

2023 REVIEW OF THE WOKING CORE STRATEGY

Executive Summary

The Core Strategy (2012-2027) is an important and statutory planning development plan document, which was produced by Woking Borough Council in 2012. It provides the local strategic planning framework for the management of land uses in the Borough for the period up to 2027.

Whilst there will be a need to produce a new Local Plan - or at least a new Core Strategy - for the period after 2027, legislation requires that Local Plans are reviewed every 5 years. The purpose of a regular review being, to assess if the policies remain in conformity with the latest national planning policy and to consider if the planning policies in the Core Strategy are still helping in the delivery of the key priorities of the Council.

Members should note that the term “review” in this context means that the Council prepares a statement setting out whether the plan needs updating. The terminology “review” is also often used to describe the process of amending and updating a local plan. To make it clear, this review does not amend the Core Strategy.

The review demonstrates that all the policies of the Core Strategy currently remain up-to-date and are in general conformity with the NPPF. Housing delivery has been in line with the Core Strategy requirement, with more than five years’ supply of extant housing permissions. Changing circumstances since the last review have been successfully adapted to by the adoption of the Site Allocations DPD, the revision of SPDs and by the flexibility built into the Core Strategy policies themselves.

The practical implications of this finding are limited, since the Council must in any event begin an update to the Core Strategy as soon as possible, in order to adopt it before the expiry of the current Local Plan period in 2027. The fact that the policies remain up-to-date means that they can continue to be applied to planning decisions during the update process. Various issues have been identified through the review, including the Duty to Cooperate exercise, which do not render the policies out-of-date but which we can take into consideration when we begin work on the update.

Recommendations

The Executive is requested to:

RECOMMEND TO COUNCIL That

- (i) the conclusions of the 5 Year Review of the Core Strategy set out in the report be confirmed; and**
- (ii) Officers bring forward a timetable and associated outline of the work programme to produce a new Local Plan for the Borough of Woking.**

Reasons for Decision

Reason: To consider a 5 year review of the Core Strategy which determines whether the policies contained within it are up to date and effective, as required by the local plan regulations and the

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National Planning Policy Framework. The last review of the Core Strategy was undertaken in 2018. There is a legislative requirement to review a Core Strategy every five years and a review in 2023 was required. The Core Strategy sets out strategic planning policy for the Borough until 2027. A new Local Plan or possibly a new Core Strategy will be required from 2027.

The item(s) above will need to be dealt with by way of a recommendation to Council.

Background Papers

[The Woking Core Strategy \(2012-2027\)](#)

[Statement of Community Involvement 2022](#)

[Annual Monitoring Report 2021/2022](#)

[Corporate Plan 2021/2022](#)

[Woking for All Strategy 2022-2027](#)

[Woking 2050 \(Climate Change Strategy\)](#)

[Climate and Ecological Emergency Declaration \(2019\) / Climate Emergency Action Plan \(CEAP, 2020\)](#)

[Economic Development Strategy 2017-2022](#)

[Housing Strategy 2021-2026](#)

[Digital Strategy 2022-2025](#)

[Natural Woking \(Biodiversity and Green Infrastructure Strategy\)](#)

[Woking Net Zero \(2023\) \(revised Climate change Strategy, following Woking 2050\)](#)

[Health and Wellbeing Strategy 2021-2031](#)

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1.0 Introduction

The Woking Local Development Plan: The Core Strategy (2012-2027)

- 1.1 The Core Strategy (2012-2027) is an important and statutory planning development plan document, produced by Woking Borough Council in 2012. It set out the overall spatial strategy for the Borough of Woking, providing the local strategic context within which all other subsequent, Local Development Documents, have been prepared (collectively replacing the 1999 Woking Borough Local Plan).
- 1.2 In summary the main Local Development Documents are:
 - The Core Strategy (2012-2027);
 - Development Management Policies DPD (2016);
 - Site Allocations DPD (2021); Proposals Map and Insets (2021);
 - Hook Heath Neighbourhood Plan (2015);
 - Pyrford Neighbourhood Plan (2017);
 - West Byfleet Neighbourhood Plan (2017);
 - The Surrey Waste Plan (2020); and
 - The saved policy of the South East Plan: Policy NRM6 Thames Basin Heath SPA.
- 1.3 The Core Strategy provides the strategic policy context for managing land uses in the Borough and it includes:
 - a spatial vision of how Woking Borough will develop from 2012 to 2027;
 - the strategic objectives for the Borough, which focuses on the key issues and challenges to be addressed in order to realise the spatial vision;
 - a delivery strategy for achieving the objectives – in particular, how much development is expected to happen where and by what means;
 - a series of strategic policies that will deliver the vision and objectives. These policies provide a framework to inform and co-ordinate future development and investment in the Borough and to guide decision making on development proposals; and
 - clear arrangements for monitoring and delivery of the policy requirements.
- 1.4 The policies in Woking's Core Strategy (2012-2027) set out an overall strategy for the distribution, scale and design of development, as set out in paragraph 20 of the National Planning Policy Framework (NPPF), including for housing, employment, retail, infrastructure and community facilities. The Core Strategy also outlines the approach to the Borough's designated Green Belt (the extent of which was altered in line with Core Strategy policies through the adoption of the Site Allocations Development Plan Document, 2021) and to the conservation and enhancement of the natural and historic environment. The Council's Core Strategy can be found at [Core Strategy - Woking 2027](#).
- 1.5 The Council monitors the progress made on the preparation and implementation of the Development Plan for the area through an Annual Monitoring Report. This is published in

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December each year and reports on the year ending 31 March. These annual reports (dating from 2012) set out how the policies of the Core Strategy are delivering their intended objectives. Consideration of monitoring results is included in the assessment of each policy in Appendix 2 below.

The 2018 review of the Core Strategy

- 1.6 The Woking Core Strategy (2012-2027) was adopted in October 2012 and was reviewed by the Council in October 2018, when it was concluded that *“The Core Strategy continues to be in general conformity with the National Planning Policy Framework (NPPF) and helps to deliver the Councils key priorities and the aims of Woking 2050”*.
- 1.7 The report to Members advised that: *‘The policies of the Core Strategy are performing well in achieving their objectives and that there was nothing to justify an immediate modification of the Core Strategy’*.

2.0 The 2023 review of the Core Strategy (2012-2027)

- 2.1 Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires Local Planning Authorities to review the need to update the policies of their Local Plans every 5 years from its adoption to determine whether the policies of the plan need updating. The reason for having a regular review is to ensure policies remain relevant and effectively address the needs of the community.
- 2.2 The Core Strategy was adopted in October 2012. The first review was undertaken in October 2018. A further review therefore becomes due by October 2023.
- 2.3 Members should note that the term “review” in this context means that the Council prepares a statement setting out whether the plan needs updating. The terminology “review” is also often used to describe the process of amending and updating a local plan. To make it clear, this review does not amend the Core Strategy.
- 2.4 National Planning Practice Guidance makes clear that a plan does not automatically become out of date once it reaches 5 years old. The requirement to review is there to ensure that the policies of the plan remain effective and are consistent with higher level policy contained in the National Planning Policy Framework.
- 2.5 This document is the Council’s 2023 review of the adopted policies in the Core Strategy. It considers whether these policies remain up to date (i.e., in general conformity with National Planning Policy Framework (NPPF) or need to be revised for it to remain as a sound and robust framework for decision making in the Borough.
- 2.6 It is important to note that there is a clear distinction between a review of a plan, and an update or modification to it. The regulations require a review but whether, having conducted the review, an update is required, is a matter of judgement for the Council. This 2023 review will inform the decision of the Council whether to update or to modify the policies in the Core Strategy.
- 2.7 At the same time, the current Local Plan period ends in 2027, less than four years away. It will therefore be essential to adopt a new Local Plan- or, at the minimum, Core Strategy (under the current system)- by that date or before. Thus, given typical timescales for Local Plan preparation, it will in any event be necessary to start work on an update as soon as possible. In effect, therefore, the only difference made by this review will be to assess whether the policies can continue to be applied to planning decisions while the update is being prepared.

The methodology for the review

- 2.8 The review of its adopted Core Strategy Development Plan Document (2012-2027) has been undertaken accordance with the National Planning Policy Framework and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 2.9 The review is based on an appraisal of changed circumstances since 2012 (e.g. corporate and national policy/ strategy and wider market and economic change) that may have significant spatial implications, such as potential changes to identified need and development requirements, and an appraisal of monitoring outcomes over the plan period to date.
- 2.10 National Planning Practice Guidance states that the review should take into account:
- conformity with national planning policy;
 - changes to local circumstances; such as a change in Local Housing Need; our Housing Delivery Test performance;
 - whether we can demonstrate a 5 year supply of deliverable sites for housing;
 - whether issues have arisen that may impact on the deliverability of key site allocations;
 - our appeals performance;
 - success of policies against indicators in the Development Plan as set out in our Authority Monitoring Report;
 - the impact of changes to higher tier plans;
 - plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need; and
 - significant economic changes that may impact on viability; and whether any new social, environmental or economic priorities may have arisen.
- 2.11 The main elements of the review are:
- considering how the Core Strategy is delivering the key priorities of the Council;
 - how the Core Strategy is in general conformity with national and regional planning; and
 - whether current evidence since the adoption of the Core Strategy and / or the monitoring of the performance of the policies of the Core Strategy justifies its immediate modification in part of in whole.
- 2.12 The Review has analysed each adopted policy individually within the Core Strategy for its:
- conformity with policies of the 2018 (and subsequently revised in February 2019, June 2019 and July 2021) version of the National Planning Policy Framework);
 - changes in circumstances at a national, regional Borough wide and local level which are relevant to the policy and would affect the purpose of the policy and / or its implementation;
 - material and conclusive changes in evidence of needs / demand; and
 - effectiveness of policy in meeting indicators set out within the policy, where monitored.

- 2.13 In carrying out the review, the results of the Duty to Cooperate work were taken into account (see section 2.14 - 2.22 below).

Duty to Cooperate Engagement and Consultation

- 2.14 As part of the review process and in accordance with national planning guidance (Plan Making unit, paragraph 075) and National Planning Policy Framework paragraph 24, Officers have carried out the Duty to Cooperate on this review with the relevant bodies. Duty to Cooperate bodies include County Councils, other nearby Local Planning Authorities and a specific prescribed set of other public bodies as set out in Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012. All of these were invited to contribute to the review of the Core Strategy with their comments. The Council also went beyond the list of prescribed bodies to invite comments from other infrastructure providers, officially designated Neighbourhood Forums in the Borough, and adjoining parish councils. 16 organisations responded to the exercise.
- 2.15 A full-scale consultation involving the development industry, community groups and the public at large is not mandated for Local Plan Reviews. Nor would it be proportionate, especially considering the financial position of the Council, and the fact that we will in any event shortly be embarking on a Local Plan Update, (see section 2.5 above), which will involve several such consultations in an (initially) similar but much more useful way.

Brief Summary of Duty to Cooperate Consultation responses:

- 2.16 National Highways and Historic England made general comments stating what they wish to be included in Local Plans and highlighting recent guidance. The Environment Agency, and also Network Rail, requested changes to the Flooding and Water Management policy. The Environment Agency recommended that a Water Cycle Study should support the Local Plan update.
- 2.17 Thames Water, Surrey Heartlands NHS Trust, National Grid Electricity Transmission and National Gas all requested the addition of new text on their own subjects; in the case of Thames Water, a whole new policy on water supply and wastewater infrastructure.
- 2.18 Surrey County Council requested updates regarding revised national flooding guidance; increased demand for secondary school places; the Environment Act; the latest Surrey Waste Plan, Local Transport Plan 4, and Healthy Streets for Surrey, as well as various heritage issues.
- 2.19 Guildford, Elmbridge and Runnymede Borough Councils all stated that they believe we should review our housing need / requirement figure. Guildford claimed that we cannot meet part of our unmet housing need in that borough. Elmbridge, Runnymede and Surrey Heath Borough Councils all listed cross border issues on which they seek future cooperation, in particular sustainable transport and infrastructure.
- 2.20 West Byfleet Neighbourhood Forum and Byfleet, West Byfleet and Pyrford Residents' Association both noted a wide range of changes on both a national level and local level which should be taken into account. In particular they highlighted changes to West Byfleet District Centre and the Green Belt. Pyrford Neighbourhood Forum focussed their response on housing mix, countryside and Biodiversity Net Gain.
- 2.21 Chobham Parish Council noted transport and economic links between Woking and Chobham, as well as healthcare, burial land, Green Belt and water pollution issues.
- 2.22 More detailed summaries of the Duty to Cooperate responses are included in Appendix 3.

Review against other strategic plans of the Council

- 2.23 Other strategic plans of Woking Borough Council have been reviewed to see how they relate to the Core Strategy, and whether the Core Strategy remains consistent with those plans, including those adopted since 2018. The findings are set out in Appendix 1 below. The Core Strategy is consistent with all of these plans. In some cases, the Core Strategy actively facilitates the aims of those plans, while in others, due to the Core Strategy's high-level nature, it simply does not conflict with those plans. Supplementary Planning Documents, in particular the recently adopted Affordable Housing Delivery SPD and the Climate Change SPD (hoped to be adopted this year), form a link between the Core Strategy and other Council strategies.

Review against national policy and monitoring

- 2.24 All the Core Strategy policies have also been reviewed against national planning policy, guidance and legislation, and against the Council's own monitoring statistics and other evidence base; this review is included as part of Appendix 2 below. It has been concluded that all of the policies of the Core Strategy currently remain up-to-date and in general conformity with the NPPF. Actual (as opposed to proposed) changes to the NPPF, planning guidance and legislation have been limited since the last Core Strategy Review, and where they have occurred, have not made the Core Strategy policies out-of-date. Whilst circumstances on the ground have changed since the last review, the Core Strategy was specifically written to be flexible and accommodate changes. In addition, the Site Allocations DPD, the revised Affordable Housing Delivery SPD and proposed revised Climate Change SPD help to accommodate changed circumstances. It is considered that there is no need at this time to modify or update any of the policies of the Core Strategy (2012-2027).
- 2.25 In particular, housing delivery, which is an important aspect of strategic planning policy for the Borough, has been in line with the Core Strategy requirement, with more than five years' supply of extant housing permissions.

Conclusion

- 2.26 As part of this review Officers have undertaken appropriate engagement and consultation with a range of organisations under the provisions of Duty to Cooperate guidance. The responses are referred to in the report with details in Appendix 3. Matters raised by organisations can, where appropriate, be addressed in work to produce a new Local Plan or new Core Strategy.
- 2.27 The relationship between the 2012 Core Strategy and other strategic plans of the Council has been considered as part of this review and this is detailed in Appendix 1. Officers consider that the Core Strategy remains relevant to the delivery of wider strategic objectives and policies of Woking Borough Council, without the need to change or modify the policies of the Core Strategy at this time.
- 2.28 One of the most important parts of this review has been to consider the whether the Core Strategy policies continue to provide a sound and robust strategic planning framework for the management of development in the Borough. Where relevant and available, monitoring information and evidence has been considered to assess the effectiveness of each of the Core Strategy policies. (Appendix 2). The policies in the Core Strategy set out an overall strategy for the distribution, scale and design of development, and to make provision of development as set out in paragraph 20 of the NPPF, including for housing, employment, retail, infrastructure and community facilities. The Core Strategy also outlines the approach to the Borough's designated Green Belt (the extent of which was altered in line with Core Strategy policies through the adoption of the Site Allocations DPD, 2021) and to the conservation and enhancement of the natural and historic environment.
- 2.29 Officers have considered whether the policies in of the Core Strategy remain effectively "up to date". in so far as they are or are not in general conformity with national planning policy in the

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most recent version of the National Planning Policy Framework (NPPF). The assessment, for each policy in the Core Strategy, is in Appendix 2. It has been concluded that all of the policies of the Core Strategy currently remain up-to-date and in general conformity with the NPPF. It is considered that there is no need at this time to modify or update any of the policies of the Core Strategy (2012-2027).

- 2.30 The practical implications of this finding are limited, since the Council must in any event begin an update to the Core Strategy as soon as possible, in order to adopt it before the expiry of the current Local Plan period in 2027. The fact that the policies remain up-to-date means that they can continue to be applied to planning decisions during the update process. There are some issues identified through this review which, while not rendering the Core Strategy out of date, would be desirable to address through an update to the Core Strategy (which could also take the form of an update to the whole Local Plan).

3.0 Corporate Strategy

- 3.1 The connections of the Core Strategy with other corporate strategies are set out in Appendix 1, and summarised in paragraph 2.23 above.

4.0 Implications

Finance and Risk

- 4.1 If the recommendations of this report are accepted a subsequent report will be prepared to identify the costs associated with the production of a new Local Plan or a new Core Strategy.

Equalities and Human Resources

- 4.2 The finding that the policies continue to be up-to-date means that they can continue to be applied, as they have been successfully to date, with a positive impact on equalities in the Borough. At the same time, the policies will inevitably have to be updated regardless of the outcome of this report.
- 4.3 There are no HR issues arising from this report. An update to the Local Plan will be required regardless of the outcome of this report.

Legal

- 4.4 Legal Services have been consulted on this report and contributed to it.
- 4.5 The 5 year review is a legal requirement. Guidance on how to carry out that review is contained in the NPPF and associated planning guidance. Once carried out, and subject to Executive confirmation and Full Council approval, the review will be published on the Council website in accordance with the regulations.

5.0 Engagement and Consultation

- 5.1 The Duty to Cooperate work carried out in support of the Core Strategy Review is set out in paragraphs 2.14-2.22 above, and in Appendix 3.

REPORT ENDS

How the Core Strategy is helping to deliver the key priorities for the Council

It is important to consider the wider implication and influence of the Core Strategy in achieving the overall priorities of the Council. To do this the Council's Strategic plans have been reviewed against relevant Core Strategy policies.

Corporate Plan 2021/2022

The Corporate Plan initially set out the Council's core vision and values, which were then presented to residents through public consultation. The plan was only intended to last for a year and served as an opportunity for the Council to engage with the community to evaluate their current overarching priorities and practically assess how to move forward.

Woking for All Strategy 2022-2027

Following the outcomes of the Corporate Plan, the Woking for All Strategy commits the Council to a set of strategic objectives over a five-year period, and sets out principles for everyone to engage with, based around four community-based themes; Healthier communities, Engaged communities, Greener communities, and Prospering communities. Underpinning these themes is the overarching theme of a 'high performing council' which will enable the Council to derive best outcomes from its funds and assets.

Woking for all supplementary priorities 2022-2023

In meeting the priorities set out within each theme of the Strategy, the supplementary priorities recognise the Council's ambitions and reshapes each theme according to the new administration. A high performing council; Greener communities; Prospering communities; Healthier communities; Engaged communities.

Relevant CS policies	All policies are considered to contribute towards the Council's overarching priorities
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Woking 2050 (Climate Change Strategy)

Adopted in September 2015, Woking 2050 sets out how the Council will achieve the overall vision of 'towards tomorrow today' by:

- Maintaining a high quality natural environment where resources are used wisely and biodiversity is conserved;
- Creating a high quality built environment which meets local needs, and enables an enterprising culture to flourish and the local economy to prosper; and
- Providing, in collaboration with partners, the physical and electronic infrastructure to enable efficient and integrated travel and to support high quality electronic services.

There has been no changes to Woking 2050 since the Core Strategy was last reviewed. This document will be superseded by the revised strategy 'Woking Net Zero' which was released for public consultation between 18th May – 30th June 2023.

Relevant CS policies	CS7, CS9, CS15, CS17, CS18, CS21, CS22, CS23, CS24, CS25
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Climate and Ecological Emergency Declaration (2019) / Climate Emergency Action Plan (CEAP, 2020)

On 19th July 2019 the Council declared a state of emergency which recognises the continued priority the Council gives to addressing global climate change, including biodiversity and habitat losses, through strong local commitment and most importantly actions. The Council set out the pledge to become carbon neutral across the Council's estate and operations by 20230. Please note the emerging draft Climate Change Strategy ('Woking Net Zero') newly sets out the commitment for the Council to become net zero by 2030 across its estate.

Following this pledge, the Council drafted and adopted the climate emergency action plan (CEAP) which identifies several actions which the Council reports and monitors against. This includes actions to:

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- Work with Planning colleagues to seek opportunities to further reflect the climate and ecological emergency in guidance where practical and appropriate e.g., biodiversity net gain (BNG) and the forthcoming review and day to day implementation of the Climate Change Supplementary Planning Document (SPD).
- Develop planning guidance regarding the installation of technologies such as ground and air source heat pumps etc.

As outlined within the national planning policy framework (NPPF), in meeting the principle of sustainable development (specifically the 'environmental objective') the planning system must meet the challenges of climate change through mitigation and adaptation. The Core Strategy sets out several policies which are responsive to the need for development in Woking to contribute toward a more sustainable future.

Relevant CS policies	CS7, CS9, CS15, CS17, CS18, CS21, CS22, CS23, CS24, CS25
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Natural Woking (Biodiversity and Green Infrastructure Strategy)

Adopted in 2016, Natural Woking recognises the importance of biodiversity in meeting the vision of a sustainable Borough and sets out a strategic vision to take forward biodiversity and green infrastructure ambitions, alongside what is detailed in Woking 2050 and the Core Strategy. This strategy is driven by long-term ambitions and is a statement of intent to enable the Council and individuals to have a positive influence on local habitats and species. The strategy is driven by the following guiding principles:

- Restore and expand habitats for priority species enhancing the links between these (reducing fragmentation).
- Build a publicly accessible, ecologically sensitive, strategic network of open spaces, green and waterways, especially to and from our urban centres'.
- Adapt and increase biodiversity and green space in our urban centres and surrounds (as well as in villages and the countryside).
- Productive places: Make the most of our buildings, streets, watercourses and landscapes, taking opportunities for multifunctional use and capitalising on all funding sources.
- Protect natural resources, proactively adapt to the direct and indirect changes in climate and population, ensure appropriate estate management and support new development.
- Promote knowledge of the value and beauty of all faces of Woking Borough's natural environment (town and countryside) and the benefits of getting involved, as a responsible individual, a community group or a business (green economy).
- Protect and strengthen the resilience of the green infrastructure network and biodiversity, now and for future generations to enjoy.

In alignment with the NPPF, the Core Strategy sets out policies which enable development to contribute to and enhance the natural environment.

Relevant CS policies	CS6, CS7, CS8, CS9, CS17, CS21, CS22, CS24
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Woking Net Zero (2023) (revised Climate change Strategy, following Woking 2050)

In response to changes in national targets, Woking Net Zero reaffirms the Council's commitment to protecting the environment and sets out net zero ambitions across nine themes, each designed to enable all sectors of the community to engage in meeting the Council's objectives. These themes are; *Energy, Waste, Water, Transport, Economy/Business/Supply Chains, Natural Environment, Communicating/Enabling Change, Built Environment, and WBC's Journey to Net Zero.*

Building upon the actions and directive of the CEAP, the Strategy further pushes the net zero agenda and commits the Council to achieving the following objectives, as in line with the national target to become net zero by 2050 across all sectors¹.

- Objective 1: A net zero Council estate by 2030
- Objective 2: A net zero Borough by 2050 (or 2045)

Principles agreed within the previous strategy ('Woking 2050') remain relevant and are reaffirmed in Woking Net Zero.

The Core Strategy is entirely concerned with 'development' and can only act within the scope of planning as a means to mandate and promote sustainable development and 'Planning for climate

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change' as outlined under Section 14 of the NPPF. Therefore, it is important to recognise that some sustainable building practices, such as retrofitting or renovation, may not fall under the definition of 'development'² and would not be subject to the planning process. In these cases, the Core strategy would have no authority in determining the outcome of such measures.

In contributing towards meeting the objectives of Net Zero Woking, as above, the core strategy sets out the following policies:

Relevant CS policies	CS7, CS9, CS15, CS17, CS18, CS21, CS22, CS23, CS24
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Housing Strategy 2021-2026

This strategy demonstrates the Council's ambition and commitment toward providing more provision of affordable housing over the next five years that is high quality, managed well and provides opportunities for people and communities to develop and prosper. The main purpose of the core strategy is to plan and distribute development in a sustainable manner and to ensure that each of its elements is well integrated functionally and physically to create a sustainable community for Woking. Over the plan period (2010 – 2027) the core strategy makes provision for the delivery of:

- 4,964 net additional dwellings with an overall affordable housing provision of 35%
- 28,000 sq.m of additional office floorspace and 20,000 sq.m of warehousing floorspace
- 93,900 sq.m of additional retail floorspace

The growth facilitated by the core strategy focuses development on previously developed land in the town, district, and local centres which has the best access to existing infrastructure. This is established through CS1 which recognises the holistic nature of development that considers housing, jobs, access to everyday shops, services and local community facilities.

In meeting the need to provide high quality housing, CS21 concerns the design of development with consideration for environmental and residential amenity, identity, landscaping, safety, sustainability, waste storage, adaptability, and general design of development so as not to cause significant harm to local amenity space.

The Core Strategy commits to providing a range of housing mix to accommodate all sections of the community and meet demand for housing where it has been identified. This means recognising that dwellings should be assumed a mix of forms and be flexible for occupants, ranging from pitches for Gypsies/Travellers, to special accommodation for vulnerable and older residents.

Implementation of relevant CS policy, in relation to the priorities of the housing strategy, is supplemented by the Affordable Housing Supplementary Planning Document (SPD), which was adopted in March 2023. This SPD reflects significant changes to national housing policy since the SPD was adopted in 2014.

Relevant CS policies	CS1, CS10, CS11, CS12, CS13, CS14, CS21, CS22, CS23
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Digital Strategy 2022-2025

Woking's Digital Strategy is focused upon three key themes to drive the vision of "a digital Borough where our residents will be digitally empowered, our businesses will be more competitive, driving prosperity and success." The themes are: smart people, smart place, smart council. The ability of the core strategy to meet this vision primarily lies within policy CS16 and the development of digital / services infrastructure to meet the demands of planned growth, as monitored and reported on within the Infrastructure Delivery Plan (IDP).

Relevant CS policies	CS16
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Health and Wellbeing Strategy 2021-2031

A 10-year plan that sets out the Council's key priorities which are focused on improving the health and wellbeing of residents. Consideration is given to Woking's most deprived areas where life expectancy is lower.

Priorities outlined include:

- support, and wherever possible, improve mental health;
- identify and support people experiencing social isolation and loneliness;
- reduce obesity rates;

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- empower residents to live independent lives; and
- support the wellbeing of carers

The core strategy encourages all planning proposals to consider addressing health and wellbeing on development through multiple policies which seek to improve the quality of living for residents.

Relevant CS policies	CS5, CS13, CS16, CS17, CS19
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Assessment of Core Strategy Policies

For each policy of the adopted Local Plan, consideration has been given to the outcome of monitoring, and conformity with national planning policy.

A conclusion and recommendation is made in respect of each policy in the Core Strategy.

Policy	Summary of content	Conformity with national planning policy	Summary of monitoring outcome	Recommendation
CS1: A spatial strategy for Woking Borough	The policy sets out overall quantum's of residential, office and retail development to be delivered; briefly describes the intention for each location in the Borough; and commits to the preparation of Site Allocations and Green Belt Boundary Review.	The policy is in general conformity with the NPPF, in particular, building a strong and competitive economy (para 81 - 83), ensuring the vitality of the main centres (para 81 - 83) and promoting good design (Section 12 of NPPF). The policy is in line with paragraph 117 - 121 regarding making effective use of land, including, use of brownfield land. The policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues.	Specific monitoring indicators are not included on this policy in the Core Strategy; as the policy itself notes 'Details of how the overall strategy will be delivered are set out by the rest of the policies in the Core Strategy'. The success of this policy is therefore monitored by the sum of the other policies described below. The Site Allocations DPD was adopted in 2021, fulfilling paragraph 8 of the policy.	The policy is in line with the NPPF and no immediate update is required. For more detail, please see the recommendations on the detailed policies below.
CS2: Woking Town Centre	The policy supports mixed town centre uses and high density residential development of the town centre as the Borough's primary centre; provides in principle support for the centre as the preferred location for a range of town centre uses; sets out the type and quantity of housing, employment (office) and retail use; and identifies a primary shopping area, shopping frontages, and sets	The policy is in general conformity with sections 7, 8 and 11 of the NPPF. It provides the flexibility needed to enable growth and diversification in response to changes in the retail sector and wider economy since the Core Strategy's adoption in 2012. However, the evidence underpinning the policy and its requirements is outdated, and the scale and type of development for the period beyond 2027 is in need of refresh. There is also a need to update the policy with regard to changes to the Use Classes Order that came into effect in Sept 2020.	Development in the town centre means the extent of the primary shopping area, and primary and secondary frontages needs review. Town centres are increasingly becoming places for social interaction, in part due to an increasing residential population, and the economy is shifting towards diverse cultural, leisure and entertainment uses. This means that a more positive approach to diverse social, cultural, arts and entertainment uses, and green spaces, may be needed (current support is included in reasoned justification), informed by relevant updated evidence.	The policy is broadly in line with the NPPF and provides adequate flexibility to enable its continued use for the purposes of decision making within the plan period, to 2027. While there is no immediate need for modification, updated evidence base and a design code is needed to inform positively prepared updated policy in line with the NPPF. This evidence base and design code will therefore be integral to the preparation of an updated local plan. Work done on the Town Centre Masterplan in 2021-22 will feed into the

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Policy	Summary of content	Conformity with national planning policy	Summary of monitoring outcome	Recommendation
	<p>requirements for changes through development within different parts of the centre.</p>	<p>A gap in the policy has been to address the scale and height of development, associated with the quantum put forward. This is noted as part of the delivery strategy (para 4.11 of the Core Strategy) and tall buildings have been the source of widespread contention, including at appeal. The NPPF update in 2021 (in section 12) added guidance on achieving appropriate densities, and a requirement for local planning authorities to prepare Design Guides or Codes consistent with the principles set out in the National Design Guide and National Model Design Code. Preparation of such a Design Code, to ensure conformity with the NPPF, will be key to addressing the issues highlighted.</p>	<p>This may include a steer on development of the Night Time Economy.</p> <p>Completed and forthcoming development in Woking is changing densities, scale and layout of built form, and the character of the centre. This requires further assessment in line with NPPF requirement to prepare a Design Code. The anticipated housing figure for the Town Centre is on track and we expect it to be exceeded.</p> <p>The policy sets out an indicative figure of 27,000 sqm of additional office floorspace to be delivered in the Town Centre. Completions data indicates that the net change in office floorspace has been negative. In spite of this, a number of schemes for new office buildings have come forward, such as 'Space' on Chertsey Road, which resulted in an additional 9,264 sqm of office floorspace.</p> <p>As of 2022, there was permission for an additional net loss of 8,275 sqm of office floorspace in the Town Centre. Most of this was on the Ecoworld site on Goldsworth Road (-5,555 sqm).</p> <p>The policy also sets out an indicative figure for up to 75,300 sqm of additional retail (A class) floorspace. Annual Monitoring Reports generally report that changes in retail floorspace in the Town Centre have been negative. However, to date, the net change in retail floorspace is 8,435 sqm.</p>	<p>Design Code and Town Centre policies in the updated local plan.</p>

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			<p>This is primarily due to the completion of over 10,000 sqm of retail space through the Victoria Place development.</p> <p>An updated evidence base for retail and office delivery will be needed to ensure that anticipated delivery is accurate, in line with changed market conditions.</p>	
<p>CS3: West Byfleet District Centre</p>	<p>The policy sets a framework for high density mixed use development of the District Centre, including the type and indicative amount of development for housing, employment (offices) and retail, and design intentions. Safeguards existing office and community facilities. Identifies a primary shopping area and presumption to retain ground floor active frontages.</p> <p>The policy sets out an indicative figure of 1,000 to 1,500 sqm of additional office floorspace to be delivered in the District Centre.</p> <p>The policy also sets out an indicative figure for up to 13,000 sqm of additional retail (A class) floorspace.</p>	<p>The policy is in general conformity with sections 7, 8 and 11 of the NPPF.</p> <p>The evidence and therefore some of the detail underpinning the policy and its requirements is outdated, and the scale and type of development for the period beyond 2027 needs review. There will also be a need to update the policy with regard to changes to the Use Classes Order that came into effect in Sept 2020.</p> <p>Updates to the NPPF in 2021 (section 12) added guidance on achieving appropriate densities, and a requirement added for local planning authorities to prepare Design Guides or Codes consistent with the principles set out in the National Design Guide and National Model Design Code.</p>	<p>Development in the centre of West Byfleet means the extent of the primary shopping area needs to be reviewed. There has also been a significant decline in office floorspace in West Byfleet centre, and this combined with updated development requirements will need to inform a review of the centre's role and position in the hierarchy of centres.</p> <p>Development is changing densities, scale and layout of buildings, and local character. This requires assessment in line with NPPF requirement to prepare a Design Code.</p> <p>The housing delivery figure to date for West Byfleet District Centre has been rather low; however, the completion of the Sheer House development is expected to allow the target to be met by the end of the plan period.</p> <p>In the four years from the last review to 2022, 538 sqm of office floorspace was lost in the District Centre.</p>	<p>The policy is in line with the NPPF and there is no immediate need for modification. However, updated evidence base (reflecting the progress of development in the area) and a design code is needed to inform positively prepared updated policy. This evidence base and design code will therefore be integral to the preparation of an updated local plan.</p>

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			As of 2022, there was a further 6,609 sqm of office floorspace permitted to be lost in West Byfleet District Centre.	
CS4: Local and Neighbourhood Centres and Shopping Parades	The policy sets out a framework to retain and support town centre uses, where viable, to meet the day to day needs of the local community. It identifies local centres and provides an indicative amount of housing and retail development for Knaphill. It provides guidance of circumstances where change of use from retail and office in these centres will be permitted.	The policy is in general conformity with sections 7, 8 and 11 of the NPPF. The policy continues to perform a useful function in delivering the requirements of national policy and in addressing local issues. The evidence underpinning the policy's requirements is outdated, update is needed to ensure it takes account of changes to the Use Classes Order that came into effect in Sept 2020, and with regard to the NPPF requirement (since 2021) for local planning authorities to prepare Design Guides or Codes.	In the four years from the last review to 2022, 104 sqm of office floorspace and a net 411 sqm of retail floorspace was lost in these centres. As of 2022, there was 5,414 sqm of office floorspace permitted to be lost in local and neighbourhood centres. Most of this (-4,103 sqm) was at 30-38 High Road, Byfleet. The housing delivery figure to date for these zones has been rather low. In part this is considered to be a result of their tight definition. Changes in the economy and shifts towards diverse uses, together with the new Use Classes, may mean, means there is a need to apply policy criteria regarding losses to retail (formerly A1 use class) and office flexibly, in order to allow reasonable adaptation to support new businesses and needs.	The policy is in line with the NPPF and there is no immediate need for modification. However, updated evidence base and a design code is needed to inform positively prepared updated policy. This evidence base and design code will therefore be integral to the preparation of an updated local plan.
CS5: Priority Places	The policy designates the former ward of Maybury and Sheerwater and the Lakeview Estate of Goldsworth Park as Priority Places to target resources to improve housing, employment,	The policy is in general conformity with paras 92 to 94 of the NPPF, and is useful in delivering its requirements and tackling local issues, including those associated with identified socio-economic deprivation.	Due to major development in Sheerwater since 2012, elements of the policy (particularly on retail) are in need of update and should be reviewed with regard to the latest socio-economic data, including deprivation indices, and evidence of need for housing, employment, retail and leisure. The intention behind the Lakeview part of	The policy is in line with the NPPF and there is no immediate need for modification. However, updated evidence base is needed to inform positively prepared updated policy. This evidence will be integral to scoping the need for this or a similar policy, in preparation of an updated local plan.

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	retail, accessibility and infrastructure.		<p>the policy should also be revisited with regard to latest evidence. Since 2012, there has been a general decline in permitted retail development, with the exception of Asda in Sheerwater which saw the redevelopment of an industrial unit to retail in 2015..</p> <p>More generally the loss of smaller retail use across priority places has been offset by permitted redevelopment of sites in West Byfleet and in the Town Centre, and the aforementioned Asda, which by itself represents a large proportion of Woking's retail floorspace growth in the Core Strategy period.</p>	
CS6: Green Belt	<p>The policy protects the Green Belt from harmful development, applying strict control to inappropriate development as defined in the NPPF. It designates a number of Major Developed Sites in the Green Belt, allowing limited infilling and redevelopment without compromising the integrity of the Green Belt. It also designates Mayford Village as an infill only settlement, and sets out criteria to assess development. The policy addresses the direction for growth to meet</p>	<p>The policy is in general conformity with section 13 of the NPPF. While the policy continues to provide a function in delivering NPPF requirements, the detail in how it addresses local issues by offering specific protection and criteria is in places unclear. Specifically, there are issues regarding implementation of the policy's wording regarding Mayford Village's infill development criteria. This relates to clarity of the policy on exceptions (reference to national Green Belt policy) on extensions, what results in disproportionate additions and how that relates to new dwellings in the Green Belt.</p> <p>There are minor inconsistencies in the detail regarding the uses that are exceptions to inappropriate development, between para 5.2 of the Core Strategy and NPPF para 149. Despite their minor</p>	<p>The part of the policy on direction for growth to meet housing need, between 2022-2027 has been implemented through the Green Belt Boundary Review, which informed the Site Allocations Development Plan Document, adopted in October 2021. The policy would need updating to reflect this.</p> <p>The concept of Major Developed Sites in the Green Belt is a local designation defined in the Glossary of the Core Strategy and continues to serve a useful purpose with regard to the Thames Water Sewage Works, Old Woking. It no longer applies to Broadoaks, West Byfleet, which was removed from the Green Belt through the SA DPD, and development is now near completion, and future policy would need updating in this respect.</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification. The NPPF and DM Policies DPD should be used where there is a lack of clarity regarding detailed criteria. The issues identified will be addressed in the preparation of an updated local plan.</p>

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	housing need, between 2022-2027.	nature, this raises issues for application of policy to proposed development.	Approximately 72 hectares of Green Belt land has been released under the Site Allocations DPD. Approximately 65 hectares was released to meet the quantity, as well as the nature and type of housing required in the borough. This demonstrates that the policy provided the flexibility needed, to achieve the spatial strategy set out in Policy CS1.	
CS7: Biodiversity and nature conservation	The policy seeks to protect the biodiversity assets of the Borough and encourages development to make a positive contribution to biodiversity.	<p>The policy continues to be in general conformity with Section 15 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. Please note that the Levelling Up and Regeneration Bill proposes changes which will affect how CS7 is implemented. The changes are as follows:</p> <ul style="list-style-type: none"> • Set out how Local Nature Recovery Strategies, introduced by the Environment Act 2021, should be given weight in the plan-making process; • Reflect updated guidance on addressing nutrient pollution, including expectations on strategic mitigation in sensitive catchment areas; • Reflect a review of policy on ancient woodland, as agreed in the passage of the Environment Act 2021; • Reflect the introduction of mandatory Biodiversity Net Gain from 2023; • Incorporate nature into development through better 	<p>The monitoring demonstrates the policy is effective. The Council's continuing proactive management programme to implement opportunities that increase biodiversity and improve access to sites for recreation and enjoyment of the countryside. With particular focus on green infrastructure in the Town Centre, on swifts and on the Great Crested Newts project. The Council is working with Natural England to develop and trial a new approach to support great crested newts (GCN) into the area. GCN's are a European protected species whose numbers have declined in recent decades. The council continues to monitor the conditions of SSSI and SNCI. The Environment Act 2021 introduces new legislation to ensure measurable biodiversity net gain with a minimum 10% increase, which comes into effect November 2023.</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification. The NPPF and DM Policies DPD should be used where there is a lack of clarity regarding detailed criteria. CS7 provides policy justification to seek biodiversity enhancement on the back of proposed development, which needs to be applied when determining day to day planning applications. The Council is currently working on guidance to secure Biodiversity net gain in advance of the effective date and once Surrey County Council completes the local nature recovery strategy (LNRS), we will align with the strategy.</p>

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		<p>planning for green infrastructure and nature-friendly buildings.</p>		
<p>CS8: Thames Basin Heaths Special Protection Areas</p>	<p>The policy provides the necessary framework to avoid harm to the Thames Basin Heaths Special Protection Areas. The SPA is a designation of European significance.</p>	<p>The policy delivers the requirements of EC Habitats Directive and the Conservation of Habitats and Species Regulations. It is also in line with Section 15 of the NPPF. Wording of Policy has been agreed with Natural England and is in general conformity with the Saved policy of the South East Plan (Policy NRM6). Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. It offers appropriate protection to birds of European significance.</p>	<p>The monitoring demonstrates this Policy has been working effectively. There are no net new residential development within the 400m buffer zone. The Borough has 4 SANGs and 5 new SANGs are proposed in the Site Allocations DPD. This does not include bespoke SANGs serving the needs of a single development. The Council has identified sufficient SANG capacity to meet its requirements over the Core Strategy period and beyond. The population of target bird species on Thames Basin Heaths SPA remains steady. Developer contributions are sought and collected for SAMM via S106 and SANG via CIL, which is monitored in the IFS. The condition of the SPA continues to be monitored. No permission has used alternative mitigation methods. In accordance with recent European Court ruling 'People Over Wind' (2018) an Appropriate Assessment will be required for relevant development in this zone. Whilst the Council already has an established Avoidance strategy, which has been in operation since June 2006, the Avoidance strategy was recently updated in Feb 2022 to reflect current circumstances and provides a most up to date policy position. In particular, the updated National Planning Policy Framework, Case Law and also the Council's adoption of its Community Infrastructure Levy (CIL).</p>	<p>The policy is in line with the NPPF and there is no need for modification.</p>
<p>CS9: Flooding and water management</p>	<p>The policy seeks to ensure that development is not at risk of flooding or</p>	<p>The policy is in general conformity with paragraphs 159-169 of the NPPF. However, an update to the PPG has</p>	<p>Water quality monitoring of the borough's main rivers and canal has remained relatively consistent with 'moderate' and</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification. However, an updated</p>

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	<p>exacerbate flooding elsewhere.</p>	<p>resulted in changes which have a bearing on the following:</p> <ul style="list-style-type: none"> • Definition of Functional Floodplain (flood zone 3b) • Sequential and Exception Tests in relation to surface water flooding • Clearer requirements for multi-functional SUDS <p>These points are dealt with in turn, as follows: The Council's Strategic Flood Risk Assessment (2015) will need updating to take into account any changes to flood risk extents, for example, in terms of fluvial flood zones. Furthermore, the change in the definition of flood zone 3b will also need to be reflected in the assessment. Policy CS9 requires a sequential test to be carried out for all development in Flood Zone 3 and areas at risk of flooding 'from sources other than river'. Therefore, whilst surface water is not explicitly stated as a source of flooding, this wording covers the new requirement for a sequential test to be carried out where surface water flooding affects a development. Furthermore, CS9 includes a requirement for significant forms of development to incorporate SUDS. Whilst there is no explicit reference to multifunctional SUDS, the general requirement of the policy does not hinder these coming forward. The Environment Agency and Surrey County Council (lead flooding authority) have been consulted, with their responses recognised in this assessment.</p>	<p>'good' conditions. However, the latest Annual Monitoring from 2019 reported that all the water courses in Woking Borough had been downgraded to 'Fail' on Chemical Status, due to the identification of contaminants from an unknown source.</p> <p>The incorporation of SUDS has become standard practice with large developments such as those on Egley Road, Sheerwater and West Byfleet all including SUDS, as well as smaller householder developments. This suggests the policy is effective in requiring and encouraging the incorporation of this flood mitigation method.</p> <p>Flood alleviation schemes have come forward consistently, which include Hoe Valley, Rive Ditch, Sutton Green, Hoe Stream at Old Woking, Horsell Common and Byfleet-Sanway. This demonstrates that the policy is effective in encouraging and supporting such schemes.</p> <p>Where dwellings have been built in flood zones 2 and 3, appropriate mitigation has been incorporated within these developments or were part of a development scheme, which had wider flood risk benefits that brought the land in which they were built into Flood Zone 1. No dwellings have been permitted against the advice of the Environment Agency. Therefore, the policy is effective in directing development to Flood Zone 1 and incorporating mitigation methods for</p>	<p>SFRA will be needed as a key part of the evidence base for the policy. The Council has access to the latest flood zone and surface water mapping to inform development proposals.</p>

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CS10: Housing provision and distribution	<p>The policy sets an overall number of dwellings to be delivered in the plan period (4964). This produces an annual housing requirement of 292 dwellings per annum. It sets the indicative number of those dwellings to be delivered in each zone, and indicative density range (dwellings per hectare) for each zone. It sets parameters for the application of the indicative density ranges, and allows for limited infill development in Mayford Settlement Area.</p> <p>NB. According to the standard method of calculating objectively assessed housing need, our need is 409 dpa (assuming the CS continues to be valid) or 437 (if it becomes out of date). There is therefore an unmet need, compared with our housing requirement, of either 117 or 144 dwellings.</p>	<p>Policy is in conformity with national policy. National policy on housing provision has remained almost entirely the same since the last Core Strategy Review. Planning Practice Guidance now suggests several indicators which can be used to assess whether housing policies remain up-to-date; Woking is performing well against all these indicators, as follows: No change in objectively assessed housing need since last Core Strategy Review (need is significantly lower than it was when the Core Strategy was adopted). Woking has a housing land supply of sufficiently more than five years, and is meeting the Housing Delivery Test: see right. The constraints on housing land (in particular the Green Belt), which informed the housing requirement as adopted, remain valid, and the Inspector’s Report into the Site Allocations DPD (2021) found that the Green Belt Boundary Review was sound and consistent with national policy.</p>	<p>development occurring in Flood Zones 2 and 3.</p> <p>3,855 dwellings have been delivered between 2010 and 2023. This averages out at 296 dwellings per annum, very slightly over the 292 requirement despite some notably low yearly delivery rates at the beginning of the period and during the Coronavirus pandemic.</p> <p>Local Housing Need has remained the same since the last Core Strategy Review, in 2018. The latter was conducted after the introduction of the standard methodology for calculating need and took that need into account.</p> <p>No Housing Delivery Test has yet been published by the Government in 2023. The 2024 Housing Delivery Test will have a base date of 1 April 2023. For Woking, the last three years saw delivery of 1,187 dwellings, compared to a requirement of 778 (including a discount of 98 dwellings to reflect Coronavirus lockdowns in 2020/21). We will therefore have a Housing Delivery Test figure of 152%, in other words, a very healthy record of delivery over the last three years. The figure for the base date of 1 April 2022 was 111%.</p> <p>The Authority Monitoring Report: Five Year Housing Land Supply supplement (2023) identifies a five year housing land supply in the Borough of 7.8 years’ worth of housing (against the Core Strategy requirement with a 5% buffer). If measured against the objectively assessed housing need, strictly for the purposes of this review, the housing land supply would be 5.8 years (using the capped need figure of 409) or 5.4 years</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification. Should it be considered desirable when the residential spatial strategy comes to be updated, it appears that an alternative strategy could also be deliverable.</p>

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	<p>The unmet need is provided for through the Waverley Local Plan and the headroom in housing delivery in Guildford.</p>		<p>(using the uncapped need figure of 437). The implementation of the Core Strategy has therefore led to the Borough having an ample housing land supply for the next five years against its requirement and a more than adequate supply against its need. In addition to this, the delivery and expected delivery rates of dwellings in both Waverley and Guildford boroughs have been and are expected to be more than adequate to meet and accommodate the unmet need that would theoretically arise from the difference between Woking’s housing requirement and need over the rest of the plan period, as set out in the inspectors’ reports for the Local Plans for both those boroughs.</p> <p>In further addition, there are several allocated sites in the planning pipeline which, if permitted, could reasonably be expected to deliver a substantial quantity of housing by 2027. Currently, these sites do not strictly meet the national criteria for inclusion in the five year housing land supply described above, so their delivery would give a yet further boost to housing numbers.</p> <p>The spatial distribution of housing development has been different from that anticipated in the Core Strategy:</p> <ul style="list-style-type: none"> • The anticipated figure for the Town Centre is on track and we expect it to be exceeded. • The figures to date for West Byfleet District Centre and for the other Local Centres have been rather low; for West Byfleet District Centre the completion of the Sheer 	

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			<p>House development is expected to allow the target to be met by the end of the plan period.</p> <ul style="list-style-type: none"> • For the Rest of the Urban Area, we have already seen the delivery of 176% of the Core Strategy expectation. • For the urban extension sites at Moor Lane and Brookwood Farm, the ultimate numbers delivered were slightly lower than anticipated in the Core Strategy. • For the sites released from the Green Belt in 2022, as expected only a small proportion of the anticipated completions have been delivered to date. However, there is a high probability of meeting the target so long as progress continues on these sites. • In addition, 104 windfall dwellings have been delivered in the rest of the Green Belt, which was not identified as a location for development in CS10. <p>Residential density has not been measured consistently over the plan period. However, over the years 2017-22, nearly all years and zones saw densities delivered within at least the indicative ranges.</p>	
CS11: Housing Mix	The policy requires housing development to provide a mix of dwelling types and sizes to address the nature of	No change to national policy on this topic since 2018. Policy is in general conformity with national policy.	The overall dwelling mix delivered from 2010-2023 (Use Class C3 housing only) has been relatively close to identified SHMA requirements with regard to 2 bedroom and 4 bedroom dwellings. There	The policy is in general conformity with the NPPF and there is no immediate need for modification. The Council will continue to monitor this policy through the annual monitoring report (AMR) and produce an

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	<p>local needs as evidenced in latest SHMA (however, this will also be subject to local character and density, and to scheme viability). It restricts loss of family homes (2+ bedrooms) on sites capable of accommodating a mix of residential units.</p>		<p>has, however, been a significant difference from SHMA needs in terms of 1 and 3 bed dwellings. 40% of all dwelling completions have been 1 bed or studio dwellings, which is twice the percentage for which a need has been identified in the latest SHMA. Meanwhile, only 13% of completions have been of 3 bedroom dwellings; that is less than half the needed percentage.</p> <p>Among dwellings with extant planning permission, this gap is even starker, with 48% being 1 bedroom or studio dwellings, and only 9% being 3 bedroom dwellings. This disparity is likely to reduce, however, as proposals on the former Green Belt sites GB1 and GB9 come forward.</p> <p>In addition, the Town Centre Housing Market Analysis Update (2022) identified that Woking town centre is well suited to meeting demand for smaller homes, not just from within the Borough but from across the housing market area and beyond.</p>	<p>updated housing needs assessment, as part of the preparation of the new Local Plan.</p>
<p>CS12: Affordable Housing</p>	<p>The policy sets overall target for affordable housing (AH) delivery (35%); sets quantitative AH contribution requirements for different types and sizes of residential schemes; sets parameters for negotiating the proportion of the AH contribution to</p>	<p>National policy now requires the provision of First Homes as a form of affordable housing. The Affordable Housing Delivery SPD, which the Council uses to interpret policy CS12, has now been updated to reflect this change, as well as other, more minor ones on this topic (and some larger changes that had occurred prior to the last Core Strategy Review). There is therefore no incompatibility between changed national policy and CS12.</p>	<p>Only 16% of dwelling completions delivered from 2010-2023 have been of affordable housing. While disappointingly low compared to the overall target, this figure is comparable to those in authorities across Surrey, indicating that it is part of a wider trend.</p> <p>Of the affordable dwellings delivered in the period, 73% have been affordable housing to rent (very close to the latest identified</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification.</p> <p>The low delivery figure for affordable housing has been caused by various factors. The first factor is the national context (mainly the ban on requiring affordable housing contributions from small sites, and the increased proportion of dwellings coming through permitted</p>

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	<p>be made on- and off-site, or as a financial contribution; lists factors to be taken into account in deciding on AH provision on a particular site; restricts sites being subdivided to avoid AH contributions; requires AH provision from non-residential schemes; states that planning conditions and/or obligations will be used to control the affordable status of the housing into the future; and commits to producing a Supplementary Planning Document</p>		<p>need figure of 71%); and 17% have been of affordable housing to buy.</p> <p>The Affordable Housing Delivery SPD was first adopted in 2016 and a revised version was adopted in 2023.</p> <p>One decision has been taken to date on a scheme where the First Homes policy was relevant: First Homes will be delivered on this site in line with national policy and the Affordable Housing Delivery SPD.</p>	<p>development), which no revised local policy could prevent. The second factor is some minor issues which the revised Affordable Housing Delivery SPD is now addressing. The third factor is the operation of the policy itself, which sets certain parameters for viability assessment that can justify non-provision of affordable housing. In the latter respect, therefore, the policy is working as it was intended to, and has allowed the continued delivery of general housing development at the required level through years of unforeseen economic turmoil.</p> <p>When the Council comes to prepare a new Local Plan over the coming years, then in the absence of further changes to national policy, a new Viability Assessment and corresponding Affordable Housing policy will be produced using the new national guidance on this topic. This will ensure that the delivery of affordable housing better matches whatever target is set out in the new policy, and should also result in a higher delivery rate.</p>
<p>CS13: Older people and vulnerable groups</p>	<p>The policy supports specialist accommodation in suitable locations; refers to latest SHMA; protects existing accommodation; requires a certain proportion of 2 bedroom units; discourages bedsits; commits to allocate sites</p>	<p>Policy is in general conformity with national policy.</p>	<p>The period 2010-2023 has seen the construction of 156 (net) units of C3 elderly and other specialist accommodation, and 115 (net) units of C2 accommodation. The development pipeline (as of 1 April 2023) is even more positive, with a further 527 units (both C2 and C3) having extant planning permission.</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification. The policy is successfully delivering on its aims. The Council will produce an updated housing needs assessment, as part of the preparation of the new Local Plan.</p>

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	<p>through SADPD to meet need; requires development to be adaptable and ‘a percentage’ to be fully wheelchair accessible; and commits to working with partners and to developing the role of the community centres.</p>		<p>In terms of extra care accommodation, 150 of the units completed to date have been of Extra Care or equivalent accommodation, and so are between 369 and 486 of the units with extant planning permission (for 117 of these units, the level of care to be provided has not yet been determined).</p> <p>48 of the completed units and 351 of the units with outstanding planning permission are on sites allocated in the 2021 Site Allocations DPD.</p>	
<p>CS14: Gypsies, Travellers and Travelling Showpeople</p>	<p>The policy requires the Council to identify land through the Site Allocations DPD process to meet the accommodation needs of Travellers. It sets out criteria for determining planning applications. It protects existing authorised sites from loss to alternative uses.</p>	<p>Policy is in conformity with national policy and ‘Planning policy for traveller sites’ (PPTS).</p>	<p>The Council has a responsibility to meet the housing needs of all sections of the community including Gypsies and Travellers and Travelling Showpeople. A Travellers Accommodation Assessment (2013) has been carried out, which justifies a need for 19 pitches between 2012 and 2027. This is equivalent to an annual average pitch supply of 1.3 pitches. Two sites (Proposal Sites GB2 and GB9A) are allocated to enable the provision of 21 pitches in this period. In addition, Stable Yard, Guildford Road and Land to the South of Gabriel Cottage/Hillview, Blanchards Hill have been allocated as inserts within the Green Belt to enable the provision of only one pitch on each of the sites. The Council will manage the delivery of all of the sites to ensure that there is a steady delivery of pitches during the plan period. Any over or under supply of pitch provision will be avoided where possible. It should be emphasised that based on the Gypsy and Traveller Accommodation Assessment (2006) that was used to</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification. The Council will continue to monitor this policy through the annual monitoring report (AMR).</p>

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			<p>inform the Core Strategy, the Council had met its pitch supply up to 2016. The 23 pitches that have been identified to meet future need up to 2027 takes into account any retrospective unmet need since 2012 that was not picked up by the 2006 Gypsy and Travellers Accommodation Assessment.</p>	
<p>CS15: Sustainable economic development</p>	<p>The policy sets out how the Council will accommodate future growth in the economy and ensure sustainable patterns of employment development. The policy seeks to enable flexibility to cater to changing needs of the economy. It identifies employment areas and safeguards land within them for employment uses. It also sets out criteria to assess change of use.</p>	<p>The policy is in general conformity with sections 6 and 7 of the NPPF. It provides the flexibility needed to enable economic growth, change (anticipated and not anticipated in the plan, as per NPPF para 82.d) and diversification, and is considered to continue to provide a useful framework for delivering the requirements of the NPPF, and addressing economic and employment development issues.</p> <p>The evidence underpinning the policy is outdated, and will need updating. However, the policy is explicitly flexible, in accounting for changing economic needs, which enables it to be appropriate for continued use for the remainder of the plan period.</p>	<p>Near-completed development at Broadoaks means there is a need for an update to the policy’s reference and aspiration for the site as a high quality business park, and its changed location with regard to Green Belt (as per 2021 adoption of the SA DPD which altered Green Belt boundaries).</p> <p>The four years from the last review to 2022 saw a net change of employment floorspace of –23,180 sqm. The great majority of the loss was of old office buildings; mainly through permitted development change of use to residential, but also a very large loss of buildings at Broadoaks. At the same time, the net figure hides substantial completions of new and renovated office space in the town centre. Among other uses, there was a slight net gain overall, with net losses of B2 general industrial space (-3,234) and B1c light industrial (-513) more than outweighed by net gains in space with permission for flexible/mixed employment uses (+3,273) and B8 warehousing and storage (+558). This reflects a general shift towards flexible/ multi-employment uses,</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification. However, updated evidence base and a design code is needed to inform positively prepared updated policy in line with the NPPF. This evidence base will therefore be integral to the preparation of an updated local plan.</p>

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Policy	Summary of content	Conformity with national planning policy	Summary of monitoring outcome	Recommendation
			<p>even before the introduction in 2020 of Use Class E (incorporating offices and light industry as well as a range of other uses). Use Class E is now beginning to feed into building completions, which will make the monitoring of this policy harder in the future.</p>	
<p>CS16: Infrastructure delivery</p>	<p>The policy requires the Council to work with other providers and developers to ensure that the infrastructure needed to support development is provided in a timely manner. It seeks to resist the loss of existing infrastructure services and facilities except where it can be justified.</p>	<p>Policy is in general conformity with paragraph 20 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. A key concern of local residents is making sure that infrastructure is provided to support development. The policy will assist in achieving that.</p>	<p>The monitoring demonstrates the policy is effective. The Council has adopted CIL, the IDP schedule highlights projects which have been delivered, it is a living document which has recently been reviewed in Feb 2022. The total amount of contributions secured and spent is shown in the Infrastructure Funding Statement (IFS).</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification.</p>
<p>CS17: Open space, green infrastructure, sport and recreation</p>	<p>The policy requires development to contribute towards the provision of open space and green infrastructure. It protects the loss of existing open space as a result of development.</p>	<p>Policy is in general conformity with Section 8 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. Policy will help enhance the social and environmental characteristics of the area to deliver healthier communities. There is a minor inconsistency. Policy CS17 differs from the NPPF, in that it states that development involving the loss of open space will not be permitted unless, amongst other things, “alternative and equivalent or better provision is made available in the vicinity”. In addition Policy CS17 also states that there will be a presumption against any development that involves the loss of a sport, recreation or play facility except “... where alternative facilities of equal or better quality will be</p>	<p>The monitoring demonstrates the policy is effective. The IDP describes how provision has increased and improved in accordance with the strategy in order to meet growing needs from planned development in the Core Strategy and Site Allocations DPD. There will be opportunities for direct enhancement of existing provision through development coming forward on the allocated sites, as expressed in key requirements, With particular regard to the Basingstoke canal and River Wey. The Council continues to progress the actions in the Playing Pitch and Outdoor Facilities Strategy, in partnership with local community groups. The IDP schedule contains Green Infrastructure and open space projects which is reviewed</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification. The NPPF and DM Policies DPD should be used where there is a lack of clarity regarding detailed criteria.</p>

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Policy	Summary of content	Conformity with national planning policy	Summary of monitoring outcome	Recommendation
		provided as part of the development". Notably, Policy CS17 does not refer to quantity.	biennially. The Council will continue to monitor demand of allotments.	
CS18: Transport and accessibility	The policy promotes a well-integrated community connected by a sustainable transport system which connects people to jobs, services and community facilities and minimise impacts on biodiversity. It supports proposals that delivers transport improvements and increased accessibility to cycle, pedestrian and public transport networks and interchange facilities. It requires the Council to implement minimum parking standards for residential development and maximum standards for non-residential development.	Policy is in general conformity with Section 9 of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. Policy will help minimise development impacts on congestion and pollution. Latest transport studies provide robust evidence to demonstrate that development impacts can be appropriately mitigated as demonstrated in the adoption of SADPD. Additional detail within the NPPF 2021 on "the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code."	The monitoring demonstrates the policy is effective. The IDP has identified many sustainable transport projects such as the Woking integrated transport and Woking sustainable transport projects which will improve walking and cycling routes in the Town Centre. Following the publication of Government's Cycling and Walking Investment Strategy in 2017, SCC and WBC have worked together to develop the Local Cycling and Walking Infrastructure Plan for Woking (LCWIP) (March 2020). The Council was awarded the Housing infrastructure fund to widen Victoria Arch. The proposed scheme will enhance traffic flow in and out of Woking Town Centre, provide enhanced pedestrian and cycle access, and enhance the transport infrastructure capacity. The new Parking Standards SPD came into force on 5 April 2018, replacing the 2006 Parking Standards. Air quality continues to be monitored.	The policy is in general conformity with the NPPF and there is no immediate need for modification. The NPPF and DM Policies DPD should be used where there is a lack of clarity regarding detailed criteria. There is an opportunity for this policy to be developed further via a Design Code in Woking. Any modification to this policy should refer to Surrey County Council's 'Healthy Streets for Surrey' Design Code and adopted Local Transport Plan (LTP4).
CS19: Social and community infrastructure	The policy requires the Council to work with partners to provide accessible social and community infrastructure. It resists the loss of existing social and community facilities.	Policy is in general conformity with Section 8 and paragraph 20 (c) of the NPPF. Policy continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. A revised Infrastructure Delivery Plan (IDP) 2022 has been prepared to demonstrate that there can be sufficient provision to meet need.	Monitoring demonstrates the policy is effective, delivering for example a major community facility completion in the form of the new Eastwood Leisure Centre (6,064sqm), part of the Sheerwater redevelopment. In order to facilitate the delivery of new or improved flexible community and library spaces to meet needs arising from planned growth across	The policy is in general conformity with the NPPF and there is no immediate need for modification.

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Policy	Summary of content	Conformity with national planning policy	Summary of monitoring outcome	Recommendation
			<p>the borough, land has been allocated in the Site Allocations DPD. Moreover, Neighbourhood CIL has been used to deliver social and community infrastructure such as improved play areas and a community fridge. CIL is monitored through the IFS.</p>	
<p>CS20: Heritage and conservation</p>	<p>The policy requires development to make positive contribution to the character, distinctiveness and significance of the historic environment, including heritage assets at risk through neglect, decay and other threats. It introduces a presumption against any development that will be harmful to a listed building.</p>	<p>The policy is in general conformity with Section 16 of the NPPF. It continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. The Heritage of Woking Study lists the heritage assets in the area worth protecting – the policy will help to protect and/or enhance them. The Council has undertaken a review of its Local List in partnership with Surrey County Council and intends to adopt this in due course. Since the previous review of the Core Strategy, a paragraph addressing the removal of historic statues, plaques, memorials and monuments has been included. The Council operates a petitions process, which has covered this matter when it has arisen – regard will be had to paragraph 198 of the NPPF in deciding these cases.</p>	<p>The policy has allowed scope for planning judgment to be made in assessing impact on heritage assets, which is within the remit of a strategic policy. There have been cases where appeal decisions, concerning heritage, have conflicted with decisions made by the Council. In particular, there are a number of appeal decisions concerning development in and adjacent to conservation areas, that may have benefitted from more detailed guidance to support the policy position. This could be achieved through the production of up-to-date appraisals and design codes, which provide greater detail on how development should be designed to respect and enhance the historic environment.</p> <p>There is one Grade I listed heritage asset, Brookwood Cemetery, which is identified on Historic England’s Heritage at Risk register. However, work continues to be undertaken to improve its condition. This includes projects such as the restoration of the Colquhoun Chapel. The condition of this asset is monitored through an annual ‘Heritage at Risk’ survey.</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification. However, the policy would benefit from strengthening to require the submission of Heritage Statements. Furthermore, there would be benefit in preparing and updating conservation area appraisals and design codes to aid in achieving the aims of the policy.</p>

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Policy	Summary of content	Conformity with national planning policy	Summary of monitoring outcome	Recommendation
CS21: Design	The policy sets out clear criteria for development to meet to ensure good quality design.	The policy continues to be in general conformity with National Policy. Since the previous review, there have been a number of additions and amendments to Section 12 of the NPPF, namely around emphasising the role in which design guides and codes can play in achieving well designed, beautiful and sustainable places. It also highlights how neighbourhood planning can play a role in facilitating this. CS21 emphasises the importance of good functional and aesthetic design. It is supported by design policies in the Development Management Polices DPD (DMPDPD) and guidance in the Design SPD. The Council is committed to preparing a framework for tall buildings in the Town Centre to provide more certainty on acceptable heights. It will also work with neighbourhood forums and developers to produce design codes for development sites and areas throughout the borough.	<p>At a strategic scale, the policy continues to function as a useful foundation to achieve well-designed development, both aesthetically and functionally. The policy is supported by further guidance including the Design SPD, Outlook, Amenity, Privacy and Daylight SPD and Character Study, which give useful direction for the detailed elements of design. This guidance continues to be used as a material consideration to assess the quality of design, both at planning application stage and appeal.</p> <p>The NPPF sets a clear incentive for the production of design codes. The preparation of these codes will improve the effectiveness of the policy and allow the Council to go a step further in setting clear standards for design. These would provide greater clarity on how the criteria, set out in the policy, would be achieved.</p>	The policy is in general conformity with the NPPF and there is no immediate need for modification. However, the policy would benefit from the preparation of design codes to aid in achieving the aims of the policy.

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Policy	Summary of content	Conformity with national planning policy	Summary of monitoring outcome	Recommendation
CS22: Sustainable construction	<p>The policy requires new residential development to meet the energy and carbon dioxide and water components of the code for sustainable development at various time periods. It requires non-residential development above specific threshold to meet BREEAM very good standards. Development should consider connecting to the existing CHP network where feasible. It promotes electric charging points. It requires development to consider the use of sustainable construction techniques that promotes the reuse and recycling of building materials. It encourages development to make biodiversity enhancements such as green roofs and bird and bat boxes.</p>	<p>Policy is in conformity with the NPPF however references to outdated buildings standards should be removed. Allowable Solutions has been scrapped following the last CS review, which noted the need to wait for further legislation/guidance before suggesting modifications to the policy. Additionally, the Code for Sustainable Homes has also been scrapped / replaced by the Future Homes Standard (FHS). Building Regulations, implemented from June 2022, act as interim improvements in efficiency standards until the FHS is published in 2025, which will have further uplifts. Changes to EV standards have been established within Part S of Building Regulations.</p>	<p>Monitoring demonstrates that development continues to connect to the Town Centre District Energy Network (DEN). In 2018 permission was granted for another CHP station. Improvements to the wider DEN continues to respond to the rate of development in the Town Centre. This is in conformity with actions outlined within the Council's Climate emergency action plan.</p>	<p>The policy is in conformity with the NPPF and no immediate modification is needed, however this policy should be reviewed and/or strengthened.</p> <p>The upcoming review of the local plan provides a platform to assess the suitability of this policy in anticipation of changes to national standards.</p> <p>Further clarity on the implementation of this policy is provided within the revised Climate change SPD, which is set for adoption late 2023.</p>
CS23: Renewable and low carbon energy generation	<p>The policy encourages the development of standalone renewable energy installations to be determined on a case by</p>	<p>Policy is in conformity with the NPPF however references to outdated UK net zero targets should be revised.</p>	<p>Monitoring demonstrates that development continues to connect to the Town Centre DEN. Implementation of small-scale renewable/LZC technologies has continued. In 2018, permission was</p>	<p>The policy is in conformity with the NPPF, and no immediate modifications are needed, however this policy should be strengthened.</p>

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Policy	Summary of content	Conformity with national planning policy	Summary of monitoring outcome	Recommendation
	<p>case based on their individual merits.</p>		<p>granted for another CHP station on Poole Road. Note that monitoring outcome of this policy is difficult to assess as CS23 is 'encouraged' and so there are no specific targets to be reported against. Enforcing CS23 standards would require further review as enforcing the implementation of renewable/LZC technologies would require viability studies and a wider evidence base to adequately support a policy which achieves above national standards.</p> <p>Please also note some types of domestic scale renewable energy projects do not require planning permission and remain unmonitored. Additionally, the maintenance and replacement of some technologies cannot be monitored (via planning system) so actual numbers of stand-alone renewable/LZC technologies will differ.</p> <p>The Council's emerging Climate change Strategy (Woking Net Zero) sets out the target for net zero across the Council's estate by 2030, and, for a net zero Borough by 2050 (or 2045). This document was subject to public consultation between 18th May – 30th June 2023, in parallel to the revised Climate Change Strategy.</p>	<p>Further clarity on the implementation of this policy is provided within the revised Climate Change SPD, which is set for adoption late 2023.</p>
<p>CS24: Woking's landscape and townscape</p>	<p>The policy requires development to provide positive benefits in terms of landscape and townscape character and local distinctiveness. It</p>	<p>The policy is in general conformity with Section 12 of the NPPF and continues to perform a useful function in delivering the requirements of the NPPF and addressing local issues. The Council has carried out a character study to describe the distinctive</p>	<p>The policy continues to be a useful basis to consider impacts of development on landscapes and townscape. The Design SPD and Character Study have been useful in setting out what development should consider in terms of character, and</p>	<p>The policy is in general conformity with the NPPF and there is no immediate need for modification. However, an update to the Character Study may be needed to take into account any major changes in character areas.</p>

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Policy	Summary of content	Conformity with national planning policy	Summary of monitoring outcome	Recommendation
	sets out key requirements for development to meet.	characters of the various parts of the borough. The policy ensures that development does not detract from the character of the area without stifling innovation. Since the previous review of the Core Strategy, an additional paragraph has been included in Section 12 of the NPPF. This highlights the importance of incorporating trees into development, particularly street trees. CS24 encourages the planting of new trees, with greater detail provided in Policy DM2 'Trees and landscaping' of the DMPDPD. This policy encourages appropriate tree planting in new development, recognising the benefit of street trees to 'enclose or mitigate the visual impact of development'.	<p>how it should be designed to be sympathetic.</p> <p>The Character Study may need updating to account for new development, particularly where new large developments have been built.</p> <p>Landscape assessments continue to be submitted for major planning applications. Areas designated as escarpments have been treated as sensitive constraints where development affects these. A development for 86 dwellings has recently been permitted on part of an allocated site, situated on the lower slopes of the Hook Heath escarpment. However, the proposal was supported by a detailed landscape masterplan and visual impact assessment, which set out how the development would be designed to respect this designation.</p>	
CS25: Presumption in favour of sustainable development	The policy reiterates parts of section 2 of the NPPF, particularly para 11, on the presumption in favour of sustainable development	The policy reflects the requirements of paragraph 11 of the NPPF. Whilst there is a slight change in the wording of the revised presumption, the policy may still have a useful function.	This policy remains in conformity with the NPPF, particularly regarding para 11 of Section 2. There have been revisions to this section that set out specific need for plans to "promote a sustainable pattern of development". Although there is a change in wording this does not detract from the objectives of this policy as a means to ensure all development applies a presumption of sustainable development.	The policy is in general conformity with the NPPF and there is no immediate need for modification.. However, consideration should be given for the need for this or a similar policy, with regard to whether the NPPF adequately provides the guidance required, in the preparation of an updated local plan.

Summary of responses to Core Strategy review with officers' response

Name of organisation	Summary of representation	Officer's response
<p>Network Rail</p>	<p>There is no current funding or plan to deliver the Woking grade separation of Woking Junction, through the implementation of a flyover, although it remains a part of Network Rail's strategy for when demand from Woking and beyond into and out of London Waterloo reaches the point at which capacity and performance through the junction and station is constrained.</p> <p>Site allocation Policy UA7 for Woking station is essential in the Core Strategy Review and work should begin on identifying suitable funding opportunities to provide for these improvements as necessary.</p> <p>The current policy on SUDS and flood risk doesn't put enough emphasis on other sources of flooding such as surface water and groundwater. Whilst this is a local decision it is important to stress that any sites, either major or minor, with the potential to impact Network Rail's infrastructure must fully mitigate the impact of development through the provision of SUDS and consider the presence of all forms of flood risk.</p> <p>The SFRA is dated 2015 and in accordance with best practice this should be updated to include recent modelling of the area and the more recent flood events in Woking. Network Rail's infrastructure should be considered as part of this process. Therefore, we would expect Flood Risk and the associated impacts to be fully assessed and any necessary changes made during the course of the Core Strategy Review.</p>	<p>Comments are noted.</p> <p>The Site Allocation DPD recognises the current and projected future capacity constraints at Woking Railway Station, and Policy UA7 includes all necessary measures to facilitate Network Railway's planned works to increase capacity (described in the Infrastructure Delivery Plan).</p> <p>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.</p>
<p>National Grid Electricity Transmission (NGET)</p>	<p>A plan showing details and locations of NGET's assets</p> <p>The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET.</p> <p>NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require</p>	<p>Comments are noted.</p> <p>Paragraph 20 of the NPPF requires strategic policies to make provision for infrastructure and community facilities to support development. This requirement is consistent with paragraph 162 of the previous NPPF that informed the preparation of the Core Strategy. The Council has followed this requirement and has worked with infrastructure providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand arising from the delivery of the Core Strategy and/or the Site Allocations DPD.</p>

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	<p>a creative approach to new development around high voltage overhead lines and other NGET assets.</p> <p>Therefore, to ensure that Design Policy CS21 is consistent with national policy we would request the inclusion of a policy strand such as:</p> <p><i>“taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”</i></p>	<p>Policy CS16 (infrastructure delivery) and Section 6 (Implementation and monitoring) of the Core Strategy provides the assurance that the Council will work with infrastructure service providers and developers to ensure that the infrastructure needed to support development is provided in a timely manner. The Council also recognises that the delivery of the Core Strategy or the Site Allocations DPD will involve multiple delivery agencies, and in this regard, will take a proactive role in coordinating them to ensure this objective is achieved.</p>
<p>National Gas</p>	<p>The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure.</p> <p>National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets.</p> <p>Therefore, to ensure that Design Policy CS21 is consistent with national policy we would request the inclusion of a policy strand such as:</p> <p><i>“x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”</i></p>	<p>Comments are noted.</p> <p>Paragraph 20 of the NPPF requires strategic policies to make provision for infrastructure and community facilities to support development. This requirement is consistent with paragraph 162 of the previous NPPF that informed the preparation of the Core Strategy. The Council has followed this requirement and has worked with infrastructure providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand arising from the delivery of the Core Strategy and/or the Site Allocations DPD.</p> <p>Policy CS16 (infrastructure delivery) and Section 6 (Implementation and monitoring) of the Core Strategy provides the assurance that the Council will work with infrastructure service providers and developers to ensure that the infrastructure needed to support development is provided in a timely manner. The Council also recognises that the delivery of the Core Strategy or the Site Allocations DPD will involve multiple delivery agencies, and in this regard, will take a proactive role in coordinating them to ensure this objective is achieved.</p>
<p>Surrey Heartlands Integrated Care Board (ICB) NHS</p>	<p>While the ICB supports the general approach to infrastructure delivery set out within adopted Policy CS16, modifications to this policy would strengthen the ability of the Council to secure the infrastructure necessary to support anticipated growth. The policy should be clear that there will be an expectation for developers to engage with the council and infrastructure providers, to demonstrate that they have explored existing infrastructure capacity, how this could be future proofed, and that they have made sufficient infrastructure provision as part of their proposal.</p>	<p>Comments are noted.</p> <p>Paragraph 20 of the NPPF requires strategic policies to make provision for infrastructure and community facilities to support development. This requirement is consistent with paragraph 162 of the previous NPPF that informed the preparation of the Core Strategy. The Council has followed this requirement and has worked with infrastructure providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand arising from the delivery of the Core Strategy and/or the Site</p>

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	<p>The recently updated Infrastructure Capacity Study and Delivery Plan (February 2022) refers to the need for developers to conduct healthcare impact assessments; this requirement should be formalised in the Local Plan with further details on what an impact assessment should include.</p> <p>Where new developments create a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services.</p> <p>Providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising – options should enable financial contributions, new on-site healthcare infrastructure, free land/ infrastructure /property, or a combination of these. Furthermore, the significant cumulative impacts of smaller residential development and their need for mitigation should also be recognized in the policy.</p> <p>Ensuring that the NHS has the resources required to develop additional healthcare infrastructure where necessary. Significant funding secured for S106 or CIL allocations for health capital funding should be anticipated over the Local Plan period.</p> <p>Recommend that adopted Core Strategy Policy CS19 should be modified to set out exceptions and offer positive support for public sector infrastructure providers through flexibility or a streamlined process to facilitate repurposing and reinvestment of capital towards modern and fit-for-purpose infrastructure facilities. The loss of existing social and community infrastructure (including health) that forms part of a wider estate plan that will support health should not be subject to any restrictions.</p>	<p>Allocations DPD. Policy CS16 (infrastructure delivery) and Section 6 (Implementation and monitoring) of the Core Strategy provides the assurance that the Council will work with infrastructure service providers and developers to ensure that the infrastructure needed to support development is provided in a timely manner. The Council also recognises that the delivery of the Core Strategy or the Site Allocations DPD will involve multiple delivery agencies, and in this regard, will take a proactive role in coordinating them to ensure this objective is achieved.</p> <p>The Council has undertaken a number of studies including the Infrastructure Delivery Plan (IDP) to demonstrate that adequate and appropriate infrastructure can be identified to support the delivery of the Core Strategy and the Site Allocations DPD. The definition of infrastructure covered in the IDP and by Policy CS16: Infrastructure delivery of the Core Strategy is wide ranging and it includes health care, education, transport, green infrastructure, sewerage and utilities. The IDP is on the Council's website (http://www.woking2027.info/ldfresearch/infrastructure). The IDP was reviewed in February 2022 to bring it up to date and therefore provides a robust basis for supporting the delivery of the Site Allocations DPD.</p> <p>The IDP sets out:</p> <ul style="list-style-type: none"> · The capacity of existing infrastructure and the impact of future development on that infrastructure; · The mechanisms in place to ensure that the additional infrastructure necessary to support new development is provided over the Plan period. <p>This includes the scale of the new infrastructure to be provided, by whom, how, at what cost and to what timescales.</p> <p>The IDP is a live document to be monitored and updated to ensure that it is as robust and up to date as possible, taking into account changes in need, capacity and the availability of funding sources in order that the Council and its partners can respond to any changes to priorities in a timely and co-ordinated manner. The IDP has been revised for this purpose, taking into account new information submitted by infrastructure providers and changes in national planning policy.</p> <p>As set out in Section 6 of the Core Strategy, the Council will also require developers to contribute towards the provision of facilities, services and</p>

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Name of organisation	Summary of representation	Officer's response
		<p>infrastructure to make a scheme acceptable in planning terms before planning approval is granted. Infrastructure contributions will be sought via Community Infrastructure Levy, and on the back of Section 106 agreements for site specific infrastructure requirements. The 'key requirements' within the policies of the Site Allocations DPD describe how any site specific requirements will be determined on a case by case basis depending on the nature of the scheme that comes forward.</p> <p>CS19 is considered sufficiently flexible and resist the loss of social and community facilities other than in specific circumstances. It encourages provision of new community facilities in accessible locations.</p>
<p>Thames Water</p>	<p>we consider that the New Local Plan should include a specific policy on the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy:</p> <p>PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT:</p> <p><i>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</i></p> <p><i>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</i></p> <p><i>“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed</i></p>	<p>Comments are noted for a new local plan.</p> <p>Paragraph 20 of the NPPF requires strategic policies to make provision for infrastructure and community facilities to support development. This requirement is consistent with paragraph 162 of the previous NPPF that informed the preparation of the Core Strategy. The Council has followed this requirement and has worked with infrastructure providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand arising from the delivery of the Core Strategy and/or the Site Allocations DPD.</p> <p>Policy CS16 (infrastructure delivery) and Section 6 (Implementation and monitoring) of the Core Strategy provides the assurance that the Council will work with infrastructure service providers and developers to ensure that the infrastructure needed to support development is provided in a timely manner. The Council also recognises that the delivery of the Core Strategy or the Site Allocations DPD will involve multiple delivery agencies, and in this regard, will take a proactive role in coordinating them to ensure this objective is achieved.</p>

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	<p><i>development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised."</i></p> <p>"When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided."</p> <p><i>"Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."</i></p> <p><i>"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</i></p>	
<p>Surrey County Council</p>	<p>Flooding: consider updates to PPG on Flood Risk and Coastal Change, and, the Environmental Agency's Climate Change Allowances Guidance.</p> <ul style="list-style-type: none"> • Definition of a 'functional floodplain' (Flood Zone 3b) has changed to increase annual probability. • Update to sequential/exception tests give greater focus on surface water flood risk • Clearer SuDS requirements stipulated <p>Education: WBC should consider the increase in demand for secondary school places over the planning period (2022 to 2032).</p>	<p>Comments have been noted.</p> <p>Flooding response: The Council will seek to update the Strategic Flood Risk Assessment (2015), when appropriate, in response to the changes in the NPPF and PPG relating to the definition of Flood Zone 3b.</p> <p>Education response: The Council continues to monitor the demand for school places, and this is recognised within the Infrastructure Delivery Plan (IDP), updated in February 2022.</p>

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	<p>Biodiversity: review should consider updates in light of Environment Act 2021 i.e., mandatory 10% biodiversity net gain requirement from November 2023 with exemptions (not applicable to small site until 2024), and development of Local Nature Recovery Strategies.</p> <p>'Spatial Vision' should recognise biodiversity should be restored in addition to preservation (i.e., halt declines and recover from past losses).</p> <p>Heritage: Notes new NPPF paragraph 198 on historic statues.</p> <p>Further consideration for policy to note heritage views, vistas, recent developments in heritage practice, setting and curtilage.</p> <p>Minerals and Waste: review should consider the Surrey Waste Local Plan 2019 and update references to outdated plans. Work has also commenced on the preparation of a new Minerals and Waste Local Plan.</p> <p>Transport: review should consider Surrey County Council's Local Transport Plan 4 (LTP4) adopted 2022. Recognises importance of Local Cycling and Walking Infrastructure Plan for Woking (LCWIP).</p> <p>Sustainable policies should go further and take the opportunity to embed need to meet carbon emissions targets across all future town improvements and developments.</p> <p>SCC is due to begin developing programme of Liveable Neighbourhoods, in line with LTP4.</p> <p>The review should also consider the recently published Healthy Streets for Surrey design code as a key supporting document.</p>	<p>To meet the forecasted increase in demand for secondary school places, the Council will continue to implement policy CS16 to work in partnership with infrastructure providers and collect financial contributions to facilitate meeting educational need to support the delivery of the Core Strategy (2012) and Site Allocations DPD (2021) for the plan period until 2027.</p> <p>The IDP is available on the Council's website (http://www.woking2027.info/ldfresearch/infrastructure). The IDP was reviewed in February 2022 to bring it up to date and therefore provides a robust basis for supporting the delivery of the Site Allocations DPD.</p> <p>Biodiversity response: In preparation for mandatory BNG in November 2023, the Council is preparing a guidance note to aid developers and officers in facilitating the delivery of BNG.</p> <p>Heritage response: Comments relating to heritage have been considered.</p> <p>Minerals and Waste response: Comments relating to minerals and waste have been considered. References to outdated waste plans will be addressed when appropriate.</p> <p>Transport response: Comments relating to transport have been noted. The Council currently implements policy CS16, CS18 and CS21 to support the development of sustainable transport measures. The need to recognise emerging and recently adopted guidance is noted and will be addressed when it is considered appropriate.</p> <p>Other: Please note the development of an interactive policy map is currently underway.</p>
<p>National Highways</p>	<p>Concerned with proposals that have the potential to impact the operation of the strategic road network (SRN), for Woking this is the A3, M25 and M3.</p> <p>In accordance with national policy, WBC should promote strategies, policies and land allocations that support alternatives to car travel and maintain operation of the transport network.</p>	<p>Comments have been noted. The Council remains committed to ensuring suitable infrastructure is provided to support the demands of planned growth within the Borough. This is implemented through policies CS16 and CS18 of the Core Strategy.</p>

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	<p>The potential impact of planned growth within Woking on the SRN or at its junctions must be considered with mitigation measures.</p> <p>It is important that the Core Strategy ensures that development cannot progress without the appropriate infrastructure being in place.</p> <p>“When considering policies and proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible.”</p> <p>Infrastructure improvements on SRN should only be considered a last resort.</p> <p>“Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.”</p> <p>Core strategy should consider ‘Strategic road network and the delivery of sustainable development’ (Department of Transport, Circular 01/2022)</p>	<p>The annual Infrastructure Delivery Plan (IDP) evidences the Council meeting demand for infrastructure in relation to planned development arising from both the Core Strategy and Site Allocations DPD.</p> <p>As specified within CS18 all proposals are required to mitigate the adverse effects of development traffic and other environmental and safety impacts (direct or cumulative). Additionally, development proposals that generate significant traffic or have significant impact on the Strategic Road Network (SRN) to be accompanied by a travel plan that sets out how any impact will be sustainably managed.</p>
<p>Chobham Parish Council</p>	<p>Transport/travel issues or improvements: Improve opportunities for active travel i.e., cycle/walking routes between Chobham, Woking, Knaphill</p> <p>Lack of bus service between Chobham and Woking during evening, weekends, bank holidays</p> <p>Long bus routes encourage car travel.</p> <p>Woking to Chobham is difficult to navigate for cyclists.</p> <p>Woking Station as a transit/commuting hub could be improved.</p> <p>Horse riders require safer routes between Woking and Chobham.</p> <p>Improvements to Town Centre Parking.</p>	<p>Comments have been noted.</p> <p>Surrey County Council (SCC) act as the lead transport authority and deal with issues relating to public transport, including bus services, across the County. Woking Borough Council (WBC) only has authority to draft policy in relation to development within the Borough’s boundary. But concerns relating to transport connections between Woking and Chobham have been noted, and WBC will continue to advocate for, and work in partnership with SCC to create opportunities for all modes of sustainable transport in and around the Borough.</p> <p>SCC in collaboration with WBC produced the Local Cycling and Walking Infrastructure Plan (LCWIP) in 2020. This is an investment plan that sets out how development can contribute toward ambitions to improve sustainable transport provision/infrastructure over the next 10 years.</p> <p>In terms of preventing urban sprawl, the Council remains committed to ensuring the green belt is managed in a sustainable manner which is</p>

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	<p>Comments relating to ' Roads & rights of way maintenance and improvements' across Woking/Chobham- detail available in full response.</p> <p>Waterway protection: Issues relating to 'The Bourne', noted as a Thames Water sewage issue.</p> <p>Economic, leisure and retail: Woking is the primary hub for Chobham residents.</p> <p>Woking is a key source of employment for Chobham residents.</p> <p>Notes whether there is an opportunity to extend 'leisure concession scheme' to Chobham.</p> <p>Aviation: notes importance of maintaining Fair Oaks Airport</p> <p>Green Belt: <i>"maintain gaps & identity, avoiding coalescence & urban sprawl"</i></p> <p>Thames Basins Heath Special Protection Area / Wildlife etc: <i>"a) Horsell Common boundary with Chobham b) Chobham Common a destination for Woking residents c) Wildlife/ecological corridors"</i></p> <p>Schools: no clear established catchment, places offered without consideration for transport</p> <p>Healthcare: significant challenges in accessing healthcare in Chobham, especially outside of core hours. No direct bus service. Woking Community Hospital is a valued resource.</p> <p>Burial land: pressure on local burial space. Potential opportunity for jointed up strategy.</p>	<p>appropriately reviewed and considered, as evidenced by the Site Allocations DPD (2021), available here.</p>
<p>Byfleet, West Byfleet & Pyrford Residents' Association</p>	<p>A need for new or updated planning policy may arise from: Levelling Up and Regeneration Bill (LURB) National Planning Policy Framework (NPPF) and current consultation SADPD and Inspector's Report Housing Numbers</p>	<p>Comments noted.</p> <p>The changing retail and office situation in West Byfleet, and changes to the Use Class Order, will be taken into account in the updating of the Local Plan.</p>

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	<p>Reduced demand for office and commercial space Changes in retail conduct and habits SCC policies and vision statements Woking town centre Electric cars Section 114 will make many CS ambitions undeliverable.</p> <p>The Core Strategy should be updated to reflect changes in national policies. Support for Neighbourhood Plans should be made more specific. CS1 needs to reflect changed economic and political circumstances and consider height of buildings. Question how much of CS2 is relevant. CS3 and supporting text needs to be rewritten in the light of West Byfleet's large site allocations / developments, empty office space (should not try to safeguard), insufficient health and recreational facilities and no post office. CS4 should be updated. CS6 should include what the SADPD inspector said about further Green Belt release. Question current requirements in relation to CS10. CS11 needs to be updated to reflect requirements and delivery. On CS13, most provision is very expensive. CS16- should refer to the East of Borough Infrastructure Study and to SCC. CS21- see Levelling Up and Regeneration Bill, and draft NPPF 2023 CS23- should align with SCC CS24- should be strengthened regarding existing and new trees.</p>	<p>The Levelling Up and Regeneration Bill, and draft NPPF revisions, are not yet national planning policy or law so it would not be appropriate to make amendments based on them at this stage.</p> <p>Other issues are addressed in the table above and will be taken into account in the updating of the Local Plan.</p>
Pyrford Neighbourhood Forum	<p>Pyrford Forum currently carrying out a Heritage Conservation Assessment which evidences a need to change the existing boundary and possibly the creation of additional new ones.</p> <p>The Forum would like the CS to reflect the changes in the Climate change strategy and national BNG policy (i.e. Environment Act 2021), and, introduce a 'Countryside Policy such as P3 of the Guildford Local Plan, <i>"This would state no physical or visual coalescence growth of the Pyrford Urban Area towards either the Old Woking or Ripley Urban Areas."</i></p>	<p>Work on additional evidence such as Heritage Conservation Assessment is welcome. However, the amendment of Conservation Area boundaries is a separate process from Local Plan review.</p> <p>Biodiversity Net Gain is addressed in the table above.</p> <p>The remaining points are all of interest but are not considered to affect whether or not the Core Strategy is out of date. These comments will be taken into account in the updating of the Local Plan.</p>

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	<p>Would like further considerations which protect housing mix (i.e., CS11), particularly bungalows as this is considered a key dwelling type for elderly residences. Highlights that there have been planning applications which have permitted the demolition of bungalows and development of 2/3 storey housing. Note that some parts of Pyrford are dominated by bungalows. It is suggested that to maintain/protect the character of the area that <i>“Article 4 directions to remove Permitted Development Rights to add one storey on the same footprint.”</i></p> <p>Has raised concern regarding development of HMOs and 4 storey apartments, which <i>“create significant noise and parking issues”</i>. The 4 storey apartments are considered to be out of character with the area and have poor public transport connections.</p>	
<p>West Byfleet Neighbourhood Forum</p>	<p>Paragraphs 4.13-4.16 should be updated to reflect local changes. There is unlikely to be a continued need for additional office or retail space, considering the ongoing vacancy of significant office units, increase in online shopping, and lack of space for new retail on Botanical Place (which largely represents the re-provision of previous retail.). Changes to the Use Class Order, and the scale of PD change-of use development in the area, should lead to the removal of references to old use classes; of the reference to the primary retail area (could replace with encouragement of active frontage businesses?); of the protection of office space; and of areas at the fringe of the district centre, from its boundaries. However, protection of community facilities should remain.</p> <p>Many other polices should also be updated, due to internal space standards; energy and water efficiency moving into building regulations; new technology such as EV charging points; BNG; housing mix to reflect a new SHMA; significant changes in national affordable housing policy; a requirement for affordable C2 provision to ensure that C2 developers contribute to affordable housing; minimum open space standards for major developments, like Runnymede's policy SL26; renewable energy thresholds/standards, like Runnymede's policy SD8.</p> <p>If an update is needed it should be a concise document that replaces both the Core Strategy and SADPD.</p>	<p>Comments noted.</p> <p>The changing retail situation in West Byfleet, and changes to the Use Class Order, will be taken into account in the updating of the Local Plan.</p> <p>Affordable housing changes, including C2 issues have been partially addressed through the revised Affordable Housing Delivery SPD.</p> <p>Other issues are addressed in the table above and will be taken into account in the updating of the Local Plan.</p>
<p>Historic England</p>	<p>HE acts as the Government's advisor on the historic environment and ensures that the protection of the historic environment is fully considered throughout the planning process. HE promotes objective of para 190 of the</p>	<p>Comments have been noted.</p>

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	<p>NPPF, to set out a positive strategy for the conservation and enjoyment of the historic environment.</p> <p>The cs review should be in alignment with para 20 d) of the NPPF and should be implemented as a passive exercise <i>“but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.”</i></p> <p>Strategic approaches can inform all aspects of the local plan. Conservation of the historic environment cannot be satisfied by stand-alone policies which repeat NPPF objectives. For a ‘sound’ conservation strategy, policies may need to be tailed to achieve the positive improvements in the historic environment that the NPPF expects.</p> <p>The local plan should consider the inter-relationship of the objective of the historic environment with issues of local importance i.e., climate change, biodiversity, local economy, sustainable transport, high quality homes, good design.</p> <p>As per para 31 of the NPPF, local plans should be based on up-to-date and relevant evidence concerning economic, social and environmental characteristics/prospects of the area. <i>“this up-to-date evidence should be used to assess the significance of heritage assets and the contribution they make to the environment, and their condition”.</i></p> <p>Comments only reflect the information provided by the Council to HE.</p>	<p>The Council recognises the need to tailor planning guidance to facilitate the best outcome for the historic environment and ensure its conservation. The policy review table provides more detail on current planning policy concerned with the historic environment (see policies CS20 and CS24) and its conformity with the NPPF.</p> <p>Where appropriate the Council will utilise emerging supplementary plans (i.e., conservation area appraisals, design codes) to facilitate further consideration for the maintenance, use and conservation of heritage assets and their local setting.</p>
<p>Guildford Borough Council</p>	<p>Woking’s housing need figure is out of date (South East Plan) and standard methodology is significantly greater. Waverley meets part of this unmet need, but not all. Woking cannot rely on Guildford headroom to meet the remainder, since this contribution was never quantified by the inspector, and Guildford’s Local Plan Part 2 makes no specific contribution to this.</p>	<p>Woking’s housing figure was not taken from the South East Plan, but rather from the most up to date evidence at the time of adoption. It continues to be up to date, it is being delivered successfully, and the constraints which limit the figure have not changed. The Standard Methodology OAN has not changed since the last Core Strategy Review, and produces a lower need figure than the one which was extant at the time of the Core Strategy’s adoption.</p> <p>Woking can indeed rely on Guildford to meet the remainder of its unmet need, as identified by the Inspector into Guildford’s Local Plan Part 1, so</p>

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		<p>long as the headroom between Guildford's housing requirement and its actual and expected housing delivery remains large enough.</p> <p>The size of both Guildford's headroom and Woking's unmet need was clear at the time of the Guildford LPP1 inspector's report (210 dwellings per annum and 34 dwellings per annum, respectively). Since that time the first figure has always remained, and is expected to remain, greater than the second figure.</p> <p>There would be no expectation for Guildford's Local Plan Part 2 to meet Woking's need, as that is a development management policies document.</p>
<p>Elmbridge Borough Council</p>	<p>EBC have raised the question of WBC core strategy review with WBC since 2017 (SADPD Martyrs Lane consultation): Woking's SHMA need was higher than CS requirement; Elmbridge sought neighbours to meet their need. EBC consider that many of the points raised by Runnymede, in response to the 2018 review, remain valid and should be considered.</p> <p>There have been several changes to the NPPF which point to the need for WBC to prepare a new LP: introduction of Standard Methodology; preparation of other LPS locally which identify unmet housing need. Any assessment that there is no capacity for further release of the Green Belt should be part of a comprehensive plan review.</p> <p>Cross boundary issues identified:</p> <ol style="list-style-type: none"> 1. Housing 2. Travellers 3. Employment / Retail 4. Transport 5. Flooding 6. Green & Blue Infrastructure 7. Green Belt & Landscape 8. Thames Basin Heaths Special Protection Area / Natural Environment 9. Climate Change 10. Historic Environment 	<p>It is true that the need identified in the West Surrey SHMA was higher than the requirement contained in the Core Strategy. However, this did not represent an increase, as stated, but a decrease. The SHMA need was significantly lower than the objectively assessed need identified for Woking at the time the Core Strategy was adopted; and the current objectively assessed need for Woking is significantly lower again.</p> <p>We appreciate that Elmbridge BC does not consider that it can meet its own objectively assessed need. Woking's Local Plan and Site Allocations also do not lead to Woking's objectively assessed need being met; and indeed nearby Boroughs are already accommodating some of our need. In these circumstances it would not be appropriate to commit to taking on any of Elmbridge's unmet need. It is true that last year, exceptionally, Woking delivered more dwellings than its objectively assessed need; in cases like this, then in so far as there is any relationship between the two borough's housing markets, the impact of this additional housing should feed through indirectly into Elmbridge's OAN calculation, in particular the affordability element.</p> <p>The introduction of the Standard Methodology took place prior to the previous review of the Local Plan, which took it into account in finding that the policies did not need updating. The result produced by the Methodology has not changed since then.</p>

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	<p>There is also need to work together ensure the delivery of the infrastructure required to support the Woking Hub Strategic Opportunity Area (SOA) as set out in the Surrey Place Ambition.</p>	<p>The only authorities neighbouring Woking to have adopted plans with new housing requirements since the last review are Runnymede and Guildford Borough Councils. Both of these councils' housing requirements fully meet their own assessed need for housing for the duration of each plan period, as assessed by the inspectors into each plan.</p> <p>We agree with the list of cross boundary issues set out by Elmbridge Borough Council. We are committed to cooperating with our neighbouring authorities on all relevant issues.</p>
<p>Runnymede Borough Council</p>	<p>Review Core Strategy to address the latest housing requirement figures, which have significantly increased since the adoption of the Core Strategy in 2012. Likewise review to address latest Gypsy and Traveller needs. Review should take account of developments in sustainable transport and active travel (such as the introduction of Local Transport Plan 4 by SCC). Several initiatives affect cross-boundary transport infrastructure, such as improvements to the A320, and improvements to cycling infrastructure through LCWIPs;</p> <p>Review of Core Strategy policies relating to GI and SANG provision would be beneficial – this is a cross-boundary issue and we continue to welcome collaboration on this;</p> <p>We continue to work with Surrey Heartlands ICB to identify healthcare infrastructure needs to accommodate growth. Acute infrastructure – such as St Peter's Hospital – is located in Runnymede but serves a wide catchment area, including that of Woking. It is important that the latest infrastructure needs are addressed through an up-to-date Local Plan.</p>	<p>Housing requirement figures have remained the same since the adoption of the Core Strategy. Housing need figures have reduced since that date, and remained the same since the last review of the Core Strategy. Gypsy and Traveller need has not been re-assessed since the last Core Strategy Review but is on target to be met.</p> <p>We look forward to cooperating with Runnymede BC and all our neighbouring authorities on the matters above, as well as transport, healthcare, Green Infrastructure and SANG, and all other relevant issues, as part of the forthcoming Core Strategy update. However, the developments in these areas do not make the Core Strategy out of date.</p>
<p>Surrey Heath Borough Council</p>	<p>Woking has confirmed it would be unable to meet SH Gypsy / Traveller or general housing needs. SHBC would be unable to meet Woking's Gypsy / Traveller or general housing needs.</p> <p>A new LP would require cross boundary work on housing, transport and infrastructure. SHBC will share their transport assessment soon. Want to</p>	<p>The point on Housing Gypsy, Traveller and Housing need is noted. We are committed to cooperating with our neighbouring authorities on all relevant issues. We would be interested to hear suggestions regarding infrastructure around Chobham (and potentially other destinations to its north and west), although our spending ability is heavily constrained.</p>

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	<p>cooperate on Local Cycling and Walking Infrastructure Plans esp. around Chobham.</p>	
<p>Environment Agency</p>	<p>The Environment Agency's comments relate to Policy CS9 'Flooding and water management' and the SFRA as a key evidence base for the policy.</p> <p>The policy would benefit from additional wording in relation to the acceptability of development on the flood plain, to ensure that it is safe and would not increase flood risk elsewhere. Furthermore, it would be beneficial to clearly set out what exceptional circumstances are for developing in Flood Zones 3a and 3b.</p> <p>The policy requires a flood risk assessment to be carried out where proposals are affected by surface water flooding. This could be expanded on to clarify the definition of 'at risk', for instance, whether the requirement applies to all levels of risk or, for example, just high-risk areas.</p> <p>An addition to the policy could include consideration for flood storage capacities and impedance of flood flows when referring to managing increased flood risk. To bring this in line with updated PPG, it could be made clear that stilts and voids would not be acceptable for compensating loss of flood plain storage. An updated SFRA could include a stance on mitigation methods.</p> <p>An updated SFRA would need to consider updated guidance on the functional flood plain (to 3.3% return period) and climate change allowances. Whilst an updated SFRA would result in policy recommendations, it would not necessarily render the existing CS9 policy out-of-date.</p> <p>A water cycle study may also need to be prepared as an additional piece of evidence base for the policy.</p>	<p>Comments noted.</p> <p>The Council will continue to work with the Environment Agency and Surrey County Council, as the lead flooding authority, to ensure that development does not result in increased flooding issues. The Council will seek to prepare an updated SFRA to ensure that this key evidence base is up to date, showing the latest known position on flooding and areas at risk. The Council may also consider preparing a water cycle study.</p>

