reasonable, modest against the projected need and is underpinned by careful assumptions to ensure the protection of the Green Belt. The following assumptions have been used to determine the scale of safeguarded land needed to meet future

development needs. Based on housing delivery over a period of about 10 years, which is averaging about 300 dwellings per year, the Council has assumed a projected housing requirement of 292 per year up to 2040. It is also assumed that previously developed land in the urban area will continue to play a key part in meeting development needs in the future. It is estimated that about 50% of future housing provision between 2027 and 2040 will be on previously developed land in the urban area as a result of sites that are presently in operational use coming forward for multiple reasons. Based on historic delivery of windfall sites, an allowance of about 600 dwellings has been made to contribute towards the overall housing supply. Finally, it assumed that the safeguarded sites will be developed at a density of 30 dwellings per hectare. By these assumptions, the Council is satisfied that the amount of safeguarded land is carefully thought out to minimise any adverse impacts on the purpose of the Green Belt.

- 2.4 Overall, the principle of safeguarding and the quantity of land proposed to be safeguarded is defensible, justified by national policy and is also good planning practice.
- 2.5 The Council has acknowledged the comments made against the merits of safeguarding sites. Whilst the Council is open-minded to carefully consider any alternative proposal to replace the allocation, no alternative evidence has been provided to demonstrate that the alternative sites can be more sustainably developed than the proposed allocation(s).
- 2.6 The Council has not made any allowance to compensate for deleting any of the sites from the draft Site Allocations DPD. Without an alternative site to replace any deleted site the Council will require another review of the Green Belt boundary to meet development needs of the next local plan.
- 2.7 A case has also been made that the safeguarded sites should be brought forward to increase the housing requirement over the present plan period without the need to look far into the future beyond the plan period up to 2027. This is the case mainly made by the adjoining local authorities. The NPPF emphasises that safeguarded sites are not allocated for development at the present time. They can only be released for development by the review of the plan. There is a significant degree of national policy protection for safeguarded sites against development.
- 2.8 As set out in paragraph 1.10 of the Core Strategy and in the Local Development Scheme, the Council is committed to prepare a;
 - Core Strategy to determine the overall quantity of development, the housing requirement for the area, the broad spatial distribution of development across the Borough and the strategic policies to guide the management of development in the area;
 - Site Allocations DPD to identify specific developable and deliverable sites to enable the development requirements of the Core Strategy to be delivered; and
 - Development Management Policies DPD to set out detailed policies to help determine day to day planning applications.

- 2.9 Each of these DPDs has specific functions to perform, and in this particular case, it is not the function of the Site Allocations DPD to retrofit the scale of the housing requirement, which is clearly the function of the Core Strategy. The Core Strategy has its own mechanism for monitoring and review. This particular matter has been comprehensively addressed in a recent case law that was before Lord Justice Jackson, Lord Justice Patten and Lord Justice Lindblom between Oxted Residential Limited and Tandridge District Council. The Woking Core Strategy is up to date and NPPF compliant. Even that, the court ruling is pertinent. The Court ruled that there is nothing in the statutory scheme to prevent the adoption of a development plan document that is making allocations consistent with an adopted core strategy, simply because the core strategy may require revision or amendment to bring it in line with national policy. More importantly, the Court emphasised that it is difficult to reconcile with the NPPF's encouragement for the timely preparation and adoption of local plans the proposition that a local planning authority cannot prepare, and an inspector cannot consider the soundness of, a development plan document dealing with the allocation of necessary housing until further steps are taken to identify whether additional housing is required. The Council is committed to ensure the delivery of its adopted NPPF compliant housing requirement and the expeditious preparation of the Site Allocations DPD is vital to achieving this objective.
- 2.10 Evidence in the Green Belt boundary review report demonstrates clearly that beyond the sites being allocated and safeguarded in the DPD no other sites can be identified in the Green Belt for development purposes without significant damage to its purpose and integrity. Based on the assumptions underpinning the quantity of land identified for safeguarding, bringing the safeguarded sites forward for development before 2027 to increase the housing requirement will mean far more significant unmet need beyond 2027. The Council will not be able to identify sufficient land to meet the amount and nature of its housing need. The Green Belt boundary review clearly demonstrates that there is no further scope to identify land in the Green Belt without significant damage to its purposes. It is not expected that the objectively assessed housing need will significantly change beyond 2027 as demonstrated by the SHMA (2015). It is estimated that the housing requirement that the environment may be able to accommodate without significant densification of the urban area, in particular, of the low density areas of the Borough or further release of land from the Green Belt that could be damaging to its purposes, will be about 150 dwellings per annum. The damage to the character of the area as a result of this approach will far outweigh the benefits of any short term increase of the housing requirement. Also, the unmet need for housing provision that neighbouring authorities might be required to accommodate in their areas could be significantly more than during this plan period.
- 2.11 Based on the above, the principle of safeguarding sites and the number of sites being safeguarded in the DPD should be published for Regulation 19 consultation and submitted for Examination.

3.0 Has adequate infrastructure provision been made to support the Site Allocations DPD?

- 3.1 Paragraph 162 of the National Planning Policy Framework (NPPF) emphasises that local planning authorities should work in partnership with other providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand. The Council followed this requirement by preparing an Infrastructure Delivery Plan (IDP) to provide an indication of what infrastructure is anticipated to be required to support forecast growth over the Core Strategy period, where and when it will be provided, by whom and how it will be funded. The definition of infrastructure covered in the IDP and by Policy CS16: *Infrastructure delivery* of the Core Strategy is wide ranging and it includes education, transport, green infrastructure, sewerage and utilities. The IDP is on the Council's website (www.woking.gov.uk).
- 3.2 The IDP was informed by a number of studies such as a Transport Assessment (2010), an Open Space audit (and Social and Community Facilities Audit (2011), Surrey Infrastructure Capacity Study (2009) and relevant information from key providers. The Council accepts that the IDP will continue to evolve with new information, for example when the investment plans of other providers are known. For example, since the IDP was published Network Rail is developing its future investment programme to improve the rail infrastructure in the Borough. This will inform the future review of the IDP. Overall, the IDP provides adequate information on infrastructure provision to support the delivery of the Core Strategy.
- 3.3 The Council has worked with its partners to publish specific strategies and programmes to provide further details on how some of the infrastructure will be delivered. This includes:
- A Regulation 123 List with an indication of the priority infrastructure that the Council wishes to spend Community Infrastructure Levy contributions. The Regulation 123 list includes the list of schemes to be delivered, by whom, when, how, at what cost and how it will be funded. It is estimated that approximately £14M could be secured from CIL contributions towards infrastructure provision;
 - Woking Transport Strategy and Programme published by Surrey County Council, which sets out transport schemes that the County Council have identified to address the infrastructure requirements of the Core Strategy. The document takes a balanced approach with an appropriate range of schemes that includes pedestrian, cycling, road network and rail to deal with the transport implications of proposed development;
 - Thames Basin Heaths Special Protection Areas (SPA) Avoidance Strategy published by Woking Borough Council to set out how Suitable Alternative Natural Greenspace will be provided to mitigate against development impacts on the SPA. The Council has identified sufficient Suitable Alternative Natural Greenspace (SANG) capacity to cover the entire plan period; and
 - County Council's Education Programme on education provision across the Borough.
- 3.4 Whilst the above is non-exhaustive, they provide adequate information to demonstrate how key infrastructure will be secured to enable the sustainable delivery of the Core Strategy and/or the Site Allocations in a timely manner.

- 3.5 The Council has used the Site Allocations DPD process to review a number of the evidence to assess the development impacts of the proposed allocations and to address any further infrastructure that will be needed to mitigate potential adverse impacts.
- 3.6 The Council has carried out a revised Green Belt Boundary Review Sensitivity Test – Strategic Transport Assessment (TA) (2015) to assess the transport implications of the allocated sites. The TA acknowledges that there will be a net but marginal increase in traffic over and above the existing situation, which will have to be mitigated to facilitate the delivery of the proposed allocated sites. The mitigation measures will comprise both strategic schemes to be funded by developer contributions and other sources of funding and by site specific measures to be determined as part of detailed Transport Assessments to support planning applications. Specific requirements have been incorporated in the relevant proposed allocations to make sure that development impacts are fully assessed and appropriate site specific measures are identified to address any adverse impacts. The Council is working with the County Council to identify the strategic schemes. This will also be used to inform the future review of the IDP and the Transport Strategy and Programme. The County Council as Highway Authority for the area is satisfied that the approach to mitigation taken by the Council will minimise any adverse traffic impacts of the DPD to enable development to be acceptable in transport terms.
- 3.7 Policy CS17: *Open space, green infrastructure, sport and recreation* of the Core Strategy provide a robust policy framework to secure and protect open space provision in the area. The regulation 123 List quantifies what is needed and how that will be funded. The Council has also identified sufficient Suitable Alternative Natural Greenspace (SANG) capacity for recreation and to mitigate development impacts on the Thames Basin Heaths Special Protection Areas.
- 3.8 Surrey County Council is the main provider of Education in the area. It provided detailed assessment of education needs to support the Core Strategy. It is satisfied that the combination of expanding capacity at existing schools and the allocation of the specific site for a secondary school in the DPD will meet the education needs of the area. Planning permission has been granted for a secondary school at Nursery land adjacent to Egley Road, Mayford.
- 3.9 Affinity Water (Veolia Water) had confirmed that based on the projected growth in the Core Strategy there is no risk to the supply of water over the plan period.
- 3.10 The Thames Water AMP5 (2010 – 15) had informed the Core Strategy. At the time, it showed that there were no capacity issues. Thames Water has provided input to the preparation of the Site Allocations DPD in its response to the Regulation 18 consultation. They have provided a robust wording for the Council to incorporate in the DPD to make sure that the wastewater and sewerage infrastructure needs of development are fully assessed and where necessary mitigation provided as part of the planning application process. Together with the introduction of SuDS, which Thames Water support, the Council is satisfied that wastewater and sewerage issues will be addressed at the planning application stage. The Thames water Sewerage

Treatment Works, Carters Lane, Old Woking is designated as a Major Developed Site in the Green Belt to allow limited infilling and redevelopment to cope with any projected future need. The Council has also been proactive in bidding for funding to address key infrastructure issues of the area, and has a good track record of success in doing so. For example, it has recently secured significant funding from the Local Enterprise Partnership (LEP) to fund transport improvements in the Town Centre.

- 3.11 The Council is by no means suggesting that the approach it has taken to mitigate development impacts of the Site Allocations DPD will be a panacea to address deficiencies in existing infrastructure provision. Nevertheless, it will ensure that the existing situation is not exacerbated and the negative impacts of any future development are minimised. In summing up for his consideration of infrastructure matters at the Core Strategy Examination, the Inspector concluded that the Core Strategy addresses adequately the provision of infrastructure to support the delivery of the strategic objectives of the Core Strategy.

4.0 Should Green Belt land be released to meet the accommodation needs of Travellers?

4.1 The Government's policy on Travellers is set out in *Planning policy for Traveller sites* (August 2015). The overall aim of the Government is to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community. To achieve this aim the Government requires local planning authorities amongst other things to:

- Make their own assessment of need for the purposes of planning;
- Work collaboratively to develop fair and effective strategies to meet need through the identification of land for sites;
- To plan over a reasonable timescale;
- Make sure that plan-making and decision-taking protects Green Belt from inappropriate development; and
- Make sure that plan-making and decision-taking aim to reduce the number of unauthorised developments and encampments and make enforcement effective.

The Planning policy for Traveller sites should be read in conjunction with the NPPF.

4.2 Policy CS14: *Gypsies, Travellers and Travelling Showpeople* of the Core Strategy commit the Council through the Site Allocations DPD process to identify sufficient sites to meet identified need over the plan period. A sequential approach should be taken to identifying sites for allocation, with sites in the urban area considered first before sites in the Green Belt. However, the Core Strategy is also clear to emphasise that a demonstrated lack of any deliverable sites in the urban area would provide very special circumstances necessary to allocate sites in the Green Belt. If sites are to be released from the Green Belt, they should be informed by a Green Belt boundary review. Any site that is identified to meet the need should not have an adverse impact on environmentally sensitive sites that cannot be adequately mitigated. The process for identifying sites and the special circumstances justification for sites to be identified in the Green Belt if supported by a sequential test has already been established and supported by the Secretary of State at the Core Strategy Examination.

4.3 Section 9 of the NPPF deals with the protection of Green Belt land. Paragraph 83 states that once established, Green Belt should only be altered in exceptional circumstances, through the preparation or review of the local plan. The use of the Site Allocations process to identify sites to meet the needs of Travellers is therefore in accordance with the requirements of the NPPF and the Core Strategy. It is the Council's view that the development of sites allocated through the plan-led process in a local plan where the principle had been established will not constitute inappropriate development in the Green Belt if care had been taken to minimise any adverse impacts of the development and it had been demonstrated that no urban sites could be identified to meet the need.

4.4 The Council has carried out a Travellers Accommodation Assessment (TAA) to determine the scale of need in the area. The TAA is on the Council's website (www.woking.gov.uk). A need for 19 pitches to be delivered between 2016 and 2027

has been identified. The Council has a responsibility to demonstrate that it has identified sufficient sites to meet the identified need. In doing so, the Council has to make sure that sufficient sites have been identified to ensure the enduring permanence of the Green Belt boundary.

- 4.5 In accordance with the sequential approach to site selection, the Council has carried out a Strategic Housing Land Availability Assessment (SHLAA) to assess the capacity of the urban area to accommodate projected housing growth at different timeframes. In compiling the sites, some of them were rejected if they were covered by absolute constraints such as European designated sites. The sites were also sustainability appraised against a set of sustainability objectives. The outcome of the exercise is a list of sites that the Council believes their development will help achieve sustainable development of the area with minimum adverse impacts on the sustainability objectives when tested against all other reasonable alternatives. It is from this list of urban sites that the Council has considered the prospect of finding suitable sites for Traveller pitches. The Sustainability Appraisal (SA) Report is on the Council's website.
- 4.6 To allocate land for development the Council has to be sure that it has a realistic prospect of coming forward for development at the time that it is needed and that the development will be viable. None of the land owners/developers who have submitted sites for consideration in the SHLAA have promoted any of the sites for Travellers accommodation. Desktop search also did not lead to any credible sites that could be viably developed in the urban area. Repeated calls for sites to be submitted for consideration have been unsuccessful. Because of land values, site contexts and constraints none of the urban sites considered are envisaged to achieve positive viability if developed for Traveller pitches. The Council is satisfied that there is a demonstrated lack of deliverable sites in the urban area to meet the identified need to provide a robust case on special circumstances grounds to justify the use of Green Belt land to deliver Traveller pitches.
- 4.7 Policy CS6: *Green Belt* of the Core Strategy identifies the Green Belt as potential future direction of growth to meet housing need. The next area of search is therefore land in the Green Belt. The Council has carried out an SA of reasonable alternative sites in the Green Belt, and has made a decision that in following the sequential approach to site selection, it will first consider whether legally established sites in the Green Belt have capacity to expand without significant adverse impacts on the environment before new sites in the Green Belt are considered. This approach is in line with the sustainability objectives of the SA Report, the requirements of the Core Strategy, the NPPF and the advice in the Green Belt boundary review.
- 4.8 Ten Acres (GB2 and GB3 of the Site Allocations DPD) and Five Acre Farm (GB7) are established sites with a combined capacity to accommodate **21** net additional pitches. This will be sufficient to meet the identified need over the plan period. They perform reasonably well against the sustainability objectives of the SA Report when compared against other Green Belt sites. Consequently, the Council is satisfied that they should be allocated to contribute towards meeting the identified need for Travellers. By taking this approach, concern has been expressed that it will concentrate all the Traveller sites at the southern part of the Borough and in close

proximity with each other. The Council acknowledges this concern. However, Five Acres, Ten Acre Farm and Hachingtan sites are functional established sites with no significant recorded management issues. The Council will continue to work closely with the operators of the sites to make sure that they continue to be effectively managed. The Council is also of the view that the overall environmental benefits for expanding capacity at the existing sites will far outweigh any benefits for spreading the development at new locations in the Green Belt.

- 4.9 The Council has also carried out a Habitats Regulations Assessment Screening to assess the impacts of the allocation of these sites on European designated sites. The HRA has been prepared with the input of Natural England. The sites have been screened out as having no likelihood of leading to significant adverse effects on European designated sites. Subject to identifying sufficient land to provide Suitable Alternative Natural Greenspace (SANG) to mitigate any adverse impacts on the Special Protection Areas, the Council is satisfied that the sites can sustainably be developed for Traveller pitches. The Council has identified sufficient SANG capacity to support housing provision than is needed in the plan period.
- 4.10 The proposed allocations include a list of key requirements to be met to make the development of the site acceptable. This includes making sure that site specific matters such as contamination, flood risk and biodiversity are fully assessed and where necessary mitigation measures identified to address adverse impacts. The requirements will also ensure that the siting, layout and design of the site minimises any adverse impacts on the amenity of nearby residents and the landscape setting of the area. It is also important to emphasise that the sites have been assessed in the context of an up-to-date Strategic Flood Risk Assessment. The siting of the pitches will be in areas with low probability of flooding. Other development plan policies such as Policy CS21: *Design* of the Core Strategy will apply to the development of the sites to minimise any adverse impacts on amenity. The Council is satisfied that the combined effects of these requirements will make sure that the development of the site are sustainable.
- 4.11 The Council has considered the merits of the alternative site(s) being proposed to replace the allocations. None of the sites are part of an established Traveller sites. Evidence in the SA Report and or the Green Belt boundary review does not provide any justifiable case why these alternative sites should be allocated instead of the proposed allocation. There is no alternative evidence submitted to the Council other than the Council's own evidence to demonstrate why these sites can deliver the Council's objectives in a more sustainable manner. Based on the above analysis the proposed allocation should be published for Regulation 19 consultation and submitted to the Secretary of State for Examination.
- 4.12 It is accepted that one of the key requirements for Ten Acre Farm could give the false impression that the site is also allocated for a business use. That is not the intention of the requirement. The requirement is intended to emphasise that the allocation should facilitate the traditional way of life of Travellers. The requirement will be amended in this regard to address this concern.

5.0 Flooding

- 5.1 The Council attaches significant importance to flood risk because of its potential threat to the livelihood of residents and local businesses. In this regard, the Site Allocations DPD directs development to areas with the lowest probability of flooding from all sources.
- 5.2 The Site Allocations DPD is informed by an up-to-date Strategic Flood Risk Assessment (2015). A Sequential Test has been carried out to determine the suitability of sites according to their susceptibility to flood risk. The Environment Agency had been consulted on the Sequential Test. The Sequential Test demonstrates that the Exception Test will not be required for any of the proposed sites in the DPD.
- 5.3 The functional floodplain had been considered an absolute constraint and sites within it had been ruled out for consideration as reasonable alternatives for the purposes of the DPD. The defined areas of the allocated sites where development will be required to be sited are all in Flood Zone 1 where development is encouraged. Full consideration has also been given to the assessment of alternative sites through the Sustainability Appraisal (SA) process where flood risk is one of the key objectives against which all alternative sites were appraised. In accordance with national policy, proposals in Flood Zone 1 that are on sites of 1 hectare or greater will be required to provide a site base FRA to show that development will be safe for its lifetime. It is not necessary to repeat this in the DPD as a site specific requirement.
- 5.4 Where relevant, the key requirements of the proposed allocated sites sets out conditions for the need for detailed flood risk assessment. This will ensure that the development of the site addresses any site specific issues relating to flood risk, including making sure that the development of the site do not exacerbate flood risk elsewhere.
- 5.5 Sustainable Urban Drainage system (SuDs) is required for major development and encouraged for all other development where feasible. This will help minimise the risk of flooding, in particular, flooding due to surface water run-off. Policy CS9: *Flooding and water management* of the Core Strategy sets out robust policy requirements for managing the impacts of development on flood risk. This will apply when determining any application that will come forward on any of the allocated sites.
- 5.6 Based on the above, Officers are satisfied that flood risk has been sufficiently, adequately and appropriately considered in the preparation of the DPD and the development of the allocated sites will not lead to or be exposed to unacceptable level of flood risk.

6.0 Was the regulation 18 consultation of the Site Allocations DPD adequate?

6.1 The minimum level of public consultation required for a Regulation 18 consultation on a draft Development Plan Document such as the Site Allocation Development Plan Document (DPD) is prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council has also published a Statement of Community Involvement setting out how the community will be involved in the preparation of key planning policy documents. The Council published the DPD for a six weeks Regulation 18 consultation period between 18 June 2015 and 31 July 2015, and have carried out the following events:

- Sending direct mails to over 2,000 individuals or organisations on the consultation database;
- Depositing copies of the Site Allocations and its accompanying supporting documents at the main libraries across the Borough for public inspection;
- Doing presentations to local community groups, Resident Associations, Neighbourhood Forums, Agents Forum and the Chamber of commerce;
- Visiting places such as Shopping Centres, rail stations, and events such as Woking in the Park;
- Putting the Site Allocations DPD on the Council's website;
- Sending the Woking Magazine that included an article on the consultation to about 46,000 households;
- Publishing press notices and news release in the local news papers; and
- Engaging with the youth through the Woking Youth Council.

6.2 Under the Duty to Cooperate, the Council has also engaged with relevant neighbouring authorities, statutory consultees and key stakeholders before and during the consultation period. A Duty to Cooperate statement and a Consultation Statement will be published in due course as part of the submission documents to be sent to the Secretary of State to demonstrate in detail how the Council has engaged with local residents and key stakeholders in the preparation of the DPD.

6.3 The Council is satisfied that it has done what it can within the available resources to engage the community during the Regulation 18 consultation. It has done so in accordance with the Statement of Community Involvement and all other statutory and policy requirements. The Council is also satisfied that sufficient time had been allowed for the consultation and the consultation events were spread across the borough and amongst various groups to give everyone the opportunity to participate.

6.4 The Council will publish the 'Publication' version of the DPD for a Regulation 19 consultation to give the public a further opportunity to comment on the document before it is submitted to the Secretary of State for Examination. Everyone will have the opportunity to be heard at the examination if they felt that their concerns have not been satisfactorily addressed by the Council at the Regulations 18 and 19 consultation stages.

7.0 Has comprehensive Landscape Character Assessment and Heritage Assets Appraisal been carried out to inform the Site Allocations DPD?

7.1 No up-to-date comprehensive Borough-wide Landscape Character Assessment had been published prior to the publication of the Site Allocations DPD for Regulation 18 consultation to provide the baseline for the Green Belt boundary review. The Woking Character Study only focused on the townscape of Woking. To address the landscape implications of the proposed allocations in the Site Allocations DPD consultants were particularly engaged to undertake a preliminary assessment of the landscape characteristics of the various parcels of land that formed the basis of the Green Belt boundary review (a copy of the Green Belt boundary review report is on the website). This approach to Landscape Character Assessment is referred to as landscape sensitivity and capacity assessment, and is commonly used at this level of landscape character assessment. Landscape sensitivity and capacity assessment tests the characteristics of the receiving landscape to development of the sites. Peter Brett rightly carried out their own assessment of the character of the sites and assessed alongside this the capacity for change based on landscape character and sensitivity. The scale of the assessments is at the correct scale for sensitivity study and brings the extra amount of detail regarding landscape character and sensitivity to change that would be expected of any such study. The study is therefore robust and well considered. Whilst this is not a comprehensive Borough-wide landscape character study it provides a detailed overview of the prevailing landscape character of the parcels and their potential sensitivity to change and potential for accommodating a strategic level of development. This level of assessment is sufficient to enable appropriate planning judgments to be made about the individual sites appraised and preferred sites proposed to be released from the Green Belt for future development.

7.2 The Council has been working in partnership with Surrey County Council and the other Surrey districts and boroughs over time to prepare a detailed Borough-wide Landscape Character Assessment. This was being done in parallel with the preparation of the Site Allocations DPD. This has now been completed. There is nothing in the document that would have led the Council to different conclusions about the selection of the preferred sites to be released from the Green Belt on landscape grounds. The Peter Brett study and the Borough-wide Landscape Character Assessment complement each other. The Landscape Character Assessment is on the Council's website.

7.3 Whilst the Council acknowledges the importance of protecting the landscape character of the area and had insisted for it to be considered as part of the Green Belt boundary review, the fundamental aim of the Green Belt boundary review is to ensure the protection of its purposes. These purposes are set out in paragraph 80 of the NPPF. The Green Belt boundary review has ensured that the parcels of land identified for consideration are consistently and rigorously appraised against the purposes of the Green Belt. For the avoidance of doubt, the five purposes of the Green Belt are:

- To check the unrestricted sprawl of large built-up area;
- To prevent neighbouring towns merging into one another;

- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

7.4 Each proposed site allocations set out a number of key requirements to be met for development to be acceptable, including the protection of trees. A minor modification is proposed to the key requirements to strengthen the importance of trees to the landscape character of the area. The combination of the plan-making and development management processes will ensure that the development of the proposed sites will not undermine the landscape character of the area. It is also emphasised that the requirements of the Core Strategy, in particular, Policy CS24: *Woking's landscape and townscape* and Policies DM1 and DM2 of the emerging Development Management Policies DPD will apply to any proposal that would come forward to develop the allocated sites.

7.5 The term Heritage Assets is defined in the Glossary of the Core Strategy. The Heritage of Woking Study (2000) provides an inventory of the heritage assets. Policy CS20: *Heritage and conservation* of the Core Strategy provides a robust policy framework for the protection and conservation of the heritage assets of the area as a result of development pressures. For example, the policy ensures that there is a presumption against any development that will be harmful to a listed building. The requirements of the Core Strategy will apply to the development of any of the allocated sites if they are adopted. The Council is aware to carry out Conservation Area reviews when resources will allow. However, this is a separate matter that should not be a pre-requisite to the preparation of the Site Allocations DPD. There is no evidence to demonstrate that the outcome of the Conservation Area reviews will have a direct bearing on protecting the five purposes of the Green Belt in so far as it will apply to sites in Pyrford and for that matter other sites elsewhere.

8.0 Is the evidence base to support the Site Allocations DPD adequate?

8.1 The overall purpose of the Site Allocations DPD is to deliver the requirements of the Woking Core Strategy. The Council is satisfied that the depth and breadth of evidence used to support the Core Strategy was comprehensive, robust and was able to withstand scrutiny at the Core Strategy Examination. The list of evidence base studies used to justify the Core Strategy is at Appendix 1 of the Core Strategy. A number of the evidence base studies have been reviewed since the Core Strategy was adopted to inform the Site Allocations DPD. This includes:

- Strategic Housing Land Availability Assessment (SHLAA) (2015);
- Strategic Housing Market Assessment (SHMA) (2015);
- Green Belt boundary review (2014);
- Landscape Assessment (2014);
- Strategic Transport Assessment (2015);
- Travellers Accommodation Assessment (2013);
- Sustainability Appraisal Report (2015);
- Habitats Regulations Assessment (2015);
- Employment Topic Paper (2015);
- Woking Transport Strategy and Programme;
- Strategic Flood Risk Assessment (2015); and
- Technical information captured from statutory consultees, neighbouring authorities and other key stakeholders during Duty to Cooperate exercises.

Appendix 1 of the draft Site Allocations DPD is a full list of the evidence base used to inform the DPD.

8.2 The evidence gathered is sufficiently comprehensive, adequate, sufficient and robust enough to inform planning judgments about the preferred sites in the DPD. They have all been prepared to high quality standards to meet all necessary requirements. It is an extensive list of studies and covers evidence base studies required or suggested by national guidance such as SHLAA and SHMA. The breadth and depth of the evidence base studies reflect the nature and issues that are pertinent to the preparation of the DPD. The evidence base required by the SEA Directive has also been covered as part of the Sustainability Appraisal Report. Information gathered from the responses to the Regulation 18 consultation will also continue to be useful source of evidence to inform subsequent stages of the process. Overall, Officers are satisfied that the DPD is adequately and appropriately informed by robust and up-to-date evidence base.

9.0 Has there been a thorough assessment of reasonable alternative sites to inform the selection of preferred sites?

- 9.1 The Sustainability Appraisal (SA) process has been used to appraise reasonable alternative sites to inform the Site Allocations DPD. The SA Framework used for the appraisal of the alternative options is objective-led and has provided a consistent basis for describing, analysing and comparing the sustainability effects of the various options and the specific proposals of the Site Allocations DPD. The SA Report is on the Council's website. It includes all the reasonable alternative sites that were appraised (see Appendix 5 of the SA Report of the draft Site Allocations DPD) and why sites have either been selected or rejected (see Tables 7 and 8 of the SA Report). The appraisal methodology is clearly set out in the SA Report and had consistently applied throughout the appraisal.
- 9.2 The Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Review (ELR) has provided the basis of the reasonable alternative sites appraised. The SHLAA adopts a comprehensive methodology to assessing sites, including density and potential housing yield. It represents an adequate, proportionate and robust source of evidence to inform the Site Allocations DPD process. The methodology used for the SHLAA has been commended by the Inspector who conducted the Core Strategy. In this regard, the Council is satisfied that the SHLAA does not need an independent verification of either its process or its outcomes. The ELR is also a consultants report prepared to high quality standards.
- 9.3 To make the Site Allocations DPD and appraisal process manageable, only reasonable alternative sites that will yield 10 dwellings or more or 500sq.m or more of employment floorspace were appraised. Sites in both the urban area and within the Green Belt were appraised. Every site with a realistic prospect of coming forward during the plan period that the Council is aware has been appraised before preferred sites were selected for the DPD. Overall, about 125 alternative sites were appraised. It is therefore incorrect as suggested by a number of the representations that there is a lack of thorough assessment of alternative sites.

10.0 Does the Green Belt boundary review adopt the right approach for assessing sites?

10.1 Peter Brett Associates were commissioned to carry out the Green Belt boundary review. The consultants' brief was approved by the Local Development Framework Working Group. The Working Group has considered the consultants' report and is satisfied that it has been prepared in accordance with the brief, and that the report provides a useful evidence base to inform the Site Allocations DPD. It is important to emphasise that Officers reviewed a number of examples of Green Belt boundary reviews before finalising the brief for the consultants.

10.2 There is no prescribed methodology for carrying out a Green Belt boundary review. The Council had been concerned to ensure that the review is founded on a robust and credible methodology. In this regard, the consultants published the methodology for carrying out the Green Belt boundary review for stakeholder consultation to make sure that all technical aspects of how to carry out a Green Belt boundary review would be covered. Comments received were taken into account before the review was undertaken. The Council is satisfied that the methodology for the review is robust, logical, coherent, and comprehensive to form the basis of the review. The appraisal of individual parcels of land that were carried out and the conclusions and recommendations of the report follow the methodology in a logical and coherent manner.

10.3 The review was borough-wide in coverage to ensure that all reasonable alternative sites across the borough are assessed. This was necessary to ensure that a defensible boundary that is able to endure beyond the period of the Core Strategy can be drawn. Various relevant assessments were undertaken as part of the review, including:

- An assessment of how various parcels of land in the Green Belt contribute to its purpose;
- An assessment of the landscape character and sensitivity to change of developing the parcels of land assessed;
- An assessment of the sustainability of sites with respect to their proximity to key services and facilities and how accessible they are by various modes of travel; and
- The availability, viability and deliverability of the sites were also considered.

10.4 The combined information from these assessment provide sufficient basis to make informed judgments about the proposed site allocations in the DPD. It is emphasised that the Green Belt boundary review report is only one of a number of evidence base studies used to inform the Site Allocations DPD. A detailed list of the evidence base studies is at Appendix 1 of the draft Site Allocations DPD.

Other representations

The following representations attracted a significant number of representations but not necessarily of a strategic nature.

11.0 No evidence has been produced to demonstrate that Woking Borough Council has exhausted assessment of brownfield sites for development.

11.1 It is not correct that the Council has not comprehensively assessed brownfield sites as part of the evidence to inform the Site Allocations DPD. The Council has published detailed information on previously developed land (brownfield land) that is suitable, available and achievable for housing and employment purposes. This is contained in the Strategic Housing Land Availability Assessment (SHLAA) (2015), the Employment Land Review (2009) and Employment Topic Paper (2015). The documents are on the Council's website at www.woking.gov.uk. The Council has also carried out and published a Sustainability Appraisal Report that assesses all reasonable alternative brownfield sites in a consistent manner against a set of sustainability objectives, including environmental, social and economic objectives. The available evidence on previously developed land is sufficiently comprehensive and robust enough to enable informed decisions about the preferred sites being proposed for allocation in the DPD. The evidence also demonstrates that the preferred sites are the most sustainable when compared against other alternative sites. It is important to highlight that there is no presumption that land which is previously developed is necessarily suitable for residential development. Officers will consider any other sites that will be suggested for consideration in response to the Regulations 18 and 19 consultations on the DPD.

12.0 Green Belt land in Mayford is fundamental to the physical separation of Woking, Mayford and Guildford and should be recognised. The Green Belt boundary review incorrectly classified it as 'important'.

12.1 The Green Belt boundary review assessed parcels of land against the purposes of the Green Belt, one of which is preventing neighbouring towns from merging into one another. Sites GB8, GB9, GB10, GB11 and GB14 are all in parcel 20 of the Green Belt boundary review. The review concluded that development in this parcel would not reduce the gap between the town and the northern edge of Guildford.

12.2 It is recognised that the separation between Woking and Mayford will be reduced as a result of the proposal. However the identity and character of Mayford will not be undermined as it is protected by Core Strategy Policy CS6: *Green Belt*.

13.0 The ownership status of land should have no bearing on whether it should be Green Belt or not.

13.1 The ownership status of land (i.e. who owns what land) has not been used as criteria to determine whether or not land should be released from the Green Belt. However, in accordance with national planning policy the availability of land is a significant consideration that the Council has to take into account. Footnote 11 and 12 of the NPPF is clear to emphasise that to be considered deliverable, sites should be available. This is necessary to ensure that any land that is identified for development

has a realistic prospect of coming forward for the anticipated nature and type of development at the time that it is needed. The NPPF defines previously developed land as *'land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time'*. Based on this definition it is important that availability is an important material consideration to provide certainty of delivery.

14.0 Prey Heath and Smarts Heath are SSSIs with the potential to be designated as Special Protection Areas (SPA) and should therefore have 400m buffer zone within which development is not allowed.

14.1 Prey Heath and Smarts Heath are not designated SPAs, and as such they could not be accorded the same status with the same policy justification for their protection. The 400m exclusion zone could not therefore apply in this situation. Nevertheless, the ecological significance of the land will continue to be conserved and taken into account in the consideration of any development that could have potential impacts on their ecological integrity.

15.0 Development will lead to urban sprawl.

15.1 The Green Belt boundary review assessed the parcels of Green Belt land against the purposes of the Green Belt, one of which is to check the unrestricted sprawl of large built up areas. None of the proposed allocations will lead to unacceptable urban sprawl.

16.0 The Council should use empty offices, commercial buildings in industrial estates for development instead of Green Belt land.

16.1 The Council has assessed brownfield sites including empty offices that can be developed for housing and/or alternative uses. However, the amount of land identified from this source is insufficient to meet development requirements over the entire plan period. Green Belt land will be needed in accordance with the Core strategy and as demonstrated by evidence to meet future development needs. It is important to acknowledge that whilst the focus has been on residential development the Council also has a responsibility to identify sufficient land to meet its economic, social and environmental requirements. Evidence of previously developed land assessed is contained the Strategic Housing Land Availability Assessment, Employment Land Review, Employment Topic Paper and the SA Report for the Site Allocations DPD.

17.0 Council has deviated from the recommendations of the Green Belt boundary review report.

17.1 It is a fact that the Council did not take forward the entire recommendations of the Green Belt boundary review in the Site Allocations DPD. For example, the Council did not take forward the recommendation to release from the Green Belt sites to rationalise the Green Belt boundary but not for the purposes of development. The Council has been transparent about the reasons for not accepting some of the recommendations in relevant committee reports. Nevertheless, the recommendations have been broadly followed where it has been necessary to do so taking into account all other available evidence. It is important to emphasise that the Green Belt boundary review is only one of a number of evidence base studies that has been used to inform the DPD. Other evidence base studies such as the Sustainability Appraisal Report, Transport Assessment have also played a key role in informing the DPD. The full list of the evidence base studies is at Appendix 1 of the DPD.

17.2 Regarding Ten Acre Farm which has attracted a number of this particular concern, the proposed allocation is broadly in line with the recommendations of the Green Belt boundary review report. Paragraph 6.4.10 of the report states '*the site WOK003 (Ten acre Farm) is potentially suitable for intensification, but is not available for increased Gypsy and Traveller use at this time. The Council should continue to investigate the potential of intensification with the owner, if the TAA pitch requirement is not met within or adjacent to the urban area (outside the Green Belt)*'. The suitability of the site for intensification is supported by the report. The key issue had been availability, and the Council is confident that this will be overcome. Therefore, the concern that the Council has ignored the recommendations of the Green Belt boundary review regarding this site is not correct if the availability issue can be overcome.

18.0 Proposed densities are excessive and incompatible with surroundings.

18.1 The Core Strategy (Policy CS10: Housing provision and distribution) provides an indication of the densities that could be achieved at various broad locations such as the Green Belt. The Council takes the view that the proposed anticipated densities are reasonable and are broadly in line with the Core Strategy. It is always emphasised that the proposed densities are indicative and actual densities can only be agreed on a case by case basis depending on the merits of each proposal at the planning application stage. As a general rule, it is important to highlight that lesser densities as suggested (of about 15 dwellings per hectare) could require the Council to identify more land, including Green Belt land to meet the identified need.

19.0 The proposals in the DPD will have adverse impacts on the heritage assets of the area.

19.1 It is not envisaged that the DPD will have significant adverse impacts on the heritage assets of the area. This is confirmed by the evidence in the SA Report. The Core Strategy (Policy SC20) and the emerging Development Management Policies DPD (Policy DM20) has robust policies to conserve the heritage assets of the area as a result of development impacts. Historic England has also confirmed that they are satisfied that the relationship of the Site Allocations DPD to the policies of the Woking

Core Strategy will ensure that development takes place in a sustainable form that reflects the requirements of the NPPF, and by definition, this includes the objective to conserve heritage assets in a manner appropriate to their significance.

20.0 The 2010 Transport Assessment is based on modelling that does not take account of the proposed development of Green Belt land and in particular, around West Hall, and should not be used to justify the proposals in the DPD.

20.1 The 2010 Strategic Transport Assessment assessed the transport impacts of the quantum of development proposed in the Core Strategy including the development of about 500 new dwelling towards the south of the Borough. The assessment concluded that the transport impacts of the proposed scale of uses can be mitigated. This was supported by the Core Strategy Inspector. Subsequently, the County Council has published the Woking Transport Strategy and Programme to identify specific transport mitigation measures to contribute towards addressing the development impacts. This will be in addition to any site specific measures that will be identified through the development management process. As part of the Site Allocation DPD process, the County Council has carried out a new Strategic Transport Assessment (titled: Green Belt Boundary Review Sensitivity Test – Strategic Transport Assessment 2015) to assess the transport impacts of the proposed Green Belt sites. The outcome has been used to inform the DPD. The DPD is therefore informed by an up-to-date Transport Assessment. This Transport Assessment also concluded that the proposed site allocations would lead to marginal increase in traffic over and above the current situation, and that will require mitigation. This will be both additional strategic transport proposals and site specific measures to be identified as part of the development management process. The Council will be working with the County Council to identify feasible and effective transport improvements to address the traffic impacts and would jointly work to consider how the improvements would be funded and implemented.

21.0 The proposed allocations will significantly reduce or take away Green Belt land in this particular area/ward to the detriment of the general wellbeing and amenity of residents.

21.1 The Council accepts that any land taken out of the Green Belt will lead to a reduction of the amount of Green Belt land and the benefits it brings to the particular communities where the land is situated. Whilst the Council sympathises with this concern, it has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity. Taking into account the constraints of the Borough and the available evidence, the proposed allocations are the most sustainable to deliver the objectives of the Core Strategy when compared against other reasonable alternatives. The Sustainability Appraisal Report provides the evidence to support this view. Whilst not underplaying the significance of the benefits of Green Belt land to individual local communities, the overall total of Green Belt land proposed to be released from the Green Belt to meet development needs up to 2040 is about 3.46% of the total area of the Green Belt. Presently, the Green Belt is about 63.27% of the total area of the Borough. When all the allocated sites have been developed the Green Belt will be about 61.8% of the

total area of the Borough. The amount of land being proposed to be released is therefore relatively modest.

22.0 There are over concentration of Travellers sites in the West of the Borough and the proposals of the DPD will exacerbate this trend.

22.1 The DPD has not led to an increase in the number of Traveller sites across the Borough. It will however be intensifying the use of existing sites and the Council accepts that this will lead to an increase in the number of pitches and consequently the population of Travellers in this part of the Borough. The existing sites have so far been well managed and there is every indication that they will continue to be well managed when the additional pitches are delivered. Based on the sequential approach, the Council believes that the proposed site allocations relatively offer the most sustainable locations to meet Travellers accommodation needs when compared against other alternatives.

23.0 The proposals will change the character of the respective local areas where the sites are allocated for the worse.

23.1 Most of the housing need for the Borough is internally generated. Consequently, it is envisaged that planning to meet that need should not undermine the overall social fabric of the area. There is no doubt that the development of the sites will increase the population of some areas/wards. However, it is expected that development will be supported by adequate infrastructure to minimise any social, environmental and infrastructure pressures in the area as a result of the development. Development will also be built to high environmental standards in accordance with the environmental/climate change requirements of the Core Strategy. Development will also be designed to respect the general character of its surroundings. The Core Strategy and the Design SPD provides adequate guidance to enable this to be achieved. Overall, the Council is satisfied that the social, environmental and economic character of the area will not be significantly undermined.

24.0 Lack of joined up work between Woking Borough Council and Surrey County Council on transport matters.

24.1 The Council has constructively and positively been working with the County Council in assessing the transport impacts of both the Core Strategy which the Site Allocations DPD seeks to deliver and the Site Allocations DPD itself. The two authorities have worked together to carry out the Strategic Transport Assessment (2010) to inform the Core strategy, the Infrastructure Delivery Plan (IDP) to identify the infrastructure requirements to support the Core strategy, the Transport Strategy and Programme, the Regulation 123 list which Community Infrastructure Levy will be spent and the latest Strategic Transport Assessment (2015) to support the Site Allocations DPD. It has also worked with the County Council and the other Surrey authorities to prepare the Cumulative Assessment of Future Development Impacts on the Highway. A Duty to Cooperate statement will be published in due course to demonstrate the extent of cooperation between the two authorities and indeed with other relevant organisations and neighbouring authorities. The proposals of the DPD are informed by comments from the County Council both formally and informally. The

Council is committed to continue to work positively with the County Council throughout the Site Allocations DPD process and beyond to address common and strategic transport issues of the area. It is therefore incorrect for the representation to suggest that there is no joined up work between the two authorities.

Other issues that attracted significant representations of mainly locally specific nature

A. Travel times are based on Google averages and do not reflect traffic in peak hours

The journey times used in estimating the sustainability of sites by reference to their proximity to key services and facilities provide a consistent baseline in calculating the accessibility to local services and retail centres. They do not exactly reflect real-time conditions or peak hour journey times. Its purpose is to make sure that sites are in sustainable locations. The Council has undertaken a Transport Assessment (TA) that assesses the transport/traffic impacts of the proposed allocations. The TA uses real peak time data to inform the modelling. Any mitigation measures that will be necessary will be informed by the Transport Assessment and not the journey time estimates used in the Green Belt boundary review report.

B. The site is not deliverable as it is not available for development.

In accordance with national planning policy the availability of land is a consideration that the Council has to take into account. Footnote 11 and 12 of the NPPF is clear to emphasise that to be considered deliverable, sites should be available. This is necessary to ensure that any land that is identified for development has a realistic prospect of coming forward for the anticipated nature and type of development at the time that it is needed. As with all of the sites identified within the DPD, the Council has sought confirmation from the landowner that the site is available for development. The landowner has confirmed that the site is likely to be available and therefore has been considered within the Site Allocations DPD.

As noted in the SHLAA (2015) the site would only be deliverable or developable during the Plan period subject to it being released from the Green Belt through the Site Allocations DPD. The Council is therefore pursuing the use of the site for Travellers accommodation through the Plan led process.

C. The Green Belt review did not take into account the purpose of the Green Belt to preserve the setting and special character of historic towns as Woking does not have a particularly strong historical character. However Mayford does have a strong historical character.

The specific purpose of the Green Belt to preserve the setting and special character of historic towns was not considered relevant in the Green Belt boundary review because by definition Woking and its villages are not classified as historic towns. It is acknowledged that Woking has a variety of heritage assets, and there are sufficient

and robust policies to preserve and/or enhance these assets. It is not envisaged that the integrity of any of these assets will be compromised by the proposed allocations.

In addition, the special character of Mayford is recognised by the Council and Core Strategy Policy CS6: *Green Belt* specifically highlights that development will not be allowed if it will have an unacceptable effect on the primarily residential character of the village and Green Belt.

D. The existing public transport service in the area is infrequent

As part of Transport for Woking, the Council is working with the relevant operators and providers to see how best they can collectively enhance existing operational deficiencies in service provision to meet the increasing demand. The Council is also working with interested parties such as Network Rail, Enterprise M3 and the County Council to ensure that there is future investment to deliver the necessary public transport infrastructure to meet the projected demand on the back of the Core Strategy. A number of specific programmes have been identified in the Regulation 123 List and the Woking Transport Strategy and Programme to enhance public transport infrastructure in the area.

E. There are roads in the area that do not offer pavements to those travelling on foot. This will lead to more people travelling by car.

The Council will draw the County Council's attention to this representation to see what can be done to address the existing situation. Regarding the allocated sites, the Council will ensure that any specific scheme that comes forward, there is easy access to and within the site by all sustainable modes of travel including walking, cycling and public transport where feasible. The Regulation 123 List and the Woking Transport Strategy and Programme include specific programmes to improve pedestrian infrastructure.

F. The Green Belt Review recommended Mayford on the basis of proximity to a "Local Centre", however, other than a Post Office and Barbers, Mayford has no supporting infrastructure in the form of shops, doctors, dentists, medical facilities, or schools. Residents living on any major development in the Village would be isolated unless they have a vehicle.

The existing shops in Mayford form the Mayford Neighbourhood Centre which caters for the everyday needs of those living locally. The proposed allocations set around Mayford would inevitably increase the number of people living locally, placing a greater demand on the shops and services currently offered in the Neighbourhood Centre. The proposed allocation at Egley Road Garden Centre (GB9) notes that there is an opportunity to provide an element of retail/community development to enhance the rather dispersed provision currently in the Mayford area. It is envisaged that this relevantly small provision of retail and or community development will meet the day to day needs of local people and therefore reduce the need to travel by car.

In addition planning permission has recently been granted for a new secondary school and leisure centre at the site known as 'Nursery land adjacent to Egley Road (GB8)'. The provision of this infrastructure will further support the daily needs of local people.

- G. The Green Belt boundary review indicates that a school on Egley Road would maintain the openness of the area, however this is misleading if the school is merely a Trojan horse and as a precursor to housing on fields either side of the school later on.**

The site at Egley Road (Policy GB8) is allocated for housing and educational uses. There is therefore no intention to be misleading. The recommendations of the Green Belt boundary review support this decision. The Council believe that the site can be developed for a school and about 188 new homes without undermining the overall purpose of the Green Belt. For update purposes, the school now has a planning permission.

- H. Ten Acre Farm is unacceptable as an expanded Traveller site being sited on contaminated land. Only where land has been properly decontaminated should development be considered on that land.**

A number of the proposed allocations in the DPD are sited on land which could have land contamination from previous or historic land uses. This proposed allocation includes a list of key requirements to be met to make the development of the site acceptable. This includes making sure that site specific matters such as contamination are fully assessed and where necessary mitigation measures identified to address adverse impacts. Subject to thorough contamination assessments being carried out and the implementation of any necessary remediation measures, the Council is satisfied that the development of the site is sustainable.

- I. Any proposal that will have an adverse impact on environmentally sensitive sites that cannot be adequately mitigated should be refused (*Referring to Ten Acres*).**

The Council agrees with the above, and indeed Policies CS7: Biodiversity and Nature Conservation and CS8: Thames Basin Heaths Special Protection Areas reiterates the importance of protecting environmentally sensitive sites. Nevertheless, the Council is satisfied that the site can be development for the proposed use without significant damage to surrounding environmentally sensitive designations. This conclusion is supported by the available evidence such as the Habitats Regulations Assessment, Sustainability Appraisal and the Landscape Assessment. None of the relevant environmental bodies such as Natural England have objected to the use of the site as a Traveller site on the basis of its potential significant impacts on environmentally sensitive sites. The site does not fall within any of the areas identified in the Green Belt boundary review report and the SA as absolute constraints. The Council is therefore confident that the site can be brought forward to deliver the necessary Traveller pitches to meet the accommodation needs of Travellers.

The proposed allocations include a list of key requirements to be met to make the development of the site acceptable. This includes making sure that site specific matters such as biodiversity are fully assessed and where necessary mitigation measures identified to address adverse impacts. The requirements will also ensure that the siting, layout and design on development on the site minimises any adverse impacts on the amenity of nearby residents and the landscape setting of the area.

J. What will be the impact of the proposals on local wildlife/Proposals will adversely impact on wildlife of the area

During the preparation of the Site Allocations DPD the Council consulted with Natural England on the biodiversity value of each of the proposed sites. Overall the preferred sites did not raise any objection from Natural England based on existing biodiversity features that could not be addressed.

Nevertheless a number of the proposed allocations will require a detailed ecological survey as a key requirement to assess and address any site specific ecological issues. This will help determine how development is managed on the site.

The Council is committed to conserving and protecting existing biodiversity assets within the Borough. Outside of designated important sites and habitats, the Council will encourage new development to make positive contribution to biodiversity through the creation of green spaces and the creation of linkages between sites to create a biodiversity network of wildlife corridors and green infrastructure. This is clearly set out in Core Strategy Policy CS7: Biodiversity and nature conservation. In addition to this the Council will consult with the relevant biodiversity organisations including Surrey Wildlife Trust and Natural England during the detailed planning application stage as well as require applicants to carry out prior assessments of the site to provide information on species and habitats, as set out in the site specific key Requirements. This will ensure the effective avoidance and or mitigation of any adverse effects prior to approval of the development.

K. Why is West Byfleet losing up to 90% of its green belt?

The Council has decided through the Core Strategy that the significant unmet need for housing justifies the need to release Green Belt land for housing development. In doing so it is important that development is directed to the most sustainable locations of the Borough. It is within this broad spatial strategy context that sites are allocated for development. To clarify, the Site Allocations DPD proposes to remove 43.5% of the existing Green Belt in the ward of West Byfleet. Excluding site GB23 which will not be developed and will continue to provide open space and sports provision for the Junior and Infant schools, the total amount of Green Belt lost for development in West Byfleet is 37.8% (45ha). Whilst the Council sympathises with the concerns of local residents over the loss of Green Belt, it has ensured through a number of studies that any land that is released from the Green Belt will not undermine its overall purpose and integrity.

L. The proposals would remove most of our local Green Belt in Byfleet while Woking still has 98% of its Green Belt!

The Council accepts that the proposed allocation of sites for development is not evenly spread across the Borough. This could not be achieved because of the uneven distribution of constraints and the need to make sure that development is directed to the most sustainable locations when compared against all other reasonable alternatives. More importantly, the Council has to make sure that any land that is released from the Green Belt does not undermine its overall purpose and integrity. The available evidence suggest that the sites proposed for allocation in Byfleet are in sustainable locations and can be released for development without compromising the purpose of the Green Belt. The Site Allocations DPD proposes to remove 18.3% of the existing Green Belt land in the ward of Byfleet. Excluding site GB17 which will not be developed and is proposed to be used as publically accessible open space (SANG), the total amount of Green Belt land that will be lost for development in Byfleet is 7.3% (10.26ha).

Overall the Site Allocations DPD proposes to remove 3.46% of Green Belt land from across the Borough, including Byfleet, West Byfleet, Pyrford, Mayford and Brookwood. This is to meet development needs up to 2040 and the amount of land being proposed to be released is therefore relatively modest.

M. The existing medical facilities are at capacity. What is proposed to deal with an increasing population?

The Infrastructure Delivery Plan notes that at present there is adequate GP provision to meet overall demand in the Borough. Whilst this is the case, it is also accepted that there might be locally specific pressures of over subscription that needs to be addressed. Whilst traditionally health provision reacts to meet projected demand, the Council is seeking to work with the Clinical Commission Groups to see how well provision could be aligned to the proposed development to avoid unacceptable standards of provision in the area.

N. Ten Acre Farm is adjacent to a SSSI which is used for leisure and recreation purposes. Expansion of the site would have a negative impact on visual amenity and local character and pose a risk to wildlife due to the increase in domestic animals.

Ten Acre Farm is already a functional established Traveller site. The Council is satisfied the intensification of the use of the site by an additional 12 pitches will not have significant adverse impacts on nearby designated sites that cannot be adequately mitigated by the key requirements of the allocation. The Council has consulted with Natural England and no objection has been raised over the expansion of the site and its impact on the SSSI. In addition, the Council has been working in partnership with Surrey County Council and the other Surrey districts and boroughs over time to prepare a detailed Borough-wide Landscape Character Assessment. There is nothing in the document that would have led the Council to different conclusions about the selection of Ten Acre Farm for expansion on landscape

grounds. The Landscape Character Assessment is available on the Council's website.

There are robust Development Plan policies and a Design SPD to make sure that any proposal for the development of Ten Acre Farm takes a sensitive design approach to ensure any adverse impacts on the character and landscape of the immediate area are suitably mitigated. The site will continue to remain within the Green Belt and Green Belt policies will continue to apply in addition to design guidance and Core Strategy Policy CS21: *Design*.

The Council will continue to work with the operators of the site and local stakeholders to ensure an effective management of the operations on and off the site, including the control of domestic animals. The ecological significance of the SSSI will continue to be conserved and taken into account in the consideration of any development that could have potential impacts on its ecological integrity.

O. Ten Acre Farm is adjacent to residential properties and heritage assets and will have an adverse impact on local character.

This representation has been addressed in section 19.0. In addition, other development plan policies such as Policy CS21: *Design* of the Core Strategy will apply to the development of the site to minimise any adverse impacts on amenity and local character. The Council is satisfied that the combined effects of these requirements will make sure that the development of the site is sustainable.

P. Ten Acre Farm has little supporting infrastructure, whilst the site would require acoustic and flooding mitigation measures. This will increase the cost of preparing the site.

The general approach to infrastructure provision to support the proposals in the Site Allocations DPD is addressed in Section 3.0. In addition, all of the sites set out in the Site Allocations DPD will require site preparation and ground works to be carried out prior to development taking place. Depending on the recent and historic uses of the site, its location and site constraints, site specific matters will need to be fully assessed and where necessary, mitigation measures identified to address any adverse impacts. The requirements will also ensure that the siting, layout and design of the site minimises any adverse impacts on the amenity of nearby residents and the landscape setting of the area. The Council is satisfied that the combined effects of these requirements will make sure the development of the site is both sustainable and viable. A sequential test has been carried out to inform the allocation of sites. Whilst it is accepted that some parts of the site falls within Flood Zones 2 and 3, the majority of the site, about 72% is in Flood Zone 1 where development is acceptable. The proposal directs the development of the site to Flood Zone 1 where there is minimum risk of flooding.

Q. The proposal will weaken the Green Belt boundary due to the removal of the escarpment (Mayford)

The Green Belt boundary review report provides sufficient evidence that the release of the proposed allocated sites from the Green Belt will enable a defensible boundary to be drawn that will endure over a long period of time beyond the Core Strategy period. Where the recommendations of the Green Belt boundary review report had not been accepted by the Council, a clear reason has been given. The proposed Green Belt boundary has been drawn to follow the edge of the development sites in Mayford. For sites GB8, GB9, GB10 and GB14 there will be a continuation of the existing urban area which is well defined by Saunders Lane to the south and Egley Road to the east. The Green Belt boundary to the west has been defined by site GB11 which is adjacent to the Hook Heath escarpment. This will protect the purpose of the Green Belt and not undermine the integrity of the escarpment.

Site GB7 will continue to remain within the Green Belt and therefore the Green Belt boundary will not change in this particular location.

R. Planning applications on the site have been refused previously due to the impact on the openness of the Green Belt (Ten Acre Farm)

This representation has been comprehensively addressed in section 4.0

S. Traveller sites should be located close to schools and services and Mayford has no supporting infrastructure.

It is agreed that all types of new residential development should have good access to local shops and services. The existing shops in Mayford form the Mayford Neighbourhood Centre which caters for the everyday needs of those living locally. The proposed allocation at Egley Road Garden Centre (GB9) notes that there is an opportunity to provide an element of retail/community development to enhance the rather dispersed provision currently in the Mayford area. It is envisaged that this relevantly small provision of retail and or community development will help meet the day to day needs of local people and therefore reduce the need to travel by car.

In addition planning permission has recently been granted for a new secondary school and leisure centre at the site known as 'Nursery land adjacent to Egley Road (GB8)'. The provision of this infrastructure will further support the daily needs of local people.

T. The Byfleet petition has been ignored

The Byfleet Petition states 'we the undersigned residents of Byfleet, strongly object to any further erosion of our Green Belt, especially in the area surrounding Murrays Lane. We therefore ask Woking Borough Council to do their utmost to preserve this last small area of countryside around the village'. The Council has taken the petition into account as a representation to the Regulation 18 consultation and has formally

responded under Representor ID 1524. The Council has not ignored the views of local residents expressed in the petition. However, it has to balance that with its responsibility to plan to meet the development needs of the Borough.

U. The proposed developments will result in gridlock. The existing roads are congested and it will be dangerous for drivers and pedestrians (this concern is made by representations across the Borough).

The representation regarding congestion and the impact of the proposed development on the road network has been addressed in sections 3.0, 20 and V.

The Council fully understands the concern about the level of traffic experienced by people and the potential for this to be exacerbated by the traffic implications of the proposals in the DPD. In this regard, the Council has been concerned to make sure that the traffic implications of the proposals are fully assessed and where necessary mitigations measures will be put in place to address adverse impacts. The various transports studies prepared by Surrey County Council and Woking Borough Council set out the impacts the proposed site allocations will have on the strategic road network. These impacts will be mitigated by strategic transport improvements and site specific measures that will be identified and comprehensively addressed through the development management process. As part of these site specific measures, the key requirements for the proposed allocation in the DPD state that the development of the site will be required to provide satisfactory vehicular access and improvements to pedestrian, cycle links and access to public transport will be required. The exact nature of these measures will be informed by a Transport Assessment at the planning application stage.

The Council has constructively been working with the County Council in assessing the transport impacts of both the Core Strategy which the Site Allocations DPD seeks to deliver and the Site Allocations DPD itself. The two authorities have worked together to carry out the Strategic Transport Assessment (2010) to inform the Core strategy, the Infrastructure Delivery Plan (IDP) to identify the infrastructure requirements to support the Core strategy, the Transport Strategy and Programme, the Regulation 123 list which Community Infrastructure Levy will be spent and the latest Strategic Transport Assessment (2015) to support the Site Allocations DPD. It has also worked with the County Council and the other Surrey authorities to prepare the Cumulative Assessment of Future Development Impacts on the Highway. The proposals of the DPD are informed by these studies and comments from the County Council both formally and informally. The Council is committed to continue to work positively with the County Council throughout the Site Allocations DPD process and beyond to identify feasible and effective mitigation measures and how they could be funded and implemented.

- V No consideration has been given to the impact of the proposals on Mayford's infrastructure. More strain on transport infrastructure, with no plans to upgrade the road network and railway bridges. Egley Road is already congested and access to Worplesdon Station is dangerous.**

This representation has been addressed in sections 3.0, 20, D, F and U

In addition to the existing programmes set out in the Regulation 123 List and the Woking Transport Strategy and Programme, the Council is working with the County Council to identify feasible and effective mitigation to address the development impacts of the proposals. Other transport infrastructure will be put in place on the back detailed transport assessment that will be undertaken as part of the development management process.

The Council will draw the County Council's attention to the elements of the representation regarding pedestrian access to Worplesdon Station to see what can be done to address the existing situation. Regarding the allocated sites, the Council will ensure that any specific scheme that comes forward, there is easy access to and within the site by all sustainable modes of travel including walking, cycling and public transport where feasible.

- W Downsizing and elderly accommodation**

Core Strategy Policy CS13 states that the Council will encourage the provision of elderly accommodation in sustainable locations across the Borough. It is recognised that downsizing could help in freeing up family sized housing in the Borough. Nevertheless this alone will not reduce the amount of land or dwellings required to meet the local housing need.