

## Woking Borough Council Climate Change SPD

### Consultation Statement

The Climate Change Supplementary Planning Document (SPD) provides detail on how development should implement policies within the Core Strategy, and wider Development Plan, relating to climate change and the need to mitigate and/or adapt to its effects. The SPD was first adopted in 2013, and since then there have been significant changes to building efficiency standards. Therefore, the revised SPD acknowledges these updates and subsequent changes in sustainability standards.

Before a Local Planning Authority can adopt an SPD, Regulation 12 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires it to publish a statement setting out:

- I. The persons the local planning authority consulted when preparing the Supplementary Planning Document;
- II. A summary of the main issues raised by those persons; and
- III. How those issues have been addressed in the Supplementary Planning Document. This statement reflects these requirements.

The Council released the draft SPD for public consultation for a period of six weeks between 18<sup>th</sup> May and 30<sup>th</sup> June 2023. A list of persons consulted can be found in **Appendix (a)**. In addition, the consultation was publicised through notices in the local newspaper and on the Council's website (**see Appendix (c)**). Physical copies of the draft SPD were also made available in Woking, West Byfleet, Byfleet, and Knaphill libraries in addition to the reception of the Civic offices.

Representations have been considered and the main issues are summarised in **Appendix (b)**. This also includes reference to how the issues raised have been considered and addressed.

The following modifications have been made following the consultation and are incorporated in the SPD. Underlined text has been added and/or amended. These modifications enhance the quality of and/or provide updated information to the SPD:

Para 4.2.4 inserted as follows:

*"In terms of best practice, the London Energy Transformation Initiative (LETI) provides guidance for developers on how to design and build zero carbon buildings. See [Climate Emergency Design Guide | LETI for more information.](#)"*

Para 4.2.5 wording 'if possible and practical' has been removed.

Page 29 'Sewage gas' section, additional wording "*grass cuttings, food waste*" added.

Within Box 5.1 the aim: '*Maximising the potential for passive solar gain when designing site layouts*' has been amended to '*Optimising the potential for passive solar gain when designing site layouts*'.

Para 7.2.18, 7.2.19 and 7.2.20 inserted as follows:

*"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. Development must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding. In May 2022 the Environment Agency updated the guidance on flood risk assessment in relation to climate change allowances .*

On sites with historical or archaeological constraints, a historic water management appraisal of an area should be included as part of flood risk assessment and planning submissions.

It is advised that developers reach out to the lead local flood authority (LLFA) for confirmation regarding the suitability of SuDS within their proposed development. Surrey County Council act as LLFA and provide [guidance on SuDS](#). It is advised that developers review this guidance when considering how best to address water management.”

Pages 56 and 57 under ‘Rain Gardens’ additional paragraph inserted as follows:

“In urban environments the planting of street trees also provides a natural solution to mitigate against flood risk. It is advised that the principles of ‘Right tree, right place’ are applied to ensure trees remain suitable and best placed to mitigate against all the effects of climate change.”

Additional sentence inserted onto grey box above para 7.2.25 as follows:

“This should be set out within a statement clarifying how the measures have been achieved.”

Para 7.2.25, 7.2.26 and 7.2.27 inserted as follows:

“The Council will ensure compliance by means of planning conditions specifying that the optional requirement as set out above will apply to the development. Applicants are encouraged to submit the required evidence at the earliest opportunity – preferably at planning application validation stage. If sufficient evidence is not submitted at planning application validation stage, or during the life of a planning application, a pre-commencement planning condition will be used to confirm that the development will be able to achieve the required standard prior to construction starting; and evidence should be in the form of a design stage water efficiency calculator (as per the methodology set out in Appendix A of Approved Document G).

In all cases, a pre-occupation planning condition will be used to conclusively show that the standard has been achieved prior to the occupation of dwellings; and evidence will be in the form of the notice submitted to the local authority under Regulation 37 of the Building Regulations 2010, as amended (see paragraphs 2.13- 2.16 of Approved Document G for guidance).

People who are responsible for building work (e.g., agent, designer, builder or installer) must ensure that the work complies with all applicable requirements of the Building Regulations. Where an optional requirement is made a condition of the planning permission the developer has a statutory obligation to inform the Building Control Body that an optional requirement has been imposed. A local authority may not issue a completion certificate under regulation 17 of the Building Regulations or an approved inspector a final certificate under section 51 of the Building Act unless satisfied that any imposed optional requirement has been complied with.”

Para 7.2.29 has been inserted as follows:

“All the water companies which serve Woking have been identified by the Environment Agency as companies within areas of serious water stress. In addition to following the optional requirement outlined above, the council advises that the ‘Fittings Approach’ is used to determine the water consumption of a development.”

Para 7.2.38, 7.2.39 and 7.2.40 have been amended to reflect recent changes made by government on the mandatory implementation of biodiversity net gain. As per the announcement made by DEFRA on 27<sup>th</sup> September 2023 10% BNG will apply to development from January 2024 and not November 2023. The paragraphs have been amended as follows:

*“The Environment Act gained ascension in November 2021 and has a two-year transition period for its requirements to come into effect. The Department for Environment, Food and Rural Affairs (DEFRA) has confirmed that from January 2024 the Act will require mandatory BNG of 10% on all development sites for which planning permission is granted under the Town and Country Planning Act 1990 (there are a few exemptions). The Council does not have a Local Plan Policy which requires 10% BNG on site. However, it is important to note that the current up to date policies of the development plan highlights the need for biodiversity enhancement as a result of development, which needs to be applied when determining day to day planning applications until the mandatory requirements are introduced (i.e., policy CS7 ‘Biodiversity and nature conservation’).*

*As outlined within policy CS7 and CS8, the Council will pay consideration to important sites and habitats in the Borough. Proposals should acknowledge and mitigate against the direct and indirect impacts of development on these sites.*

*The emerging BNG legislation will enable a greater focus on the integration and extension of GBI to promote biodiversity and implement Natural Based Solutions (NBS). Thus, providing secondary benefits regarding climate mitigation actions in respect of both reducing urban heat island effects and offering additional shading benefits for buildings. All development should consider the long-term management and maintenance of green and blue infrastructure, to ensure continued climate change resilience and benefits across the Borough and wider landscape. This is supported under policy CS7.”*

Additional sentence inserted with link onto para 7.2.42, to provide more detail regarding SCC’s development of the LNRS, as follows:

*“Surrey County Council will lead the development of the LNRS in Surrey. Development in Woking will be asked to align with and help deliver the nature recovery priorities identified in the forthcoming LNRS, which will be produced over the coming 18 months.”*

Para 7.2.43 with footnote link inserted as follows:

*“Biodiversity opportunity areas (BOAs) and urban BOAs also identify priority areas for habitat restoration and enable the increased implementation of NBS , helping to connect green infrastructure across the Borough and create green corridors.”*

Para 7.2.45 with footnote link inserted as follows:

*“Surrey County Council provide additional guidance on best practice and case studies for implementing green and blue infrastructure within development.”*

Page numbers have also been amended/removed as appropriate following consultation.

\*Note that all references made to the draft climate change strategy ‘Net Zero Woking’ have been removed. This is light of the council’s financial situation and commitments made within the strategy which require further review. References have been removed from the following pages: 3, 15, 16, 31, 66.

## **Appendix (a): Persons and organisations consulted during consultation**

### **Community**

Carers Support Woking  
Community Learning Partnership  
Horsell Park Neighbourhood Watch/WAN  
Just Advocacy  
Liaise Women's Centre  
Phoenix Cultural Centre  
Probation Service  
PROWD  
Sheerwater Neighbourhood Watch  
Surrey Access Forum  
Surrey Community Action  
Surrey Lifelong Learning Partnership (SLLP)  
The Barnsbury Project  
The Grove Area LTD  
The Lighthouse  
The Sheerwater And Maybury Partnership  
Westfield Primary School  
Woking Association Of Voluntary Service (WAVS)  
Woking Cycle Users Group  
Woking Youth Arts Centre  
Woking Youth Centre  
Woodlands Community Group  
York Road Project

### **Business, developers, agents and landowners**

AAP Architecture Ltd  
Ace Marcelle Hope Limited  
ADM Architecture  
AMG Planning And Development  
AND Consulting  
Banner Homes (Wessex) Ltd  
Baratt Homes  
Barratt Homes (Southern Counties)  
Barton Willmore  
Basingstoke Canal Authority  
Batcheller Thacker  
BDB Pitmans LLP  
Beaumonde Homes  
Bell Cornwell  
Bewley Homes  
Birchwood Homes  
BNP Parabis Real Estate  
Boyer Planning Limited  
Brimble, Lea And Partners  
British Land Properties  
Carter Planning Ltd  
Castle Wildish Chartered Surveyors  
Charles Austen Pumps Ltd  
Charles Church Developments Ltd

Charles Richards  
Clarence Country Homes Limited  
Clerical Medical Managed Funds Ltd  
Clifford Chance Secretaries Limited  
Convery Developments Ltd  
Cooper Environmental Planning  
Courtley Consultants Ltd  
Crest Strategic Projects  
Croudace  
Danks Badnell  
Development Planning Partnership  
Devine Homes PLC  
DHA Architecture  
DHS Engineering  
DPDS Consulting Group  
Drivers Jones  
Drivers Jones Deloitte  
Fairview New Homes Plc  
Form Architecture And Planning  
Fromson Construction Co Ltd  
Fullerthorne  
George Wimpey West London Ltd  
Goldcrest Homes  
Grant Consultancy  
Gravitas 1061 Limited  
Greenoak Housing Association  
Hammerson UK  
Henry Smith  
Heritage Architecture  
Horsell Businesses' And Traders' Association  
Iconic Design  
John Ebdon Homes  
JSA Architects  
Keith Hiley Associates Ltd  
Kier Homes Ltd  
King Sturge  
Knaphill Traders Association  
Lacey Simmons  
Landmark Information Group Ltd  
Lewandowski Architects  
Linden Homes South-East Limited  
Mantle Panel Ltd  
Martin Gardner  
Martin Grant Homes  
MBH Partnership  
McCarthy And Stone  
McClosky And Bingham  
McLaren Group Limited  
Mercury Planning  
Millgate Homes

Montague Alan Ltd  
Mount Green Housing Association  
N K Accountancy  
Nathaniel Lichfield And Partners  
National Housing Federation  
NULAP (Aviva Investors)  
Octagon Developments Ltd  
Peacocks Centre  
Peter Allan  
Pinecrofe Housing Association  
Planning Issues And Churchill Retirement  
Planware Ltd  
PRP Architects  
Pyrford Homes Ltd  
Quinton Scott Chartered Surveyors And Estate Agents  
Rolfe Judd  
Rosemary Simmons Memorial Housing Association  
Rosetower Ltd  
Runnymede Homes Ltd  
Rutland Group  
Savills  
Shanly Homes  
Sterling Potfolio Management On Behalf Of Leylani Ltd  
Stonham Housing Association  
Surrey Chamber Of Commerce  
Terence O'Rourke  
Tetlow King Planning  
Thames Valley Housing Association  
The Landmark Trust  
The Lightbox  
Thomas Eggar LLP  
Welmede Housing Association  
Woking And District Trades Council  
Woking Chamber  
Woking Shopmobility  
Wolsey Place Shopping Centre  
Woolf Bond Planning  
WYG Management Services  
**Health**  
Adult Social Care NW Surrey  
Health And Safety Executive  
NHS  
NHS England  
NHS England (South)  
NHS Guildford And Waverley Clinical Commissioning Group  
NHS North West Surrey Commissioning Group

NHS Surrey Heath Clinical Commissioning Group  
North West Surrey CCG  
South East Coast Strategic Health Authority  
Surrey Health And Wellbeing Board  
Virgin Care Limited  
**Infrastructure, Telecoms & Transport**  
Abellio Surrey  
Affinity Water  
AMEC Foster Wheeler  
Arriva  
Arriva Southern Counties  
Avison Young  
Carlone Buses  
Civil Aviation Authority  
Civil Aviation Authority (Safety Regulation Group)  
CNS Systems - Navigation, Spectrum And Surveillance  
Department For Transport  
EE  
Entec UK Ltd  
Fairoaks Airport Ltd  
Freight Transport Association  
Guildford Police Station  
Highways England  
HM Prison Service  
Mobile Operators Association  
Mobile Operators Association  
National Grid  
National Grid  
National Grid Control Centre  
Network Rail  
NOMS/ HM Prison Service  
Office Of Rail Regulations  
Reptons Coaches  
Scotia Gas Networks  
Scottish And Southern Energy  
SGN  
Southern Gas Networks  
Southwest Trains  
St John The Baptist School  
Stagecoach South  
Surrey And Hampshire Canal Society  
Surrey Police  
Surrey Police- Estates Department  
Thames Water Planning/Property  
Thamesway Sustainable Communities Ltd  
The Coal Authority  
Three  
Veolia Water Central

Walden Telecom Ltd  
Woking Community Transport Ltd  
Wood E&I Solutions UK Ltd  
Wood Plc  
**Interest groups**  
Age Concern  
Age Concern Woking  
Ancient Monuments Society  
Campaign To Protect Rural England  
Council For British Archaeology  
CPRE Surrey  
Deafplus  
DEFRA  
Environment Agency  
Forestry Commission  
Friends Of The Earth  
Friends Of The Elderly  
Gay Surrey  
Georgian Group  
Horsell Common Preservation Society  
Irish Community Association  
Irish Travellers Movement In Britain  
Maybury Sheerwater Partnership Garden  
Project  
National Trust  
NFU Office  
Surrey And Farming Wildlife Advisory Group  
Surrey Archaeological Society  
Surrey Campaign to Protect Rural England  
Surrey Coalition Of Disabled People  
Surrey County Council  
Surrey Disabled People's Partnership  
Surrey Heathland Project  
Surrey Minority Ethnic Forum  
Surrey Nature Partnership  
Surrey Travellers Community Relations Forum  
Surrey Wildlife Trust  
Sussex Wildlife Trust  
The Bangladesh Cultural Association  
The Garden History Society  
The Gypsy Council  
The Indian Association Of Surrey  
The Maybury Centre  
The National Trust  
The RSPB  
The Society For The Protection Of Ancient  
Buildings  
The Twentieth Century Society  
The Woodland Trust  
Victorian Society  
Westfield Common Preservation Society

Woking Mind  
Woking Pakistan Muslim Welfare Association  
Woodland Trust  
**Leisure**  
Ambassadors Theatre Group  
Arts Council For Woking  
Link Leisure  
Open Spaces Society  
Sport England  
Sport England South  
Surrey County Playing Field Association  
The Lawn Tennis Association  
The Ramblers  
The Rotary Club Of Woking  
The Theatres Trust  
Tourism South East  
Tourism South East  
West Byfleet Golf Club  
Woking Community Play Association  
Woking Ramblers  
Woking Sports Council  
**Local Planning Authorities**  
Bracknell Forest Council  
Elmbridge Borough Council  
Epsom And Ewell Borough Council  
Guildford Borough Council  
Hart District Council  
Mole Valley District Council  
Reigate And Barnstead Borough Council  
Royal Borough Of Windsor And Maidenhead  
Runnymede Borough Council  
Rushmoor Borough Council  
Spelthorne Borough Council  
Surrey County Council  
Surrey Heath Borough Council  
Tandridge District Council  
Waverley Borough Council  
Wokingham Borough Council  
**Other**  
Campaign For Real Ale  
Coal Pension Properties  
Department For Education  
Education Funding Agency  
Homes And Communities Agency  
National Farmers Union SE Region  
National Landlords Association  
NATS Ltd  
Network Rail  
Outline  
Scottish Gas Networks  
Surrey Playing Fields

Surrey Police  
The Planning Inspectorate  
Woking Borough Council  
Woking Chamber Of Commerce  
Woking FC

**Parish Councils**

Bisley Parish Council  
Chobham Parish Council  
Ockham Parish Council  
Pirbright Parish Council  
Ripley Parish Council  
Send Parish Council  
West End Parish Council  
Wisley Parish Council  
Worplesdon Parish Council

**Political / Religious groups**

All Saint's Church  
Church Comissioners  
Congregation Of St Mary's Church Byfleet  
First Church Of Christ Scientist  
Jehovah's Witnesses  
Masjid Albirr  
New Life Church  
Religious Society Of Friends  
Shah Jahan Mosque  
St Edward Brotherhood  
St Mary's Church Office  
The Rt Hon Jonathan Lord MP  
The Church Of England Guildford Diocesan  
Board Of Finance  
Woking Conservatives  
Woking Constituency Labour Party  
Woking Liberal Democrats

**Residents Associations**

Anthony's Residents Association  
Brambledown Residents Association  
Brookwood Village Association  
Byfleet Village Association  
Friars Rise Residents Association  
Horsell Residents Association  
Horsell Residents Association  
Maybury Community Association  
Pyrford Green Belt Action Group  
Sheets Heath Residents Association  
St Johns Village Society  
Sutton Green Village Hall And Association  
Wych Hill Way Residents Association

**Young people and Education**

Barnsbury Infant School  
Beaufort Community Primary School  
Broadmere Community Primary School

Brookwood Primary School  
Byfleet Primary School  
Goldsworth Primary School  
Kingfield School  
Knaphill Lower School  
Maybury Infant School  
New Monument School  
Pyrford C Of E (Aided) School  
St Dunstan's Roman Catholic Primary School  
St Hugh Of Lincoln Catholic Primary School  
St John The Baptist R.C Secondary School  
St John's Primary School  
St Mary's C Of E Priamary School  
The Bishop David Brown School  
The Hermitage School  
The Horsell Village School  
The Marist Catholic Primary School  
The Oaktree School  
The Park School  
The Winston Churchill School  
West Byfleet Infant School  
Westfield Primary School  
Wishmore Cross School  
Woking College  
Woking High School  
Woking Scouts  
Woking Youth Council

**Consultation Statement Appendix (b). Summary of the main issues raised in consultation, and how they have been considered and addressed.**

Name of respondent	Summary of comments	Officer response
WEAct	Recognise that the revision is necessary.	It is important that supplementary documents, which aid decision-making, are revised and reflect updates in planning policy/legislation.
WEAct	Every attempt should be made to ensure publication of the new SPD.	It is anticipated that the SPD will be adopted late 2023.
WEAct	Consider that ‘commercial developers’ may view the Council’s financial situation ‘may make the organisation appear less able to challenge and decline development that would not be accepted elsewhere and that would not feature the climate sustainability and resilience that we would wish for’.	The council will remain committed to ensuring that development remains consistent with planning policies set out within the local plan and national planning guidance.
WEAct	Notes that the SPD reads as ‘detail dense’ and could be improved. Would also like to see improvements made to the draft SPD between January 2023 and the formally released consultation draft in June 2023.	Changes made to the SPD between January 2023 and June 2023 were made in response to initial feedback from WBC officers and working groups and was considered internally before consultation. This feedback was implemented on an ongoing basis. Please refer to the most recent draft published for consultation, available here: <a href="#">Draft Climate Change SPD (2023) - Woking 2027</a>
WEAct	Raises concern regarding the longevity of the SPD given the breadth of change anticipated in the next few years i.e., ‘national development legislation and carbon reduction.	Local planning policy must respond to changes in national legislation and guidance. When appropriate, officers will review whether the SPD is still in conformity with national planning guidance.
WEAct	Notes due to emerging requirements for developers stemming from Environment Act 2021 and Future Homes Standard, the impact of the SPD may be short lived. Given the severity of the climate emergency it is suggested the SPD is updated every three to five years.	The local plan is set to expire in 2027. This will serve as an opportunity to consider current the weight of current planning policy relating to climate change.
WEAct	Notes that the SPD ‘is trying to facilitate and achieve significant environmental transformation’, which is what WBC as a high ambition council in climate response should be attempting to do.	The council remains committed to ensuring development within the Borough can meet the challenge of climate change.
WEAct	Some dates and wording is dated several years ago may imply to readers that the Borough is not in line with current legislation. For example in reference to CS22 having wording that includes ‘ ... from now until 31st March 2013... ’. Section 1.3 comments regarding ‘sustainability appraisals’ refers to judgements made in 2012	Policy CS22 was implemented within the Woking Core Strategy, adopted in 2012. SPDs act as supplementary guidance to aid the delivery of policies within the Core Strategy. A review of the Core Strategy was presented to



	and is considered out of date. Wording about Climate change strategy in section 2.4 is also considered out of date.	Executive on 5 <sup>th</sup> October and recommendations approved. Please see link for full report: <a href="#">Issue details - 2023 Review of the Woking Core Strategy</a>
WEAct	<p>Reviewing weekly planning notices demonstrates that a significant proportion of planning applications are for private home extensions, and there is a risk applicants may believe the SPD is mostly targeted at new builds and large scale developers.</p> <p>‘We could not see guidance that if a homeowner is extending then the existing property should have modern levels of insulation, renewable energy use and climate emergency features.’</p>	<p>Please note that the SPD can only influence proposals within the remit of the planning system, and of which constitutes ‘development’. The definition of what is classed as development is set out within Section 55 of the Town and County Planning Act 1990 (as amended). See here: <a href="https://www.legislation.gov.uk/ukpga/1990/8/section/55">https://www.legislation.gov.uk/ukpga/1990/8/section/55</a></p> <p>The SPD sets out guidance that all development is expected to follow and outlines that a key objective of the SPD is to ensure development is ‘Designed to be future-proofed in response to socio-environmental shifts associated with climate change.’</p>
WEAct	<i>Section 2.3 Borough Context – page 9 Design SPD. The wording suggests that a Design SPD is under development, however the Council adopted a Design SPD in February 2015.</i>	Comments are noted – please refer to the draft SPD published for consultation.
WEAct	<i>Page 11 Section 3.1. Standards for New Residential Development. Possibly this first paragraph should have a reference, or alternatively an ‘on line’ link ?</i>	This is in reference to an earlier draft of the SPD – please refer to the draft SPD published for consultation.
WEAct	<i>Page 15 Table at top of page – minimum targets for new residential development in woking. Could the historic detail, top level of the box referring to 1st April 2013 to 31st March 2015 be removed?</i>	Please refer to the draft SPD published for consultation.
WEAct	Page 15- suggests changing wording ‘where justified and viable, the Council will negotiate with developers to achieve...’ as suggests there is an option to negotiate. Current wording ‘will increase WBC Planning Department workload’.	Policy CS22 of the core strategy provides flexibility in meeting requirements so as not to impede on the viability of development in Woking “Where it can be demonstrated that the standards set out in this policy cannot be met on site, permission will only be granted if the applicant makes provision for compensatory energy and CO <sup>2</sup> and water savings elsewhere in the Borough equivalent to the carbon savings which would have been made by applying this policy”. There is opportunity to reconsider the weight of this policy as the council works towards producing a new local plan.

WEAct	Page 24- <i>'would be interested to know if the words 'if possible and practical' can be removed and whether the process in how a planning committee and delegated Council officers would like to see this planned sustainability being illustrated, evidenced to be part of the submitted development plan'.</i>	Wording 'if possible and practical' has been removed from page 24.
WEAct	Page 26- <i>Referring to the Climate neutral development checklist, is it necessary to have the checklist available through a website <a href="http://www.sustainabilityplanner.co.uk">www.sustainabilityplanner.co.uk</a> that is not Council controlled. This is also shown in relation to Energy solutions Item 2 on page 54.</i>	All planning policy and guidance relating to Woking Borough is made available at: <a href="https://www.woking2027.info/">https://www.woking2027.info/</a>
WEAct	Page 27- <i>'If applicable (likely to be from 2016)...' Surely this can be more defined now?</i>	Please refer to the draft SPD published for consultation.
WEAct	Page 32- <i>Section 4.1 Second paragraph under text box – referring to 'Feed in tariffs (FITs) are currently available...' Our understanding is that all Fits and Renewable heat incentives for new developments have been withdrawn by central government.</i>	Please refer to the draft SPD published for consultation.
WEAct	Page 41- states 'Large scale ground mounted solar PV farms can have a negative impact on rural environment' This is a judgemental statement that possibly is incorrect to make. A better sentence may be 'If planned sensitively, the visual impact of a ground mounted solar array can be acceptable in the landscape'.	Please refer to the draft SPD published for consultation.
WEAct	Page 43- Section 4.2 reference to Surrey Waste Plan 2008 should be updated. <i>Is it appropriate in a SPD to refer to a particular site, the waste treatment centre in Martyrs Lane. The negative comment on Sewage gas – suitability for Woking is possibly unnecessary? Would it be possible to refer to biomethane production from Grass cuttings, there are now examples of Gas production from grass (Ecotricity 2021) and this is described as carbon neutral over a very short timeframe, just six months from absorption to release.</i>	Reference to biogas is referred to on page 29. Additional reference to 'grass cutting and food waste' has been added.
WEAct	In ref to Section 4.2, evidence is clear now that even modern wood burners contribute to local air pollution, and that they still make avoidable carbon emissions, which is particularly inappropriate for urban areas. Greater London managed to exclude woodburners from all new developments. Additionally, through the 'Feb 2023 Air Quality Neutral Guidance' all new development must not contribute to net air pollution. Woking should consider following this example.	There is opportunity to consider restricting the usage of wood burners through planning policy as the council works towards producing a new local plan. Please note SPDs can only provide guidance to support the implementation of policy adopted within the core strategy.

WEAct	<p>Page 54- <i>Section 4.4 item 3 Energy experts and delivery partners. Possibly this paragraph needs to stop after the first sentence ‘developers may choose to partner with an energy service company...’</i></p> <p><i>Promotion of an individual company Thameswey, currently a Woking Borough Council subsidiary appears inappropriate.</i></p>	<p>Thameswey was founded by Woking Borough Council to deliver on the council’s strategic objectives as set out within the Woking 2050 strategy, reflecting efforts to meet the UK net-zero target by 2050. The energy centre on Poole Road currently operates the district heat network across the Town Centre and supports the Borough’s transition to low carbon energy generation.</p>
WEAct	<p>Page 55 – <i>Section 4.5 Zero Carbon Homes. This details an out of date target 2016 in the first paragraph, removal of the date and a more general statement that Zero carbon homes will help developers, occupiers and prospective tenants in the long term could be workable? Second paragraph again seems out of date and stating an obvious comment ‘The SPD will be updated...’ that should be stated elsewhere in the SPD.</i></p>	<p>Please refer to the draft SPD published for consultation.</p>
WEAct	<p>Page 61- Waste and Recycling case example from Sweden considered interesting but a ‘significant commercial undertaking’ ‘only relevant to a few major developments’</p>	<p>Please refer to the draft SPD published for consultation.</p>
WEAct	<p>Page 67- EV section. Considers paragraph beginning ‘Management and maintenance’ unnecessary and ‘possibly could be replaced with a comment that EV charging points connected by telemetry, remote monitoring and customer identification systems are expected in new developments. There have been significant reliability problems with EV charging points and remote monitoring could address this.’</p>	<p>Comments are noted and will be considered further when appropriate.</p>
WEAct	<p>Page 72- there is little reference to the Environment Act 2021 and new developer responsibilities namely 10% BNG requirement. These requirements have potential to address several issues i.e., ‘urban heat islands, reduction in local air pollution affecting insect life and micro biodiversity, and habitat loss. Particularly better design will add to community and biodiversity resilience. Better waste water management could add to water flows into water courses that are running low, such as Basingstoke canal.’</p>	<p>Please refer to chapter 7 ‘Climate Change Resilience and Adaptation’ where information is provided within ‘Green and Blue Infrastructure’ page 64.</p>
WEAct	<p>[Notes on the Sustainable Construction Checklist] consider the checklist a key tool for ensuring best practice.</p>	<p>Comments are noted and will be considered further when appropriate.</p>

	<p>Has noted the following WBC advice documents could benefit from ‘some research, analysis of customer / developer responses on these forms to ascertain outcomes and potential ways that they could be improved’ and whether there is potential for these documents to be redesigned to better highlight sustainability options and assist the planning department and planning committee.</p> <p>In sec 4 Q2,3,5,6 and 7 the word ‘considered’ should be removed.</p> <p>Would like wording in Section 1 Q3 to change from “does the proposal provide appropriate levels and standards of Electric Vehicle Parking?” to “Does the scheme provide better than statutorily required electrical vehicle parking, a mix of fast and slow charging options?”</p> <p>Notes that when this paperwork is submitted alongside a planning application, a comment on forms should state ‘all proposed development should comply with the Woking B.C. vision for a low carbon future and development with sustainability and biodiversity enhancements’</p>	<p>The term “considered” allows DM officers to query proposals with developers and review evidence which indicates that the developer has laid out all options appropriately.</p> <p>Comments are noted and will be considered further as the council moves towards producing a new local plan.</p>
Pyrford Neighbourhood Forum	<p>Concern the SPD only applies to new development, which mean it will exclude replacement dwellings (i.e., demolition &amp; rebuild), extensions, permitted development rights (like an additional storey).</p>	<p>Please note that the SPD can only influence proposals within the remit of the planning system, and of which constitutes ‘development’. The definition of what is classed as development is set out within Section 55 of the Town and County Planning Act 1990 (as amended). See here: <a href="https://www.legislation.gov.uk/ukpga/1990/8/section/55">https://www.legislation.gov.uk/ukpga/1990/8/section/55</a></p>
Pyrford Neighbourhood Forum	<p>Notes that the current number of dwellings in Woking is around 43,000, and the Core Plan only requires 292 additional dwellings per annum- therefore this policy will effect less than 1% of dwellings a year. Would take 150 years to impact all dwellings in Woking if no additional sites were used.</p>	<p>The SPD can only influence the quality of building work within the planning system. Please note some forms of building improvement, such as refurbishment and retrofitting, may not require planning permission. The council should be consulted where applicants are unsure if planning permission is needed.</p>
Pyrford Neighbourhood Forum	<p>I think this SPD should apply to all planning applications.</p>	<p>As a supplementary planning document, the guidance detailed will aid decision-makers on all planning applications and ensure development remains in compliance with the core strategy.</p>

Thames Water	Most of the renewable electricity Thames Water self-generate comes from the treatment of sewage sludge via anaerobic digestion, but to help meet the carbon zero target the use of more solar power is proposed on Thames Water's operational sites and this should be supported in the SPD.	Comments are noted, the SPD makes reference to advocating for solar power.
Thames Water	In terms of EV, a key requirement should be flexibility over charging points.	Comments are noted.
Thames Water	Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.	Has been noted. In response this detail has been amended, please see page 60.
Thames Water	Water efficiency requirement of 110 litres per day is only applicable if enforced via a planning condition, as per Reg 36 of Approved Document G e.g. <a href="#">here</a> page 15. As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.	Has been noted. In response this detail has been amended, please see page 60.
Thames Water	Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.	Has been noted. In response this detail has been amended, please see page 60.
Thames Water	We have introduced environmental incentives for developers for implementing water efficiency measures in the form of discounts to connection charges. Further details available at: <a href="https://www.thameswater.co.uk/about-us/newsroom/latest-news/2022/feb/rewards-for-developers-who-achieve-water-neutrality">https://www.thameswater.co.uk/about-us/newsroom/latest-news/2022/feb/rewards-for-developers-who-achieve-water-neutrality</a>	Comments are noted.
Thames Water	Consider that text in line with the following should be included in the SPD: <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</i>	Amendments have been made, please see page 60.

	<i>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>	
Thames Water	In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".	Comments are noted. Please see policy CS9 of the core strategy.
Thames Water	When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas.... Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.	Comments are noted. Please see policy CS9 of the core strategy.
Thames Water	Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off-site sewerage infrastructure and capacity is not in place ahead of development.	Comments are noted. Please see policy CS9 of the core strategy.
Thames Water	With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.	Amendments have been made, please see page 56.
Thames Water	With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: <b><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></b>	Amendments have been made, please see page 56.
Thames Water	Additional information that should be included with planning applications: <ul style="list-style-type: none"> <li>• Lead local flood authority (LLFA) confirmation about the suitability of SuDS</li> <li>• Statement setting out how the water usage of 110 l/p/d is achieved</li> </ul>	Amendments have been made, please see pages 56 and 60.
Waverley Borough Council	Waverley Borough Council has declared a Climate Emergency and supports measures taken to tackle climate change and achieve net zero objectives in consultation with local communities.	Comments are noted.

Ellen Pirie	Is a good document and takes us in the right direction for policies which address climate and environmental issues.	Comments are noted.
Ellen Pirie	Would like to see stronger mention and commitment to adopt Passivhaus standards for new development. Believes Woking should aim for this. Suggests <b><i>“a timetable saying that by 2030 you would expect all relevant developments to meet this standard.”</i></b>	BREEAM standards are outlined within Policy CS22. SPDs do not have remit to introduce new policy with new requirements. However, given the impending need to review the local plan there is scope to advocate for passivhaus standards if considered appropriate.
Ellen Pirie	In ref to sec 3.3.2, sees room to enable developers to ‘wriggle out’ of meeting standards if they submit a technical or financial argument. Suggests they should also be asked “to be explicit about the expected impact to future residents, occupants of their buildings or to the environment and impact on achieving net zero.” i.e., higher energy costs due to poorer insulation, higher thermal shock, higher carbon emissions. If these aspects are considered significant then planning permission should not be granted.	SPDs do not have remit to introduce new planning policy. As stipulated within policy CS22 the guidance is intended to provide flexibility to developers i.e., enable offsetting policy requirements to support development in Woking.  The impact of development on future occupants will be a consideration for decision-makers at planning application stage. Policy CS21 ‘Design’ of the Core Strategy sets out that development ‘Ensure the building is adaptable to allow scope for changes to be made to meet the needs of the occupier (lifetime homes and modern business needs).’
Ellen Pirie	Suggests implementing planning policy to require new car parking areas, particularly for commercial developments, should be covered with roofing that allows solar panels.	SPDs do not have remit to introduce new policies.
Ellen Pirie	Notes there is no mention of need to provide play areas for children within new development.	This will be considered further and has potential to be addressed through potential design codes in Woking.
Ellen Pirie	Notes there may be future pandemics which will require social distancing/lockdowns and queries how this will affect planning policy. For example, maintenance of outdoor greenspaces to aid wellbeing. Was difficult for those in flats with limited access to outdoor space to get regular exercise during COVID.	Please note that the core strategy sets out policies which ensure green space is both provided and managed within proposals for development. Most notably policies CS7 ‘Biodiversity and nature conservation’, CS16 ‘Infrastructure delivery’ and CS17 ‘Open space, green infrastructure, sport and recreation’. The strategy is available here: <a href="https://www.woking2027.info/developmentplan/corestrategy">https://www.woking2027.info/developmentplan/corestrategy</a>

Ellen Pirie	Given aging population and longer lifespans, how will this be supported in new buildings so that expensive adaptations are not required at a later stage i.e., will all homes accommodate wheelchairs and will homes be able to be fitted with technology to support older people in their own homes?	Policy CS21 'Design' of the Core Strategy sets out that development 'Ensure the building is adaptable to allow scope for changes to be made to meet the needs of the occupier (lifetime homes and modern business needs).'
Ellen Pirie	Suggests SPD should mention banning wood-burning stoves in the document as they contribute towards global warming and bad air quality.	There is opportunity to consider restricting the usage of wood burners through planning policy as the council works towards producing a new local plan.
Ellen Pirie	Sec 1 Q3 of the checklist for resi development, should say does the number of EV charging points meet the new building regs requirements – "appropriate" is too subjective. Should also apply to non-residential developments.	Please note SPDs provide guidance to build upon policies within the core strategy, and, act as a material consideration for decision makers when considering the appropriateness of a scheme.
Ellen Pirie	Sec 3 Q6 of the checklist for resi development, suggested better wording to "Has local energy generation from renewables and/or local energy networks been considered as part of the scheme?" - should also apply to non-resi development.	Comments are noted.
Ellen Pirie	Sec 3 of the checklist for resi development should include "Has the building been designed to ensure that it will protect the inhabitants from overheating as temperatures rise due to climate change in the coming years?" - should also be included with non-resi checklist	This is addressed within section 2 'Layout & Design' of the checklist.
Ellen Pirie	Notes that many checklist questions use the word "considered" and does not give a strong enough indication to developers to implement them.	Please note SPDs provide guidance to build upon policies within the core strategy, and act as a material consideration for decision makers when considering the appropriateness of a proposal. The core strategy sets out the policy requirements that proposals must reflect to be considered appropriate for development.
Ellen Pirie	Developers should be required to confirm that they have met the requirements of biodiversity net gain under the Environment Act 2021. Should evidence details of this plan and show how BNG will be achieved ideally within Woking.	The Environment Act 2021 will make the submission of a biodiversity gain plan mandatory from January 2024. This will set out how the development will achieve 10% BNG. Currently the council is drafting guidance to aid developers and officers with facilitating BNG in Woking.
Historic England	Has no specific comments. SPD largely beyond remit.	Comments are noted.
The Coal Authority	Has no specific comments. Woking Borough Council lies outside the defined coalfield.	Comments are noted.



Thameswey (Strategy comments)	Pleased that the importance of this community asset (i.e., Woking's Decentralised Energy Network) is recognised in both 'Woking Net Zero' and the Draft Climate Change Supplementary Planning Document.	Comments are noted.
Thameswey	ThamesWey supports adoption of the proposed Climate Change Supplementary Planning Document.	Comments are noted.
Sue Clements	Notes document is Woking-centric (i.e., town centre focused). Would like to see more charging points in Byfleet to service the large number of dwellings that do not have their own driveways. Parking is scarce in the village and petrol cars park in the designated EV spaces.	The SPD will apply to development across the Borough of Woking, not just the Town Centre. Note that the need for additional electric vehicle infrastructure is considered during the planning process in alignment with the requirements of policy within the core strategy. Please refer to the Parking Standards SPD <a href="#">Parking Standards Supplementary Planning Document - Woking 2027</a> for more guidance on the implementation of policy CS18 'Transport and accessibility'.
Sue Clements	Notes that standards will only apply to new development, and majority of the population live in 'aging' existing buildings which are not designed to cope with changing climates. Would be good if financial help was available on a sliding scale depending on means, and also a list of registered approved installers.	Please note that the SPD can only influence proposals within the remit of the planning system, and of which constitutes 'development'. The definition of what is classed as development is set out within Section 55 of the Town and County Planning Act 1990 (as amended). See here: <a href="https://www.legislation.gov.uk/ukpga/1990/8/section/55">https://www.legislation.gov.uk/ukpga/1990/8/section/55</a>  Action Surrey provide advice to residents across the county on funding and methods to make your house greener, alongside details of their installer network. Please see the Action Surrey website here: <a href="https://www.actionsurrey.org/">https://www.actionsurrey.org/</a>
Byfleet, West Byfleet and Pyrford Residents Association	Regarding the checklist in Appendix C- suggests adding an 'Explanatory Comments' column for developers to note the actions they intend to take.	Comments are noted and will be considered further.
Byfleet, West Byfleet and Pyrford Residents Association	Suggests a scaled Sustainable Construction Checklist be included to highlight the opportunity for climate mitigating technologies as part of planning approval for domestic house extensions and/or refurbishments.	Comments are noted and will be considered further.
Byfleet, West Byfleet and Pyrford Residents Association	In regard to increased pressure on sewage systems, should there be a requirement to carry out an assessment on any possible impact of any new development on the likelihood of overloading the sewage system. Recognises advocating for SuDS, but	Please note policy CS9 'Flooding and water management' currently outlines the requirement for development to prevent surface water run off (e.g., through minimising paved

	stresses that new development causes strain on local sewage infrastructure, and this should be considered at planning stage to prevent future sewage overloading.	areas, keeping drains clear, general maintenance). On-site solutions such as infiltration devices, filter strips should then be sought and only if these will not satisfactorily deal with the run-off should off-site solutions be considered (such as discharge into water courses). A Flood Risk Assessment will be required for development proposals within or adjacent to areas at risk of surface water flooding as identified in the strategic flood risk assessment (SFRA). Please note that following the review of the core strategy, the council will be looking to update the current SFRA.
Mary Tobin	SPD should be more consumable.	Comments are noted and will be considered further.
Mary Tobin	Enforceability needs to be clarified.	All proposals for development must pass through the planning system. Supplementary planning documents (SPDs) aid decision making and support the implementation of policies within the Core Strategy.
Mary Tobin	How far have other councils gone?	The SPD sets out how development should implement policies within the core strategy relating to climate change. Like most other councils Woking remains committed to tackling climate change within the borough, as demonstrated by the climate emergency declaration <a href="#">How we're tackling climate change   Woking Borough Council</a> . All councils will differ in how they face the challenges of climate change and so the council can only comment in relation to progress within Woking.
Surrey County Council	Notes that a smaller document might make it more accessible to domestic builders and householders. Suggests a short summary SPD setting out policies and aims. Then the detailed information being contained within a technical appendix. Alternatively, a checklist could be included that sets out adopted SPD requirements for applicants.	Comments are noted. Please note the SPD provides a summary of requirements (page 4 – 7) and the Appendix C (page 84 – 92) sets out a residential and non-residential checklist for applicants to complete and/or use towards a sustainable statement setting out how the proposed is in conformity with the core strategy.
Surrey County Council	Suggests an additional objective is added on climate change adaptation e.g., Objective 3: a resilient and climate adapted Borough by 2050.	Comments are noted and will be reviewed in the future.

Surrey County Council	Exec Summary: Notes that climate change resilience and adaptation are standalone sections/chapters. Suggests that adaptation is weaved throughout the entire document and is integrated into each of the sector responses.	Comments are noted and will be considered further.
Surrey County Council	Chp 3: Suggests that table 3.1 also sets out the highest category for operational carbon emissions.	Comments are noted and will be considered further.
	Chp 4: Recommends referencing the <a href="#">Climate Emergency Design Guide   LETI</a> .	Amendments have been made, see page 23.
Surrey County Council	Chp 4: In terms of buildings that don't meet required standards, recommends that document references offsets as outlined within CS22.	Details on complying with standards are set out on page 19.
Surrey County Council	Chp 4: ref to hydroelectricity – has micro-hydropower been considered as an option, as is widely considered a feasible approach for smaller rivers or water pipelines.	Comments are noted and will be reviewed in the future.
Surrey County Council	Chp 5: Notes that environmental briefing targets were exceeded dramatically at Hale End Court (box 5.5.) can any data be included on how the building performed in relation to heatwaves such as the heat impacts experienced in Summer of 2022.	Comments are noted. Unfortunately, this information is not immediately available to the council.
Surrey County Council	Chp 6: Paragraph 6.1.6 should refer to SCC's <a href="#">Healthy Streets for Surrey (surreycc.gov.uk)</a> Design Code. Rather than London study.	Amendments have been made, see page 47.
Surrey County Council	Chp 7: notes box 7.1 outlines residential development to design for a minimum water efficiency of 110 litres/person/day. 105 litres/person/day would align with higher standard evidenced within the London Plan.	Amendments have been made, see page 60.
Surrey County Council	Chp 7: In ref to 'Resilience to Flood Risk' (pg55) suggests a ref to SCC design guidance <a href="#">Sustainable Drainage System Design Guidance - Surrey County Council (surreycc.gov.uk)</a>	Amendments have been made, see page 56.
Surrey County Council	Chp 7: para 7.2.18 should include link to the climate change guidance updated in May 2022 <a href="#">Climate change allowances for peak rainfall in England (data.gov.uk)</a>	Amendments have been made, see page 56.
Surrey County Council	Chp 7: In para 7.2.18 a historic water management appraisal of an area should be included as part of flood risk assessments and planning submissions i.e., to examine historic water management on a site, paleochannels and environmental evidence, to ascertain if there is historic water management or landscape factors on or nearby the site that is likely to be affected by a proposal.	Amendments have been made, see page 56.
Surrey County Council	Chp 7: In addition to mention of green and blue infrastructure in para 7.2.30 and 7.2.26, additional ref to SCC's guidance <a href="#">Green and blue infrastructure: best practice and case studies - Surrey County Council (surreycc.gov.uk)</a> .	Amendments have been made, see page 65.

Surrey County Council	Chp 7: ref to LNRS in para 7.2.33 should extend to reference LNRS in Surrey and that development in Woking should take account of and look to align with and help deliver the nature recovery priorities identified in the forthcoming LNRS, which will be produced over the coming 18 months.	Amendments have been made, see page 64.
Surrey County Council	Chp 7: notes in ref to box 7.8 further specific reference could be made to the role of trees in encouraging more biodiversity into our urban areas, offsetting carbon emissions and providing a natural drainage feature. Additional reference to <a href="#">the urban greening section</a> of the SCC Green and Blue Infrastructure Guide for details of the types of trees which should be encouraged.	Box 7.8 sets out requirements relating to policy CS7 and CS17. Reference to the Green and Blue Infrastructure Guide from SCC is made on page 65.
Surrey County Council	Chp 7: additional ref should be made to the need for sustainable transport infrastructure i.e., footpaths, cycle route, public transport nodes, cycle parking, and EV charging infrastructure, and, for all other buildings and developments to be designed/implemented so that users are able to manage different climate impacts, like heatwaves. Infrastructure needs to be resilient to climate impacts and risks-risk assessments need to be prioritised and undertaken.	Please see pages 45 – 49 and policy CS18. However, it is noted that this is a key consideration and will be considered further as the council develops a new local plan.
Surrey County Council	Appendix B- information/evidence from SCC's climate change risk and opportunities assessment can be included. Copy will be available on website soon.	Comments are noted.
Barratt David Wilson Homes	Chp 4: Highlight that the Future Homes Standards referenced in 1.1.7 are likely to have transitional arrangements that will mean that these new requirements are not met immediately.	Comments are noted. The council will review guidance once further details on the FHS are made available.
Barratt David Wilson Homes	Chp 4: Notes that planning policy should not attempt to implement requirements outside of planning i.e., building regulations. Would be useful if council could clarify whether further works might be requested above and beyond building regulations.	The draft SPD is intended to support the implementation of policies within the Core Strategy, particularly CS22 and CS23. As the council looks towards producing a new local plan, further consideration will be given to the weight current policy has, particularly in terms of enabling development to adapt and mitigate against the effects of climate change.
Barratt David Wilson Homes	Chp 4: notes that table 4.2 is not a comprehensive list of innovative renewable/low carbon technologies. Would welcome the inclusion of industry wide methods currently used by developers such as waste-water heat recovery (WWHR) systems. Would like a more precise definition of 'exceptionally high total energy consumption' to provide further clarity on standards anticipated.	Comments are noted and will be reviewed further.

Barratt David Wilson Homes	Chp 4: would suggest that, regarding the aims to create and maintain low carbon heat and the decentralised energy network, the DEN should be suggested as a preference and subject to viability.	Please see policy CS22 and CS23 for requirements of development.
Barratt David Wilson Homes	<p>Chp 5: suggests some amendments to the aims set out in box 5.1...</p> <ul style="list-style-type: none"> <li>• ‘maximising’ passive solar gain will lead to overheating, contradicting with the Council’s point about ‘Design in measures to prevent excess solar gain’ and being in potential contrast with Part O of Building Regulations. Therefore, BDW suggest that the point should instead read as ‘Optimising the potential for passive gain’ rather than ‘Maximising’.</li> <li>• would suggest to the Council that a Site Waste Management Plan should be implemented as a condition on developments rather than as part of Planning Policy.</li> </ul>	<p>Comments are noted. Amendment made on page 37 in reference to solar gain.</p> <p>The SPD does not have authority to introduce nor remove planning policy. However, this can be considered as the council works towards a new local plan.</p>
Barratt David Wilson Homes	Chp 6: notes that grey water recycling is extremely complex and cost-prohibitive, for developers, future purchases and users. Knowledge and understanding around grey water recycling is limited and recommends that the Council aim to achieve a water consumption of 110/l per person, per day in replacement.	Please note the SPD acts as a material consideration. Refer to page 60 for details on water efficiency.
Surrey Wildlife Trust	Notes references to the Environment Act 2021 and mandatory net gains coming into force from November 2023 (April 2024 for minor sites). Recognising that the council has no formal policy within its core strategy relating. SWT supports Surrey Nature Partnership’s recommendation for local planning authorities to adopt a minimum of 20% biodiversity net gain policy, which is considered necessary for Surrey.	<p>The council is currently drafting additional guidance to enable the effective delivery of BNG from November. This will be published on the policy website ‘Woking 2027’ in advance of mandatory BNG implementation. Currently the Core Strategy sets out CS7 which requires development to contribute to the enhancement of existing biodiversity and geodiversity features and explore opportunities to create and manage new ones where it is appropriate.</p> <p>We recognise Surrey Nature Partnership’s recommendation of 20% BNG and given the expiry date of our local plan the council is currently reviewing this policy. However, please note that implementing a 20% BNG policy would require further evidence/viability studies and given the council’s financial position this is not currently considered feasible.</p>


Surrey Wildlife Trust	Consideration should be given to direct/indirect impacts on other protected sites within the Borough, including Ancient Woodland, Habitats of Principal Importance and locally protected Sites of Nature Conservation Importance.	Amendments made on page 64.
Surrey Wildlife Trust	Consider that it would be helpful to acknowledge BOAs (and urban BOAs) within the SPD as their realisation can be a key outcome of Nature Based Solutions, helping connect important GI across the borough. Note in particular that Green Corridors can also incorporate the priority habitat/Habitat of Principal Importance Hedgerows, which provide a number of benefits in their own right, which assist in climate change resilience.	Amendments made on page 65.
Surrey Wildlife Trust	In ref to NBS, the planting of street trees can also be a useful natural solution, providing it follows the principles of 'right tree, right place'. These can also help reduce flood risk.	Amendments made on page 57.
Surrey Wildlife Trust	The draft document also states that, with regard to flooding, designing development should also take account of the use of impermeable materials. Recommends the 'for example' list is extended to include to the use of artificial lawns as these have been shown to increase the risk of flooding through water runoff, whereas living lawns absorb almost all rainfall.	Amendments made on page 55.
Surrey Wildlife Trust	With regard to the use materials used to reduce heat within buildings, films on glass are recommended within the document to reduce shading. Recommend bird-friendly glass film is referenced as this allows birds to see windows which they might ordinarily not see and therefore fly into.	Amendments made, please see page 53.
Surrey Wildlife Trust	Also important to ensure that all Green/Blue infrastructure features are managed and maintained for the long-term to ensure benefits for nature and ensure continued climate change resilience across the borough and wider landscape.	Amendments made, please see page 64.
Natural England	NE suggest 4 specific actions to include in the SPD:  <ol style="list-style-type: none"> <li>1. Set an ambitious climate-specific targets within the Policy for reducing greenhouse gas emissions that can be monitored over the Plan period, in line with the national commitment to achieving the national statutory target of net zero emissions by 2050;</li> <li>2. Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional</li> </ol>	These points will be considered further as the council works toward producing a new local plan.

	<p>benefits. Planting on peatlands and other open priority habitats must be avoided.</p> <p>3. Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment.</p> <p>4. Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities.</p>	
Natural England	Advise that actions are integrated into a strategic approach alongside green infrastructure, health and wellbeing, biodiversity net gain, natural flood management, air and water quality in order to deliver multifunctional benefits to people and wildlife.	Comments are noted. The council utilises various strategic documents to deliver multifunctional benefits to Woking. Please refer to the review of the core strategy which addresses this and which was approved at Council on the 12 <sup>th</sup> October: <a href="https://www.woking.gov.uk/2023/10/12/agenda-for-council-on-thursday-12th-october-2023-7.00-pm">Agenda for Council on Thursday, 12th October, 2023, 7.00 pm (woking.gov.uk)</a>
Natural England	SPD should ensure sustainable development can be achieved across the plan period. Targets should be set that can be monitored over the period to demonstrate effectiveness of the policy in addressing climate change.	Comments are noted. The Annual Monitoring Report (AMR) sets out outcomes relating to policies within the Core Strategy.
Mike Kerslake	Language in the SPD speaks in terms of “be encouraged to” is inadequate. Mandatory requirements must be introduced to have any chance of hitting climate change targets.	Supplementary planning documents are intended to support the implementation of policies within the Core Strategy and cannot enforce requirements unless supported. In addition, SPDs help decision makers and developers assess the suitability of proposals for development in Woking.
Mike Kerslake	Housing- measures described don’t appear to have quantified estimates of carbon impact. A priority should be alignment to the recommendations of the Parliamentary Environmental Audit Committee.	Comments are noted.
Mike Kerslake	Is data available on occupancy of the existing housing stock? Increasing the occupancy of existing housing would reduce the energy consumption per person and minimise the need for new build, which has a high carbon footprint.	Please note there are several issues which factor into ensuring the existing housing stock can reduce energy consumption, but it is noted that promoting occupancy of existing buildings is a consideration i.e., this feeds into the reasoning for retrofitting/redevelopment, whereby existing buildings are

		made more sustainable, flexible and desirable places to live for future occupants.
Mike Kerlake	Environmental impact assessment of new builds should factor GHG emissions associated with the construction phase, and offset against these GHG emissions within the first 10 years of use.	Comments are noted.
Mike Kerlake	Disappointing that paragraph 5.2.12 of the SPD doesn't mandate the submission of a Whole Life Carbon Assessment.	Comments are noted. There is opportunity to explore this further before the current local plan expires in 2027.
Mike Kerlake	They are concerned that either the WBC is granting permission for garden conversions to parking without considering the negative consequences or that there is little to no enforcement to prevent this. They also state that there needs to be more enforcement against nuisance parking, suggesting it should be made illegal like in London.	Planning permission is usually required to install a dropped kerb i.e., convert front gardens into on-drive parking. It is up to the discretion of the assigned planning officer and Surrey County Council (as local highways authority) to assess the suitability of proposals. See here for more info: <a href="https://www.woking.gov.uk/planning-and-building-control/planning/do-i-need-planning-permission/dropped-kerbs-and-vehicle">https://www.woking.gov.uk/planning-and-building-control/planning/do-i-need-planning-permission/dropped-kerbs-and-vehicle</a>
Mike Kerlake	Emphasis on walking, cycling and public transport is of very high importance.	Comment are noted. The SPD provides supporting guidance and encourages development to implement modes of sustainable transport.
Mike Kerlake	Discouraging car use, particularly for short trips, will have numerous benefits i.e., less GHG emissions, improved air quality, less traffic congestion, improved road safety, more road space for micromobility modes, and will reduce space demands for parking in residential and destination sites.	Comment are noted. The SPD provides supporting guidance and encourages development to implement modes of sustainable transport.
Mike Kerlake	Electric scooters are an attractive local mobility choice but there are legal and safety concerns regarding their use. It is hoped the government will introduce legislation to facilitate wider use- could Woking look into initiating trials where some usage is permitted? Woking already has a reasonable network of pedestrian and cycle paths that are segregated from road traffic. Can these be promoted as suitable for electric scooters? Expansion of the network would encourage greater use.	The feasibility of promoting usage of electric scooters is currently out of the SPD's remit. However, note this topic area can be revisited once the legal and safety implications of electric scooters have been fully addressed by government.



## Appendix (c). Released consultation details (e.g., press releases, website content, letters send to consultees).



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## One planet, two consultations, six weeks to have your say

**Date:** Thursday, 18 May, 2023

Residents and stakeholders are being asked to read and comment on two important climate change documents that will help Woking on its journey to net zero.

Woking Borough Council has published two draft strategies, which together, propose a vision of a sustainable borough with net zero carbon emissions, that supports growth and clean development, whilst boosting resilience to the changing climate.

The council is seeking views on its draft Climate Change Supplementary Planning Document (SPD) and 'Woking Net Zero' Climate Change Strategy, which were first adopted in 2013 and 2015 respectively. These updated drafts reflect changes in government legislation, targets and best practice. They also reaffirm Woking's commitment to tackling climate change, which is a key priority for the council.

Residents and stakeholders have six weeks (from 18 May to 30 June 2023), to read the documents and feed back their views. They can also have their say in person at a number of upcoming roadshow events throughout May and June.

Cllr Peter Graves, Woking Borough Council's Portfolio Holder for Greener Woking, said: "Most of us have heard the phrase "think global, act local", well for people living, working and doing business in the borough, this is your chance.

"We all have a carbon footprint and no one is immune to the effects of climate change so it's vitally important we all make the journey to net zero together.

"The two documents we're seeking views on build on our legacy of local climate action, which began in 2002, more than twenty years ago. Much has been achieved since then and I'm enormously grateful for the continued support of partners such as Woking Environment Action (WEAct), Action Surrey, Surrey Wildlife Trust and Horsell Common Preservation Society.

"But to enable us to do more, and reach our net-zero targets, we need to rally the support of the community. That starts with a shared vision and an agreed set of actions that everyone can get on board with, so please read our draft strategies, have your say and let us know if there's anything else we should or could be doing collectively."


Residents and stakeholders can read the draft strategies and have their say online via the [council's online community forum](#).

To share their views in person, residents and stakeholders can attend any of the following drop-in sessions:

- Moorcroft Centre for the Community (GU22 9LY), 25 May, 9am to 12 noon.
- The Vyne Centre for the Community (GU21 2SP), 5 June, 9.30am to 11.30am.
- Wolsey Place (outside Sainsbury's), 7 June, 11am to 2pm.
- Parkview Centre for the Community (GU21 5NZ), 12 June, 12 noon to 2.30pm.
- St Mary's Centre for the Community (KT14 7LZ), 15 June, 9.30am to 11.30am.

Hard copies of the strategies are available in each of the borough's four libraries and written feedback can be emailed or posted to the addresses provided in the strategy documents.

On Tuesday 13 June, at 7pm, the council is hosting a virtual panel discussion with presentations from a number of guest speakers and an audience Q&A. [Register online](#) @Eventbrite.



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## Consultations to set path towards net zero

**Date:** Monday, 20 March, 2023

Residents and key stakeholders will have the opportunity to contribute towards Woking's vision for a sustainable borough with net zero carbon emissions that supports growth and clean development, whilst boosting resilience to the changing climate.

### Climate change strategy

The current climate change strategy, known as Woking 2050 and adopted in 2015, sets out a vision guiding our collective efforts to create a sustainable borough by reducing our environmental impact.

To ensure that the strategy remains relevant, council officers have carefully reviewed and updated the document to reflect the latest good practice, government policies and targets.

The draft strategy suggests nine key themes each giving guidance on how the local authority, residents, businesses and other organisations can play their part to achieve our shared environmental goals.

### Climate Change Supplementary Planning Document (SPD)

The Climate Change SPD, adopted in 2013, sets out how future development should contribute toward reducing carbon emissions and making efficient use of local resources, such as water and energy. It provides detail on how policies within Woking's Core Strategy apply to day-to-day planning decisions.

Since 2013 there have been significant changes to the planning system, particularly around sustainable construction and renewable and low carbon energy generation.

The revised SPD will bring together these changes, as well as the most recent building practices and promote the use of sustainable technologies, whilst encouraging developers to go beyond minimum national standards.

Speaking ahead of Thursday's (23 March 2023) Executive meeting where these consultations will be recommended to progress, Cllr Peter Graves, Woking Borough Council's Portfolio Holder for Greener Woking, said: "Woking has long been committed to protecting the environment, with our first climate change strategy adopted in 2002.

"We have achieved a lot since then and much has been made possible through working together. To enable us to do more and reach our net-zero targets across the Council's estate and the wider borough, it is critical that both documents are reviewed and consulted upon in parallel.

"By seeking the views of residents and key stakeholders we can provide a clear path that we can all follow and identify the actions we can take to tackle climate change."

### Consultation

Resident and stakeholder feedback will not only help shape and inform the final strategy but will also provide an opportunity for public engagement and further raise awareness of the need for us all to play our part in local climate action.

The two six-week consultations will run together and be hosted on the Woking Community Forum. The consultations will commence following May's local election.

→ [Read the Executive meeting papers](#)

→ [Watch the Executive meeting from 7pm, Thursday 23 March 2023](#)

[View all news items](#)



- ASK A QUESTION
- COMMENT ON IT
- GLOSSARY
- PROPOSALS MAP
- USEFUL LINKS

SUPPLEMENTARY PLANNING DOCUMENTS AND GUIDANCE > CLIMATE CHANGE

Development Plan for Woking

Site Allocations DPD

Supplementary Planning Documents and Guidance

Statement of Community Involvement

Local Development Scheme

Community Infrastructure Levy

Research and Evidence Base

Neighbourhood Planning

Registers

Archived planning policy documents

# Climate Change

## Climate Change Supplementary Planning Document

The Climate Change SPD was adopted by the Council on 5 December 2013, and is a material consideration in the determination of planning applications. It provides detailed guidance for the application of Policies CS22 'Sustainable construction' and CS23 'Renewable and low carbon energy generation' of the Core Strategy. It explains what developers need to do to meet the requirements of policies within the Development Plan for Woking. It is therefore an important document to help deliver the spatial vision and objectives of the Core Strategy, particularly in terms of leading the way in high quality sustainable development that minimises the adverse impacts of climate change.

To view the 2013 Climate Change SPD see [here](#)

### Draft Climate Change SPD

Following significant changes to planning policy since 2013, Woking Borough Council have revised the Climate Change SPD. The revised SPD sets out the updates to national and local targets regarding net zero ambitions and uplifts in building efficiency standards, as enacted by the changes to Building Regulation in June 2022. It is expected that all development complies with national standards and considers achieving beyond them to implement net zero development wherever it is considered viable.

Public consultation on the SPD will occur **between 18th May - 30th June 2023**. You can view the draft Climate Change SPD by:

- Downloading an electronic copy of the document [here](#); or
- Requesting a paper copy of the document (subject to a charge) by emailing: [planning.policy@woking.gov.uk](mailto:planning.policy@woking.gov.uk)

Written responses to the draft SPD will be accepted by email or post:

- Email your response to the Planning Policy team at: [planning.policy@woking.gov.uk](mailto:planning.policy@woking.gov.uk)
- Post your response to 'The Planning Policy Team, Woking Borough Council, Civic Offices, Gloucester Square, Woking, Surrey, GU21 6YL'

Please note that the Climate Neutral Development Checklist has been updated in response to the draft SPD. To view the updated checklist please see [here](#). The checklist is designed to aid applicants in meeting policy requirements and should be submitted alongside a statement which sets out the sustainable design and construction measures to be implemented within the development, including the use of any low/zero carbon technologies. For new residential development, the statement should also set out how the water and energy efficiency standards set out in the revised SPD will be met.

If you have any questions on the draft Climate Change SPD please do not hesitate to contact a member of the Planning Policy Team on 01483 743871, or at [planning.policy@woking.gov.uk](mailto:planning.policy@woking.gov.uk).

This consultation is running in parallel with release of the new Climate Change Strategy. Please see <https://communityforum.woking.gov.uk/hub-page/netzero> for more information on the wider Climate Change consultation and Woking's net zero ambitions.

### THIS SECTION

More in Climate Change

- [Draft Climate Change SPD \(2023\)](#)
- [Draft Climate Neutral Development Checklist](#)
- [Climate Change SPD](#)
- [Consultation Statement](#)
- [Climate Change SPD Adoption Statement](#)
- [Climate Change SPD Strategic Environmental Assessment Screening Statement](#)

Also in Supplementary Planning Documents and Guidance

- [Self-Build and Custom Housebuilding Guidance Note](#)
- [Parking Standards SPD](#)
- [Parking Standards Supplementary Planning Document](#)
- [Affordable Housing Delivery Supplementary Planning Document](#)
- [Design Supplementary Planning Document](#)
- [Hot Food Takeaway SPD](#)
- [Thames Basin Heaths Special Protection Areas Avoidance Strategy](#)
- [Housing Density](#)
- [Plot Subdivision](#)
- [Urban Areas of Special Residential Character](#)
- [Residential Boundary Treatment](#)
- [House Extensions](#)
- [High Density Housing Development](#)
- [Light Pollution](#)
- [Heritage of Woking](#)
- [Mount Hermon Conservation Area](#)
- [Old Woking Conservation Area](#)
- [Ashwood Road Conservation Area](#)
- [Horsell Conservation Area](#)
- [Byfleet Corner Conservation Area](#)
- [Pond Road Conservation](#)

# HAVE YOUR SAY: CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT (SPD) CONSULTATION

May 18, 2023

At Home | Sustainable Transport | The Great Outdoors | Urban



Planning policy has a key role to play in the development of new homes, buildings and how residents of the future will live. First adopted in December 2013, the Climate Change SPD is under review. Incorporating the latest national guidance, the SPD will continue to support and strengthen the Council's climate change agenda covering themes such as low carbon energy and resilience and adaptation issues such as overheating and flood risk.

We'd love to hear your views to help shape and inform the final SPD.

[View the online consultation.](#)



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18 May 2023

Dear Sir or Madam,

Woking Borough Council is publishing a **draft Climate Change Strategy and a draft Climate Change Supplementary Planning Document (SPD)** for public consultation between **18 May and 30 June 2023**.

The Climate Change SPD sets out how future development should contribute toward reducing carbon emissions and making efficient use of local resources, such as water and energy. Detail is provided on how policies within Woking's Core Strategy, particularly CS22 and CS23, apply to day-to-day planning decisions.

Since the Climate Change SPD was first adopted in 2013, there have been significant changes to the planning system, particularly around sustainable construction and renewable/low carbon energy generation. The revised SPD brings together these changes, as well as updates to building practices and use of sustainable technologies, whilst encouraging developers to go beyond minimum national standards.

The new Climate Change Strategy – Woking Net Zero – will replace the Woking 2050 strategy adopted in 2015. To ensure the strategy remains relevant Council officers have carefully reviewed and updated the document to reflect policy changes, new environmental targets and best practice. The draft strategy sets out our climate ambitions across nine key themes including energy, waste, transport and the natural environment. Each theme gives guidance on how the local authority, residents, businesses and stakeholders can play their part to achieve our shared environmental goals.

**We would like to hear your views on the draft Climate Change Strategy and Climate Change SPD.**

**FOR ATTENTION:  
LOCAL PLAN MAILING LIST REVIEW**

We are trying to reduce postage costs wherever possible and encourage digital options for communication.

Bearing this in mind, if there is a reason why you still wish to receive Local Plan information by **post**, please contact us by telephone on **01483 743871** or by letter to the address at the top of this letter, stating your name and contact details.

If you would be happy to receive Local Plan information by **email** instead, please let us know at the details above or by writing to **planning.policy@woking.gov.uk**.

If we do not hear from you by **Friday 30<sup>th</sup> June 2023** we will take this as confirmation that you are happy for your postal address to be **removed** from our mailing list.

Please remember that you can contact us by any of the methods above at any time, to have your details added, corrected or reinstated onto our mailing list.

Before telling us your views it's important that you read and understand all the information available so you can give us your informed response. There are various ways you can find detailed information about the Strategy and SPD and provide your feedback:

Visit [www.communityforum.woking.gov.uk](http://www.communityforum.woking.gov.uk) for 'Active consultations' where you'll find:

- Woking's ambitions to meet net zero
- a copy of the draft Climate Change Strategy
- a copy of the draft SPD
- details on where to submit your comments.

Alternatively, you can access the draft SPD directly via WBC's planning policy website 'Woking 2027' at [www.woking2027.info/supplementary/climatechangespd](http://www.woking2027.info/supplementary/climatechangespd)

Over the course of the six-week consultation there are events happening which will provide members of the public with the opportunity to ask council officers questions about the emerging draft Climate Change Strategy and SPD. For more information please visit: [www.communityforum.woking.gov.uk](http://www.communityforum.woking.gov.uk)

Hard copies of the draft documents are available for inspection at the following venues:

- Woking, Byfleet, West Byfleet and Knaphill libraries. Please visit: [www.surreycc.gov.uk/libraries](http://www.surreycc.gov.uk/libraries) for library addresses and opening times.
- Woking Borough Council, Civic Offices, Gloucester Square, Woking, GU21 6YL. Monday to Friday, 9am to 4.45pm.

**To give us your response to the Strategy:**

- Use the online survey at [www.communityforum.woking.gov.uk](http://www.communityforum.woking.gov.uk)

**To give us your response to the SPD:**

- Submit a written representation via email to [Planning.Policy@woking.gov.uk](mailto:Planning.Policy@woking.gov.uk)
- Post your response to Planning Policy, Woking Borough Council, Civic Offices, Gloucester Square, Woking, Surrey, GU21 6YL.

The consultation will close after six-weeks, so all responses to the SPD will need to be received by **the end of Friday 30<sup>th</sup> June 2023**.

**Please be aware that all comments relating to the SPD consultation will be made publicly available and identifiable by name and organisation.** Any other personal information provided will be processed by Woking Borough Council in line with the Data Protection Act 1998.

If you have any questions on any of the documents or wish to be removed from or update your details on the Planning Policy contact list, please do not hesitate to contact the Planning Policy Team on **01483 743871** or email us at [planning.policy@woking.gov.uk](mailto:planning.policy@woking.gov.uk).

Yours sincerely,

The Planning Policy and Green Infrastructure Teams